

Leonora Earls

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From: Colin Ryan - (DECLG) [Colin.Ryan@environ.ie]
Sent: 19 February 2016 16:21
To: Planning - Development Plan Review
Cc: Ciara Gilgunn - (DECLG)
Subject: Comments on Draft Wicklow County Development Plan -2016-2022
Attachments: Letter to Wicklow CC 19 Feb 2016 Final.pdf; ATT00001.txt

A1

Good afternoon

Attached please find comments from the Minister for the Environment, Community and Local Government on the **Preparation of the Draft Wicklow County Development Plan 2016-2022.**

Please acknowledge receipt of this email.

Thanking you,

Ciara Gilgunn
Forward Planning Section

Water and Planning Division | DECLG | Custom House | Dublin 1 | +353 (0) 1 8882418



Seirbhís ar scoth an domhain a chur ar fáil don Stát agus do mhuintir na hÉireann.



Comhshaol, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government



19 February, 2016.

County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town.

Re: Preparation of the Draft Wicklow County Development Plan 2016-2022

A Chara,

I am directed by the Minister for the Environment, Community and Local Government to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department considers that the Draft Wicklow County Development Plan 2016-22 provides a well-structured framework for the demographic, economic and social growth of the county in the context of national and regional policy objectives.

However, there are a number of important aspects of the Draft Plan that would benefit from the Council addressing more effectively, as set out below;

Development Standards

In December 2015, the updated '*Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities*' (2015) were published to replace the previous 2007 guidelines on the subject. They were formally issued under Section 28 of the Planning & Development Act, 2000 and are now the relevant statutory Ministerial Guidelines. They provide guidance on an expanded number of topics related to the apartment building itself and on the individual apartment units including internal space standards for different types of apartments (including studio apartments), dual aspect ratios and floor to ceiling heights.

The Council should also be aware of the Planning & Development (Amendment) Act 2015 which provides under section 3 for specific planning policy requirements (SPPRs) to be applied by planning authorities. The 2015 Apartment Guidelines contain such SPPRs to ensure their consistent application including in the determination of planning applications such that where the guidelines and the standards or provisions of a development plan differ, the national planning policy as reflected in Ministerial guidelines shall prevail and take precedence.

The Department accepts that the updated Apartment Guidelines were issued subsequent to the publishing of the Draft Wicklow CDP 2016-22 in November 2015. The Council should therefore consult the revised Apartment Development Guidelines and examine the Draft Wicklow CDP to ensure that its provisions do not conflict with this updated Ministerial Guidance. In particular, the '*Development and Design Standards*' Appendix should be revised accordingly.

Exceptional Zonings Proposed on Specific Sites

The plan features a number of what are described as "exceptional" residential and employment zonings at specific locations that appear to lack the evidential base required by the relevant Ministerial guidelines and appear to be in conflict with the stated core strategy of the Draft Wicklow County Development Plan 2016-22. These are as follows:

Employment Zonings

Chapter 5 has a number of specific sites included in Objective EMP12 (Map numbers 5.01-5.07) which are located outside of identified settlements and development areas of the county. These sites have specific zoning objectives for employment/commercial development and appear to be piecemeal and random in nature. They are in conflict with Objective EMP2 which seeks to locate new employment generating development in settlements and overall the strategic emphasis of the Plan based around the major population settlements as the key focus for economic growth.

Proposed zonings 5.01-5.07 in Objective EMP12 would appear to be significantly at variance with the requirements of the Development Plans Guidelines (2007) which seek, *inter alia*, a spatially sequential and evidence-based approach to development zoning and also to the Spatial Planning and National Roads Guidelines (2012) which seek to ensure the avoidance of any adverse impact on the national road infrastructure from inappropriate new development.

In particular, sites at Kilpedder, Kilmurray South and Kilmurray North adjoining the N11 have not been considered in a strategic manner in relation to the Guidelines on Spatial Planning and National Roads (2012). These three sites are also identified in the Strategic Flood Risk Assessment as subject to flooding (Flood Zone A) and are therefore inappropriate for development with reference to the Sequential Approach to Flood Risk (Figure 3.1 of the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009') whereby areas prone to flooding should be avoided for new development.

Zoning West of Newtownmountkennedy

Objective HD24 (pg.78) details a specific zoning provision for housing, tourism and recreational development on a 28ha site at Ballinahinch Lower, west of Newtownmountkennedy (the lands are identified on accompanying map 04.01). This zoning proposal is in conflict with the core strategy of the Plan whereby the identified settlements are to have their housing allocation provided through the LAP process in conformity with the Core Strategy. The proposed zoning is also isolated to the south west of the village and is at odds with the sequential development of lands in Newtownmountkennedy as required by the Development Plans Guidelines (2007) issued by the Minister under section 28.

The Council is advised to delete the above zonings related to Objectives EMP12 and HD24 of the Draft Plan which conflict with the identified core strategy of the Plan and the relevant Ministerial Guidelines on the zoning of lands.

Ashford Film Studios

The proposed zoning Objective EMP12/Map No.5.08 in Ashford appears to be related to the film industry which is supported in Chapter 5 as one of the key sectors for growth in the local economy. The proposed zoning is extensive in nature and covers c.160 hectares of land in two land parcels to the north of Ashford village. Notwithstanding the wording and intention of the zoning objective, it is considered that the justification for such an extensive zoning has not been demonstrated and the intensity/extent of future development remains insufficiently defined.

The Council is advised to substantially reduce the spatial extent of the zoning and confine development to the locality of the existing studio structures on the site. The wording of the objective should also be examined to ensure that it is sufficiently specific to film industry-related development only that will have minimal impact on the rural character of this area.

Retail Policy

Retail Strategy for the GDA 2008-16 designates Four Level 3 (TOWN AND/OR DISTRICT CENTRE & SUB-COUNTY TOWN CENTRES) centres in County Wicklow at Greystones, Blessington, Baltinglass and Rathdrum. However, The *County Wicklow Retail Hierarchy* (Table 6.2, pg.112) of the Plan has also introduced Newtownmountkennedy into this grouping as a county town centre. The rationale underpinning this departure from the Retail Strategy for the GDA 2008-16 is not satisfactorily provided in the Plan. The designation of Newtownmountkennedy as a Level 3 retail centre is not in accordance with the Regional Retail Strategy.

The Council is therefore requested to omit Newtownmountkennedy as a designated Level 3 retail centre in Table 6.2 and elsewhere as appropriate.

An objective requiring a future review of the county retail strategy in light of the forthcoming Regional Spatial and Economic Strategy by the Regional Assembly is also advised to be included in the Plan.

Proposed Objective RT17 relates to the assessment of proposals for fast food outlets in the context of promoting active and healthy living patterns in local communities. In this regard, consideration should be given to the location of many existing schools, parks and playgrounds in or near town centres and proximate to existing retail facilities and developments. The important planning rationale for the aggregation of such local facilities in sustainable, compact settlements should also be noted. The practical application of Objective RT17 may be at odds with the desired mix of retail and town centre uses and the restriction of fast food outlets in these kinds of situations needs to be carefully considered on a case by case basis.

The Council is advised to re-consider the wording of Objective RT17 in light of the distinction between existing urban areas and other areas where substantial new development is being planned, often through the LAP process, where such locational separateness may potentially be accommodated. A specified distance should also be avoided to allow consideration of individual case circumstances.

Wind Energy

In December 2013 DECLG issued Circular PL 20-13 to planning authorities to advise them that, pending conclusion of the review process for the 2006 Wind Energy Development

Guidelines, they should defer changing their existing Development Plan policies relating to wind energy development.

Accordingly, the Council must omit Objectives CCE6 (distance to residential) and Objective CCE7 (limitation on permission duration) as they are considered premature pending the conclusion of the initiated review process and ensure the continuance of existing development plan policy in the Draft Plan.

Housing Strategy

The new Regional Spatial and Economic Strategy (RSES) will be commenced in 2016 by the Eastern and Midland Regional Assembly which will replace the former RPGs including future population and housing allocations for County Wicklow. It is recommended that the Housing Strategy be considered interim in nature and that an appropriate objective be included in the Plan requiring a review of the Housing Strategy be undertaken within two years as part of the mandatory 2 year report on the progress of the Development Plan under section 15(2) of the Act.

Transport Policy

The NTA have a '*Draft Transport Strategy for the Greater Dublin Area 2016-35*' currently in the latter stages of the adoption process under section 12(1)(a) of the Dublin Transport Authority Act 2008. This strategy replaces the previous 2011-2030 strategy document as the NTA policy on transport development and investment in the GDA to 2035.

The Council is advised to examine this new strategy and consider if policy changes included in it will affect the strategy of the Plan or specific objectives/policies included within it – for example in relation to transport objectives in Chapter 9 or the phased of delivery of employment and housing in Bray/ Fassaroe where significant transport infrastructure is required.

Flooding

The Plan is accompanied by a Strategic Flood Risk Assessment or SFRA (Appendix 11 of the Plan) and features Objectives (Nos. FL1-FL9, Chapter 9) in relation to Flood Management. In section 4 of the SFRA composite maps are provided identifying the Flood Risk Zones A & B in certain Level 5 settlements of the Plan as per the '*Planning System and Flood Risk Management*'.

This analysis clearly indicates that there are lands zoned for residential development that are located within Flood Zone A and B in these settlements (eg. Ashford – Site 1). Such residential zonings are not compliant with the *Planning System and Flood Risk Management Guidelines* (2009) as residential development is classified as Highly Vulnerable per Table 3.1 of the Guidelines and would not be appropriate for development on Flood Zone A or B lands.

The Council is advised to review the Draft CDP settlements and ensure that lands in Flood Zone A or B are not zoned for development in accordance with sequential approach of Figure 3.1 of the *'The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009'* whereby areas prone to flooding should be avoided for new development.

Minor Drafting Items

There is an error in Table 2.5 where it is suggested that the year '2012' should perhaps be '2022'.

Paragraph 2 on page 18 – this should perhaps refer to '*Table 2.7*' and not '*Table 2.6*'.

The Housing & Urban Regeneration Act 2015 was enacted on 1st September 2015 and the Plan will need to reflect that this legislation is now in effect. In particular, sections 10(2)(h)(i)-(iv) of the Act requiring objectives in relation to regeneration need to be satisfactorily detailed.

The planning authority is reminded to have regard to any observations made by the Eastern & Midlands Regional Assembly, Office of Public Works, Department of Arts, Heritage and the Gaeltacht, National Parks & Wildlife Service, Environmental Protection Agency and Irish Water. In this regard, Wicklow County Council must satisfy itself that it has met the relevant requirements as appropriate, and that the Draft County Wicklow Development Plan 2016-22 is fully compliant with its obligations under planning legislation.

The officials of the Department are available to discuss the matters raised above as necessary. If there are any queries in relation to the content of this letter, please contact Mr. Stewart Logan, Planning Adviser, on 01-8882419.

Is mise le meas,

Niall Cussen

Niall Cussen

Principal Adviser

Forward Planning Section

Leonora Earls

From: Malachy Bradley [mbradley@emra.ie]
Sent: 05 February 2016 15:28
To: Planning - Development Plan Review
Cc: Jim Conway; Info
Subject: EMRA submission on Wicklow County Draft Development Plan 2016-2022
Attachments: 160205_Wicklow Draft CDP FINAL.pdf

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Please see attached the submission of the Eastern and Midland Regional Assembly on the Wicklow County Draft Development Plan 2016-2022, in accordance with the requirements of Section 27B of the Planning & Development Act, 2000 (as inserted by Section 18 of the Planning and Development Act, 2010).

This submission was approved by the members of the Eastern and Midland Regional Assembly at the meeting of 5th February 2016.

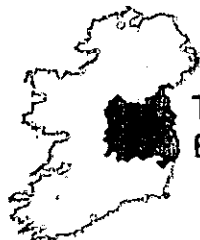
Can a receipt be issued for our records.

☐ Regards

Malachy Bradley | Assistant Director | Eastern & Midland Regional Assembly |

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Tionól Reigiúnach Oirthir agus Lár-Tíre
Eastern and Midland Regional Assembly

☐



Doicte Reigiúneach Oibre in agus I nGairt Eastern and Midland Regional Assembly

3rd Floor North | Ballymun Civic Centre | Main Street | Ballymun | Dublin 9
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Wicklow County Draft Development Plan 2016 -2022

This submission on the Wicklow County Draft Development Plan 2016-2022 has been addressed by the members of the Eastern and Midland Regional Assembly at the meeting of 5th February 2016.

Introduction

As set out in the Action Programme for Effective Government and under the Local Government Reform Act 2014 the former eight Regional Authorities and two Regional Assemblies have been replaced by three new Regional Assemblies. The Local Government Act 1991 (Regional Assemblies) (Establishment) Order 2014 (S.I. 573 of 2014) came into effect on the 1st January 2015 establishing the new Regional Assemblies; the Northern and Western, the Eastern and Midland, and the Southern. The Eastern and Midland Regional Assembly, has twelve constituent local authorities split into three Strategic Planning Areas as follows -

Dublin	Fingal, Dublin City, South Dublin, Dún Laoghaire-Rathdown
Eastern	Louth, Kildare, Meath, Wicklow
Midlands	Longford, Laois, Offaly, Westmeath

Note: Louth is located in the Border NUTS III area but is now moving to the Eastern and Midland assembly region from the former BMW region.

The function of the new Regional Assemblies are the formulation, adoption and implementation of Regional Spatial and Economic Strategies (which will replace the existing Regional Planning Guidelines), management of EU Operational Programs, EU project participation, implementation of national economic policy, and additional functions through working with the new National Oversight and Audit Commission.

With regard to the Regional Spatial and Economic Strategies (RSES) which are to replace the Regional Planning Guidelines (RPGs) 2010 - 2022, the Local Government Reform Act 2014 (which amends the Planning and Development Act 2000) 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."

The relevant document for the Wicklow County Draft Development Plan is the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs) which contains strategic goals and objectives providing a regional focus for NSS implementation. The RPGs identify strategic infrastructural priorities in the main growth areas, setting out priority locations for future investments in line with current National Spatial Strategy and funding objectives.

The implementation of the RPGs is an integral part of the Government's programme to enable Ireland's planning system to play an important role in the national economic recovery by delivering a plan-led planning system where spatial plans are aligned to benefit the economy, environment and provide for an improved quality of life. This process has sought to prioritise future infrastructural investment at a regional and local level, whilst promoting the growth of designated settlements.

There has been a significant level of transition in Regional Governance in Ireland post June 2014. 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. It is unlikely that the timeframe for the adoption process of the Regional Spatial and Economic Strategies (RSES) will coincide with the Development Plan process for Wicklow County Council.

Legislative context

Under Section 27B 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 which shall state whether, in the opinion of the Regional Assembly, the Draft Development Plan is consistent with the Regional Planning Guidelines in force for the area of the Development Plan. If, in the opinion of the Regional Assembly the Draft Development Plan is not consistent with the RPGs, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27B of the Planning and Development Act 2000 as amended.

This submission will also reflect the contents of the submission by the Southern and Eastern Regional Assembly, who were the relevant regional body, at the pre-draft public consultation phase of the County Development Plan process in December 2014.

Submission

The Assembly acknowledges the effort of Wicklow County Council to co-ordinate the policies and objectives of the Draft Development Plan so that they are consistent with the Greater Dublin Area Regional Planning Guidelines (RPGs). The Assembly considers that the overall population and housing targets proposed in the core strategy and the policies and objectives contained in the Draft Plan are generally consistent with the Regional Planning Guidelines.

The remainder of this submission will address specific issues and broadly follows the chapter headings of the draft Development Plan, under the following headings:

1. Introduction to Wicklow County Development Plan 2016 - 2022
2. Vision And Core Strategy
3. Settlement Strategy
4. Housing
5. Economic Development
6. Centres and Retail
7. Tourism and Recreation
8. Community Development
9. Infrastructure
10. Heritage
11. Coastal Zone Management

- 12. Implementation and Monitoring
- 13. Level 5 Town Plans and Level 6 Settlement Plans
- 14. SEA and AA
- 15. Other

1. Introduction to Wicklow County Development Plan 2016 – 2022

This chapter provides a strategic introduction to the current issues facing Wicklow County, addressing the key policy documents that shape the approach to the Development Plan and is welcomed.

2. Vision And Core Strategy

The Core Strategy of the Draft Development Plan (DDP) comments extensively on the current national and regional policy framework that informs the strategic policy context for the making of the plan. The strategy includes a vision for the county with 11 key strategic goals underpinning the plan, this is a welcome reference for the overall goals of the plan and the inclusion of climate change as a goal is supported. The core strategy map is a key requirement of any core strategy and this example is a legible representation of the settlement hierarchy in the County.

Settlement hierarchy

The settlement hierarchy as identified in Table 2.2 of the DDP is consistent with the settlement hierarchy in Table 8 of the RPGs for the settlements identified as county development plan level 1-4 settlements. With regard to the lower order settlements these are to be defined by individual development plans and in this regard it is noted that Dunlavin has been re-designated from level 6 in the current Wicklow County Development Plan 2010 to level 5 in the DDP.

Population

With regard to the population targets for the County, the CSO regional projections issued in 2013 which are based on the 2011 census would suggest, using the M2F2 Traditional Scenario that the population targets expressed in the RPGs will not be reached by 2022 in Wicklow County, the projection would suggest 2028. It is worthwhile noting that these regional projections are based on trends in fertility, mortality and migration, and that the RPG population targets are county and local authority area targets that are influenced by regional policy as well as the prevailing demographic trends.

Whilst the local authority may not reach its RPG policy population target by 2022, it is considered prudent that the capacity to achieve this target, in housing numbers and overall zoned land available for residential development, should be retained in the Plan. Therefore the

approach in the plan to provide capacity for the RPG population target, but project it to 2028 is supported. The narrative on the methodology for the population targets for the County is sound and it is recognized that delivery of these targets is in some part predicated on factors outside of the gift of the local authority.

Housing

The core strategy uses a declining average household size to project the housing need over the DDP period with growth based on the existing housing stock numbers, it is noted that this analysis results in a projected total housing stock of 85,589 units whereas the RPGs project 82,012 units. Given the revised household size (falling further in 2028) and the vacancy rate used in the core strategy and that the projection is to 2028 (not 2022 as per the RPGs) this deviation is acceptable.

Zoning

This section of the core strategy sets the population and housing targets for all of the defined settlements in the DDP and is detailed in tables 2.7 and 2.8. The DDP proposes to produce new LAPs for each of the identified settlements in table 2.7 replacing existing Local Area Plans and the plan itself provides zoning and objectives for development of the other towns/settlements. This approach is welcomed and the structure for these plans (both in the DDP and in future LAPs) is outlined in the core strategy. Tables 2.7 and 2.8 would benefit from further clarity by demonstrating the connection to the overall housing target of 31,238 units in the County expressed in table 2.6.

Under table 2.7 LAP settlements Newtownmountkennedy has a further surplus of zoned residential lands proposed in this DDP without any rationale. This additional zoning does not accord with the evidence based approach to the core strategy which is supported by the Assembly, and therefore it is recommended that it is omitted.

Economic Development

The analysis in the core strategy of the employment growth in the county is a sound methodology and the use of jobs ratio as a measurement of economic development in the county is recognized. This could be further enhanced to a spatial perspective by an analysis of the quantum of land zoned for enterprise and employment in the County, aligned with job location and density, which could assist in addressing the complex issue of lands to be identified for enterprise and employment. This would provide for an evidence based approach, in the core strategy, to policy making for employment and enterprise zoned lands.

Retail

The Retail Strategy for the Greater Dublin Area (RSGDA) 2008 is the relevant retail policy document from the Regional Planning Guidelines to reflect the retail hierarchy in Wicklow County. Whilst this document may require a review, which will take place as part of the

upcoming Regional Spatial and Economic Strategy, the policy hierarchy for retail centres (which is also set out in section 3.6 of the RPGs) and the definitions of the centre level of retail remains relevant. In this regard whilst the planned growth in Newtownmountkennedy and Rathdrum is recognized, it is not at the level commensurate with a need for town centre level of retail provision and the hierarchy policy for retail should reflect the hierarchy stated in the Regional Planning Guidelines and The Retail Strategy for the Greater Dublin Area.

3. Settlement Strategy

The Assembly welcomes the Settlement Strategy for County Wicklow outlining the role and function of each settlement, this will assist in the preparation of LAPs for those identified settlement and sets the policy framework and development boundary for the other planned settlements in the DDP.

4. Housing

The RPGs support the key housing principles identified in this chapter including the consolidation of the existing built urban footprint by redevelopment of underutilised sites and densification, followed by the sequential development of greenfield lands in a phased manner all in accordance with the core strategy housing unit targets. Suitable densities should be promoted at a sufficient scale and nature, with higher densities promoted at appropriate locations to ensure a sustainable return on the development of serviced lands that will provide for high quality neighborhoods and vibrant communities.

With regard to Policy HD24 "Special Zoning Newtownmountkennedy" which appears to have no rational or justification in the core strategy for these proposals. They are located outside of the development boundary of Newtownmountkennedy as identified in the LAP and do not accord with the key housing principles in this chapter. Therefore it is recommended that these entire proposals at this location, including the nursing home and associated leisure, tourism and recreational facilities are omitted.

5. Economic Development

The Regional Assembly recognizes that the local authority is performing its enhanced economic role as required under the Local Government Reform Act 2014, which provided a stronger, clearer role for local government in economic and community development. The Local Community and Economic Plans (LECPs) introduced in the Local Government Reform Act 2014 are a central component of the local authority's role in economic and community 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, and also consistency with the core strategy of the County Development Plan. In performing this function the Regional Assembly will also continue to consult with the local authority during the preparation, consultation and development of the LECs.

The Assembly recognizes the economic approach taken by the DDP and supports the policy of focusing economic growth in key centers, which are aligned with the RPGs and focused on the two core economic areas of Wicklow / Arklow 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.

The principles for determination of zoned employment land are sustainable and the policies, in particular EMP2, of brownfield and centrally located lands being developed before sequentially developing greenfield lands is supported. In this regard the rationale for policy EMP12 is not evident in the DDP, these proposed employment zonings are contrary to the principles expressed in this chapter and Policy EMP2 and therefore it is recommended that they are omitted. It is also noted that some of these lands are identified at a flood risk in the Strategic Flood Risk Assessment, and any proposals to zone these lands should be considered in accordance with DECLG 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities'.

6. Centres and Retailing

As stated above under the core strategy, the Retail Strategy for the Greater Dublin Area (RSGDA) 2008 is the relevant retail policy document from the Regional Planning Guidelines to reflect the retail hierarchy in Wicklow County. In this regard whilst the planned growth in Newtownmountkenedy and Rathdrum is recognized it is not at the level commensurate with a town centre, this is reflected in the indicative additional floorspace allocations provide for these settlements in this chapter, which are of a neighbourhood centre level. Therefore it is recommended that the hierarchy policy for retail should reflect the hierarchy stated in the Regional Planning Guidelines and The Retail Strategy for the Greater Dublin Area

7. Tourism and Recreation

The RPGs support the policies in relation to tourism, Chapter 7 of the RPGs addresses the Tourism industry and its potential to contribute to community, economy and quality of life.

8. Community Development

The Local Community and Economic Plans (LECPs) introduced in the Local Government Reform Act 2014 are a central component of the local authority's role in economic and community development. In the formulation of the LECP for Wicklow County some of the objectives and actions in this chapter could be expressed in the objectives and actions of the LECP.

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. In this regard the settlement strategy expressed as clear policies in the RPGs support the growth and consolidation of the settlement hierarchy and its existing settlements, and therefore requirement for additional infrastructure capacity to facilitate this growth is also supported.

With regard to Sustainable Travel it should be noted that the National Transport Authority are preparing a new transport strategy for the GDA that will align with Regional Planning Guidelines policy, and should assist in the realization of the DDP for Wicklow County. In this regard the overall sustainability principles in this chapter to change the mode share and promote the increased use of soft modes and public transport are reflected and supported by the policies in the RPGs

Climate change has an influence on a cross section of themes including transportation, water provision and distribution of population. The approach of integrating climate change considerations into policies and objectives of the DDP in conjunction with the National Climate Change Adaptation Framework is welcomed.

10. Heritage

The Assembly recognizes the significant built and natural heritage of Wicklow County and supports policies to protect and conserve the built heritage and conserve and enhance the natural heritage and biodiversity of the County.

The Assembly notes the recognition of a Green Infrastructure Network of natural resources and biodiversity in the County and welcomes the Green Infrastructure Strategy for the County as an appendix of this Plan, as a recommendation from the Regional Planning Guidelines.

11. Coastal Zone Management

This chapter is welcomed in the DDP and could benefit from consideration to the RPG policy on Coastal Zone Management (CZM) and the Regional Assembly's Celtic Seas Partnership project. This project will provide best practice on how integrated coastal management and the Maritime Spatial Planning Directive can be integrated into land use planning, to provide for the proper planning and sustainable development of the coast, while protecting its landscape and seascape character.

