



Submission to Department of Transport, Tourism and Sport on the Draft Tourism Policy Statement

Unlocking the Significant Potential of the 65+ Market

1.0 Introduction

This submission to the Tourism Policy Review 2013/2014 has been prepared by Age Friendly Ireland.

Established since January 1, 2014, the key purpose of Age Friendly Ireland is to manage the now five year old national Age Friendly Cities & Counties Programme. Age Friendly Ireland is in pursuit of a vision that *"every county in Ireland will be a great place in which to grow old."* Local older people are key to the process – their voice is at the heart of the Age Friendly programme design in every city or county. Age Friendly Ireland has been tasked with supporting the extension of the national roll-out of this Programme to *all* Local Authority areas by the end of 2015.

Age Friendly Ireland welcomes this opportunity to contribute to the shaping of a National Tourism Policy for Ireland.

1.1 About the Age Friendly Cities and Counties Programme

The Age Friendly Cities & Counties Programme supports the development of communities where people, as they age, can continue enjoy a good quality of life and continue to participate fully in their communities. The model is based on the World Health Organisation (WHO) Age-Friendly Cities Framework and Guidelines which were developed in recognition of the challenges and opportunities that societies will face as they respond to an unprecedented growth in the number of older people living in our communities. It is our belief that this Programme can have a very considerable and positive impact on the tourism sector in Ireland, in particular in the 65+ market. As our communities move towards becoming age friendly they are better equipped to serve the needs of the older tourist, whether from Ireland or abroad.

This submission outlines the rationale for a specific focus on the rapidly expanding and extremely valuable senior tourist (65+) market segment. The structure of this submission follows the structure set out within the draft policy – “A National Tourism Policy for Ireland”.

2.0 Creating the desire to travel and meeting the visitor expectations

2.1 Population change – More people are living longer, holidaying more and seeking different experiences

Throughout the developed world, people are living longer, healthier lives. Life expectancy is increasing at a rapid rate – 2.5 years per decade which translates to 5 hours per day. For the first time in human history, there will soon be more people in the world over 60 than there are children under the age of five.

Key Market Segments

The Draft National Tourism Policy recognises the following key market segments: the **Culturally Curious, Great Escapers and Social Energisers**. Research would indicate that the ‘older’ demographic is becoming increasingly diverse with considerable scope for older tourists to be classified simultaneously under all three categories. The variation and diversity amongst the older demographic is only likely to increase as levels of education and engagement (cultural, political, social, civic and other forms of engagement) amongst our ageing population continues to increase over time.

At a practical level, older people in the main, have access to income and the available time to take extended breaks and to explore different places both nationally and internationally. According to Eurostat 43 (2012), by 2020 the share of the 65+ to total European population will reach 20% and by 2035 it will have reached 25%. As a share of the tourism market in 2011, the 65+ market accounted for 20% of total tourism expenditure and 30% of package travel expenditure. The average 65+ tourist spent €1,344 on long tourism trips in 2011 (11% above the general population average of €1,203) accounting for €53 billion being spent by them 23.7 billion on domestic trips and €29.5 billion on outbound trips (outside their country of origin). The report recorded that in the period 2006 – 2011 the 65+ market segment was the only one to show increases in tourism trends, increasing by 10% over this period compared to other market segments. The 65+ market segment made 29% more trips and 23% more overnight stays in 2011 than they did in 2006. The tourism expenditure of the 65+ market segment grew 33% over this period to 20% of *all* tourism spending of Europeans compared to 15% in 2006. These statistics demonstrate the significant role and valuable

contribution that the 65+ market segment plays in tourism today. The data would also point to the potential to further develop this market segment into the future.

In an Irish context, Eurostat predicts that the population percentage of 65+ in Ireland will increase from 11.3% in 2010 to 16% in 2030. The Central Statistics Office predicts that, over the next 30 years, the number of people over the age of 65 will double and the number over 80 will quadruple.