12. Implementation and Monitoring

An integral part of delivering and implementing the development plan is monitoring, and the proposals to monitor the plan through the development management function in tandem with the monitoring programme from the SEA is welcomed.

13. Level 5 Town Plans and Level 6 Settlement Plans

The approach of incorporating the Local Area Plans for the smaller settlements into the DDP is welcomed as this streamlines the number of plans available and reduce the overall number of LAPs to 8 in county (as identified in Table 2.7). The principles of aligning these settlement plans with the core strategy is supported and the objectives and zoning to inform development in the level 5 and 6 plans is adequate.

14. SEA/AA

The use of relevant viable scenarios in the SEA is noted and the emergence of a scenario based on even growth in a policy based settlement hierarchy is welcomed. The evaluations against the Strategic Environmental Objectives supports this selection. The elements of these scenarios are reflected in RPG policies and are considered to be underpinned in the draft Development Plan.

17. Other

Resilience is another principle that is considered in the new approach to the city, in this regard the Assembly is commencing a Horizon 2020 funded, 3 year project to prepare a European Resilience Management Guideline to support the practical application of resilience with regard to critical infrastructure. The outputs of this project may inform future policy making on resilience.

Conclusion

This submission was prepared by the Assistant Director and approved by the members of the Regional Assembly, and the Assembly welcomes further opportunities to engage in the statutory process of the Wicklow County Development Plan.

Regards,



Jim Conway
Director
Eastern and Midland Regional Assembly

11th December 2015

Leonora Earls

From: David Clements [David.Clements@nationaltransport.ie]
Sent: 17 February 2016 15:48
To: Planning - Development Plan Review
Subject: NTA Submission on Draft Wicklow County Development Plan
Attachments: NTA Submission Wicklow County Draft Development Plan 2016-2022.pdf

A13
A3

To whom it may concern,

Please find attached the National Transport Authority's submission on the Draft Wicklow County Development Plan. Can you please confirm receipt of this submission at your earliest convenience.

Regards,

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


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

17th February 2016

Re: Draft Wicklow County Development Plan 2016-2022

To whom it may concern,

The National Transport Authority ("the Authority") welcomes the opportunity to comment on the Draft Wicklow County Development Plan 2016-2022. In our submission on the Issues Paper, we emphasised the importance of the following:

- The need for a clear and unambiguous policy of prioritisation of residential development land and phasing of growth; and
- A clear policy which states that zoning for employment uses will be done in a manner which protects investment in the national road network;

With the above in mind, and on review of the draft plan in full, the Authority makes the following comments.

Vision and Core Strategy

Since the publication of the Draft Development Plan, the Authority has formally submitted a Draft Transport Strategy for the period 2016-2035 to the Minister for Transport, Tourism and Sport for his determination. The Authority therefore recommends that the section in Chapter 2 related to the previous strategy is replaced.

The projects within the current Draft Transport Strategy of relevance to County Wicklow are as follows:

- Extension of Luas Green Line to Bray;
- Core Bus Corridor on the N11 to Bray;
- Core Regional Bus Route from Wicklow and Arklow;
- Widening of the M50 to three lanes in each direction between Junction 14 (Sandyford) and Junction 17 (M11);

- Capacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford);
- Protection of the Leinster Outer Orbital Route Corridor; and
- Increased passenger capacity on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones.

The Authority welcomes the revised population targets, as agreed with the RPG office, as a temporary solution in the absence of national and regional figures. In terms of the detailed distribution into the settlement hierarchy, the Authority recommends that growth in certain settlements should be prioritised over others. As most people in all settlements in Wicklow, particularly in lower-order settlements, travel to work in other settlements, both in Wicklow and elsewhere, any population growth in such locations will add to the demand for travel in peak hours. As such, those settlements which provide transport alternatives should be prioritised, specifically, those settlements with public transport links to Bray and Dublin.

The Authority recommends that the Core Strategy provides greater clarity in relation to the precise locations for the distribution of the 22,380 new jobs in the County as proposed in the Draft Development Plan, in particular, the 18,340 proposed for settlement levels 1-4. It is also recommended the transport required to serve this growth is set out in the Development Plan, having regard to the Draft Transport Strategy.

Housing

The Authority welcomes the Key Housing Principles set out in section 4.3 of the draft plan and look forward to their application in future Local Area Plans.

Economic Development

The Authority welcomes the land use zoning principles set out in section 5.4 and the objectives in section 5.5, most notably that which states that developments that result in an unacceptable high level of traffic generation will not be permitted. It is recommended that an objective is added to this chapter which states that development will be carried out in accordance with the Department of Environment's "Spatial Planning and National Roads: Guidelines for Planning Authorities".

Infrastructure

Public Transport

It is recommended that reference to BRT serving Bray is removed. It is the intention of the Authority to extend the Luas Green Line to Bray and there is no proposal therefore to deliver BRT.

Reference to the NTA (as the contracting authority for Public Service Obligation transport services, as provided by state transport companies) should be inserted into Public Transport Objectives TR3 and TR7.

It is recommended that Policy TR5 is amended to read as follows:

"To facilitate, through both the zoning of land and the tie-in of new facilities with the development of land and the application of supplementary development contributions, the extension of the LUAS/Bus Rapid Transport to Bray Environs/Fassaroe and linked to Bray DART Station the extension of the Luas Green Line to Bray and an appropriate public transport service to Fassaroe, in accordance with the provisions of the 'Greater Dublin Area Draft Transport Strategy 2016-2035'".

The Authority has serious concerns in relation to the rationale behind the second bullet point under Objective TR7. The location of large-scale residential and employment uses¹ more than 2km from rail stations and Luas stops is contrary to a wide range of transport and land-use planning policies, including those set out in the Authority's Integrated Implementation Plan and the Draft Transport Strategy 2016-2035. Furthermore, the feasibility of providing feeder bus services as an alternative in order to ameliorate traffic impacts of such developments in all cases, and to promote public transport, is questionable.

The Authority recommends that in cases where such proposals are catered for by existing land-use zonings, the zonings are reviewed in the first instance, and in the event that the zonings remain, that close engagement with the Authority is undertaken with a view to providing adequate public transport by way of variations to existing bus services provided as part of the comprehensive metropolitan bus network. In the case that such services cannot be provided, it must then be demonstrated that the proposal will operate in a manner that minimises impact on the road network, for example by applying a more restrictive car parking standard than that which would normally apply, and by committing the applicant to the implementation of a comprehensive workplace or residential Travel Plan. For certain proposals, such plans may include a feeder bus service, if feasible and appropriate. These recommendations are of particular significance for developments which may impact on the carrying-capacity of the national road network.

The rationale behind the fourth bullet point under the same objective, requiring new housing estates to provide "bus-only" links, is also questionable. The Development Plan or Local Area Plan process should identify if bus services are required in each settlement, and the general routings of such services. Bus services will also generally run on distributor roads and not necessarily through housing estates. As such, this objective is unnecessary and may not apply in many cases.

Roads

In relation to national roads, it is recommended that the term "various road agencies" is replaced with "Transport Infrastructure Ireland and the National Transport Authority". In the Draft Transport Strategy, the Authority recognises the constraints on the N/M11 and the south-eastern section of the M50, and proposes to enhance the capacity on these routes. Some of the detailed objectives of the Draft Development Plan related to the N/M11, however, are overly-specific and may not be supported by the Authority. As such, it is recommended that the second, fifth and seventh bullet points are removed. It is also recommended that the following objective is inserted:

¹ large-scale residential development is defined as any single development that would increase the housing stock in the settlement by 10% or more and a large-scale employment development is taken to be one with a working population of 200 persons or more

- Undertake a detailed study and design process for improvements to the N/M11 with Transport Infrastructure Ireland and the National Transport Authority, and adopt the findings of this study as a Variation to the County Development Plan once complete.

Car Parking

In relation to the car parking standards, the Authority welcomes their continued application as maximum standards in areas where alternatives are available.

General Comments

The Authority is fully aware of the constraints that apply to both transport infrastructure and services in County Wicklow – more specifically, the limited capacity on both the road and public transport networks along the east coast. The Authority is also cognisant of the requirement of Wicklow County Council to demonstrate consistency with the prevailing Regional Planning Guidelines, which will be superseded in 2016, and the difficulties in doing so, given such constraints. The Authority will continue to support and collaborate with Wicklow County Council, the Eastern and Midland Regional Assembly, and Transport Infrastructure Ireland in delivering sustainable regional and local spatial planning, and its integration with transport infrastructure and services.

Yours sincerely,



Michael MacAree
Head of Planning and Data Analysis



An Taisce
The National Trust for Ireland

AL4

20160216-27-CDP

County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town

16.02.16

Email: planreview@wicklowcoco.ie

**RE: Submission on Draft Wicklow County Development Plan
2016-2022**

Sir/Madam,

Thank you for referring the above to An Taisce for comment. We 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.

Ian Lumley

Built Environment Office
An Taisce – The National Trust for Ireland

Table of Contents

1.0 General Comments	4
2.0 Specific Comments	4
2.1 Vision and Goals	4
2.2 Population	5
2.3 Roads	5
2.4 Zoning (section 4.3.2)	6
2.5 Retail	7
2.6 Housing Objectives	7
2.7 Objectives for Economic Development (5.5)	8
2.8 Integrated Tourism/Leisure/Recreational Complexes	9
2.9 Education and Development	9
2.10 Residential and Day Care	9
2.11 Leinster Outer Orbital Route (LOOR)	10
2.12 Solar Power	10
2.13 Architectural Conservation Area Objectives (pg.204)	11
2.14 Appendix 6 - Wicklow Wind Energy Strategy	12
2.15 Appendix 7 Climate Change Audit 2016-2022	12
3.0 Conclusion	13

1.0 General Comments

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 objectives.

It is now over 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 not 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.

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. The flexibility is evidenced both vagueness and by 'let-out' clauses which causes interpretation problems for the developer, the Councilors, the public, and even the officials.

- The PA is requested is review the plan ensuring any vagueness and 'let-out' clauses are removed;
- The PA is requested to explain planning terms in an appending glossary

2.0 Specific Comments

2.1 Vision and Goals

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

The local authority should be less restrictive in their vision of a cohesive community. The inclusion of 'well paid jobs' impedes the facilitation of an economy that supports sustainable living through all job sectors and wage.

2.2 Population

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

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

The RPG is a policy document which aims to direct the future growth of the GDA over the medium to long term and works to implement the strategic planning framework set out in the NSS. ¹

The Population and housing Distribution Table for Target Year 2016 require that 42% of the total growth allocated to County Wicklow be allocated to the Metropolitan Area settlements.

It is stated in the RPGs for the GDA that "This figure should be regarded as a minimum requirement by councils and where possible should exceed". (An Taisce Emphasis Added)

In accordance with provisions of the Planning and Development (amendment) Act (PDA) 2012, it is a mandatory requirement that the CDP must 'be consist' with the relevant Regional Planning Guidelines and the National Spatial Strategy.

An Taisce submit that the Council should adhere to the RPGs for the Greater Dublin Area and ensure that the figure allocated for the GDA for the Metropolitan area shall be accommodated by the council.

2.3 Roads

- *"The RPGs also identify the 'Leinster Outer Orbital Route', traversing the region from Arklow to the south-east to the Naas-Kilcullen area in the west via a route similar to the existing 747-N81 corridor"*.

¹ Regional Planning Guidelines for the Greater Dublin Area 2010-2022

An Taisce submit that such a proposal for an Outer Orbital Road would have the effect of further widening Dublin's Sprawl and tie us further into a model of long distance commuting by private transport mode, thus increasing car-dependency and creating an unsustainable transport system.

- *"In light of the likely continuing car dependency to access the metropolitan region in the short to medium term is the strategy of this plan to facilitate and encourage measures to improve capacity and efficiency of the national routes and facilitate the improved use of the national routes by public transport" (An Taisce Emphasis Added)*

An Taisce submit that the council should fully encourage and facilitate public transport. Rather than accepting a 'continued car dependency', focus should be placed on reducing such dependency through effective public transport and sustainable land-use zoning means.

2.4 Zoning (section 4.3.2)

- *"The priority for new residential development shall be in the designated 'town' and 'village'/'neighbourhood centers' or 'primary zone' in settlements with development plans, or in this historic centre or large and small villages, through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, particular cognisance must be taken on respecting the existing built fabric and residential amenities enjoyed by existing residents and maintaining existing parks and other open areas with settlement"*

An Taisce support residential in the town centre in the re-use of derelict or brownfield sites, attempts should be made to maintain groundfloor for retail use in order to maintain vitality, viability and vibrancy with town centres. Volume 2 of the Draft Wicklow Development Plan states that it is an objective for the towns to:

"Encourage higher residential densities in the town centre and the concept of "living of the shop"

It is stated elsewhere in the draft development plan that "The most suitable location for local or small scale office development and small scale service industries is generally in above ground flood premises at appropriate locations in town/village centre and neighbourhood centres" (Objective EMP16 Office Developments and Small-Scale Service Industries) [An Taisce Emphasis Added]

- Under 'Table 2.7 LAP Settlements', An Taisce note that Newtownmountkenedy has additional surplus of land zoned for residential. There is a lack of evidence to support this additional surplus

and as such should not be adopted in the final Wicklow County Development Plan.

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

Wicklow County Council 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.

2.5 Retail

The Wicklow County Development should be consistent with the Regional Planning Guidelines (RPG) and The Retail Strategy for the Greater Dublin Area. The need for 'town centre' level of retail provision in both Newtownmountkennedy and Rathdrum does not wholly reflect the RPGs and the Retail Strategy for the Greater Dublin Area.

2.6 Housing Objectives

HD21 Residential development will be considered in the open countryside only when it is for the provision of a rural dwelling to those with a housing, social or economic need to live in the open countryside

In the event of conflict of any other settlement strategy objective/Landscape Zones and Categories, a person who qualifies under policy HD21 their needs shall be supreme except where the proposed development would be a likely traffic hazard or public health hazard"

An Taisce submit that due consideration should be given to high value landscape zones and any development, dwelling or otherwise, that is proposed in such a location, should be avoided if it were to injure the character of the surrounding environment.

HD 24 *To provide for low density residential development with associated leisure, tourism and recreational facilities on lands measuring c. 28ha Ballinahinch Lower, Co. Wicklow, as shown on Map 04.01.*

The proposed 'Special Zoning' for Newtownmountkennedy laid out in the draft Wicklow Development Plan is detached from the development boundary of Newtownmountkennedy. There is no justification for such land uses (residential, leisure, tourism and recreational facilities) at this location departs proper

planning and sustainable practice. As such, An Taisce submit that omitted from the final Wicklow Development County Development Plan.

The principles of appropriate land zoning, the reuse of brownfield sites and the implementation of sequential tests when developing outside of centrally located lands should be strongly adopted and implemented by the council the County Development Plan. The proposed zoning under policy EMP12 is contrary to proper planning and sustainable practices. Furthermore, it contravene policies within the Draft Development Plan such as EMP2 and some of these lands are identified as a flood risk the Strategic Flood Risk Assessment.

2.7 Objectives for Economic Development (5.5)

EMP7 To encourage the redevelopment of brownfield sites for enterprise and employment creation through the County and to consider allowing 'relaxation' in normal development standards on such sites to promote their redevelopment, subject to no adverse impacts arising on the locality.

An Taisce fully support the redevelopment of brownfield sites, however, it is imperative that such redevelopment and design is considered appropriate for the location. The wording of objective EMP7 to consider "*allowing relaxation in normal development standards*" is vague and may impact on the surrounding streetscape, building quality, built environment and road safety.

A 'relaxation' in development standards may result in a development that is contrary to Objective EMP9 and EMP 11 which states that it is an objective of the Council to:

"Promote and support the enhancement of the built, natural and social environment to attract and sustain employment creation initiatives"
(EMP9)

"Require employment based developments to be of the highest standard of architectural design and layout and comply with the Development and Design Standards set out in this plan" (EMP11)

Similar wording is included in Volume 2 of the Draft Development Plan stating that is an objective for town centre and retail development that:

"To allow a relaxation in certain development standards in the towns centres in achieving the best development possible, both visually and functionally"

An Taisce consider that this objective, due to its vague wording and 'relaxation' of development standards may contravene an objective in the same section which states that:

"The redevelopment of lands within the core areas, particularly those sites with frontage onto main streets and squares of the town, shall provide for a street fronting building of high quality design or for a high quality urban space, including hard and soft landscaping and appropriate street fixtures and furniture, in order to enhance and create a more attractive streetscape" [An Taisce Emphasis Added].

2.8 Integrated Tourism/Leisure/Recreational Complexes

An Taisce support sustainable enterprise in Rural Ireland that would promote social community and tourism development.

The council should include an objective to ensure that such development is successfully integrated into the surrounding environment and would not negatively impact on aspects including: traffic generation; visual impact and amenity; air quality and climate and biodiversity and water quality.

2.9 Education and Development

"The council seeks to create an environment in which everyone can develop to their full potential to enable them to participate in and contribute to all aspects of social, economic and cultural life. The Planning Authority will endeavor to facilitate the provision of the best possible educational facilities at pre-school, primary, secondary and adult levels, on suitable zoned lands, in conjunction with the Department of Education & Skills, the Department of Jobs, Enterprise & Innovation, the Department of Health and the Department of Children and Youth Affairs" [An Taisce Emphasis Added]

An Taisce recommends that an objective in relation to access is included in this section, in order to ensure that proposed developments for education is easily accessed by all.

2.10 Residential and Day Care

"Having regard to the 'aging' of the Irish population, in addition to health care facilities, there is a growing need for the provision of specific residential and day care facilities for the elderly. The Council recognize that the provision of residential/day care and nursing homes is an essential community requirement and that this area is underdeveloped in this Country. [An Taisce Emphasis Added]

As those in residential or day care facilities will have different needs and abilities depending on health and ability, it is important to ensure that such facilities are well integrated into society and afford residents full access to goods and services outside of the facility" [An Taisce Emphasis Added]

An Taisce note that it is a specific objective that:

CD19 *"Residential and day care facilities shall in general be required to locate in existing towns or villages and shall be located close to shops and other community facilities required by the occupants and shall be easily accessible to visitors, staff and servicing traffic, locations outside of delineated settlement boundaries shall only be considered where:*

- *the site is located in close proximity to a settlement and would not compromise an isolated development;*
- *there are excellent existing or potential to provide new vehicular and pedestrian linkages to settlement services; and*
- *the design and scale of the facility is reflective of the semi rural location."* [An Taisce Emphasis Added]

Map No. 08.01 indicates zoning to provide for new or extended residential care facility for the elderly at Ballinahinch Lower, Newtownmountkennedy.

An Taisce consider that the zoning allocated to this site for such a use would be contrary to the objectives laid out pertaining to integration and access for residential and day care

2.11 Leinster Outer Orbital Route (LOOR)

"Both Transport 21 and the National Development Plan 2007 committed the NRA (now the TII) to carrying out a feasibility study on the LOOR. In 2009, the NRA completed a draft study, which included the identification of possible route corridors. A corridor linking Drogheda to Navan to Naas is identified as the optimum route having regard to the objectives set out in the policy document. While this study does not identify a link to Wicklow, it does recommend that further studies be carried out into this possibility...It is therefore considered appropriate to identify possible route corridors for this link up in this Plan"

As recently commented on above, An Taisce considers that this would have the effect of further widening of Dublin's sprawl.

2.12 Solar Power

In recent years, countries across the world have begun to reverse their dependency on fossil fuels. One method of reducing dependency is through the development of Solar PV.

France for example, recently passed a new law that requires all new buildings constructed in commercial areas to be partially covered by either solar panels or green roofs.

Solar PV is an excellent distributive renewable energy source ideal for local and community placement. While not all communities have the resources for a wind development, all communities have rooftops which can be utilized for renewable energy generation – communal buildings, community buildings, schools and individual homes.

An Taisce note that the following objectives are laid out in the Draft Wicklow Development Plan 2016-2022: Solar Energy Objectives

CCE9 *To facilitate the development of solar generated electricity*

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

Wicklow County Council should use this as an opportunity to encourage the development of renewable energy in tandem with new development proposals, in a manner that is not to the detriment of surrounding landscape and good tillage land.

Suitable lands for large scale Solar PV development need to be identified in order to ensure that any such development would be well screened and not injure the visual amenity, land use quality and biodiversity value of an area.

An Taisce recommend that a strong emphasis is placed on reducing energy demand on all building, with particular emphasis on new commercial/warehouse/industrial developments.

2.13 Architectural Conservation Area Objectives (pg.204)

BH19 *"The design of any development in Architectural Conservation Areas, including any changes of use of existing building, should preserve and/or enhance the character and appearance of the Architectural Conservation Area as a whole..."*

In order to ensure that the character of Architectural Conservation Areas are maintained and that developments contribute positively in terms of design, scale, setting and material finishes, An Taisce recommends the inclusion of the wording "The design of any development in, or adjacent to Architectural Conservation Areas..."

An Taisce recommended including an objective that protects all structure, groups of structures and all features considered to be intrinsic elements to the character of ACAs – all of which should be protected from demolition and non-sympathetic alteration.

Furthermore, An Taisce recommend the inclusion of objectives pertaining to signage, lighting and advertising within Architectural Conservations Areas in

order to ensure that they are designed in a manner that it does not detract from the overall character of the ACA.

2.14 Appendix 6 – Wicklow Wind Energy Strategy

“The most readily available and simplest to exploit renewable source is wind”

An Taisce consider this statement to be outdated. As previously mentioned, the development of Solar PV should be strongly encouraged within the new County Development Plan.

Wicklow County Council should use this as an opportunity to encourage the development of renewable solar energy in a manner that is not to the detriment of surrounding landscape and good tillage land in tandem with new development proposals.

Suitable lands for large scale Solar PV development need to be identified in order to ensure that any such development would be well screened and not injure the visual amenity, land use quality and biodiversity value of an area.

An Taisce recommend that a strong emphasis is placed on reducing energy demand on all building, with particular emphasis on new commercial/warehouse/industrial developments.

2.15 Appendix 7 Climate Change Audit 2016-2022

Under Climate Change Goals (pg.5), climate change mitigation and targets including: Kyoto Protocol (UNFCCC, 1997). Copenhagen (2009), European Plan on Climate Change – EU2020 and National Climate Bill 2015 are all listed.

An Taisce recommend the inclusion of CoP21 and EU2030.

Following on from CoP21, at which Ireland accepted an obligation to take action to limit global temperature rise below 2 degrees Celsius above pre-industrial levels and notably ‘to limit that to 1.5 degrees Celsius’, it is now imperative that such action is taken in order to ensure Ireland’s contribution to decarbonisation and limit global temperature increases.

The importance of emissions reductions is growing and Ireland has a legally binding obligation under EU 2020 and EU 2030 to commit to a 20% cut in greenhouse gas emissions from 1990 levels by 2020 and a commitment to continue reducing greenhouse gas emissions and setting reduction targets by 40% by 2030 relative to 1990 levels respectively.

3.0 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.

The success or otherwise of the draft CDP can only be judged against verifiable and implementable criteria which are subject to ongoing monitoring.

Leonora Earls

A5

From: Manager Dau [Manager.Dau@ahg.gov.ie]
Sent: 17 February 2016 15:51
To: Catherine McDonald
Cc: Planning - Development Plan Review
Subject: PREPARATION OF THE DRAFT WICKLOW COUNTY DEVELOPMENT PLAN
2016-2022
Attachments: FP2015-122 WCDP RESP.pdf

I refer to the notice in relation to the above Draft Wicklow County Development Plan 2016-2022.

Attached are the archaeological and 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

053-9117516





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

17 February 2016

Ref: **FP2015/122**

Planning & Development
Wicklow County Council
County Buildings
Wicklow

PREPARATION OF THE DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

A Chara,

I refer to the notice in relation to the above Draft Wicklow County Development Plan 2016-2022. Outlined below are the archaeological and nature conservation recommendations of the Department of Arts, Heritage and the Gaeltacht.

Archaeological

Within the area of Cultural Heritage (Mitigation Measures (9) of particular concern is the impact of large scale zoning in development plans on sub-surface archaeology. The Department would recommend that:

Archaeological Impact Assessment be prepared for proposed zoned areas in the Wicklow County Development Plan 2016-2022 at the very earliest stage in the process and that this impact assessment would include targeted geo-physical survey and archaeological testing in advance of this zoning.

Archaeological Heritage Protection: The Department would recommend that the *Wicklow County Council Development Plan* state as an objective to *protect the archaeological heritage of the county, above and below ground and water*.

Archaeological Heritage Protection: Wicklow's archaeological heritage is protected under the National Monuments Acts (1930-2004), Natural Cultural Institutions Act 1997 and the Planning Acts. The Department would recommend that the Development Plan state that the protection of the archaeological heritage of County Wicklow will be considered in the broader context of the European Convention on the Protection of the Archaeological Heritage (Valetta, 1992) ratified by Ireland in 1997 which relates to the setting and context of archaeological sites.

Nature Conservation

Draft Plan

This Department welcomes the comprehensive protection given to the Natural Heritage and notes the use of mitigatory policies to offset potential negative impacts.

Potential impacts that could arise from the draft Plan include potential impacts from proposed amenity walkways and cycleways, more extensive use of the coastal strip, new river crossings over the River Slaney, additional potable water requirements and waste water treatment requirements arising from the proposed increase in population, upgrading the capacity of the railway, upgrading the N11/M11, developments relating to ports and marinas, and renewable energy such as hydroelectricity plants and wind turbines. Such impacts have been assessed in the SEA Environmental Report (ER) and natura impact report (NIR). This Department has some comments on these assessments as detailed below.

This Department notes that Biodiversity objective NH11 is "Engage with the National Parks & Wildlife Service to ensure Integrated Management Plans are prepared for all Natura 2000 sites (or parts thereof).

This will facilitate the development of site specific Conservation Objectives in the context of the proper planning and sustainable development of the County". This Department is currently working on the site specific conservation objectives (SSCOs) and is not currently preparing management plans. Furthermore the Local Authority should note that the site specific conservation objectives (SSCOs) are defined by a list of attributes and targets and accompanied by supporting documents. A reading of the attributes and targets and supporting documents will in fact give a good indication of the required management of the habitats and species that are a qualifying interest for a site.

SEA Environmental Report and NIR

It is the view of this Department that the assessments have not adequately considered cumulative and ex-situ impacts with other plans and projects. These include for example;

- cumulative impacts as a result of increased water abstraction from groundwater and surface waters including the Derry river, as part of this plan and of other plans and projects within the same catchments/aquifers,
- ex-situ impacts such as the proposed new water supply for the greater Dublin area from the River Shannon catchment,
- cumulative and ex-situ impacts on migrating geese from Wexford along the Slaney River from the proposed new bridges when considered in combination with other projects such as the proposed suspension bridge for the New Ross bypass,
- and cumulative impacts from proposed amenity walkways and cycleways including along river ecological corridors and the coastal strip within the County and also Nationally where such routes form part of a National Network.

The assessments appear to have looked at a 15 km buffer around the Plan area without adequate consideration of source and receptor linkages, or river catchments, or groundwater aquifers which may extend outside this buffer. For example, because migrating geese can fly along the River Slaney, Natura 2000 sites further afield such as the Wexford Harbour and Sloba Special Protection Area (SPA) (site code 004076) designated under the EC Birds Directive (Directive 2009/147 EC), need to be considered in the NIS. Also the proposal for a new Greater Dublin water supply will involve the river Shannon catchment.

The assessments have considered this to be a high level plan and therefore have not adequately considered the projects arising from it. While it may be hard to assess such projects at this stage, this Department would have expected at least some discussion of the issues involved which could inform project constraints at a later stage, thus avoiding development expectations that may be damaging to the environment.

With regard to sites with no site specific conservation objectives it is recommended that when carrying out an appropriate assessment that the Local Authority 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.

Table 2.5 of the NIR identifies sites potentially affected but does not explain how. This is explained in somewhat general terms in section 2.3.3. of the NIR and table 4.1 making it hard to know if all potential impacts have been considered.

There appears to be some confusion in the SEA ER between Nationally protected species and species and habitats listed on the annexes of the Birds and Habitats Directives, referred to as annexed species and annexed habitats in the SEA. For example SEO B1 deals with Natura 2000 sites and annexed habitats and species but the target is to maintain favourable conservation status for all species protected under National and International legislation. It should be noted that the Birds and Habitats Directives are European Directives and that more species are protected under National legislation than under these Directives. It is unclear what is meant in SEO B3 by wildlife sites and listed species. Please refer to the previous advice given by this Department at SEA scoping stage for Biodiversity, Flora and Fauna SEOs, our ref FP2014/123. It is important to be aware that species protected under the Wildlife Acts of 1976-2012 can occur anywhere in the country and not just in designated sites.

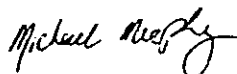
Residual impacts identified in table 8.5 of the SEA ER mention losses or damage to ecology and loss of an extent of non-protected habitats and species arising from the replacement of semi-natural land cover with artificial surfaces. The Local Authority should note that any replacement of semi-natural land cover with artificial surfaces will result in a loss of species, most likely including protected species, as all wild birds are protected.

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**

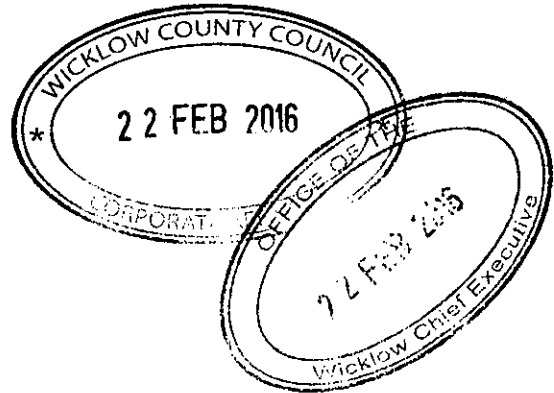


A. Walsh S. P.

Roinn Cumarsáide,
Fuinnimh & Acmhainní Nádurtha
Department of Communications,
Energy & Natural Resources

\$A6

~~The Chief Executive
Wicklow County Council
County Buildings,
Whitegates,
Wicklow Town
Co. Wicklow~~



19 February 2016

By Registered Post

Re. Submission on behalf of the Minister for Communication, Energy and Natural Resources on the Public Display of the Draft County Development Plan for Wicklow, 2016 – 2022, in relation to the former Avoca Mining Area

Dear Mr Doyle,

On behalf of the Minister for Communication, Energy and Natural Resources, please find enclosed a submission in response to the public display of the Draft County Development Plan.

At the outset the Minister would like to acknowledge the comprehensive Draft Plan. Moreover the Minister wishes to acknowledge the provisions made in the Plan as they affect the former Avoca Mining Area, having regard to the detailed submission made in an earlier stage of the process.

As a follow up to that submission, the Minister would suggest the following amendment to the Draft Plan:

Reference	Proposed Amendment (new text underlined)	Rationale
T32, 7.4 Tourism and Recreation Objectives	To support the development of Avoca Mines as a tourist attraction. The development of a mining heritage centre could incorporate a range of projects incorporating tourism, nature exploitation, scientific and ecological research, adventure, craftwork and environmental projects. Any development shall accord with the principle of sustainable tourist development and shall particularly ensure the preservation and enhancement of mining heritage, <u>having regard to the public safety and environmental management issues associated with such sites.</u>	The long-term realisation of heritage and tourism potential on the site will require co-operation between the Department, Wicklow County Council and the local community. This policy should be amended to reflect that partnership approach. Furthermore this brings the policy more closely in-line with Policy BH23.

Fáiltítear roimh comhfhreagras i nGaeilge

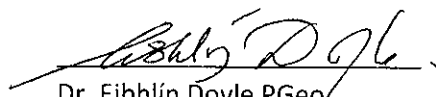


**Roinn Cumarsáide,
Fuinnimh & Acmhainní Nádurtha**
Department of Communications,
Energy & Natural Resources

On the related issue of Protected Structures and the definition of curtilages, please note that following on from the Department's submission of August 2015, it is the intention of the Minister to seek Section 57 Declarations with respect to all Protected Structures in the Department's ownership in the coming months. The Minister is not seeking the definition of these at this time.

We thank you for your time and consideration and look forward to receipt of acknowledgement of this submission.

Yours sincerely,


Dr. Eibhlín Doyle PGeo
Chief Geologist

Fáiltítear roimh comhfhreagras i nGaeilge

A3

Leonora Earls

From: Frank Groome [Frank.Groome@dcenr.gov.ie]
Sent: 19 February 2016 14:14
To: Stephen Willoughby
Cc: Planning - Development Plan Review
Subject: Draft Wicklow County Development Plan 2016-2022 - DCENR Submission

Dear Stephen,

The Department of Communications, Energy and Natural Resources (*the Department*) welcomes the opportunity to respond to the Draft Wicklow County Development Plan 2016-2022.

As a Department with policy responsibility for a number of key strategic economic sectors the issues that arise here are of significant importance.

The 2009 EU Renewable Energy Directive set Ireland a legally binding target of meeting 16% of our energy requirements from renewable sources by 2020 and in order to meet this target, Ireland is committed to meeting 40% of electricity demand from renewable sources, 12% renewables in the heating sector and 10% in transport. To date, wind energy has proved to be the most cost effective renewable energy technology in the Irish electricity market. However, despite good progress, meeting our targets remains challenging and failure to meet these obligations is likely to result in penalties against Ireland. It is estimated that for every percentage point missed the penalty could be as much as €150 million.

In addition to our EU obligations, the Energy White Paper (consistent with Ireland's engagement with the COP21 process) published in December last, sets out a vision for transforming Ireland's fossil-fuel based energy sector into a clean, low carbon system by 2050, and wind energy is likely to play an important role in this transition.

The Department notes the intent of the County Council to set out a range of Wind Energy Objectives in Chapter 9 (on Infrastructure) as part of the Draft Development Plan. The Department believes it is important that in deciding to determine a setback distance for wind farm projects from residential dwellings, the County Council should be mindful of the work on-going between the Department of Communications Energy and Natural Resources and the Department of Environment, Community and Local Government to revise the national Wind Energy Development Guidelines. In December 2013, the Department of Environment, Community and Local Government began a review of the existing Wind Energy Development Guidelines. The review focused on the specific issues of noise, proximity, and shadow flicker. Submissions were received from around 7,500 organisations and members of the public during the public consultation period.

This is a very technical area and the engagement between the two departments is on-going. Studies have been obtained on various aspects of the issues, particularly noise - including separation distance - and detailed assessments of various options have been undertaken by the two Departments.

It is possible that any decision by Wicklow County Council to issue a decision on wind energy setback distances before this work is complete could cause a range of unintended consequences for meeting our legally binding renewable energy targets.

It is also important to note that any revisions to the guidelines following the conclusion of deliberations will be introduced by issuing the revised guidelines to planning authorities under Section 28 of the Planning and Development Act 2000, as amended.

The Department is happy to engage with the County Council and discuss this matter further if required.

Regards
Frank



Frank Groome, Assistant Principal Officer | Decarbonisation Policy & Coordination
Department of Communications, Energy & Natural Resources
29-31 Adelaide Road, Dublin, D02 X285, Ireland
www.dcenr.gov.ie | @dcenr
T: +353 1 678 2633 E: Frank.Groome@dcenr.gov.ie

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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: Cian O'Mahony [c.omahony@epa.ie]
Sent: 09 February 2016 10:09
To: Planning - Development Plan Review
Subject: EPA Submission Re. Draft Wicklow CDP 2016 - 2022 and SEA ER
Attachments: SCP141007.2 EPA Submission Draft Wicklow CDP 2016-22 and SEA ER.pdf

#6
A7

Re. Draft Wicklow County Development Plan 2016 - 2022 and Strategic Environmental Assessment Environmental Report

Dear Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 27th November 2015 regarding the preparation of the Draft Wicklow County Development Plan (the Plan) and associated SEA Environmental Report (the SEA ER).

We welcome the incorporation of many of the issues made in our SEA Scoping submission, dated the 11th December 2014, have been incorporated into the Plan and the SEA ER. A number of key additional aspects to be considered are outlined below and should also be taken into account in finalising the plan.

Specific Comments on the Draft Plan to be considered

We acknowledge the commitment, in *Chapter 2 Vision and Core Strategy*, to prepare local area plans (LAPs) for eight settlements within the County. These LAPs should be prepared taking into account the requirements of the SEA, Floods, Water Framework and Habitats Directives.

Flood risk assessments should also be carried out for the LAPs to guide/inform the appropriate zoning and development of lands in accordance with the requirements of the *Flood Risk Management Guidelines* (DEHLG, 2009). Where existing zoned undeveloped lands are identified as being at risk of significant flood risk (Flood Zone A or B), the LAPs should consider re-zoning or de-zoning to more appropriate land uses as appropriate.

The Settlement Maps accompanying the Plan should also take into account the findings of the flood risk assessment(s). Superimposing existing (and proposed additional) land use zoning within the settlement, with flood risk maps may highlight potential zoning conflicts to be addressed. The Plan should ensure that only appropriate land uses are considered in areas of significant flood risk, in accordance with the *Flood Risk Management Guidelines*, as relevant and appropriate.

We acknowledge the intention that in the current 'Level 5 settlements', surplus zoned housing lands will be either re-zoned or reserved as a 'Strategic Land Bank' for future development. The flood risk assessment(s) could assist in identifying potential surplus zoned lands for removal, where relevant.

We welcome the commitment in *Section 2.2 Strategic Policy Context* to accommodate higher density developments in areas that are well served by rail. This will assist in encouraging and facilitating increased public transport use. We also note that *Section 2.4.2 Population* describes that settlement growth will be carried out in collaboration with Transport Infrastructure Ireland, in the context of ensuring sustainable modes of travel and public transport usage are promoted / encouraged.

We note that Appropriate Assessment Screening will be required for all projects and plans arising from the Plan, under Article 6 of the Habitats Directive, in *Objective NH4* where relevant and appropriate. A similar commitment to take into account the requirements of the Environmental Impact Assessment, Water Framework and Floods Directives respectively, as appropriate and relevant should also be considered.

In *Subsection 9.2.2 Water Supply and Demand* and *Subsection 9.2.3 Waste Water*, we acknowledge the commitment to collaborate with Irish Water to ensure the provision of appropriate potable water and an adequate wastewater collection and treatment infrastructure.

In *subsection 9.5 Climate and Energy*, the Plan should include a reference to the National Mitigation Plan (DECLG), which is currently being prepared. This national plan seeks to reduce greenhouse gas emissions across a range of

sector (transport, energy, agriculture etc.) in collaboration with other Government Departments including DTTAS, DA and DCENR.

Specific Comments on the SEA Environmental Report

The SEA ER (in Section 4.6.3.2 WFD Surface Status) describes that certain rivers to the west of the County (including the Douglas River, the Derry River and the Shillelagh River), are currently classified as being of 'Poor' status under the Water Framework Directive (WFD) and the Avoca River is classified as being 'Bad'. The Plan should protect and improve water quality within the Plan area, in accordance with the requirements of the WFD.

Section 4.8.1.2 Waste Water Infrastructure and Section 4.8.1.3 Drinking Water) of the SEA ER describes the specific issues with a number of public waste water treatment plants and drinking water plants in the County. These are also highlighted in the EPA reports on *Urban Waste Water Treatment in 2014* (EPA, 2015) and *Drinking Water Report for 2013*, (EPA, 2015). The Plan should ensure population and economic growth (and associated development) are linked to the ability to provide adequate and appropriate critical service infrastructure to support current and future growth, in collaboration with other key stakeholders. Issues with drinking water and wastewater treatment facilities should be addressed on a priority basis in association with Irish Water.

We welcome the inclusion of the Green Infrastructure Strategy 2016 – 2022 (Appendix 8) of the Plan. This will provide a framework to guide future zoning and development in the County while protecting ecological corridors and linkages (and associated biodiversity) at a Plan level. This strategy should also be taken into account and inform the preparation of the proposed eight LAPs as appropriate.

We note the inclusion the coastal zone management objectives in *Chapter 11 – Coastal Zone Management*. The Plan should also consider future climate scenarios in terms of predicted higher sea levels and periods of increased frequency of storm conditions and associated flooding. The Plan should ensure the protection of ecological buffers/marshlands/estuaries, in order that the effects of coastal squeeze on protected species/designated habitats can be managed appropriately where possible. The role which estuaries and marshes play in terms of flood alleviation could also be highlighted.

We note the inclusion of *Table 7.1 - Environmental objectives, indicators and targets*. To further strengthen Water objective W1, there is merit in amending it as follows: "*To maintain and approve where possible the quality and status of surface water, in accordance with the requirements of the Water Framework Directive*". Including an additional indicator to monitoring trends in (WFD) water quality status would also be useful.

This trend in water quality status should also be incorporated into the monitoring programme for the plan period. The EPA's WFD Application, available on EDEN (www.edenireland.ie) may assist in monitoring the trend of water bodies.

Additional Plans/Programme considerations

The following additional Plans/Programmes should also be considered and integrated as appropriate into the Plan:

- National Peatlands Strategy and associated Raised Bog SAC Management Plans and Raised Bog NHA Review (NPWS, 2015)
- Draft Plan for Forestry and Freshwater Pearl Mussel in Ireland (DAFM, currently being prepared).
- Draft National Bioenergy Plan (DCENR, currently under preparation).
- National Landscape Strategy
- Wicklow Mountains National Park Management Plan 2005-2009

Future Amendments to the Draft Plan

Where amendments to the Plan are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 2A of the SEA Regulations and should be subject to the same method of assessment applied in the "environmental assessment" of the Draft Plan.

SEA Statement– "Information on the Decision"

Following adoption of the Plan, an SEA Statement, should summarise the following:

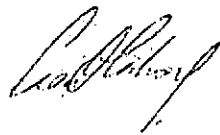
- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,

- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process. 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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County Development Plan Review
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town,
Co. Wicklow

9th February 2016

Our Ref: SCP141007.2

**Re. Draft Wicklow County Development Plan 2016 - 2022 and Strategic Environmental Assessment
Environmental Report**

Dear Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 27th November 2015 regarding the preparation of the Draft Wicklow County Development Plan (the Plan) and associated SEA Environmental Report (the SEA ER).

We welcome the incorporation of many of the issues made in our SEA Scoping submission, dated the 11th December 2014, have been incorporated into the Plan and the SEA ER. A number of key additional aspects to be considered are outlined below and should also be taken into account in finalising the plan.

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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



Leonora Earls

From: Colm Cummins [Colm.Cummins@esb.ie]
Sent: 19 February 2016 16:17
To: Planning - Development Plan Review
Subject: ESB Submission
Attachments: ESB Sub Draft Wicklow CDP.pdf; ATT00001.txt; ATT00002.htm

A Chara,

Please find attached a submission on behalf of the Electricity Supply Board to the Draft Wicklow County Development Plan 2016-2022.

If you have any queries do not hesitate to contact the undersigned.

Regards

Colm Cummins | Planning & Asset Management | ESB Business Service Centre | T: +353 1 702 6357 / +353 87 763 8171 |



Energy for
generations

ESB Group Property

Draft Wicklow County Development Plan 2016-2022

Submission on behalf of Electricity Supply Board to the Draft Wicklow County
Development Plan 2016-2022
19/02/2016



Contents

1. Introduction.....	3
1.1 Generation.....	3
1.2 Transmission and Distribution.....	3
1.3 ESB Telecoms & Telecommunications Infrastructure	3
1.4 ESB roll-out of EV infrastructure	4
2. Overall Policy Context	4
2.1 National Planning Policy	4
2.2 Regional Planning Guidelines.....	5
2.3 National Economic Policy & Infrastructure Development	5
2.4 Transport Policy.....	6
3. Planning Policy & CDP Review.....	7
3.1 Generation, Transmission & Distribution Policy	7
3.1.1 Access to ESB Generation Lands.....	7
3.2 Telecommunications.....	8
4. Green Infrastructure Strategy & Draft CDP	9
4.1 EU Policy.....	9
4.2 Sustainable Power Generation	9
4.3 Government Electric Transport System	10
4.4 Transport Related Planning Policy in CDP.....	10
5. Conclusion.....	12



1. INTRODUCTION

Electricity Supply Board (ESB), 27 Lower Fitzwilliam St, Dublin 2, welcomes this opportunity to make a submission to the Draft Wicklow County Development Plan 2016-2022. ESB agree with the overall vision for the Draft Development Plan, however, outlined below are a number of observations with regard to strategic issues that should be taken into consideration in the preparation of the final plan.

ESB is a landowner and employer in Wicklow with property and infrastructural assets throughout the county which service the Generation, Transmission and Distribution of electricity. The Distribution System now comprises the installation of Electric Vehicle (EV) charging infrastructure. Telecommunications forms a critical element of our network infrastructure and links our Supervisory Control and Data Acquisition (SCADA) system which is used to monitor, control and remotely operate ESB's distribution network.

1.1 Generation

Turlough Hill, Ireland's only pumped storage power station is located approximately 60km south of Dublin City in the Wicklow Mountains. Construction commenced in 1968, and the station became fully operational in 1974. The station generates up to 292MW during peak demand periods by releasing water from its upper reservoir and allowing it to flow through its four turbines into a lower reservoir. During periods of lower demand the water is pumped back to the upper reservoir ready to be used again. In 2004, Turlough Hill became the Hydro Control Centre (HCC) for the entire ESB hydro fleet which contains 19 generators in total.

There are three hydro generation stations on the Liffey. These comprise two 15MW generators located at Poulaphouca and two 4MW generators each at Golden Falls and Leixlip, giving a total installed capacity of 38MW. In creating the water storage for the power stations at Poulaphouca, Golden Falls and Leixlip, the vital need for increased water supplies to Dublin was met by the 5,600 acre reservoir. The scheme was undertaken in three stages - beginning in 1937 and ending in 1949.

The final Plan must ensure that the long-term operational requirements of existing utilities including Power Stations are protected. Therefore, the need for curtilage management and for the restriction of land uses, which might affect the ability to consolidate and/or expand operations, is essential.

1.2 Transmission and Distribution

ESB Networks provides an essential service building and maintaining the electricity networks in Wicklow and throughout Ireland. It is responsible for constructing all the sub-transmission, medium and low voltage electricity network infrastructure in the country and for managing this infrastructure which is owned by ESB. It is unique in that all electricity users are in contact with ESB Networks.

To further improve and strengthen the electricity networks countrywide and to support the country's continued economic development, ESB Networks are currently implementing an investment programme in national energy infrastructure worth €4 billion. This will considerably enhance the security of supply to existing customers and will ensure that a world class infrastructure is in place to support continuing economic development into the future.

1.3 ESB Telecoms & Telecommunications Infrastructure

ESB Telecoms is Ireland's leading independent telecommunications infrastructure provider, delivering high quality, turnkey communication network solutions. ESB Telecoms built and owns a 1,300 kilometre National Telecommunications Fibre Optic Network (NTFON). The NTFON is



constructed in a 'Figure of Eight' around Ireland. The NTFON enables high speed data connections to remote locations. The rollout of next generation mobile broadband services (4G) is using capacity available via the NTFON network to provide virtually limitless backhauling capacity to customers and network operators.

1.4 ESB roll-out of EV infrastructure

ESB, as the single owner/operator of the electricity distribution system, is responsible for providing the EV charging infrastructure in Ireland.

To date, ESB has rolled out over 1,000 publicly accessible charge points; including 70 fast chargers along all major inter urban routes. Currently, the charge point infrastructure is building to become a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars. ESB targets are to install 2,000 home charge points, 1,500 public charge points and 60 fast charge points nationwide. Approximately 95% of all major towns and cities already have electric vehicle recharging infrastructure in place.

According to the 3rd National Energy Efficiency Action Plan (NEEAP), it is now estimated that approximately 50,000 electric vehicles will form part of the transport fleet by 2020.

2. OVERALL POLICY CONTEXT

2.1 National Planning Policy

The National Spatial Strategy (NSS), under section 3.7 Key Infrastructure states:

'Physical networks of infrastructure such as roads, public transport, energy and communications are of particular relevance to the NSS, since they themselves have a spatial impact and also influence the location, timing and extent of development. A feature of the most mature and successful economies is that they possess highly developed, well integrated infrastructure that supports movement, i.e. public and private transport, and energy and communication networks.'

Section 3.7.2 of the NSS, deals specifically with energy as one of the three key physical elements of strategic infrastructure and states the following:

'Reliable and effective energy systems, such as gas and electricity to power industry and services, are key prerequisites for effective regional development. Ireland's electricity and gas networks are evolving in an integrated way, serving the whole island, while focusing on strategic locations.'

The NSS supports the development of energy infrastructure facilities, including the support for energy developments under the Electricity sub-section of the Energy section which identifies:

'the need to liaise with the operators of the transmission and distribution grids, particularly in the environs of towns, to ensure the continued availability of corridors for overhead cables and continuity of supply for existing and new users of electricity.'



2.2 Regional Planning Guidelines

The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 outline the role of Local Authorities under Section 6.6.7 (p. 138) and that Development Plans should facilitate the provision of energy networks in principle and highlights five key conditions. ESB deliver projects in accordance with these conditions and it should be noted that development plans should facilitate provision of energy networks where it can be shown that;

"The proposed development is consistent with international best practice with regard to materials and technologies that will ensure a safe, secure, reliable, economic and efficient and high quality network."

Strategic recommendation PIR25 states;

"That reinforcements and new infrastructure are put in place by the key agencies, and their provision is supported in Local Authority policies, to ensure the energy needs of future population and economic expansion within designated growth areas and across the GDA can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs."