These changing demographics have major implications for public policy, services provision, long-term planning and society as a whole across areas as diverse as housing, planning, transport, health, local government, education, work, enterprise development, the arts and volunteering and in particular tourism. The Age Friendly Cities and Counties Programme embraces the multi-faceted challenges and opportunities that ageing presents by providing a structure and supports which enable Local Authorities to take the lead on changing thinking about ageing, how services are planned and delivered and how the economic potential of the older market is tapped into both at home and abroad. The potential of this change has been recognised by the EU Commission. In a communication (Com- 2010- 352) from the Commission to the EU Parliament, the Council, The European Economic and Social Committee and the Committee of the Regions; the Commission calls for the tourism industry to adapt quickly to these changes in order to retain its level of competitiveness. The EU has established a number of projects to help member states to prepare for and capitalise on these demographic changes such as The TOURage project, funded under INTERREG IVC, with the key objective:

“To enhance regional economy by the means of senior tourism development and to support active and healthy ageing. The project aimed to enlighten the responsible personnel of regional authorities, decision makers and politicians in the field: its challenges and benefits, its future and trends and above all good practices exchanged and deployed”. www.tourage.eu

Ireland participated in this project under the auspices of the Western Regional Authority (now assumed into the Borders, Midlands and Western Regional Authority - BMW).

2.2 Suggestions for consideration and inclusion - Chapter 1

1.1 Marketing Ireland as a visitor destination

Draft Policy Ref #	AFI suggestions for consideration and / or inclusion in National Tourism Policy
1.1.1	<p>Age Friendly Ireland recognises the value and potential of the overseas market segment of the culturally curious. Age Friendly Ireland would also emphasise the importance of the culturally curious and all other types of senior tourist from within Ireland, especially those 65+.</p> <p>According to the CSO 2011 Census there are 999,247 people over the age of 55 of which 535,393 are 65+.</p> <p>According to Eurostat 49/2011 domestic tourism accounts for 77% of total spend with 74% of 65+ holidaying at home.</p> <p>Many of these have retired early and are more likely to seek a short break at non peak times when tourist attractions are not operating at full capacity.</p> <p>As referenced above the 65+ market segment, is recognised by the EU as an increasingly important market and its value should not be overlooked. There are many examples of ways in which tourism in Ireland can attract this segment. Please refer to findings and experience of TOURage.</p>
1.1.2	<p>The total population of the EU, (one of the main tourism target areas for Ireland) in 2010 was 499,389m, of which:</p> <p>87,393m were 65+ in 2010 (total EU)</p> <p>This is set to increase to 122,706m by 2030 (projected share EU)</p> <p>10,165m were 65+ in 2010 (total UK)</p> <p>This is set to increase to 14,190.92m in 2030 (projected share UK)</p> <p>These are considerable markets that AFI believes should not be underestimated as revenue contributors to tourism for Ireland.</p>
1.1.3	<p>It is estimated that only 10% of marketing is focused on the 65+ market. It is therefore recommended that more emphasis could be applied to marketing Ireland to the 65+ market in Ireland, Europe and further afield.</p>
1.1.4	<p>The experience of projects such as TOURage should be further utilised in order to identify specific products that Ireland can uniquely offer to the older tourist, e.g. genealogy (Ireland Reaching Out - Clan gatherings), Culinary trips, spiritual tourism (Knock), and trekking holidays to name but a few.</p>

1.2 Protecting key tourism assets

Age Friendly Ireland supports the recommendations put forward in this section as our natural and built environment are a key attraction for the older tourist.