2.3 National Economic Policy & Infrastructure Development

National development plans and policies illustrate the stated commitment of the Irish Government for connectivity and appropriate reinforcement of the existing electricity system and for ensuring the provision of critical, national, strategic infrastructure. ESB supports the implementation of the provisions national planning and economic development policy documents, such as those outlined below, through the development of electricity generation, transmission and distribution infrastructure development.

- Government Policy Statement on Strategic Importance of Transmission and Other Energy Infrastructure.
- Our Sustainable Future – A Framework for Sustainable Development in Ireland.
- National Spatial Strategy for Ireland 2002-2020.
- Government White Paper – the Energy Policy Framework 2007-2020: Delivering a Sustainable Energy Future for Ireland 2007.
- National Development Plan 2007-2013: Transforming Ireland – A better quality of life for all and infrastructure and capital investment 2012-2020 (Medium Term Exchequer Framework).
- Building Ireland's Smart Economy – A Framework for Sustainable Economic Renewal, December 2008.
- National Renewable Energy Action Plan 2014.
- Sustainable Energy Authority of Ireland (SEAI) Strategic Plan 2010-2015.
- Strategy for Renewable Energy 2012-2020.

The strategy outlined in Our Sustainable Future broadly follows the thematic approach of the EU Sustainable Development. ESB is supporting these measures which aim to achieve continuous improvement in quality of life for both current and for future generations. Continued investments in



the electricity infrastructure are identified as vital developments for the regions and for the economy and society as a whole. The benefits include:

- Securing future electricity supply for homes, businesses, farms, factories and communities.
- Underpinning sustainable economic growth and new jobs in the regions.
- Enabling Ireland to meet its renewable energy targets and reducing the country's dependence on imported gas and oil and reduce CO₂ emissions.

ESB power generation has been a model of sustainability since its inception - it was first based on hydro power. The demands of economic development soon led to the familiar dominance of fossil fuel thermal stations (peat, oil and coal). At ESB, the future sustainable generation platform will be based on a greatly expanded wind capacity.

ESB is divesting much of our older inefficient thermal plants and replacing them with high-efficiency, combined cycle gas turbines. We're also making rapid progress in building our renewables portfolio based on wind. The latest data from ESB Networks & EirGrid suggests 24% of Ireland's electricity from wind in 2015. ESB has over 400MW of installed capacity in the Republic of Ireland with additional wind farms in development.

2.4 Transport Policy

In the Programme for Government 2011, the Government stated that it was fully committed to the EU2020 strategy and in 2015 the Climate Action and Low Carbon Development Bill was published, which aims to provide certainty surrounding government policy and provide a clear pathway for emissions reductions, in line with negotiated EU 2020 targets. In the memorandum attached to the Bill it states;

"The purpose of the Bill is to provide for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy by the year 2050."

Energy use in transport has grown significantly, increasing 6.3% per annum average between 1990 and 2007, reflecting the country's rapid economic growth. Notwithstanding the economic slow down, continued growth of 2.7% per annum in transport energy to 2020 is anticipated. The National Energy Efficiency Plan sets out actions to reduce the transport energy demand.

The Government Electric Transport Programme sets the following targets for 2020;

- 10% of all vehicles will be electric.
- 10% of all road transport energy will be renewable.
- ESB will roll out charging points to meet 10% EV target.
- Open access to all electricity suppliers and car manufacturers.
- Roll out of EV's will provide major employment opportunities.

The above targets demonstrate that EV's (incl. plug-in hybrid electric vehicles PHEV's) are central to Government targets for zero carbon emissions transportation systems.



3. PLANNING POLICY & CDP REVIEW

ESB supports the vision of Wicklow County Council in relation to infrastructure as set out under section 2.3 of the plan – Vision & Goals, where it states;

"To protect and improve the county's transport, water, waste, energy and communications infrastructure whilst having regard to our responsibilities to respect areas protected for their important flora, fauna and other natural features"

In this regard, ESB has a number of observations with regard to strategic issues, as set out below that should be taken into consideration in the preparation of the final plan.

3.1 Generation, Transmission & Distribution Policy

The Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure (July, 2012) emphasises the strategic and economic importance of investment in networks and energy infrastructure. Under this policy the Government has mandated the State owned Networks Companies to deliver the State's network investment programmes in the most cost efficient and timely way possible in the interests of all energy consumers who need the investment and who also pay for it. Government policies and objectives require *"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."*

At present, about two percent of Ireland's electricity generating capacity is in the form of hydropower. This power derives mainly from ESB's hydropower stations, with minor contributions coming from smaller, independently owned sites. Excluding pumped storage at Turlough Hill, the Liffey accounts for almost a quarter of ESB's Hydro Generating Capacity and is fully integrated into the local and national electricity transmission and distribution network. These vital local and national activities require both curtilage space to enable future consolidation and expansion and buffer space to protect against inappropriate new neighbouring development.

The recognition of 'strategic infrastructure corridors' for transmission and distribution infrastructure and the importance of protecting the immediate environment from inappropriate development is fully supported by ESB. In this regard, ESB welcome the Transmission and Distribution Objectives on p.194 of the Infrastructure Chapter of the draft plan; which state;

CCE16 – *To support the development and expansion of the electricity transmission and distribution grid including the development of new lines, pylons and substations required.*

CCE17 – *To suitably manage development within 35m of existing 110kV/220kV transmission lines.*

CCE18 – *To support and facilitate the development of landing locations for any cross channel power interconnectors.*

The inclusion of the above objectives enable ESB to develop and maintain a safe, secure, reliable, economical and efficient electricity Transmission and Distribution System with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment.

3.1.1 Access to ESB Generation Lands

The primary function of ESB is the generation, transmission and distribution of electricity. The Penstock and Power Station, Dams, Embankments, Reservoirs, Headrace and Tailrace Canals, Transmission and Distribution Stations are elements of an integrated Hydro Electricity Generating



System. All elements are part of operational plant and require ongoing inspection, maintenance, repair, upkeep and on occasion emergency safety works.

Dams, canals reservoirs and embankments constructed for the purpose of electricity generation and can be extremely hazardous. ESB cannot allow open public access due to issues of public safety, site security and operational requirements as these elements are an integral part of an active Power Station.

Objective T29, Chapter 7, Tourism & Recreation, Draft County Development Plan, states;

To support the development of new and existing walking, cycling, and driving routes / trails, including facilities ancillary to trails (such as sign posting car parks) and the development of linkages between trails in Wicklow and adjoining counties. In, particular, to encourage and facilitate;...the expansion of the 'Blessington Greenway' walk around the Phoulaphuca reservoir..."

In this context ESB wish to highlight that access is only considered when issues such as ownership, maintenance, impact on station operations and liability for the proposed activities have been addressed.

Therefore, ESB grant access for the use of its lands where appropriate by;

- legal agreement which indemnifies ESB and controls the type of activity,
- providing access to responsible bodies or organisations which have a particular interest or knowledge of a specified activity, and,
- use of appropriate locations where activities can be carried out in a safe manner and do not impact on the operations of the Hydro Scheme.

Implementation of this policy can be illustrated by the type of access that is currently permitted by ESB including:

- Grazing Agreements for flood lands adjacent to the Hydro Scheme which allow for the control of water levels by ESB to facilitate electricity generation, water supply, boating etc.
- Licence Agreements for specific sporting/recreational activities (currently there are a number of agreements in place relating to Phoulaphuca Reservoir for activities which include canoeing, sailing, rowing, fishing, walking etc.).

Access to ESB lands under licence is granted where appropriate to organisations that have the expertise to manage and control their activities and can indemnify ESB from any liability associated with such activities.

3.2 Telecommunications

The provision of modern information and communications technologies (ICT) is recognised by Wicklow County Council as being a key component of connectivity, which in turn is one of the drivers for enhanced economic and social development. ESB's collection of ICT infrastructure in the county continues to assist in delivering enhanced communications networks through the provision of backhaul fibre and shared telecommunications towers.

We welcome the strategy highlighted in section 9.4.1 of the draft plan;



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"To promote and facilitate the development of telecommunications infrastructure throughout the county."

ESB generally supports the Telecommunications policy set out in Section 9.4 of the draft plan and in particular, Council Objectives T1, T2 & T3, which state;

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

T2 – The development of new masts and antennae shall be in accordance with the development standards set out in volume 4(1) of this plan.

T3 – To ensure that telecommunications structures are provided at appropriate locations that minimise and/or mitigate any adverse impacts on communities, and the built or natural environment.

All ESB Telecoms Mast sites are open for co-location and duplication of infrastructure is reduced as a result. Detailed technical justifications are used in the planning of all new ESB Telecoms infrastructure. The standards for the provision of information as set down in the section 10 of Appendix 1 *Mast and Telecommunications Development & Design* standard, when making a planning application in the immediate surrounds of smaller towns or villages, within a residential area, within the vicinity of schools or private dwellings is consistent with the level of information ESB Telecoms would normally provide in such circumstances.

4. GREEN INFRASTRUCTURE STRATEGY & DRAFT CDP

4.1 EU Policy

The EU is working to reduce the effects of climate change and establish a common energy policy. The overarching EU target is to reduce emissions within the EU to 20% below 1990 levels by the year 2020. By 2020, renewable energy should account for 20% of the EU's final energy consumption (at 8.5% in 2005). To meet this common target, each Member State needs to increase its production and use of renewable energy in electricity, heating, cooling and transport.

According to the EU Directive on Renewable Energy each Member State is mandated to ensure 10% of transport energy (excluding aviation and marine transport) comes from renewable sources by 2020. This forms the basis for the renewable energy transport target for Ireland. In parallel with the focus on renewable energy, the EU has a complementary package of measures that directly target climate change and these are likely to result in even stronger targets for renewable energy in transport. In addition, the European Commission Proposal (January 2015-2021) for a Directive of European Parliament and of the Council on the development of alternative fuels infrastructure proposes a minimum of 2200 publicly accessible charging points in Ireland by 2020.

4.2 Sustainable Power Generation

Ireland's National Renewable Energy Action Plan (2010) sets a target of 16% of the national gross final consumption of energy should be from renewable resources by 2020 to be achieved by, inter alia, attaining 40% consumption of electricity and 10% of transport energy from renewable sources. The contribution of all renewable sources of generation must be maximised to achieve these targets.

The Government White Paper, *Delivering a Sustainable Energy Future for Ireland - The Energy Policy Framework 2007 – 2020* has the specific objective to create strong linkages between energy



policy and transport policy goals given that the transport sector is 99% oil dependent and accounts for around 33% of total Irish energy demand.

In terms of transportation, an EV doesn't just consume electricity. Its battery stores power, taken from the grid for use later on the road. When that power originates at a wind turbine or solar cell, the EV's avoid burning fossil fuels. Unfortunately, the grid's limited storage capacity can't always accept the full surge of power coming in during windy weather. But if enough electric cars charge up at the right time, their batteries en masse would facilitate more renewable energy to the grid. In the future, plug in cars could supply massive amounts of collective storage to maximise renewable production, as well as balancing fluctuations in the national electricity grid. A network of electric vehicles connected to the smart grid could be coordinated to smooth out the peaks and valleys in the supply from renewable sources and help ensure that the supply of electricity matches the demand. ***The deployment of infrastructure for EV's acts as an enabler for large scale wind energy projects in Ireland.***

4.3 Government Electric Transport System

Energy use in transport has grown significantly, increasing 6.3% per annum average between 1990 and 2007, reflecting the country's rapid economic growth. Notwithstanding the economic slow down, continued growth of 2.7% per annum in transport energy to 2020 is anticipated. The National Energy Efficiency Plan sets out actions to reduce the transport energy demand.

Transportation is one of the key elements contributing to greenhouse gas emissions. The Government Electric Transport Programme sets the following targets for 2020;

- 10% of all vehicles will be electric.
- 10% of all road transport energy will be renewable.
- ESB will roll out charging points to meet 10% EV target.
- Open access to all electricity suppliers and car manufacturers.
- Roll out of EVs will provide major employment opportunities.

ESB is currently working towards providing a charging infrastructure to support up to 10% of all vehicles being electric by 2020 and plans to complete the rollout of a nationwide infrastructure. In addition to providing a national charging base, the infrastructure will ensure optimal integration of EVs with the electricity grid and deliver long term benefits to the electricity system in Ireland in terms of demand side management and optimisation of renewables.

4.4 Transport Related Planning Policy in CDP

The establishment of EV infrastructure by ESB and the associated EV usage both nationally and internationally aligns with the key principles and benefits of sustainability and the National Climate Change Strategy on reduction of emissions. ESB will continue to work with Wicklow County Council as appropriate to ensure that this is carried out with maximum benefit to all parties.

Under the transport section in chapter 9.4 of the draft plan, there is recognition of the Government's ambition to see 10% of the vehicles electrified by 2020. Transport Energy Objective CCE23 states;

"To facilitate the development of services and utilities for alternative vehicle types."

ESB welcomes this commitment to sustainable transport modes and wish to take this opportunity to highlight revised and updated standards required in order to achieve the desired 10% target for the Electric vehicles. S.I. No. 325 of 2014 ROAD TRAFFIC (TRAFFIC AND PARKING) (CAR CLUBS



AND ELECTRICALLY POWERED VEHICLES) REGULATIONS 2014 makes provision for EV parking in public areas. Therefore, in order to meet the targets of the Governments Electric Transport Programme, we respectfully submit that Wicklow County Council should strengthen their support for the roll-out of EV infrastructure with the inclusion of following updated parking standards:

3.4.1 Proposed parking standards for Draft CDP

1. For Developments with Private Car Spaces (residential and non-residential) including visitor car parking spaces e.g. office –spaces

- a. *At least one parking space should be equipped with one fully functional EV charging point in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems. This should be capable of supplying 32A 230V single phase AC electricity and be equipped with Mode 3 protection. It should be fitted with a Type 2 socket as defined by IEC 62196.*
- b. *It should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point.*

2. For Developments with Publicly Accessible Spaces (e.g. supermarket car park, cinema etc.)

- a. *At least one parking space should be equipped with one fully functional EV charging point in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems. This should be capable of supplying 32A 230V single phase AC electricity and be equipped with Mode 3 protection. It should be fitted with a Type 2 socket as defined by IEC 62196.*
- b. *It should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point.*
- c. *The Charge Point Parking space(s) should be clearly marked as being designated for EV charging.*
- d. *Appropriate signage indicating the presence of a charge point or points should also be erected.*
- e. *All charge points fitted in publicly accessible areas should be capable of communicating usage data with the national charge point management system and use the latest version of the Open Charge Point Protocol (OCPP). They should also support a user identification system such as RFID.*

As the use of electric vehicles continues to increase the Council may increase the number of parking spaces to be equipped with fully functional charge points in either of the above cases.

Currently, the charge point infrastructure is building to become a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars. ESB targets are to install 2,000 home charge points, 1,500 public charge points and 60 fast charge points nationwide.



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5. CONCLUSION

ESB endorse the strategic goals for future use of infrastructural resources as set out in the draft plan. Investment in infrastructure is crucial to the economic and social well-being of our country. Such investment creates jobs, stimulates economic activity and provides modern, efficient facilities to provide the services that people need including healthcare, education and community services amongst others. There is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. This investment in infrastructure is also necessary to support EU and national policy on Climate Change adaptation and mitigation.

ESB requests that Wicklow County Council give due consideration to the matters raised in this submission including:

- The recognition of 'strategic infrastructure corridors' for transmission and distribution infrastructure and the importance of protecting the immediate environment from inappropriate development is fully supported by ESB. The inclusion of Objectives CCE16-CCE18 will enable ESB to develop and maintain a safe, secure, reliable, economical and efficient electricity Transmission and Distribution System with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment.
- ESB cannot allow uncontrolled public access to our lands at Phoulaphuca Reservoir due to issues of public safety, site security and operational requirements. ESB grant access for the use of our land by legal agreements which allow for the control of water levels by ESB to facilitate electricity generation, water supply, fishing etc. **Where access is granted for recreational activities it is at selected locations deemed suitable for specific activities.**
- ESB would welcome Planning Policies and Objectives which will facilitate an improvement in telecommunications infrastructure and help position the county to attract intellectual and physical capital.
- Reflecting the strategic goals of the State to reduce anthropogenic greenhouse gas emissions, support energy generation from renewable sources and to embrace the principles of sustainable development, ESB submit **that Wicklow County Development Plan should be enhanced and specific objectives regarding the provision EV charge points at residential, commercial and 'on-street' locations should be included to ensure the proposed levels of parking provision for EV's are achieved. Indicative standards are set out in s.3.4.1. of this submission.**

If we can be of any further assistance, or if you wish to clarify any of the points raised, please do not hesitate in contacting the undersigned.

Yours sincerely,

Colm Cummins-Planning & Asset Management| ESB Business Service Centre
| T: +353 1 702 6357 / +353 87 763 8171 |

Deirdre Lardner

A8

A9

From: Deirdre Lardner [deirdre.lardner@esb.ie]
Sent: 12 February 2016 14:26
To: Planning - Development Plan Review
Subject: ESB Telecoms Ltd submission to draft Wicklow County Development Plan 2016-2022
Attachments: Wicklow dev plan submission 2016.pdf; ATT00001.txt; ATT00002.htm

Dear Sir/Madam,

Please find attached ESB Telecoms Ltd submission highlighting concerns with the draft Wicklow County Development Plan 2016-2022.

Regards,

**Deirdre Lardner | Planning Consultant | ESB Telecoms Ltd. | T: +353 1 7027397/ m: +353 83 1533733/
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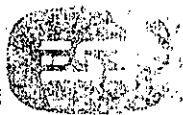
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**DRAFT WICKLOW COUNTY
DEVELOPMENT PLAN 2016-20202**

SUBMISSION BY ESB TELECOMS LTD

February 2016



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County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town.

12th February 2016
Submission by email
planreview@wiclowncoco.ie

Submission to the Draft Wicklow County Development Plan 2016-2022

Dear Sir/Madam,

ESB Telecoms Ltd write in connection with the above-mentioned review of the Wicklow County Development Plan. We would particularly like to comment on the development and improvement of telecommunication infrastructure in the county.

In making this submission, ESB Telecoms Ltd would like to state that the company as a whole has a strong corporate responsibility culture and understands that there are other planning considerations for Local Government. ESB Telecoms Ltd wish to assist in achieving positive outcomes for communities in the provision of quality telecommunication infrastructure.

Background

ESB Telecoms Ltd was established in early 2001 as a subsidiary company to ESB, Ireland's premier electricity supplier. Since that time ESB Telecoms Ltd has become Ireland's leading independent telecommunications infrastructure provider, delivering high quality, turnkey communication network solutions.

ESB Telecoms Ltd has grown from its original function of providing a communications system for our parent company, ESB. This communications system is called Supervisory Control and Data Acquisition (SCADA) and is still used today to monitor, control and remotely operate the ESB's complex electricity network infrastructure. The SCADA system continues to be upgraded as it is a vital part of radio and transmission communication for ESB's maintenance and repair crews.

ESB Telecoms Ltd now provides network solutions for a wide variety of mobile network operators, wireless broadband providers, as well as transferring data for the SCADA network. In recent years we have grown a substantial external customer base, supporting a wide range of private and public sector business activities.

It is ESB Telecoms Ltd policy to design and construct our communication structures to the highest international standards. All sites developed by ESB Telecoms Ltd are made available to our customer base as points for co-location. Customers provide mobile and broadband coverage from such sites using 2G, 3G and 4G networks.

The ESB Fibre Optic Network consists of 48 fibres (24 pairs, each pair capable of delivering 2.5GB) wrapped around the ESB's high voltage network. This is one of the quickest and most cost-effective ways of delivering a fibre optic network. The technology has been used extensively in Europe and has proven to be up to 10 times more reliable than equivalent underground networks. The ESB network is the first service to offer a uniform bandwidth across the country and plays an important role in fulfilling one of the aims of the National Development Plan by improving telecommunications infrastructure in Ireland.

ESB Telecoms Ltd owns a 1,300 kilometre National Fibre Optic Network (NTFON). The NTFON is constructed in a 'Figure of Eight' around Ireland and also includes a spur from Carrick-on-Shannon to Buncrana, now connected back to Dublin via BT (NI). The NTFON enables high speed data connections (4G) to many urban areas of the country as well as remote locations that may otherwise have been overlooked.

The presence of fibre permits transmission over longer distances at virtually limitless bandwidths (data rates) when compared to other forms of communication. Faster data transmission results in a better service for the end user. The evolution of the telecommunications industry over the past number of years means that the presence of fibre at communication base stations is a key criterion for the provision of mobile technologies such as mobile broadband and internet services to mobile phones.

In November 2012, under the terms of the 4G licence auction, it is stipulated that 70% of the population will have access to 4G services within three years. It is essential that telecommunications infrastructure development be supported over the medium term if such targets are to be achieved.

National Guidance

Since the introduction of the National Spatial Strategy (NSS) in 2002, the planning system in Ireland has evolved, in line with the European Spatial Development Perspective, whereby appropriate policies are to be structured within a hierarchy of plans progressing from national through to local plans. Government policy on telecommunications aims to place Ireland in the top quartile of OECD economies as regards to the availability, price and quality of telecommunications services, in order to promote industrial and commercial development and to improve personal and household security and to enhance social exchange and mobility.

National Spatial Strategy 2002 - 2020

The National Spatial Strategy 2002 - 2020 (NSS) seeks the balanced regional development of the state through the promotion of policies that enable regions develop to their full potential. This spatial development is to be achieved through the designation of Gateways, Hubs and complementary growth centres with the goal

of ensuring critical mass can be obtained to support the investment needed in new and existing infrastructure into the future. The continued development of telecommunications infrastructure is highlighted in the National Spatial Strategy 2002 - 2020 (NSS) as vital to the overall development of the country as they have a direct impact on the spatial nature of development in the areas they service. Additionally,

"future living standards ...will be determined by Ireland's ability ... to capture an adequate share of mobile investment" (Section 2.6).

This point is again emphasised in Section 5.2.1 where it states that

"the ability to attract mobile investment will be supported by the strategic development of infrastructure such as telecommunications".

A stated aim of the NSS is to promote the cost effective delivery of public services, a key benefit of good telecommunications linkages, while seeking the development of socially inclusive communities. Mobile communications and its near universal access form an increasingly integral part of the delivery of "socially inclusive communities".

The importance of advanced communications infrastructure in encouraging clustering of ICT customers is stressed, since such infrastructure is becoming increasingly more important as mobile broadband and fibre optic network linkages become crucial to successful businesses (NSS Section 3.8.3). Furthermore,

"effective communications infrastructure will help support and attract intellectual and physical capital" (NSS 3.7.3).

Construction 2020

Construction 2020 was published in May 2014 in response to the economic downturn and push for recovery. It discusses a range of improvements necessary in the construction sector regarding regulations and standards of build, housing, financing, re-employment and ways in which the planning process can assist recovery. It discusses a new National Planning Framework, policy statement and planning bill which will ensure that

"appropriate development requirements are both identified and approved efficiently, ensuring both sustainable development and economic recovery".

National Broadband Plan

The National Broadband Plan recognises "the importance of digital engagement for Ireland, both economically and socially" and the Government commitment to the rollout of high speed broadband.

In order to drive commercial rollout of high speed broadband

"the Government is committed to a range of actions that will facilitate the more efficient rollout of infrastructure including addressing planning and road opening challenges, assisting in getting citizens

and businesses online, measures relating to spectrum policy and maximising the use of State assets where possible".

It is envisaged that

"once completed, all parts of Ireland will have access to a modern and reliable broadband network, capable of supporting current and future generations".

Regional Planning Guidelines for Greater Dublin Area 2010-2022

The Guidelines recognise the need for broadband services in the Greater Dublin Area (Section 1.6). The timely delivery of "advanced broadband connectivity (next generation networks)" is considered an essential component in terms of supporting service sector growth into the future (Section 3.4).

The availability of adequate broadband capacity through the promotion of physical infrastructure, with the aim of promoting entrepreneurial activity, is recognised in Section 3.5.2.

It is a stated aim of these guidelines to develop "economic growth areas" in proximity to major transport routes in order to capitalise on the potential for developing

"diverse regional enterprise and economic clustering activity"

(Policy EP1)

and investment in ICT is considered to be central to the achievement of this policy. The importance of economic growth areas are expanded further in Policy EP1 which refers to

"critical infrastructural investment in ICT".

Furthermore, Policy PIP4 confirms the need for ICT investment in such corridors.

Section 6.6.3 supports the roll out and advancement of telecommunications infrastructure and performance as a critical step in creating a more competitive regional and national economy. It states that

"planning should facilitate future-proofing of the regions telecommunication infrastructure; and improve the availability of advanced service offerings".

ESB Telecoms Ltd maintain that continued investment in telecommunication development will aid in achieving the stated aims of these guidelines in terms of the delivery of vital telecommunications infrastructure to the area.

Telecommunications Antennae and Support Structures, 1996

It is stated in the guidelines that the design and siting of antennae support structures will to a large extent be dictated by radio and engineering parameters (Section 4.2).

The Guidelines explicitly state that

"substations operated by the ESB may be suitable for the location of antennae support structures (Section 4.3).

It is a primary aim of these guidelines to encourage local authorities to promote clustering and shared services at telecommunication masts, especially in suburban areas, with the aim of reducing visual intrusion (Section 4.5). ESB Telecoms Ltd sites are an excellent example of co-location and shared services as they are available to all operators for co-location.

Ministerial Circular PL 07/12

In October 2012 the Minister issued Circular letter PL 07/12 to ensure that Local Authorities did not hamper the rollout of telecommunication infrastructure. It stated that authorities should allow for flexibility stating that

"distance requirements, without allowing for flexibility on a case-by-case basis, can make the identification of a site for new infrastructure very difficult. Planning authorities should therefore not include such separation distances as they can inadvertently have a major impact on the roll out of a viable and effective telecommunications network".

Against a background of the rollout of next generation broadband (4G), the Department of the Environment, Community and Local Government issued updated guidance for local authorities in relation to telecommunications infrastructure. We draw your attention to Section 2.2 of Circular PL07/12 which advises planning authorities to cease attaching time-limited conditions to telecommunication masts as such structures will continue to play a vital role in delivering economic growth to the areas they service into the future. In order to ensure the progression of telecommunications across the country development contributions and temporary permissions were discouraged in the Minister's Circular. It states that

"all future Development Contribution Schemes must include waivers for broadband infrastructure provision and these waivers are intended to be applied consistently across all local authority areas".

The Circular further states that

"Planning authorities are therefore advised that from the date of this Circular Letter, attaching a condition to a permission for telecommunication masts and antennae which limit their life to a set temporary period should cease. Where a renewal of a previously temporary permission is being considered, the planning authority should determine the application on its merits with no time limit being attached to the permission. Only in exceptional circumstances where particular site or environmental conditions apply should a permission issue with conditions limiting their life".

Appendix 1 of the draft plan "Development & Design Standards" Section 10 Energy and Telecommunications page 66 states as follows

"Duration of permission

- Permissions for antennae support structures and associated base stations shall only be granted for 5 years;
- Further permissions for the facility at the end of the 5 year period shall be conditional on the provision of evidence, as necessary, to justify the continued need for the facility, given changes in technology and development of other sites in the meantime;
- Where a subsequent permission does not include any alterations to the permitted facility, the applicant shall be required to show that no new changes in technology have come about that would allow the design (height, width, no of antennae etc.) or environmental impacts of the installation to be improved;

The Planning Authority shall apply more stringent conditions on any subsequent permission for the same site, if considered necessary".

This policy conflicts with Ministerial Circular PL 07/12 which seeks to discourage temporary permissions. ESB Telecoms Ltd request that this draft policy be revised accordingly as it is inconsistent with government policy and restricts telecommunication advancement across the county.

Appendix 1 of the draft plan "Development & Design Standards" Section 10 Energy and Telecommunications also discusses the lodgement of bonds for the removal of redundant structures page 66 further states

"Obsolete structures

- Where the original operator is no longer using the antennae and their support structures and no new user has been identified they should be demolished, removed and the site reinstated at the operators expense (This will be a condition of any permission and a bonding arrangement to this effect will be put in place)".

ESB Telecoms Ltd request that the Council refrain from including any condition requiring payment of a bond. Ministerial advice in Circular Letter PL 07/12 states that

"Having reviewed experience since 1996 and the limited number of sites that have become obsolescent in that time, it is considered that the lodgement of a bond or cash deposit is no longer appropriate. It is therefore advised that, in general, future permissions should simply include a condition stating that when the structure is no longer required it should be demolished, removed and the site re-instated at the operators' expense".

Section 2.4 of Circular Letter PL 07/12

Development Control

Appendix 1 of the draft plan "Development & Design Standards" Section 10 Energy and Telecommunications page 63 states that applications must include

- "details of antennae operated by other providers in the area and their associated coverage maps
- a technical evaluation of the capabilities of these masts to take additional antennae and provide the coverage required".

Coverage maps and associated technical information of the particular mobile network operators is commercially sensitive and is not available for redistribution in the public domain. For example if ESB Telecoms Ltd propose to erect a structure capable of carrying equipment for say ESB, Tetra, Three and Vodafone – the coverage maps for a nearby Meteor base station cannot be obtained as they are not party to the application and are under no obligation to provide these. The location of other base stations can be identified using details obtained on the ComReg website but the requirement for the actual coverage to be assessed by the applicant is not possible without assessing the individual pieces of transmission equipment on the particular site to which access is difficult. This requirement should be revised to letters of support and intent from operators who have a demonstrated need for the proposed structure as this identifies their intention to locate on the structure rather than an impractical requirement for other operator coverage maps. Access to base stations are strictly monitored for health and safety reasons and technical evaluations of surrounding structures is carried out by the site provider or structure owner rather than other prospective infrastructure providers. This requirement is wholly impractical.

Health and Safety

With many developments of this nature, there may be concerns from local residents about the perceived implications of the development, primarily in relation to the adverse health effects of the installation. ESB Telecoms Ltd regards the protection of the health, safety and welfare of its staff and the general public as a core company value in all its activities. Accordingly, it is ESB Telecoms Ltd policy to continually review and update standards in light of new developments and research findings.

The Commission for Communications Regulation (ComReg) is the licensing authority for the use of radio frequency in Ireland. ComReg is responsible for ensuring that communication operators comply with their license conditions relating to non-ionising radiation. Planning authorities are urged to concern themselves with design and siting issues only and should defer any health and safety issues and their monitoring to the relevant authorities, in this instance ComReg. Since 2001 ComReg have been randomly testing communication sites to ensure compliance with the adopted ICNIRP and ComReg Standards. In addition to this ESB Telecoms Ltd carry out yearly independent testing of all their sites each of which have fallen well below the ICNIRP limits.

Conclusion

The vital services provided to the area by telecommunication infrastructure is often overlooked with developments of this nature vastly improving commercial prospects in the area and assisting in implementing Council policy for social inclusion. By providing a good quality and reliable telecommunication service residents will avail of improved telecommunication infrastructure which creates a better work life balance. The provision of good telecommunication linkages improves the quality of life for residents and provides communities with opportunities and services which contributes to their overall wellbeing.

Further to National policy, Government recommendations and overall economic recovery it is requested that Wicklow County Council adhere to Ministerial Guidelines and refrain from restricting telecommunication advancements in the county and specifically request that the Council

- remove time limit restrictions in accordance with Circular PL07/12
- remove requirements for bonds in accordance with Circular PL07/12
- remove requirements for the submission of unattainable technical documents associated with other base station sites.

I trust that the Council will take our concerns on board and refrain from adopting any policies which may inadvertently curtail telecommunication development across the county. Should you require any further information please do not hesitate in contacting me.

Yours sincerely,



Deirdre Lardner
ESB Telecoms Ltd.
(01) 7027397

Leonora Eavis



From: Yvonne Jackson [Yvonne.Jackson@failteireland.ie]
Sent: 19 February 2016 10:19
To: Planning - Development Plan Review
Subject: Submission to Draft Wicklow County Development Plan
Attachments: Submission to Draft Wicklow County Development Plan Final.pptx

A10

To whom it may concern,

Please find attached a submission that has been prepared by Fáilte Ireland in response to the public display of the Draft Development Plan for County Wicklow.
I would be most grateful if you could acknowledge that you have received our submission.

Regards,

Yvonne

Yvonne Jackson

Innovation and Investment | Fáilte Ireland | Áras Fáilte | 88/95 Amiens Street | Dublin 1

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Submission to Draft Wicklow County Development Plan

by Fáilte Ireland



Fáilte Ireland

National Tourism Development Authority

Introduction

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the public display of the Draft Development Plan for County Wicklow for the period 2016 – 2022.

The Authority welcomes the opportunity to engage with Wicklow County Council on the emerging Plan for the County and to build on the well-established relationship between the Authority and the County Council working together in one of Ireland's prime tourism counties.

The preparation of this submission comes at a time when Fáilte Ireland are emphasising the need for land-use plans to manage all land uses and economic drivers – of which tourism is but one, in a more holistic, strategic and spatial manner to maximise the efficient use of resources and the achievement of greater outcomes for society at large.

We hope that this submission can represent a first step in a collaborative process that culminates in the adoption of the new Development Plan.

The objective of this submission

Fáilte Ireland has prepared this submission to support and assist Wicklow County Council in the formulation of planning policies and frameworks for the period 2016 – 2022.

Fáilte Ireland are seeking to enhance the partnership approach between the County Council and the Authority and ensure that the expertise of both organisations is shared.

The submission seeks to enhance the policy coverage in the new Development Plan to ensure a meaningful framework is established for the enhancement of tourism in the County, and the wider Region, during the Plan period. It has been prepared with inputs from professional planners as well as various strands within Fáilte Ireland. It provides the Council with a concise single submission from the Authority dealing with all aspects of tourism – from strategic planning, to visitor experience and destination management.

The submission has been prepared having regard to the tourism profile of the County; the existing policy context in the Draft County Development Plan; and an established template for sustainable tourism policies being used by Fáilte Ireland to guide Planning Authorities.

Structure of the submission

For ease of reading, we have structured this submission as follows:

- **Commentary on the Draft Plan;**
- **Proposals for the Wicklow County Development Plan**

Commentary on the Draft Plan

The Authority is generally supportive of the Draft Plan and again welcomes the opportunity to assist the County Council in the important area of policy preparation. The Authority is acutely aware of the complex range of issues that a Development Plan must tackle. It is also mindful of both the responsibilities and limitations of the prevailing legislation and the role that the Development Plan plays in a statutory context. Our submission has been fully informed by these considerations.

The key comments the Authority would like to make in respect of the current plan are as follows:

1. The Draft Plan is well-structured and provides a comprehensive coverage of topics. The inclusion of detailed plans for settlements in the County is particularly welcome – not least as Wicklow's towns and villages are focal points of tourism and economic activity.
2. The vision statements (Para. 2.3) underpinning the Plan are positive – although a reference to the tourism sector under item (9) Heritage is recommended. Furthermore within Para 2.4.7 Economic Development, references to the tourism sector would be beneficial.
3. Within the sections of the Plan dealing with Economic Development (Section 5) additional reference to the role of the tourism sector as an economic driver would be welcome. In particular coverage should be given to tourism as a 'key sector' (para. 5.4(vii)); and also a number of new policies set out under Para. 5.5. Similarly under the section dealing with the rural economy, the absence of references to tourism is regrettable and should be addressed. This would ensure tourism is 'planned for' like other industries and not simply relegated to sections of the Plan that deal with softer infrastructure.

Commentary on the Draft Plan, continued

4. The inclusion of policy RT30 which specifically deals with Retail Tourism is particularly welcome.
5. The Draft Plan provides a dedicated chapter on tourism (Chapter 7). The introductory text estimates the value of the sector as €105m in 2013 – which clearly establishes it as a key economic driver. The overall contribution is difficult to consider in context however as an estimate of the value of the County's economy in general is not provided elsewhere and the recognition provided for the tourism sector as a key economic driver.
6. The range of policies currently set out in Chapter 7 – Tourism & Recreation, is comprehensive and Fáilte Ireland is generally supportive of these.
7. Under Section 7.2, coverage is given of the Ireland's Ancient East strategy, including a description of the growth targets established by Fáilte Ireland. This text has been superceeded by more recent strategy documents [see forward to page 12]. Text in relation to the Kildare-Wicklow Destination Grand Tour is out of date and should be clarified as proposed [see forward].
8. The inclusion of goals and objectives for Wicklow County Tourism Ltd is also welcome. This text provides the only real profile of the industry however, so the inclusion of additional analysis is recommended. [see forward to page 15]

Commentary on the Draft Plan

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Commentary on the Draft Plan, continued

9. The strategic objectives for tourism (para. 7.3) are good, though somewhat generic in places. These would benefit from additional coverage – particularly arising from a more comprehensive evaluation of the strengths and weaknesses of the sector [see forward to page 15]
10. The objectives for Tourism and Recreation are specifically assessed in the second section of this report which includes specific amendments, as proposed.
11. The policies set out in Chapters 10 and 11 in particular, go to great lengths to protect and enhance much of what is special and unique about Wicklow – which is extremely positive from the point of view of the County's tourism resource.

Proposals for the Wicklow County Development Plan

We have prepared this part of the submission drawing on existing strategies for the enhancement and management of tourism in the County.

Proposed statements are based on identified gaps in policy coverage and recommended good practice in the area of sustainable tourism. We have set out explanatory text for discussion among the plan-writing team and then included boxed text intended for consideration as a direct insert to the Plan itself.

Additional references in CDP Text

- **Economic Development- Para 2.4.7**

Amend text under the bullet points to add:

In addition to these objectives, Wicklow County Council is committed to the enhancement of sectors of the economy – such as the tourism and recreation sector, that protect, promote and enhance the natural resources of the County making it a nicer place to live and visit.

- **Economic Development- Para 5.4(viii)**

Amend text to build on the preceding paragraph is recommended as follows:

The Tourism and Recreational Sector

This is an important sector of activity in the County – and one which has the added benefit of acting as an external economic driver and also significantly improving the quality of life of the residents of the County.

New innovation in the area during the life of the Plan includes the implementation of the new umbrella destination brand - Ireland's Ancient East, by Fáilte Ireland. The brand is rooted in the rich history and diverse range of cultural heritage experiences that are particularly prevalent in the East and South regions of Ireland. The new destination brand has been designed to appeal to the key target markets and to present this large geographic area in a cohesive and unified manner.

- **Economic Development- Para 5.5**

Amend new policy in relation to the tourism sector:

"EMP23: Tourism Development

To facilitate the expansion of the County's tourism sector in-line with the principles and policies of sustainable tourism, and in accordance with the general policies and objectives set out herein.

Additional contextual information

(Para.7.1)

The introductory text to Chapter 7 requires additional detail to provide a more detailed assessment of the needs of the tourism sector within the lifetime of the Plan. Based on the assessments undertaken by Fáilte Ireland, the addition of the following text is recommended after the second paragraph in Para. 7.1.

It is further recommended that the value of the sector is put in the context of overall economic activity and expressed as a % of the County's annual economic activity (or GDP).

Proposed text, after second paragraph in Para. 7.1:

Wicklow's close proximity to Dublin offers significant opportunities to expand the existing tourism offer and brand for the County. With Dublin's increasing importance as a popular destination for city-breaks, Wicklow's scenic beauty and rich built- and natural-heritage provide opportunities to attract visitors from the nearby City-region. Furthermore, the County can benefit from the constrained capacity of the Capital City and act as an accommodation base for those visiting Dublin and the east.

While Wicklow is a particularly attractive location for day-trippers, the additional enhancement of the visitor experience is needed to increase dwell-time – particularly in the east and south of the County, and ensure the County fully benefits from growth in the tourism sector. The implementation of the Ireland's Ancient East strategy aims to ensure that visitors are aware of, and directed to, a broader range of attractions across the County, thereby better managing visitor numbers at sites. A phased signage programme will ensure better orientation to sites and also cross-selling of facilities and products. Wicklow County Council will give to the maintenance and improvement of routes and corridors that link sites; the availability of transport links (particularly public transport) between attractions; and the enhancement of facilities proximate to each route – including accommodation, facilities and flag-ship events, to ensure the visitor experience is well-rounded and highly attractive.

Additional contextual information

(Para.7.2)

Proposed text, under Fáilte Ireland Strategies in Para. 7.2:

To offer visitors a compelling motivation to visit the east of Ireland, Fáilte Ireland has developed a new umbrella destination brand called Ireland's Ancient East. The brand is rooted in the rich history and diverse range of cultural heritage experiences that are particularly prevalent in the East and South regions of Ireland. The new destination brand has been designed to appeal to the key customer segments – namely the Culturally Curious and the Great Escapers, and to present this large geographic area in a cohesive and unified manner.

The key strategic objectives of the Ireland's Ancient East initiative are:

- To drive growth in international visitor numbers, tourism revenue and associated tourism employment in the regions which currently underperform in these areas.*
- To move Ireland's east and south from a transit and day tripping zone to a destination which attracts international overnight visitors.*
- To develop a world class visitor experience, which delivers fully on the brand promise.*
- To differentiate the Ireland's East and South destination, within the international tourism marketplace, on the basis of the quality of its heritage experiences and a clear and memorable narrative, which links all experiences within it.*
- To disperse visitor traffic across the geography by encouraging the exploration of both the well-known attractions (in some cases congested) and lesser known sites and experiences (hidden gems).*
- To ensure Ireland's Ancient East is delivered in accordance with the principles of sustainable tourism, ensuring that economic, social and environmental benefits are delivered in a balanced way.*

During the life-time of this Plan there will be a phased roll-out of the branding strategy, with investment in orientation signage and the enhancement of the visitor experience, across the programme area.

Additional contextual information (Para.7.2)

The strategy will develop Ireland's Ancient East as a destination that is easy for the independent visitor to explore, interpret, understand and appreciate. The implementation strategy will deal with on-the-ground information as well as promotional aspects of the brand and the accessibility of sites possibly including mechanisms for pre-booking, ticketing and improved management. The strategy will enhance the visitor experience by promoting innovation in product development including in the delivery of information through foreign languages and using digital technology where appropriate.

Wicklow County Council and Fáilte Ireland will also liaise on other Kildare-Wicklow experiences that are fit for purpose and deliver on the Ireland's Ancient East brand promise.

Note: text in relation to the Kildare-Wicklow Grand Tour is out-of-date and should be excluded. That initiative is addressed by the last sentence proposed above.

Additional contextual information

(Para.7.2)

Fáilte Ireland promotes the incorporation of the principles of sustainable in the tourism policy section of the County Development Plan. The following five principles have been prepared to encapsulate the need to achieve a balance between appropriate tourism development and economic, environmental and social sustainability.

Proposed text, under Fáilte Ireland Strategies in Para. 7.2:

Fáilte Ireland's Guidance on Sustainable Tourism

Fáilte Ireland have developed five key principles that ensure developments achieve a balance between appropriate tourism development and economic, environmental and social sustainability. Developments will be assessed having regard to compliance with these, and the associated policies .

Principle 1: *Tourism, when it is well managed and properly located, should be recognised as a positive activity which has potential to benefit the host community, the place itself and the visitor alike. Sustainable tourism planning requires a balance to be struck between the needs of the visitor, the place and the host community.*

Principle 2: *Our landscapes, our cultural heritage, our environment and our linguistic heritage all have an intrinsic value which outweighs their value simply as a tourism asset. However, sustainable tourism planning makes sure that they can continue to be enjoyed and cherished by future generations and not prejudiced simply by short term considerations.*

Principle 3: *Built development and other activities associated with tourism should in all respects be appropriate to the character of the place in which they are situated. This applies to the scale, design and nature of the place as well as to the particular land use, economic and social requirements of the place and its surroundings.*

Additional contextual information (Para.7.2)

Principle 4: Strategic tourism assets – including special landscapes, important views, the setting of historic buildings and monuments, areas of cultural significance and access points to the open countryside, should be safeguarded from encroachment by inappropriate development.

Principle 5: Visitor accommodation, interpretation centres, and commercial / retail facilities serving the tourism sector should generally be located within established settlements thereby fostering strong links to a whole range of other economic and commercial sectors and sustaining the host communities. Sustainable tourism facilities, when properly located and managed can, especially if accessible by a range of transport modes, encourage longer visitor stays, help to extend the tourism season, and add to the vitality of settlements throughout the year.

Underlying these the principles for Sustainable Tourism, the definitions of economic, environmental and social sustainability against which any tourism project assessed are defined as follows:

Economic sustainability must be considered to ensure that the tourism sector is managed. The key strengths of the County include landscape, heritage, natural environment, lifestyle and amenity pursuits. The sector is highly affected by seasonality and there are extremes in visitor numbers at key attractions contrasted with smaller attractions which struggle to maintain visitor numbers. These 'peaks and troughs' should be carefully managed to ensure the protection of natural resources. Tourism innovation should also be encouraged – particularly where it brings about environmental benefits. Finally, for projects to be economically sustainable they should meet the needs of the permanent and also visitor population alike, so the preparation of robust business plans for all such developments will ensure proposals are viable and sustainable.

Additional contextual information

(Para.7.2)

- ***Environmental sustainability** will be central to the development and protection of a viable tourism sector and this is a key consideration in the County where tourism attractions are located in environmentally sensitive areas and close to historic areas where the quality of the built heritage and environment must be protected from inappropriate development – whether tourism related or not. The ‘mainstreaming’ of policy guidance tools such as the Strategic Environmental Assessment (SEA) will undoubtedly address any deficits in relation to many of these key policy areas.*
- ***Social Sustainability** is arguably more difficult to assess. Many of the potentially negative impacts of tourism development can however be addressed through careful consideration of the social and cultural nature of the receiving environment. The impacts that large-scale developments can have on existing local communities policies can be assessed having regard to the impact of visitor numbers on local quality of life, culture and heritage – with a particular emphasis placed on unique areas such as culturally sensitive areas where small impacts over time may have a significant cumulative effect.*

Additional strategy statements (Para.7.3)

- Strategic Objectives' to be restated as follows (new text shown as underlined):

Strategic Objectives

- *To facilitate the expansion of existing and the development new tourism and recreation related development, in-line with the principles and policies for sustainable tourism;*
- *To facilitate Fáilte Ireland and Wicklow County Tourism initiatives for the development of tourism in the County including the ~~Kildare-Wicklow Destination 'Grand Tour'~~ and 'Ireland's Ancient East' initiative and other Kildare-Wicklow experiences that are fit for purpose and deliver on the Ireland's Ancient East brand promise, within the context of land-use management and infrastructural provision in the County;*
- *To integrate the County's transport and tourism strategies to promote increasingly sustainable travel patterns among visitors to the County;*
- *To identify strategic sites capable of accommodating new tourism ventures while also ensuring the preservation of the natural landscape of the area.*
- *To ensure the effective management and enhancement of the appearance of the key settlements within the County;*
- *To protect Wicklow's principal strengths and capitalise on the distinct tourism and recreational attractions that are on offer – scenic beauty, woodlands and waterways, coastal areas and beaches, and built and natural heritage;*
- *To facilitate the development of alternative tourism products within the County such as eco tourism, craft / artisan centres, having regard to the ability of an applicant to demonstrate compliance with the principles and policies of sustainable tourism;*
- *To preserve the character and distinctiveness of scenic landscaped as described in the Landscape Categories of the County set out in Chapter 10;*
- *To ensure a focus on high quality tourism and recreation facilities that are of benefit to visitors and the community alike;*
- *To protect the environmental quality of the County.*

Commentary on the Draft Plan,

continued

The objectives for Tourism and Recreation are assessed as follows:

Objective	Comment
T1, T2	Good general objectives
T3	Good objective but would be strengthened to an additional reference to sustainability as follows: <i>"To generally require tourism and recreation related developments to locate within existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable. Within existing towns and villages, the Planning Authority will promote and facilitate the development of tourist related uses at appropriate sites. <u>In all cases, the applicant must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability, as defined herein.</u>"</i>
T4	Somewhat repetitive with T3 but a statement with merit nonetheless.
T5	Good policy that would be strengthened with added text (underlined) in the last sentence to read: <i>"The additional use shall be located adjacent to the tourism facility, <u>and avail of shared infrastructure and services, insofar as possible.</u>"</i>
T6	Robust statement that reads well with LCA policies
T7	Good policy that would be strengthened with added text (underlined) in the first sentence to read: <i>"To favourably consider proposals for tourism and recreation related development, which involve the reinstatement, conservation and / or replacement of existing disused buildings, <u>and to adopt a positive interpretation to plan policies to encourage such developments.</u>"</i>

Commentary on the Draft Plan,

continued

Objective	Comment
T8 – T19	Good general objectives
T20	Good site-specific objective
T21, T22	Good general objectives that will assist in the development of new facilities.
T23	<p>Well intentioned objective but very restrictive in terms of possible new uses – which may inhibit the development of a good range of uses and innovative approaches.</p> <p>Alternatively text could read as follows: <i>“T23 The Planning Authority will encourage the opening up of heritage Country houses (such as Derrybawn House, Laragh (see Map 07.09)) for <u>sympathetic uses including – but not limited to, as places of Retreat, Study and Education</u> subject to the following criteria being fulfilled:”</i></p>
T24 – T26	Good general objectives
T27	Good objective – although a definition of ‘eco-tourism’ would be helpful as this is a branding that many project tend to rely on but which may also be overly-relied upon.
T28	Good general objective

Commentary on the Draft Plan,

continued

Objective	Comment
T29, T30	Good site-specific objective
T31	Good objective which would benefit from explicit reference to the Ireland's Ancient East strategy and also updated text as to the focus of the strategy [see xx]
T32	Good objective that would be strengthened with added text (underlined) in the first sentence to read: <i>"To support the <u>long-term</u> development of Avoca Mines as a tourist attraction <u>having regard to the public safety issues associated with such brown-field sites.</u>"</i>
T33, T34	Good general objectives
T35	New statement proposed as follows <i>To work with Fáilte Ireland on the development of the Ireland's Ancient East branding strategy. As part of that process Wicklow County Council will liaise with the Authority on the development of the over-arching strategy, as well as any smaller scale plans or programmes that are prepared to give effect to that strategy. Wicklow County Council will consult with the Authority as required, on the assessment of any such plans, programmes or policies to ensure they are adequately screened or assessed in full compliance with Directives including the SEA Directive and the Habitats Directive.</i>

Commentary on the Draft Plan,

continued

Objective	Comment
T36	<p>New statement</p> <p><i>To support the implementation of the Ireland's Ancient East programme by Fáilte Ireland, by facilitating the provision of orientation information within the IAE programme area – in-line with the policies and objectives with respect to heritage sites; and integrating the objectives of that programme with transport programmes in the County.</i></p> <p><i>With respect to transport, Wicklow County Council will play a key role as a Roads Authority in ensuring that the links between sites are well maintained, signposted and managed. The County Council will liaise with public and private transport providers (including coach touring companies) to facilitate access and parking arrangements at visitor sites, while protecting the integrity of the County's resources. The County Council will facilitate information boards and displays to give effect to the strategy on the ground and ensure the tourism sector of the County realises its full potential.</i></p>

Concluding remarks

We wish to take this final opportunity to commend the County Council on the Draft Development Plan and reiterate the commitment of Fáilte Ireland to working with the Authority on achieving the Plan objectives over the coming years.