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1.2.1 / 1.2.2	<p>Events and special activities, targeted at this specific market segment, when developed and packaged appropriately can reap considerable rewards for the Irish tourism industry. Ireland has the potential to offer a large range of events and activities that are particularly attractive to the 65+ market:</p> <p>Our landscapes and seascapes offer opportunities for activity and nature based packages and products.</p> <p>Ireland’s cultural and historical assets offer attractive products for the 65+ segment; spiritual tourism (Knock Shrine), early church history (Trinity & the Book of Kells, Glendalough, Rock of Cashel) etc.</p> <p>Understanding and investing in the 65+ market will reap benefits for the tourist sector in Ireland. The TOURage Good Practice Guidelines provide excellent examples and guidance for Local Authorities and tourist sector to tap into this market and is based on proven experience and learning from across Ireland and Europe.</p>
1.2.3	<p>AFI recommends that in the designing and planning for future supports for built heritage that the needs and requirements of Older People are considered.</p> <p>The WHO framework for Age Friendly Cities and Communities outlines 8 themes for consideration, in order for the lived experience to meet the needs of older people: Outdoor spaces and buildings, transportation. Housing, social participation, respect and social inclusion, civic participation and employment, communication and information and community support and health services.</p> <p>When tourist services are being planned and supports put in place, providers should refer to guidelines and experiences of how these eight domains can be addressed and in turn providing a positive experience for the older customer. Age Friendly Ireland and the Age Friendly Cities and Counties programme can provide assistance at a national and local level in this process.</p>

1.3 Supporting investment in the visitor experience

Age Friendly Ireland through its experience in working in Ireland in supporting the Age Friendly Cities and Counties programme and through its engagement with international networks such as the European Innovation Partnership supports the aims put forward as part of this section. Capital

investment in themed frameworks, such as the Wild Atlantic Way and the “Táin Way” in the Cooley Peninsula provide considerable opportunities to attract visitors from overseas and domestically, particularly in the low season.

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<p>1.3.1 – 1.3.3</p>	<p><i>Wild Atlantic Way (WAW) and the Age Friendly Cities and Counties Programme – A Regional Case Study.</i></p> <p>The Age Friendly Cities and Counties Programme is currently operational in all but one of the counties that feature as part of the WAW. AFI sees great opportunity in positioning and promoting the WAW as a holistic Age Friendly experience. AFI is currently working with Dublin Airport Authority (DAA) to create an ‘Age Friendly Airport’. Learnings from this experience can be adopted by both Knock and Shannon airports to ensure from the minute that visitors land in Ireland that they have an age friendly service. A driver training checklist has also been developed which can be delivered to all official bus operators along the route. This can be combined with the development of age friendly hotels and restaurants on all stops along the WAW. Signage and viewing points along the way can also be modified to comply with simple age friendly principles. In addition, any walks along the WAW could incorporate the Age Friendly logo rather than the traditional ‘Easy’ grade used to notate that it is suitable for all.</p>
<p>Additional points for consideration and / or inclusion in Tourism Policy under 1.1</p>	
<p>AFI recommends, in the context of the Tourism Capital Investment Programme 2016, that particular priority be afforded to the physical environment and how it can support and attract the older tourist. Particular initiatives could, in this context, include:</p> <ul style="list-style-type: none"> • Signage that is Age Friendly; • Provision of adequate and age friendly seating, lighting and access to toilets; • Provision of older person specific parking bays located close to visitor attractions - similar to disabled parking bays. 	
<p>Age Friendly Ireland and the individual Age Friendly Cities and Counties programmes can offer support to tourist attractions on how to ensure that the older visitor experience is optimised through smarter design. Each Age Friendly City & County programme has an associated Age Friendly Business Forum. Age Friendly Ireland also manages an Age Friendly Business Recognition Scheme which can further support, recognise and champion good practice in this space.</p>	

1.4 The contribution of events to the quality of the visitor experience

Ireland, as noted in the draft Tourism Policy, offers a variety of sporting, cultural and business events that are attractive to *all* segments and in particular to the older tourist segment. As highlighted, older people have access to money and time to holiday, so consideration could usefully be given to the introduction of a targeted marketing approach to attract this group. All events should cater for the older tourist.

In addition themed older person festivals (such as the Bealtine Festival) exist and these could be further supported and developed to attract the older tourist.

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1.4.1	Ireland's unique variety and range of festivals such as the Bealtaine Festival in May every year provide considerable marketing potential for the 65+ tourist.
1.4.1 - 1.4.5	Both established events and events planned for the future such as fleadh, genealogy events, clan reunions, all provide a particular interest for the older members of the diaspora and particularly those from the US and UK. The provision of specific funding and/or other relevant supports would support organisers to ensure that they have considered the needs of the older tourist when designing, packaging and promoting their events.
1.4.1 – 1.4.5	Examples of successful tourism events targeted at the older tourist are available through the TOURage Initiative, many of which are replicable here in Ireland.