Contact Details:

Yvonne Jackson

Fáilte Ireland- The National Tourism Development Authority

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Dublin 1

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Leonora Earls

From: CorporateSupport.Unit [CorporateSupport.Unit@dcenr.gov.ie]
Sent: 17 February 2016 16:21
To: Planning - Development Plan Review
Cc: CorporateSupport.Unit
Subject: Draft Wicklow County Development Plan 2016-2022
Attachments: 20160212 Obs from GSI.pdf

17/2/2016

Wicklow County Council,

I refer to your correspondence of the 26 November 2015 in the above regard.

The Department of Communications, Energy and Natural Resources on behalf of the Geological Survey of Ireland have the following comments to make 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.

Kind regards,

Noelle Carroll



Noelle Carroll | Corporate Support Unit
Department of Communications, Energy & Natural Resources
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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.



Roinn Cumarsáide,
Fuinnimh & Acmhainní Nádúrtha
Department of Communications,
Energy & Natural Resources



Leonara Earls
Planning Department
Wicklow County Council
County Buildings
Station Road, Wicklow Town

12th February 2016

Re: Notice of proposed addition / deletion / amendment to the Record of Protected Structures (RPS) –Draft Wicklow County Development Plan 2016-2022

Our Ref.: 15/236

Dear Ms Earls,

With reference to your letter of the 26th November 2015, concerning the Notice of proposed addition / deletion / amendment to the Record of Protected Structures (RPS) as part of the Draft Wicklow County Development Plan (CDP) 2016-2022, sent to the Department of Communications, Energy and Natural Resources of which the Geological Survey of Ireland (GSI) is a division; the Irish Geological Heritage Programme of the GSI has the following comments for several localities in County Wicklow.

- It is requested that under the proposed RPS amendments/additions AMD4, AMD5, AMD6 and ADD6 to ADD16 inclusive, concerning the Ballymurtagh, Connary Upper, East Avoca and Tigroney West Avoca Mine Areas, it be stated that these areas, including the spoil heaps, have been recognized as County Geological Sites (Avoca - Connary, Cronebane, Tigroney East, Tigroney West, West Avoca, Sroughmore) in the CDP and should retain due consideration and protection from inappropriate development.
- The reason for the amendment under DEL3, Cronebane and East Avoca, that 'These features are included as a County Geological Site in the CDP and afforded more appropriate protection' is duly noted and welcomed.

I hope that these comments are of assistance for the preparation of Wicklow new CDP. Should you have any query in relation to the above comments, please contact Sarah Gatley (Irish Geological Heritage Programme) at sarah.gatley@gsi.ie.

Yours sincerely,

Sophie Préteseille, Geologist
Information Management Programme
E. sophie.preteseille@gsi.ie
T. 01-678 2897

Suirbhéireacht Gheolaíochta Éireann
Tor an Bhacaigh / Bóthar Haddington
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Geological Survey of Ireland
Beggars Bush / Haddington Road
Dublin D04 K7X4
Tel +353 1 678 2000 / Fax +353 1 668 1782
www.gsi.ie

Bernadette Harvey

From: Minister of State [MinisterofState@environ.ie]
Sent: 30 November 2015 13:55
To: Planning - Development Plan Review
Subject: REP757/PC/15
Attachments: ATT00001.txt; ATT00002.htm

Please Quote Ref: REP757/PC/15

30 November, 2015.

Leonora Earls,
Wicklow County Council.

Dear Ms Earls,

I have been asked by Mr. Paudie Coffey T.D., Minister for Housing, Planning and Co-ordination of Construction 2020 Strategy, to acknowledge receipt of your recent email notifying the preparation of the Draft Wicklow County Development Plan 2016-2022.

Yours sincerely

Aisling Glynn
Private Secretary

*Please Note: The Minister of State is a Designated Public Official under the Regulation of Lobbying Act 2015

Sorcha Walsh

From: Sophie Preteseille [Sophie.Preteseille@gsi.ie]
Sent: 04 May 2016 08:15
To: Sorcha Walsh
Cc: BrianT Carroll; Eibhlin Doyle; Dave Hanley; Koen Verbruggen; Sarah Gatley; Ray Scanlon
Subject: RE: Wicklow Record of Protected Structures
Attachments: 15_236_Wicklow CDP2016-2022_RPS_clarification_03-05-2016.pdf

Dear Sorcha,

Please find attached letter clarifying DCENR's position on behalf of EMD and GSI in relation to the spoil heaps at the Avoca Mines area.

Should you have any query, please do not hesitate to contact me.

Kind regards
Sophie



Sophie Pr teseille Geologist | Information Management Programme | Geological Survey of Ireland
Department of Communications, Energy & Natural Resources
Beggars Bush, Haddington Road, Dublin, D04 K7X4, Ireland
www.gsi.ie | www.dcenr.gov.ie | @dcenr
T: +353 1 678 2897 | E: sophie.preteseille@gsi.ie

From: Sorcha Walsh [<mailto:SWalsh@wicklowcoco.ie>]
Sent: 07 April 2016 14:54
To: Sophie Preteseille
Cc: Deirdre Burns
Subject: Wicklow Record of Protected Structures

Dear Sophie,

I am writing to you with respect to the GSI's submission to the Wicklow County Development Plan, received 17.02.16 for which we thank you (copy attached).

I am seeking clarification from you with regard to the spoil heaps at the Avoca Mines area. It is proposed to remove specific reference to these features in the Record of Protected Structures (RPS) at Avoca Mines. This proposal has partly arisen due to ongoing consultation and interaction with the Exploration and Mining Division of the DCENR. However, it seems to me that the GSI is in fact seeking the opposite – that these features retain specific protection. I would be obliged if you would confirm that this is what the GSI is requesting.

If this is the case, we now have conflicting requests from the DCENR regarding the RPS and it would be of benefit to us if the DCENR as a whole could formulate one position of the matter and advise us.

I have sent the same request to Dave Hanley and Eibhlin Doyle of the EMD.

I would be obliged if you could revert to me ASAP as we are currently finalising a report on this matter.

Many thanks,

Sorcha

Sorcha Walsh

Senior Planner | Planning & Development
Wicklow County Council | Station Road | Wicklow Town | Co. Wicklow
☎: 0404 20100 | 📠: 0404 69462 | ✉: swalsh@wicklowcoco.ie

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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.



Roinn Cumarsáide,
Fuinnimh & Acmhainní Nádurtha
Department of Communications,
Energy & Natural Resources



Sorcha Walsh
Planning & Development
Wicklow County Council
County Buildings
Station Road, Wicklow Town

3rd May 2016

Re: Notice of proposed addition / deletion / amendment to the Record of Protected Structures (RPS) –Draft Wicklow County Development Plan 2016-2022

Our Ref.: 15/236

Dear Sorcha,

Thank you for your emails of 7th April requesting clarification in respect of submissions made by the Department of Communications, Energy and Natural Resources (DCENR) on behalf of the Exploration Mining Division (EMD) and the Geological Survey of Ireland (GSI).

In relation to the first bullet point the letter from GSI dated of 12th February, DCENR can confirm that it does not support the designation of spoil piles in Record of Protected Structures and therefore supports the proposed amendments to the Record of Protected Structures.

In relation to the second point in the letter, the designation of Cronebane and East Avoca as County Geological Sites is welcomed.

I hope this clarifies the situation.

Should you have any query in relation to the above comments, please contact Sarah Gatley (Irish Geological Heritage Programme) at sarah.gatley@gsi.ie , 01-678 2837.

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Sophie Préteseille, Geologist
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Sorcha Walsh

Senior Planner | Planning & Development
Wicklow County Council | Station Road | Wicklow Town | Co. Wicklow
☎: 0404 20100 | 📠: 0404 69462 | ✉: swalsh@wicklowcoco.ie

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Roinn Cumarsáide,
Fuinnimh & Acmhainní Nádurtha
Department of Communications,
Energy & Natural Resources



Sorcha Walsh
Planning & Development
Wicklow County Council
County Buildings
Station Road, Wicklow Town

3rd May 2016

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Yours sincerely,

Sophie Préteseille, Geologist
Information Management Programme
E. sophie.preteseille@gsi.ie
T. 01-678 2897



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A12

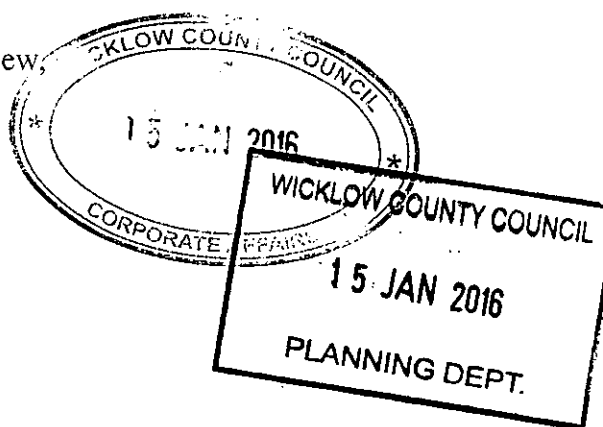


Clár um Bhia Shláintiúil & Maireachtáil Ghníomhach
Healthy Eating & Active Living Programme

c/o Health Promotion Office
St Catherines Hall
Waterside
Waterford

13/1/2016

Ms. SORCHA WALSH
County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town



Dear SORCHA,

As the lead for HSE Healthy Eating & Active Living programme under the Health and Wellbeing Division I am writing to you to relay my support, and the support of my colleagues in Health and Wellbeing, for measures to be put in place to restrict the development of fast food restaurants within 400 metres of the gates or site boundary of schools, parks or playgrounds, excluding premises zoned town centre.

The World Health Organisation and numerous international and national strategies and policies recognise the built environment as an important determinant of health and wellbeing of individuals, communities and countries as a whole. The current health status of people living in Ireland, lifestyle trends and inequalities in health outcomes are leading us toward a future that is dangerously unhealthy and from an economic perspective likely to be unaffordable. Currently 6 out of 10 adults and 1 in 3 children are overweight or obese in Ireland. In addition only 1 in 3 adults and 1 in 4

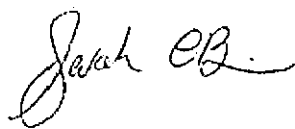
children are sufficiently physically active. This increases their risk of developing chronic diseases such as diabetes, cardiovascular disease and cancer. Increasing the levels of healthy eating and regular physical activity across the population is an important public health measure to address the growing burden of chronic disease.

The Healthy Ireland Framework recognises that while individuals can be motivated and supported to make healthier choices, effective action must also include work to remove or at least minimise any legislative or practical barriers that impede their ability to make healthier choices. Doing this requires a concerted effort and commitment across government, public and private sectors as well as at community and individual level.

Through the Healthy Ireland Framework, the HSE will continue our efforts to influence policy in relation to the built environment. To this end in our engagements with the Department of Health in relation to the forthcoming national obesity policy and action plan we advocated for the Department of Health and Department of Environment and Local Government to commit to jointly developing planning guidelines that support and promote active living and healthy eating.

In adding the endorsement of the HSE to the proposal, I'd like to take the opportunity to commend Wicklow County Council for addressing this important issue in the draft County Development plan and urge you to adopt the measures outlined.

Kind regards

A rectangular box containing a handwritten signature in cursive script, which appears to read "Sarah O'Brien".

Sarah O'Brien

Ceannasaí Náisiúnta / National Lead

Clár um Bhia Shláintiúil & Maireachtáil Ghníomhach

Healthy Eating & Active Living Programme

Leonora Earls

From: Stephanie Kempin [stephanie.kempin@hse.ie]
Sent: 19 February 2016 12:11
To: Planning - Development Plan Review
Subject: Wicklow County Development Plan 2016
Attachments: No.Fry Zone Wicklow.pdf

Importance: High

Dear Sir/Madam,

Please find attached correspondence for your immediate attention.

Best Regards
Stephanie Kempin

Stephanie Kempin
Oifig an Bainisteora Oibríochtaí um Chúram Príomhúil
Eagraíocht Cúram Sláinte Pobail Ceantar 6
Galla Cnocán an Imill
Cluain Sceach
Baile Átha Cliath 6

Á: 01 2680575 | AE: 01 2830002 | 8: stephanie.kempin@hse.ie

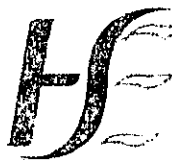
Office of the Operations Manager for Primary Care
Community Healthcare Organisation Area 6
Vergemount Hall
Clonskeagh
Dublin 6

When we go through tough time, little things like talking about our problems, getting regular exercise, drinking less alcohol and being involved in activities we enjoy can make a big difference to how we feel. Find the little things that work for you at yourmentalhealth.ie

"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seans gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 1 6352757](tel:+35316352757) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Oifig Sláinte Aitiúil
Baile Átha Cliath Thoir Theas
Halla Chnocán an Imill
Cluain Sceach
Baile Átha Cliath 6
Local Health Office
Dublin South East
Vergemount Hall
Clonskeagh
Dublin 6

Fón Phone: (01) 268 0300
Facs Fax: (01) 283 0002

County Development Plan Review
Planning Department
Wicklow County Council
Station Road
Wicklow Town

Friday 19th February 2016

Dear Sir/Madam

I am writing in support of the amendment to the Wicklow County Development Plan to restrict the development of any new fast food outlets within 400m of the gate or site boundary of schools, parks or playgrounds.

Increasing levels of obesity and overweight in adults (60%) and in children (25%) is significantly increasing health care demands and subsequent costs, notably in chronic disease management such as diabetes and cardiovascular disease. Based on the population in Co Wicklow, this equates to 58,000 adults and 10,000 children who are overweight/obese.

Obesity is a complex problem with many contributing factors including social and economic factors, our physical environment and individual factors. Modifying a physical environment that promotes sedentary behaviour and/or easy access to energy dense foods is a clear example of a multisectoral approach to 'making the healthy choice the easy choice'

Planning authorities can influence our built environment to promote health and reduce the extent to which it promotes obesity. The proposed amendment to the Wicklow County Development Plan can help create places where people and communities are supported to maintain a healthy weight. I strongly support the passing of this amendment.

Yours faithfully,



Antoinette Barry
Operations Manager for Primary Care Services
Community Healthcare Organisation 6

Leonora Earls

~~A12~~
A13

From: Olwyn James [ojames@water.ie]
Sent: 19 February 2016 12:24
To: Planning - Development Plan Review
Subject: Draft Wicklow County Council Development Plan
Attachments: 15_IW_FP_58 Draft Wicklow County Development Plan IW submission.pdf

Good morning,

Please find attached Irish Water's submission on the Draft Wicklow County Development Plan 2016-2022.


Regards,

Olwyn

Olwyn James
Spatial Planning Specialist
Asset Strategy and Sustainability

Irish Water

Colville House| Talbot St.| Dublin 1
T: 01 8925612 E: ojames@water.ie

 Please consider the environment before printing this e-mail



Our Ref: 15_IW_FP_58

Ms. Sórcha Walsh
Senior Planner
Planning Department
Wicklow County Council
Station Road
Wicklow Town

Uisce Éireann
Bosra-OP 860
Oifig Sheachadta
na Cathrach Theas
Cathair Chorcaí

Irish Water
PO Box 860
South City
Delivery Office
Cork City

www.water.ie

18th February 2016

Re: Draft Wicklow County Development Plan 2016-2022

Dear Ms. Walsh,

Irish Water welcomes the opportunity to review the Draft Wicklow County Development Plan 2016-2022. Our observations relate to the provision of sustainable, cost effective water services and the protection of water sources used for public supply. It is Irish Water's objective to provide both drinking water and wastewater strategic infrastructure capacity to meet the domestic requirements of the Settlement and Core Strategies of development plans prepared in accordance with the National Spatial Strategy and Regional Planning Guidelines. Irish Water will endeavour to secure the provision of the infrastructure necessary to support the evolving population change and economic activity over the next plan period, subject to the availability of the necessary capital investment and in compliance with environmental objectives and regulations. It is Irish Water's objective to provide and operate water services both economically and efficiently and in a manner that protects and enhances the environment including supporting the achievement of water body objectives under the Water Framework Directive and supports Ireland's national Climate Change Policy and associated plans and frameworks.

Irish Water has significant challenges in balancing our commitments and available funds to achieve these objectives. Irish Water invests in the development and expansion of the water and wastewater infrastructure in line with its investment programme and connection policies which are subject to the approval by the Commission for Energy Regulation (CER).

All capital investment beyond the Proposed Capital Investment Plan 2014-2016 is subject to the agreement of CER. Irish Water is currently in the process of preparing a submission to the Commission for Energy Regulation (CER) on the national investment programme for the next Capital Investment Plan (2017 - 2021). As part of this a review of all water and wastewater infrastructure in County Wicklow has been undertaken.

Irish Water has a suite of policies/objectives which we can suggest to the Council for inclusion in the development plan in relation to protecting Irish Water service assets and the



environment for the benefit of current and future populations served by public water services networks. We have attached these policies/objectives to this submission.

In relation to Water Supply please be advised of the following:

- Bray, Wicklow, Greystones / Delgany, Newtown, Enniskerry, Kilcoole, Avoca, Kilmacanogue, Newcastle and Ashford are supplied from Vartry Water Treatment Plant (WTP). Water Supply is currently at a risk due to structural / infrastructural deficits and raw water quality issues (algal blooms) at the Water Treatment Plant. Irish Water is planning an upgrade to the Vartry Water Supply Scheme to ensure a safe and sustainable water supply for the Greater Dublin Region which includes North Wicklow and it is envisaged that this will be complete by 2019.

The Water Supply Project – East and Midlands Region will further increase the resilience of water supply to the area, this has an envisaged delivery date of 2022.

- Arklow: An upgrade has just been completed at the Arklow Water Treatment Plant and there is expanded capacity to meet anticipated demand for water supply in the area.
- Blessington: Blessington is currently supplied from the Ballymore Eustace Water Treatment Plant (WTP). Ballymore Eustace WTP is one of the main water supply sources for the Greater Dublin Area. Irish Water has proposed the inclusion of a number of items in the Emerging Investment Plan (2017-2018) which are intended to aid with the resilience of water supply within the Region.

The water supply Project – East and Midlands Region will further increase the resilience of water supply to the area, this has an envisaged delivery date of 2022.

It is envisaged that these projects will ensure a water supply to meet Irish Water's current growth projections in the area.

- Dunlavin: The water supply for Dunlavin is currently constraint due to issues with the current source's available yield. Irish Water envisages resolving these issues in the next investment period (2017 – 2018) and providing a safe and sustainable water supply for the area.
- Aughrim: The existing water supply is at risk due to constraints at the Water Treatment Plant. Irish Water is planning an upgrade to the water supply scheme to ensure a safe and sustainable water supply for mid Wicklow and it is envisaged that this will be complete in 2018.
- Roundwood: The existing water supply is at risk due to constraints at the Water Treatment Plant. Irish Water is planning an upgrade to the water supply scheme to ensure a safe and sustainable water supply for mid Wicklow and it is envisaged that this will be complete in 2018.



- Rathdrum: The existing water supply is at risk due to constraints at the Water Treatment Plant. Irish Water is planning an upgrade to the water supply scheme to ensure a safe and sustainable water supply for mid Wicklow and it is envisaged that this will be complete in 2018.
- Baltinglass: Baltinglass is currently supplied by the Baltinglass Water Treatment Plant, this water supply does not currently have the capacity to meet anticipated demand for water supply and the scheme has not been included in the current Emerging Investment Plan (2017-2018).
- Tinahely, Carnew, and Shillelagh: The Tinahely Water Treatment Plant provides the water supply to Tinahely, Carnew and Shillelagh and given its production capacity it is envisaged that it will be in a position to meet anticipated demand for water supply in the area.
- Donard: Donard is currently supplied by the Hollywood Donard Public Water Supply, this water supply scheme does not currently have the capacity to meet the envisaged growth projections and the scheme is not currently included in the Emerging Investment Plan (2017-2018).

Vartry Water Supply Scheme

The Vartry Water Supply Scheme provides drinking water for a supply area stretching from Roundwood, through North Wicklow up to South Dublin and serves over 200,000 people. It was developed in the 1860s and includes two raw water reservoirs, a water treatment plant, a 4km tunnel under Callowhill and 40km of trunk mains that deliver water to storage reservoirs at Stillorgan in Dublin. A significant investment in the Vartry Water Supply Scheme is planned by Irish Water so as to ensure a safe and sustainable drinking supply for the North Wicklow and South Dublin areas. The proposed investment is focused on securing the existing supply to customers and it is not proposed to abstract any additional water from the Vartry reservoirs or catchment areas.

Irish Water would welcome the inclusion of the following objective in Section 9.2.2 Water Supply and Demand of the Draft Wicklow County Development Plan 2016-2022:

'It is an objective of Wicklow County Council to support Irish Water's proposed investment in the Vartry Water Supply Scheme, which is required to secure the existing supply for customers. The proposed upgrade works will comprise:

- Construction of a new water treatment plant on the site at Vartry and decommissioning the existing water treatment plant;
- Construction of a 4km pipeline to secure the transfer of treated water from Vartry to Callowhill pumping station;
- Upgrading the dam of the Vartry Reservoir.'

Mid Wicklow Water Supply Schemes

There is a combination of water quality, water availability and sludge management issues associated with the water supply zones for Rathdrum, Aughrim / Annacurra, Avoca /



Ballinaclesh, Roundwood, Laragh / Annamoe, Redcross / Conary and Glenealy. Delivery of the Mid Wicklow Water Supply Schemes will address quality issues at all locations and will provide additional quantity, in the medium term, to Rathdrum, Roundwood, Laragh / Annamoe, Redcross / Conary and Glenealy.

Irish Water would welcome the inclusion of the following objective in Section 9.2.2 Water Supply and Demand of the Draft Wicklow County Development Plan 2016-2022:

'It is an objective of Wicklow County Council to support Irish Water's proposed Mid Wicklow Water Supply Schemes comprising:

- New additional reservoirs at Roundwood and Ballygannon;
- Refurbishment of reservoirs at Ballymanus and Barnbawn;
- New pumping stations at Barnbawn, Vartry Water Treatment Plant, Rathdrum
- Upgrade existing pumping station at Blackhill
- Interconnecting pipework.'

In relation to Wastewater please be advised of the following:

- Arklow: At present untreated wastewater from homes and businesses in Arklow is discharged into the Avoca River that runs directly through Arklow Town, County Wicklow. Economic and residential development in Arklow is currently constrained due to the lack of a Wastewater Treatment Plant (WwTP) for the town. Arklow is identified as a Large Growth Town II in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs) and as a Level 3 Town in the Draft Wicklow County Development Plan. The Draft Wicklow County Development Plan 2016-2022 allocates approximately 19% of the County's core strategy population target to Arklow. The 'development of a high quality treatment plant for Arklow town' is identified in Table 11: Critical Strategic Projects – Wastewater & Surface Water, in the RPG. Achieving the Core Strategies of both the Wicklow County Development Plan and the Arklow Town and Environs Development Plan is dependent upon the WwTP being constructed.

Irish Water intends to develop the Arklow Sewerage Scheme to include the following:

- A new Wastewater Treatment Plant (WwTP) estimated to treat 36,000 Population Equivalent (PE) and associated infrastructure such as pumping station(s);
- Pipeline(s) to bring the untreated wastewater to the WwTP and to bring treated wastewater from the plant to the outfall;
- An outfall pipe to safely discharge the treated wastewater to the sea.

Irish Water has carried out public consultation to identify a suitable site for a new Wastewater Treatment Plant in Arklow and is currently in consultation with An Bord Pleanála as to whether a planning application for the WwTP will be made as Strategic Infrastructure Development. The process for preparing a planning application and Environmental Impact Assessment (EIA) is also underway. It is imperative that the Wicklow County Development Plan includes planning policy that supports the delivery

of a new WwTP in Arklow. Irish Water would welcome the inclusion of the following objective in Section 9.2.3 Waste Water in the Draft Wicklow County Development Plan 2016-2022:

Arklow Wastewater Treatment Plant:

'It is an objective of Wicklow County Council to support Irish Water in the provision of a new Wastewater Treatment Plant, and related infrastructure, in Arklow, at a site that best meets the principles of sustainable development and addresses climate change adaptation through the reduction of energy demand and use.'

- **Avoca:** Avoca is served by a Wastewater Treatment Plant which is located at Ballanagh. There are issues around access to the existing treatment plant and treatment processes at the plant. Irish Water is examining ways to resolve these issues and once these are resolved there would be sufficient capacity to meet anticipated demand. Irish Water would welcome the inclusion of the following objective Section 9.2.3 Waste Water in the Draft Wicklow County Development Plan 2016-2022:

Avoca Wastewater Treatment Plant:


'It is an objective of Wicklow County Council to support the provision of appropriate treatment of wastewater for Avoca.'

- **Aughrim:** There is no capacity to facilitate development and an upgrade to the existing WwTP has not been included in Irish Water's Investment Plans.
- **Blessington:** The current plant does not have capacity for additional load and Irish Water has plans to expand the plant in the short term to meet growth needs.
- **Carnew:** Irish Water is evaluating options to remove existing sludge imports to the site which would free up capacity to accommodate some growth.
- **Dunlavin:** WwTP has been upgraded and there is a currently 1,200PE spare capacity at the plant.
- **Newcastle:** WwTP is currently being upgraded.
- **Wicklow Town:** The local network does not have sufficient capacity to facilitate further residential development. Irish Water plans to undertake a network upgrade in Abbey Street and Marlton Road within the next two years.
- **Greystones:** There is currently a high level of restriction in the existing network which is resulting in flooding. Irish Water plans to undertake a Drainage Area Study to develop a model and define solutions that will be carried out within two years and will provide capacity for future residential development.
- **Bray/Shanganagh:** Irish Water intends undertaking a Drainage Area Plan in the next two years to identify how best zoned lands can be connected to the core network.

Irish Water advises that where specific investment to address capacity deficits in relation to meeting anticipated demands for growth at water/wastewater treatment plants has not been identified in the Emerging Investment Plan 2017-2021, Irish Water will be considering the need to address infrastructural constraints on growth for funding in the next investment cycle. In addition, significant funding for national programmes to address specific deficiencies in water services assets are included in the current Emerging Investment Plan 2017-2021 and a number of assets in County Wicklow will be included in these programmes. In particular, in the case of water supply we are planning for a major programme for leakage reduction. Supplies which are currently constrained in terms of supply will be targeted for leakage reduction thereby creating capacity for growth.

Irish Water is available to discuss this submission with the Council and any other issue with respect of water services within our remit.

Yours sincerely,


Suzanne Dempsey
Spatial Planning Strategy Specialist

¹ The use of the term strategic infrastructure here does not have the same meaning as the term strategic infrastructure used in the Planning and Development Act.

Menu of appropriate Objectives/Policies for Water Services in development plans

General Policies in relation to Water Services

- a) To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realize the development objectives of this plan;
- b) When identifying areas for development, to ensure that full consideration is given to the level of investment that will be required in the provision of water services - particularly in environmentally sensitive areas - to ensure that the provision of water services does not negatively impact on habitat quality, species diversity or other environmental considerations
- c) To facilitate the provision of integrated and sustainable water services through effective consultation with Irish Water on the layout and design of water services in relation to the selection and planning of development areas and the preparation of master plans and SDZs;
- d) To maximise the use of existing capacity in water services in the planning of new development;
- e) To ensure that adequate water services will be available to service development prior to the granting of planning permission for those developments and to require developers to consult Irish Water regarding available capacity, prior to applying for planning permission;
- f) To protect existing way leaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;
- g) To ensure that development proposals comply with the standards and requirements of Irish Water in relation to water and wastewater infrastructure to facilitate the proposed developments

Water Supply

- h) To protect both ground and surface water resources and to work with Irish Water to develop and implement Water Safety Plans to protect sources of public water supply and their contributing catchment;
- i) To minimise wastage of water supply by requiring new developments to incorporate water conservation measures;
- j) To promote water conservation and demand management measures among all water users;

Wastewater Services

- k) To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure;
- l) To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems;
- m) To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems;
- n) To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;
- o) To refuse residential development that requires the provision of private waste water treatment facilities, other than single house systems;
- p) To ensure the changeover from septic tanks to collection networks in all cases where this is feasible (subject to connection agreements with Irish Water) and that all new developments utilise and connect to the public wastewater infrastructure. The provision of individual septic tanks and treatment plants in the plan area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended, will be required;
- q) To ensure that private wastewater treatment plants, where permitted, are operated in compliance with their wastewater discharge license, in order to protect water quality;
- r) To require existing developments that are in close proximity to a public sewer to connect to that sewer, subject to a connection agreement with Irish Water;

A14

Leonora Earls

From: McCormack Michael [Michael.McCormack@tii.ie]
Sent: 17 February 2016 13:43
To: Planning - Development Plan Review
Subject: Draft Wicklow County Development Plan, 2016 - 2022
Attachments: SKHFI216021714450.pdf

Dear Sir/Madam,

Please find attached a copy of the Authority's observations on the Draft Wicklow County Development Plan, 2016 – 2022.

A hard copy has also issued by post.

Yours sincerely,
Michael McCormack
Policy Advisor (Planning)

TII E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error then please notify postmaster@tii.ie and delete the original including attachments.

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aon cheangalt?in.



County Development Plan Review
Planning Department
Wicklow County Council
County Buildings
Station Road
Wicklow Town
Co. Wicklow

Dáta | Date
17 February, 2016

Ár dTag | Our Ref.
TII15-93743

Bhur dTag | Your Ref.

Re. Draft Wicklow County Development Plan, 2016 – 2022

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes consultation on the Draft Wicklow County Development Plan, 2016 – 2022, and the opportunity to comment on emerging policies and development objectives scheduled in the Draft Plan.

The Council will be aware that TII was established in August, 2015. TII is the operational name of the National Roads Authority and the Roads Act, 2015, sets out the legal structure for the transfer of the Railway Procurement Agency (RPA) functions, etc., to the Authority.

In that context, TII's observations, provided in the following submission, seek to address issues concerning the safety, capacity and strategic function of the national road network in accordance with the Authority's statutory obligation and the provisions of official policy, and, in terms of the light rail network, to reflect the provisions of the NTA's Draft Transport Strategy for the Greater Dublin Area, 2016 – 2035. To that effect the Authority provides the following comments for the Council's consideration;

PUBLIC TRANSPORT

Light Rail Network

The Council will be aware that the NTA's Draft Transport Strategy for the Greater Dublin Area, 2016 – 2035, includes the project to extend the Luas Green Line to Bray, providing a second rail alternative, connecting to the city centre and major destinations along the corridor at Cherrywood, Sandyford and Dundrum.

While the Authority acknowledges that the Draft Plan is supportive of the proposed Luas Green Line extension to Bray, Objective TR5 and the Strategy for Bray outlined in Section 6.2.6 refer, the Council will note that the NTA Draft Strategy has not provided for an extension/spur to Fassaroe within the current Strategy period, 2016 – 2035.

The Authority considers that it is critical that local area planning in Bray and Fassaroe acknowledges the implications of development proposals in the absence of a Luas public transport option and impacts on the national road network. TII notes that it is an objective of the Draft Development Plan to prepare a new local area plan for the Bray Municipal District over the duration of the Development Plan, Objective SS6 refers, and request consultation on the local area plan process.



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Other Public Transport Proposals

In relation to Objective TR6 which outlines the Council objective to improve the capacity of the N11/M11 from Rathnew to the County Boundary at Bray in a manner capable of facilitating greater free flow of public transport; the Authority advises that safeguarding the strategic function of the N/M11 is critically important to continuing economic competitiveness and any proposals to give effect to Objective TR6 should be complementary to the continued strategic function of the national road concerned. Having regard to the network reviews being undertaken on this stretch of the N/M11 by TII and Wicklow County Council and Dun Laoghaire Rathdown County Council, TII requests consultation on proposals developed to implement Objective TR6.

In relation to Objective TR2, to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors, the Authority considers that park and ride sites should be identified based on a coherent plan-led strategy and the identification of individual sites on a case by case is inappropriate. The Authority would welcome a commitment included in Objective TR2 requiring a co-ordinated plan led approach to the provision of park and ride sites and would welcome consultation on proposals developed in this regard.

NATIONAL ROAD NETWORK

Managing Exchequer Investment and Statutory Guidance

As outlined in the Authority's initial submission on the pre-draft Development Plan consultation, 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. The N/M11/N25 Dublin to Rosslare route is identified as part of the TEN-T Comprehensive Network.

The M11/N11 is an important national road and 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 be aware, from the Authority's initial submissions, of the extensive and on-going analysis into the strategic performance of the N/M11 through Wicklow. While the Draft Plan acknowledges the pattern of commuting established in the County, the real impact of commuting traffic on the N11 is evident in am and pm peak period congestion and flow breakdown which has economic implications and impacts on journey time reliability and predictability for the county, region and nation.

It is noted that Section 9.1.4 of the Draft Plan addresses the need to continue upgrading the N11 and a number of specific objectives for the M/N11 are included in the Draft Plan. The Authority advises that improvements to the N/M11 are not only necessary to meet requirements of existing development and to meet population and employment growth, as identified in the Draft Plan, but, critically, to provide 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 Authority recommends that this wider national and international economic context is also reflected in the Development Plan.

Road Proposals

TII welcomes the inclusion of the proposed objectives that are consistent with the findings and recommendations outlined in the Reports and Studies referred to in the Authority's initial submission and reflect the NTA's objectives in the recently published Draft Transport Strategy for the Greater Dublin Area, 2016 – 2035. However, it is noted that a number of objectives are included in the absence of an evidence base and are not supported by TII or the NTA Draft Transport Strategy, in particular,

- Upgrading the N11 interchange at the Glen of the Downs to facilitate a northern link road from the N11 to Greystones, (also identified as an Objective for Regional Roads),
- Upgrade Ballyronan Interchange to facilitate improved access to Newtownmountkennedy and a possible link road from Ballyronan to Kilcoole,

- The provision of a third interchange on the Arklow Bypass linking the M11 to Vale Road.

a) M11 Arklow Bypass, third interchange

With reference to the provision of a third interchange on the Arklow Bypass, the Authority has previously advised in a submission on the Draft Development Plan, 2010 – 2016, that the Council will be aware that such a proposal is not scheduled in the Authority's programme of work and is not a TII priority. A Motorway Order is required for the development of a new junction on the M11 and the Authority wishes to advise, as before, that it would not be supportive of proposals for a motorway junction at this location.

b) Upgrade to N11 Ballyronan Junction

With reference to Newtownmountkennedy, the Objective to upgrade the Ballyronan Interchange to facilitate improved access to Newtownmountkennedy and a possible link road from Ballyronan to Kilcoole is noted. The Council is aware of potential future capacity constraints at this location arising from planned development in the area included in the existing Local Area Plan and has committed to prepare a framework plan to 'consider all aspects of the existing developed and undeveloped zoned lands in Newtownmountkennedy on the adjacent N11 junction' in the context of other planning permissions granted in this area. The Authority has not received the a copy of the framework plan nor notice that work on the plan has commenced despite the Council committing to undertake this work in 2011. TII considers it premature to include the proposed objective in advance of any works to prepare the committed to framework plan.

TII notes that it is an objective of the Draft Development Plan to prepare a new local area plan for Newtownmountkennedy over the duration of the Development Plan, Objective SS6 refers, and requests consultation on the local area plan. It is the opinion of TII that the local area plan should be progressed in accordance with the findings and recommendations of an agreed framework plan referred to above. The Council will also be aware that the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012) require that development at national road interchanges or junctions needs to be developed in accordance with the evidence base outlined in Section 2.7 of the Guidelines, such an evidence base should support proposals in the proposed Newtownmountkennedy Local Area Plan.

c) Upgrade to the N11 Glen of the Downs Junction

The proposal for upgrading the N11 junction at the Glen of the Downs to facilitate a northern link road from the N11 to Greystones, (also identified as an Objective for Regional Roads), is not a TII priority and is not provided for in the NTA Draft Transport Strategy for the Greater Dublin Area, 2016 – 2035. The Authority is uncertain of the implications such a proposal will have on the NTA Draft Transport Strategy proposal which provides for capacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford). Therefore, TII considers it premature to include the proposed objective in advance of proposals being developed to address N11 capacity enhancement in accordance with the NTA Draft Strategy.

d) Leinster Orbital Route (LOR)

The support for the Leinster Orbital Route in Objective TR20 is noted and welcome. However, the Authority also notes the inclusion of an objective identifying possible route corridors to link from Arklow west to the line of the Leinster Orbital Route, Section 9.1.4 refers. The Council will be aware that such a route from Arklow is not a scheme identified in the NTA Draft Transport Strategy nor one for which national road investment funding is scheduled. However, it is acknowledged that it is beneficial to identify road schemes that are proposed to be delivered at a local level within the term of the Plan. Though, the Council will be aware that TII may not be responsible for financing these additional projects.

e) Other national road proposals

With reference to other national road priority proposals listed in the Draft Plan, it is noted that Section 2.4.6 includes *'the upgrade of the N11 in the north of the County, from the Dublin border as far as Kilpedder, in particular improvements to the M50 / M11 merge which is deficient in capacity, and all interchanges serving Bray'*. However, elsewhere in the Draft Plan, a similar objective in Section 9.1.4 outlines *'upgrading of the N11/M11 between the County boundary and Kilmacanogue / Glen of the Downs, including road capacity and safety improvements to the main carriageway and all necessary improvements to associated junctions'*. The Council will note that these similar

objectives extend from the M50/M11 merge to, in one instance, N11 Junction 11 (Kilpedder) and one extends to N11 Junction 8 or 9 (Kilmacanogue / Glen of the Downs).

In relation to the foregoing, the NTA Draft Transport Strategy actually provides for capacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford); this is consistent with the Authority's own priorities. Therefore, the Authority recommends that the above objectives in Section 2.4.6 and Section 9.1.4 of the Draft Plan are both reviewed to ensure consistency and to align with the proposals outlined in the NTA Draft Transport Strategy for the Greater Dublin Area, 2016 – 2035.

The Authority also acknowledges the proposed road improvement objectives related to the N81 outlined in Section 9.1.4 of the Draft Plan.

Related to the foregoing, the Authority welcomes the inclusion of National Road Objectives TR18 and TR19 concerning the development of the relevant national road schemes and reserving road improvement corridors free from development which would interfere with the provision of the scheme.

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, the relative priority or timeframe for national road schemes may be subject to alteration.

DoECLG Spatial Planning and National Roads Guidelines (2012)

In addition to the above, TII's submission on pre-draft consultation advised that 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 (DTAS, 2009) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

The Authority welcomes the provisions of the Draft Plan that promote settlements of such form and layout that facilitates and encourages sustainable forms of movement and transport and the use of Integrated Land Use and Transport Studies; Section 9.1.1 refers. In the Authority's opinion, such policies assist to safeguard the strategic function of the national road network, in accordance with the requirements of official policy, and would support the overall Settlement Strategy and the Economic Strategy included in the Draft Plan. Policies and objectives that undermine the safety, efficiency and capacity of the national road network will conflict with achieving the aims and objectives of the Strategies concerned.

In addition, the Authority notes and welcomes the principles to be applied to the zoning of new employment lands included in Section 5.4 (ii) (b) of the Draft Plan.

Access to National Roads

Related to the foregoing, the Authority welcomes the inclusion of Objective TR21 in relation to safeguarding the capacity and safety of the national road network in line with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012).

It is noted that Objective TR24 outlines that a new means of access to a national road will generally not be permitted except in specified circumstances. The Council will note that the DoECLG Spatial Planning and National Roads Guidelines (2012) indicate that a new means of access and the intensification of a direct access to a national road outside urban areas should be avoided. TII would welcome clarification in relation to 'intensification' being included in Objective TR24 in the interests of consistency with the provisions of the DoECLG Guidelines.

In addition, it is noted that Objective TR24 makes reference to the NRA 'Policy Statement on Development Management and Access to National Roads (2006)', however, the Council will be aware that the policy statement

was replaced by the Department's Spatial Planning & National Roads Guidelines (2012). It is recommended that Objective TR24 is updated accordingly. The Council will also note that any 'exceptions' to the restriction on access to national roads are required to be identified plan-led in accordance with Section 2.6 of the DoECLG Guidelines. This should also be reflected in the Development Plan, in the interests of clarity.

The Authority considers that this element of the Draft Plan requires review and in the context of developing/agreeing 'exceptional circumstances' in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines, the Authority is available to discuss proposals with the Executive of Wicklow County Council. Where the Council proposes to identify 'exceptional circumstances' for agreement a sufficient and robust evidence base would need to be established in consultation with the Authority.

Similarly, Section 7, National Road Development Objectives outlined in the Development and Design Standards accompanying the Draft Plan will also need to be reviewed.

While the Authority remains available to discuss proposals in this regard with the Executive of the Council, the Authority does not support the provision of 'exceptional circumstances' as currently presented in the Draft Plan and considers the provisions to be at variance with the evidence based plan-led approach required by the DoECLG Spatial Planning and National Roads Guidelines. Accordingly, TII requests that Objective TR24 and Section 7 National Road Development Objectives are reviewed.

Development at National Road Junctions

There are a number of development objectives included in the Draft Development Plan that TII consider require review to ensure consistency with the Transport Strategy, National Road Objectives and Land Use Zoning Principles outlined in the Draft Plan and the provisions of both the NTA Draft Transport Strategy and official policy outlined in the DoECLG Spatial Planning and National Roads Guidelines, in particular;

- Objectives for Economic Development; Objective EMP 12
- Tourism and Recreation Objectives; Objective T20
- Health and Care Objectives; Objective CD17

a) Objectives for Economic Development; Objective EMP 12

The above objective seeks to provide for employment development at a number of specific locations that interface with the strategic national road network. The Council will be aware that the Authority has previously commented on a number of the relevant zoning proposals during the process of drafting and adoption of the County Development Plan, 2010 – 2016. The positions outlined below, reflect the observations made on the proposed amendments to the Draft County Development Plan, 2010 – 2016, in June, 2010.

In the interim, the Council will further be aware that the DoECLG has published the Spatial Planning and National Roads Guidelines (2012) and in the Authority's opinion, there is now a requirement to demonstrate that the zoning proposals included in Objective EMP 12 are consistent with the requirements of the DoECLG Guidelines prior to adoption in the new Development Plan.

The Council will note the requirement for evidence based analysis when proposing zoning objectives/designations at junctions on national roads. It appears that this is absent. It is the Authority's opinion that it is premature to adopt the zoning proposals at junctions on the N/M11, in the absence of the required evidence base outlined in Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

The Authority outlines the following observations in relation to the specific locations concerned;

Map ref. 5.01 (Mountkenedy Demesne, Kilpedder); indicates a proposed zoning objective to facilitate a Data Centre facility. TII acknowledges the planning history of the subject site. As indicated above, the Council has previously committed to preparing a framework plan for lands adjoining the N11 junction at this location. This framework plan remains outstanding. The proposals to zone lands at this location appear to be inconsistent with the zoning principles outlined in Section 5.4 (ii) (b) of the Draft Plan and are proposed in the absence of the evidence base required under Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

Furthermore, in advance of studies/options to implement identified 'essential improvements' to the N11/M11, the proposal is considered premature and has the potential to conflict with Objectives for the M/N11 included in Section 9.1.4 of the Draft Plan including road capacity and safety improvements to the main carriageway and associated junctions and the provisions of the NTA Draft Transport Strategy.

The Authority previously collaborated with Wicklow County Council on development proposals at this location on the basis that a framework plan for lands adjoining the N11 junction at this location would be prepared by the Council. This remains unaddressed and TII respectfully requests the Council to consider the proposed zoning designation in the context of the foregoing observations and objectives.

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 the Newtownmountkennedy local area plan under Objective SS6; please find attached copy of referred to correspondence.

Map ref. 5.03 (Kilmurray South) and Map ref. 5.04 (Kilmurray North); the Authority is concerned with the proposal to zone lands for 'transport purposes development' within the N11 junction at Kilmurray South and the proposed zoning designation for 'warehousing/storage/distribution and commercial vehicle park' at Kilmurray North

The proposals appear to be progressed in the absence of any evidence based basic transport assessment, the lands are remote from any established settlement and appear almost completely reliant on access by private car.

Furthermore, in advance of studies/options to implement identified 'essential improvements' to the N11/M11, the proposal is considered premature and has the potential to conflict with Objectives for the M/N11 included in Section 9.1.4 of the Draft Plan including road capacity and safety improvements to the main carriageway and associated junctions and the provisions of the NTA Draft Transport Strategy.

The Authority recommends review of the proposed zoning objectives having regard to the impact the development of such lands could have on the safety and efficiency of the national road network in the area and the impacts such proposals may have for any future upgrade works at the locations concerned.

Map ref. 5.06 (Kilpedder Interchange); although the subject site may be accessed from the non-national road network, the implications for the N11 are not clear. In the absence of appropriate TTA or strategic traffic/transport assessments to indicate clearly the implications for the N11, the Authority has to maintain its position initially outlined in 2010; please see copy attached.

Furthermore, in advance of studies/options to implement identified 'essential improvements' to the N11/M11, the proposal is considered premature and has the potential to conflict with Objectives for the M/N11 included in Section 9.1.4 of the Draft Plan including road capacity and safety improvements to the main carriageway and associated junctions and the provisions of the NTA Draft Transport Strategy.

Map ref. 5.07 (Rathmore, Ashford); the Authority is concerned with the proposal to zone lands for a general 'employment' designation in such close proximity to M11 Junction 15 having regard to the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012).

The proposal appears to be progressed in the absence of any basic transport assessment, the lands are remote from any established settlement and appear almost completely reliant on access by private car. The Authority recommends removal of the proposed zoning designation having regard to the impact the development of such lands could have on the safety and efficiency of the national road network in the area and having regard to the requirements of official policy outlined in the DoECLG Spatial Planning and National Roads Guidelines (2012).

Map Ref. 5.08 (Ashford); the Authority acknowledges the purpose of the proposed zoning objective to support the development of established film studios in the area. However, the zoning proposal is progressed in the absence of

any basic transport assessment and evidence base as required by the DoECLG Spatial Planning and National Roads Guidelines.

The Authority notes that the specific zoning objective at this location requires the agreement of a Masterplan for the entire area. The Authority considers that such an approach to be inappropriate given the significant strategic national road network issues that are unresolved in the proposed zoning designation, specifically concerning the absence of appropriate transport assessment or transport modelling as part of the required evidence base.

With regard to the approach to require a Masterplan, TII would draw the Councils attention to the provisions of both the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines which advise that such plans can supplement or complement but not replace statutory plans.

Also, the DoECLG Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use such non-statutory documents for development management, planning authorities should incorporate them in the development plan or local area plan for the area by way of variation and where possible, public consultation should be integrated into the preparation on non-statutory frameworks. This is not evident in the proposals to zone the subject lands.

There is an absence of appropriate Plan-led evidence based planning and the absence of future liaison and collaboration with TII in relation to planning exercises promoted by the local authority that have significant implications for the strategic national road network in the area concerned. The Authority considers that such issues should be addressed in advance of any decision to adopt the subject zoning designation proposed in the Draft Plan.

b) Objectives for Integrated Tourism/Leisure/Recreational Complexes; Objective T20

In addition to the foregoing, the Authority also notes the Tourism and Recreation Objective (Objective T20) supporting development of existing/proposed integrated tourism/leisure/recreational complexes at Jack Whites Cross; Map ref. 7.08 in the Draft Plan.

The Authority is concerned with the proposal to zone lands in such close proximity to a new junction of the recently completed M11 having regard to the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012).

The Authority considers that it is premature to include the proposed zoning designation in the Draft Plan in the absence of the required plan-led evidence based data required in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012) and having regard to the potential impact the development of such lands could have on the safety and efficiency of the strategic national road network in the area.

Accordingly, the Authority respectfully requests that the Council review the proposed zoning designation prior to the adoption of the County Development Plan, 2016 - 2022.

c) Health and Care Objectives; Objective CD17

In addition to the foregoing, the Authority also notes the proposed objective to provide residential care facilities at Killickabawn, Kilpedder; Map ref. 8.04 refers. This zoning designation should also be considered in the context of Map 5.06 which promotes a zoning designation for a variety of employment types including transport distribution, warehousing and retail warehousing.

The proposal appears to be progressed in the absence of any basic transport assessment and the lands appear almost completely reliant on access by private car. Identifying such lands in proximity to the N11 and associated junction is not considered a practice consistent with the requirement to provide future upgrades to the N11 or this junction included in Section 9.1.4 of the Draft Plan.

The proposals to zone lands at the identified locations, above, appear to be inconsistent with the zoning principles outlined in Section 5.4 (ii) (b) of the Draft Plan and all appear to be proposed in the absence of the evidence base required under Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

In that regard, TII respectfully requests the review of the zoning designations at the sites identified above and the omission of the zoning designation where requested.

The Council is advised that the Authority aims to protect the strategic national investment in the national routes in Wicklow and will, if necessary, appeal any decision to grant planning permission, which it considers, undermines this investment.

Specific Policies and Objectives

General Comments and Cross - Referencing

The Authority acknowledges and welcomes the inclusion of objectives in the Draft Plan that relate to safeguarding the strategic function of the national road network. However, it is noted that there are a number of policies and objectives outlined elsewhere in the Draft Plan, and, if read in isolation may not guide applicants/developers to appropriate policy concerning development impacting on national roads.

Such policies and objectives include, Objective EMP6 and associated text in Section 5.4 concerning wholesale, retail trade, transportation and storage, Objectives for Wicklows Rural Economy, including the Extractive Industries (Section 5.6 refers), Tourism and Recreation Objectives in Section 7.4 of the Draft Plan and Rural Retailing, Objective RT29.

In that regard, TII would welcome, in the interests of clarity, additional cross referencing in the Draft Plan between Section 9.1.4 National Roads and policies and development objectives that facilitate development proposals with the potential to impact directly on national roads or that generate a transport demand on the national road network contained elsewhere in the Draft Plan.

The Authority, as noted above, remains available to discuss proposals relating to circumstances where access to national roads may be provided in 'exceptional circumstances' with the Executive of the Council in a manner that is complimentary to achieving Government objectives in relation to national roads and to conform with the foregoing provisions of official policy.

Rural Housing

In terms of the Draft Plan approach to Rural Housing, the Authority acknowledges the tradition of rural living in County Wicklow and the identified need of particular rural housing categories to live in the countryside. The Authority notes the policy response developed in Section 4.4 of the Draft Plan.

Consistent with the provisions of the DoECLG Spatial Planning and National Roads Guidelines, it is the opinion of the Authority that such rural housing development needs to be facilitated in a manner that does not conflict with safeguarding the strategic function of the national road network in the area concerned, in the interests of road safety and in accordance with the provisions of official policy.

The Council will also be aware of the provisions of Section 3.3.4 of the Sustainable Rural Housing Guidelines (2005).

Related to the cross referencing requested above, the Authority notes the provision of Objective HD21 which states that in the event of conflicting policies, a housing need in accordance with Objective HD21 will over-ride conflicting objectives except where this may relate to a traffic hazard or public health hazard.

The Authority also requests a cross reference to Objective TR24 of the Draft Plan to ensure applicants/developers are fully aware of the provisions of official policy concerning access to national roads at the earliest stages of project development to ensure consistency with the provision of official policy.

Retailing

The Authority notes and welcomes the support for safeguarding town centres and promotion of the sequential test outlined in the Objectives for Centres and Retail.

In addition, the Authority notes the presumption against large out of town retail centres, in particular those located adjacent or close to existing, new or planned national roads/motorways outlined in Objective RT23. However, the Authority is seriously concerned with the additional text included in Objective RT23 which indicates that large retail warehouses may be considered at locations close to such networks. This exception, in the Authority's opinion, is at variance with the provisions of the Retail Planning Guidelines and the DoECLG Spatial Planning and National Roads Guidelines; the Authority recommends its removal.

Accordingly, the Authority would welcome Objective RT23 being reviewed prior to adoption of the Development Plan to ensure consistency with the provisions of official policy. The Authority considers that any development objective or zoning designation identified in proximity to the strategic national road network should be advanced plan led in accordance with the provisions of Section 2.7 of the Spatial Planning and National Roads Guidelines.

Similarly, the Council are requested to consider including specific reference to the presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways as an additional bullet point in Objective RT32.

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.

In that regard, the Authority notes the reference to the TII/NRA Traffic and Transport Assessment Guidelines in the footnote to Objective RT9 but would advise that the Authority reviewed and updated the Guidelines in 2014, the Council may consider it appropriate to update the reference in the Draft Plan accordingly. The Authority also welcomes reference to the TII/NRA TTA Guidelines in Objective TR15.

In relation to proposed Objective TR23, TII is of the opinion that all planned development in an area should be considered when assessing the cumulative impact of development in a traffic and transport assessment and not only development that has planning permission. In that regard, the potential for zoned lands to generate a transport demand, where such lands are in proximity to a national road and/or national road junction, should also be considered in cumulative impacts. The Authority requests that this is reviewed and included in a revised Objective TR23.

Service Areas

The Authority notes that Objective RT34 addresses the provision of on-line and off-line service areas and notes the reference to the DoECLG Spatial Planning and National Roads Guidelines.

In addition, the Council will be aware that the Authority has updated and issued the NRA/TII 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 of the Service Area Policy. The Authority would welcome reference in the Draft Plan to the Service Area Policy and its provisions being reflected therein.

Signage

The Authority acknowledges that advertising and signage has been addressed in Section 9.1.7 of the Draft Plan and the reference to NRA/TII Policy on the Provision of Tourist and Leisure Signage on National Roads is welcome. However, the Planning Authority is also referred to Section 3.8 of the DoECLG 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 reference to Section 3.8 of the DoECLG Guidelines within the relevant sections of the Draft Plan in the interests of clarity.

The Authority is of the opinion that the exceptions to the general presumption against signage on national roads included in both Objective AS2 and AS3 is contrary to the provisions of the DoECLG Guidelines and TII requests that the Council review this matter in the interests of road safety and consistency with official policy.

Noise

Although the Authority acknowledges that Noise is addressed in Section 9.3.5 and in the Development and Design Standards of the Draft Plan, the Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the adopted Plan and the requirements of Section 3.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012).

Local Area Plans/Development Strategies

The Authority notes the commitment to prepare new local area plans for the main settlements in the County included in Objective SS6; the Authority would welcome consultation on the relevant local area plans where there may be implications for the national road network in the area.

In relation to existing settlement plans and local area plans included in the Draft Plan, the Authority provides the following observations;

The settlements at **Barndarrig, Hollywood, Kilpedder/Willowgrove and Kilmurray (Kilmac)** all adjoin the national road network. The Authority recommends that access to lands identified in the settlement plans should conform to the requirements of the DoECLG Spatial Planning and National Roads Guidelines concerning the general restriction on access to national roads.

Ashford Town Plan

Having regard to the nature and extent of the lands identified for future development in the Town Plan area including other employment development objectives included in the Draft Plan and proximity to the nearby N11, national primary road, and associated junctions, the Authority recommends that future development proposals are progressed in accordance with the requirements of the Draft Plan concerning Traffic and Transport Assessments; the cumulative impact of planned development should be considered in relevant TTA undertaken. Regard should also be had to Section 7 Set Backs from Public Roads of the Development and Design Standards accompanying the Draft Plan.

Regard should also be had to requirements for addressing environmental noise issues in new development having regard to the proximity of proposed new residential zoned lands to the M11 and the need to provide suitable protection from impacts associated with traffic noise.

Kilmacanogue Settlement Plan

The Council will note from the Authority's submissions on the previous settlement plan proposals for Kilmacanogue that the Authority has carried out analysis on the level of inter-action between the national and non-national road network along the N11 route with a view to suggesting integrated road proposals for consideration. The Authority issued the 'M11/N11 Merging Study Report' and the 'N11 Corridor Review – Fassaroe Junction to Kilmacanogue, Co. Wicklow' Report to Wicklow County Council in April, 2010. Further to that, the Authority has also progressed the M50/M11/N11 Corridor Study (2012).

Objective 2 of the Draft Settlement Plan allows for a feasibility study and public consultation to investigate the possibility of providing a new road to the east of Kilmacanogue which would, amongst other things, provide alternative access to properties currently directly accessed from route N11.

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

In addition to Objective 2 of the Draft Plan, the Council may consider it beneficial to review the recommendations of the M50/M11/N11 Corridor Study with a view to establishing specific proposals that can be incorporated into the plan, promote the development of safe and accessible pedestrian and traffic routes and address the lack of integration between the properties on the east side of the N11 with the majority of services located on the west

side. The proposals also benefit through traffic on the strategic national road network. TII is available to discuss proposals with the Executive of the Council as they develop in this regard.

CONCLUSION

The Authority acknowledges the significant undertaking for the Council in drafting a development plan and the requirement to consider and address a multiplicity of factors in developing a sustainable spatial planning framework not just issues relating to national roads.

The Authority acknowledges and welcomes the generally positive alignment in the Draft Plan with official policy concerning development planning and development management and national roads and compliments the Council in this regard. Notwithstanding this there are a number of specific interactions between land use policy and development objectives included in the Draft Plan and the strategic national road network in Wicklow that the Authority considers require necessary review prior to the adoption of the Development Plan to ensure consistency with official policy and in order to safeguard the strategic function of the national road network in the area.

It is respectfully requested that the above observations are taken into consideration prior to the adoption of the Wicklow County Development Plan, 2016 – 2022.

As outlined above, the Authority is available to meet the Executive of the Council to discuss any issues arising in the foregoing or other matters related to the Development Plan and national roads.

Yours sincerely,



Michael McCormack
Policy Adviser (Planning)



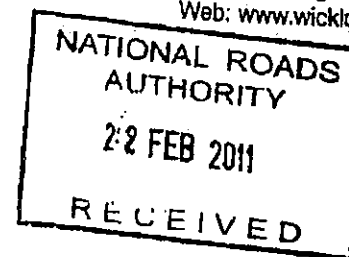
Comhairle Chontae Chill Mhantáin
WICKLOW COUNTY COUNCIL

Your Ref: 18th February 2011

Our Ref:

Mr. Fred Barry
Chief Executive
National Roads Authority
St. Martin's House
Waterloo Road
Dublin 4

Aras An Chontae,
Cill Mhantáin.
Telefón : (0404) 20100
Fax No : (0404) 67792
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Dear Mr. Barry,

I wish to acknowledge receipt of email sent to the Cathaoirleach on the 17th February 2011 (and copied to the County Manager) indicating your intention to withdraw the N.R.A. appeal against the County Council grant of permission on 28th July 2010 for a proposed Data Centre at Newtownmountkennedy.

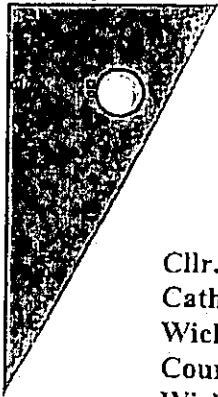
At the meeting held on the 29th October 2010 at your offices between, inter alia, the Cathaoirleach, members of Roads & Transportation S.P.C. of Wicklow County Council, Andrew Doyle T.D. and Mr. Michael Egan N.R.A., the County Manager undertook to develop a traffic framework plan to consider all aspects of the existing developed and undeveloped zoned lands in Newtownmountkennedy on the adjacent N11 junction.

The County Manager confirmed this to you in letters dated 2nd November and 10th December 2010 (copies attached).

In the absence of the County Manager I am happy to again confirm the County Council's commitment in relation to this matter. We will do everything possible to progress the preparation of this plan, and I see no reason why this should not be finalised in 2011.

Yours Sincerely

Bryan Doyle
Deputy County Manager



Cllr. Tom Fortune
Cathaoirleach
Wicklow County Council
County Buildings
Wicklow

17th February 2011

NRA11-81477

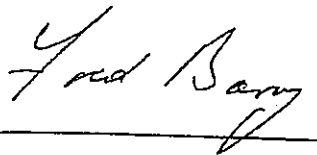
Dear Cathaoirleach,

Thank you for your letter of 10th February 2011 concerning the data centre planning permission at Newtownmountkennedy.

Given the importance of the development in question, the Authority is willing to withdraw its objection to this planning permission if Wicklow County Council will commit that within a reasonable period, say during 2011, they will provide an assessment of the traffic impact of the fully developed zoned lands on the nearby N11 junction, together with a funding plan for how any necessary upgrade might be funded without recourse to the NRA. This need not involve any contribution from the currently contested data centre.

If this is acceptable, and I would note that Wicklow County Council is required to do this in any event under the Department of the Environment, Heritage & Local Government guidelines, we will withdraw our objection immediately.

Yours sincerely,



Fred Barry
Chief Executive

c.c.: Mr. E. Sheehy, County Manager, Wicklow County Council

Sorcha Walsh
Senior Planner
Planning & Economic Development
Wicklow County Council
Áras an Chontae
Station Road
Wicklow Town

16 June, 2010

NRA10-78848

Re: Proposed Amendments to the Wicklow Draft County Development Plan 2010 - 2016

Dear Ms Walsh,

The Authority welcomes the referral of the proposed amendments to the Wicklow Draft County Development Plan, 2010 – 2016.

The Authority has reviewed the proposed amendments in the context of the Authority's submission of 18th December, 2009, to the Wicklow Draft County Development Plan, 2010 - 2016. The Authority wishes to outline its comments, in the order the proposed amendments have been published, as follows;

Chapter 3 Vision & Strategic Goals;

The Authority notes that proposed amendment no 1 indicates that, having regard to the likely continuing car dependency to access the metropolitan area in the short to medium term, it is the Councils strategy to facilitate the improved use of the national routes by public transport, section 3.3.3 refers.

The Authority reiterates comments made to the Council in the initial submission on the Draft Plan; *'while the Authority is positively disposed towards assisting public transport, there are a number of critical issues that would need to be addressed in the development of any bus priority measures on the M11/N11 corridor due to the particular constraints and circumstances that exist on this corridor. The Authority would welcome consultation on any proposals brought forward with reference to such a scheme'*. This remains the position of the Authority and the Council are welcome to discuss any proposals in relation to the improved use of national routes by public transport with the Authority. The Authority will seek to ensure that the primary function of national roads remains that of facilitating inter-urban, inter-regional traffic on a safe and efficient road network.

Chapter 6 Rural Housing & Development;

The Authority notes proposed amendment no. 10, the Authority requests that cross reference is made with section 11.7.2 indicating that direct access for residential development to a national road network outside areas to which a 50kph urban speed limit applies is restricted in accordance with official policy. It is considered that such a cross reference would bring added clarity to the Development Plan.

Chapter 7 Enterprise & Employment;

With reference to proposed amendment no. 14, the Authority advises that it is seriously concerned with the proposed zoning amendments in relation to potential impact on the safety and efficiency of the national road network.

Map ref. no. 7.01 indicates a proposed zoning objective to facilitate a Data Centre facility, the identified lands are subject to a current planning application, file ref. 10/2123 refers, on which the Authority submitted observations to Wicklow County Council. The Authority indicated that it was considered that the proposed development was at variance with official national policy in relation to control of frontage development on/affecting national roads for a number of reasons, including;

- that insufficient data had been submitted with the planning application to demonstrate that the proposed development would not have a detrimental impact on the capacity, safety or operational efficiency of the national road network in the vicinity of the site.
- it has not been demonstrated that the proposed development will not detrimentally impact the carrying capacity and safety of the N11, including the Ballyronan interchange, and thereby also compromise the on going public investment in the N11. The traffic impact assessment submitted in support of the planning application explicitly indicates that Ballyronan Interchange will be operating at or above capacity by 2010 as a result of the cumulative impact of traffic generated by the proposed development and the development of the adjacent employment lands included in the Newtownmountkennedy Local Area Plan 2008 – 2014.
- the proposal does not address the need for a coordinated approach required by Wicklow County Council for the upgrade of the junction, which needs to be addressed as further lands zoned for development come on stream. The approach needed includes funding arrangements for interchange improvements required to facilitate the zonings proposed for the area which should be borne by developers and Wicklow County Council.
- the proposed development is considered premature pending the design and provision of suitable and appropriate identified upgrades to the Ballyronan Interchange, including the necessary statutory approvals, to undertake the required works in the interests of traffic safety and maintaining the capacity and efficiency of the heavily trafficked N11.

Having regard to the foregoing, the Authority retains the position that the proposed zoning, including a specific objective to facilitate a Data Centre Facility, is premature pending resolution of the above matters. It has not been demonstrated that the proposal will not have a negative impact on the safe and efficient operation of the adjacent N11 and associated junction. It is recommended that the subject zoning designation is omitted from the County Development Plan.

The Authority would also highlight that the subject lands are removed from the established development centre of Newtonmountkennedy and are remote from public transport options which results in a car dependant location. It is difficult to rationalise the proposed amendment with Government key goals set out in Smarter Travel - A Sustainable Transport Future which seeks to reduce overall travel demand and commuting distances travelled by the private car supported by the aim that work related commuting by car will be reduced from a current modal share of 65% to 45%.

It is also noted that the subject lands, although zoned in the current County Development Plan were associated with an objective that the zoning designation would expire with the current Plan.

Map ref. no. 7.03 and 7.06; The Authority is concerned with the proposal to zone lands for transport purposes development within the N11 junction at Kilmurray South and proposals for a zoning to facilitate an arts and crafts development on the opposite side of the N11.

The proposals appear to be progressed in the absence of any basic transport assessment, the lands are remote from any established settlement and appear almost completely reliant on access by private car. Identifying such lands in proximity to the N11 and associated junction is not considered a practice consistent with the requirement to provide future upgrades to the N11 or this junction. The Authority recommends removal of the proposed amendments having regard to the impact the development of such lands could have on the safety and efficiency of the national road network in the area.

Map ref. no. 7.04; Similar to the foregoing comments, the Authority is concerned in relation to the potential impact the development of the subject lands for warehousing/storage/distribution/commercial vehicle park at Kilmurray North will have on the N11 which has a 100kph speed limit at this location. The Authority is concerned that the nature of development proposed has the potential to compromise the levels of service and safety on the N11, in addition, the Council will be aware that direct access to the national road network at a location where a 100kph speed limit applies is at variance with official policy.

Map ref. no. 7.05; The Authority is of the opinion that the zoning of the subject lands for light industrial use, business use, etc. at Scratenagh Crossroads is at variance with the proper planning and sustainable development of the area. The subject lands are remote from any established settlement and adjoin the national road network where a 100kph speed limit applies. Where an alternative access to the local road network is available this should facilitate access. The Council should assess the prematurity of the proposed zoning designation in the context of the N11 Arklow – Rathnew Scheme.

Map ref. no. 7.07, 7.08 and 7.09; The Authority notes the proposed extensive zoning designation at Kilpedder Interchange for uses that extend to employment, industrial and retail warehousing.

The Authority is of the opinion that such a zoning objective is at variance with the proper planning and sustainable development of the area. The location of the subject zoning adjacent to the N11 and associated junction is considered at variance with official policy to protect the carrying capacity, efficiency and safety of the national road network. The subject lands are removed from any established settlement and are at a location where travel patterns to the lands will be dominated by private car, such siting is considered inconsistent with Government targets to reduce overall travel demand and commuting distances travelled by the private car as outlined in Smarter Travel.

In addition, the Council will be aware of the provisions of paragraph 26 of the Retail Planning Guidelines (2005) which schedule an explicit presumption against locating large retail developments at locations adjacent or close to existing, new or planned national roads/motorways. The Council will also be familiar with the objectives of the Retail Planning Guidelines outlined in paragraphs 24 and 25 of the document which support locating development at locations which are accessible by a range of transport options and that support the consolidation of existing centres as the preferred location for developments that attract many trips.

The Authority also notes that the proposed zoning objective detailed on Map ref. no. 7.07 extends across the mainline N11.

Having regard to the foregoing, the Authority considers the principles outlined above equally apply to the proposed amendments to designate employment lands at Ashford, map ref. no. 7.08 and to designate commercial lands at Rathnew, map ref. no. 7.09 refers and it is recommended that the proposed amendments are not adopted.

In addition to the foregoing, the proposed zoning designations, map ref. no. 7.01 and map ref. no 7.03 – 7.09, are considered at variance with the strategic goal of the Council, Goal 3 of the Draft Plan, to integrate land use planning with transportation planning, with the dual aim of reducing the distance that people need to travel to work, shops, schools and places of recreation and social interaction, and facilitating the delivery of improved public transportation.

The Authority respectfully requests the omission of the zoning designation at the identified sites and that proposed amendment no. 14 is not adopted.

The Council is advised that the Authority aims to protect the strategic national investment in the national routes in Wicklow and will if necessary appeal any decision to grant planning permission, which it considers, undermines this investment.

Chapter 8 The Rural Economy;

Having regard to the foregoing comments, the Authority would welcome clarification in relation to proposed amendment no. 17 to indicate that proposed commercial/industrial developments in rural areas would still be subject to normal principles of good planning practice and a cross reference be provided with proposed new Objective NR7, proposed amendment ref. 37 refers, and section 11.7.2 indicating the Councils policy to safeguard the capacity, operational efficiency and safety of the national road network and associated junctions.

Chapter 10 Retail;

While the Authority acknowledges that proposed amendment ref. 31 relates to design considerations; it is noted that the amendment proposes a significant introduction of text in relation to edge of centre/out of centre retail sites. In this regard, the Authority requests the inclusion of a specific reference to paragraph 26 of the Retail Planning Guidelines (2005) noting the explicit presumption against locating large retail developments at locations adjacent or close to existing, new or planned national roads/motorways in the interests of clarity and the Councils adherence to official policy in this regard.

Chapter 11 Transportation;

The Authority's initial submission referenced the Councils proposed policy on the provision of Park & Ride sites, in this regard the proposed amendment to Policy PT 2 is noted. The Authority would welcome additional clarity to the amendment concerning Policy PT 2 advising that the provision of Park & Ride sites 'at appropriate locations along strategic transport corridors' would be facilitated through the preparation of a Park & Ride Strategy to be undertaken by the Council in association with stakeholders, including transport providers.

It is the Authority's opinion that the identification of individual park and ride sites should not be brought forward in the absence of a strategic policy on the provision of park and ride sites which itself identifies appropriate locations for required facilities in a co-ordinated way, including appropriate strategic transport assessments.

The Authority would welcome consultation on any proposals brought forward with reference to a Park & Ride Strategy.

With reference to proposed amendment ref. no. 37, the Authority notes proposed Objective NR7 and respectfully suggests the following minor amendment to the text of proposed Objective;

It is an objective of the Council to protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions. Significant applications either in the vicinity of or remote from the national road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development taken in conjunction with the cumulative impact of other development and/or development lands that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts.

As outlined in the Authority's initial submission on the Draft Plan, the location and capacity of junctions/interchanges on national roads are determined during the road planning process having regard to a range of factors and taking account, in particular, of anticipated inter-urban and inter-regional traffic volumes over a design horizon of at least 20 years. A key objective of the approach to road planning is to achieve a satisfactory level of service for road users and to protect and maintain that service over the design period applying to the mainline road and associated interchanges. In these circumstances, it will be necessary for planning authorities to exercise particular care in their assessment and management of development proposals that impact on the operation, safety and efficiency of the national road network and associated

junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

The Authority notes the amendment to Section 11.7.2 and welcomes clarification in relation to the consideration of exceptional circumstances in accordance with NRA policy. The Authority also welcomes deletion of the circumstances whereby rural housing accessing national roads was considered acceptable, proposed amendment no. 40 refers in both instances. The Authority supports this amendment having regard to official policy as outlined in the Authority's initial submission and the provisions of the Sustainable Rural Housing Guidelines (2005).

The Authority is concerned that a potential effect of proposed amendment ref. 42 would be to compromise the future upgrade or improvement of national roads/motorways and associated junctions if a building line set back of only 20m is applied to development adjacent to national roads. The impact on road safety as a result of driver distraction should also be considered having regard to ancillary development associated with commercial development, be it exempt development or otherwise. The Council should also be aware of the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in this regard. The Authority would support the retention of the original set back standard outlined in the Draft Plan having regard to the foregoing.

Chapter 15 Social & Community Infrastructure, Including Open Space;

In relation to proposed amendment ref. 56, designating lands at Killickbawn, Kilpedder for a residential care facility, the Authority recommends that an appropriate assessment of the traffic impact of such a development on the national road should accompany any planning application. Any application should also consider the effect of noise from the adjoining road network and provide appropriate mitigation measures, all costs in this regard shall be borne by the applicant/developer.

Conclusion;

It is requested that the foregoing comments and observations are taken into consideration in the making of the Wicklow County Development Plan, 2010 – 2016.

Yours sincerely,

Michael McCormack
Policy Advisor (Planning)