3 Empowering the tourism industry and its people for the future (Chapter 2)

- 3.1 In preparing to unlock the potential of the 65+ market segment, the industry will need to ensure that its personnel are appropriately trained and aware of the needs of the older tourist. A report carried out by the Irish Hospitality Institute (2009), *“Age Equality – Untapped Potential: Enhancing Age Friendly Service Provision in the Irish Hospitality Sector”* acknowledges that *“ageism is embedded in Irish society, in our assumptions, relationships and institutional practices. They are rooted in negative stereotypes of older people and include false assumptions which lead to discrimination”*. These attitudes will need to be challenged and addressed in order for our industry to attract a discerning and very valuable market segment. The older person, and particularly the ‘young old,’ offer a valuable resource for both volunteer and paid work to support tourist attractions. Older people, in

the main, have a great understanding of the needs of other older people and an intimate knowledge of their own local environment.

3.2 Suggestions for consideration and inclusion - Chapter 2.2 & 2.3

Draft Policy Ref #	AFI suggestions for consideration and / or inclusion in the National Tourism Policy
2.1.1	<p>Challenge ageism in the Irish hospitality sector and respect the dignity of the older person. View older people as a valued customer with specific needs.</p> <p>Age Friendly Ireland recommends that the Policy consider the findings and recommendations outlined in the Irish Hospitality Institute 2009 report – <i>“Age Equality – Untapped Potential: Enhancing Age Friendly Service Provision in the Irish Hospitality Sector.”</i></p>
2.1.2 – 2.1.3	<p>Collaborate with AFI and other older person agencies such as Age Action and Age & Opportunity to provide age awareness training for tourism personnel during formation (college level) and at local levels on how to effectively consider and meet the needs of the older person.</p>
2.1.4	<p>Age Friendly Ireland would support this point. For a large number of non-English speaking older people, language barriers can act as a barrier to considering holidaying in Ireland.</p>
2.1.5	<p>Age Friendly Ireland and the Age friendly Cities and Counties programme can offer advice and support on the development of “Standards in Service” from the older person perspective.</p>
2.2	<p>AFI supports and recognises the importance of competitiveness, research and innovation for the tourism sector in Ireland.</p>
2.2.1	<p>The AFCC programme offers considerable potential for tourist providers, at local levels, to test out their products for the senior tourist. Each AFCC programme has within its structure Older Peoples Councils and Age Friendly Business Forums which can offer the tourist sector scope for testing the ‘age friendliness’ of both existing and planned products.</p>

2.2.3	AFI welcome the Department’s plan to develop a Forum to identify key areas and ways that the sector can harness data in order to enhance understanding of tourism performance and its economic contribution. AFI would like to request that representatives from AFI/the AFC&C Programme be considered for membership of this forum.
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Additional points for consideration and / or inclusion in Tourism Policy under Chapter 2

Encourage tourist attractions to recruit older people in paid and voluntary positions. One of the key marketing elements for Irish tourism is our culture and history. Nobody can bring this aspect more to life than those who have actually lived through it. By creating opportunities for older adults to become tourism ambassadors we will be able to capture and pass on many near forgotten components of our culture and history. Pilots of this Age Friendly Ambassadorial programme are currently running in both Louth and Galway.

4 Regulation of the Tourism Sector

4.1 It will be important to communicate with the senior tourist the high quality of the tourist product. As recognised by the draft policy there is a need to be able to measure and demonstrate this measurement in the use of both “hard” and “soft” indicators. This will assist in attracting new and repeat visitors from both the domestic and international market.

4.2 Suggestions for consideration and inclusion - Chapter 3

Draft Policy Ref #	AFI suggestions for consideration and / or inclusion in National Tourism Policy
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3.1.1	As part of the Age Friendly Cities and Counties Programme, Age Friendly Ireland has developed an Age Friendly Business Recognition Scheme. This has been successfully rolled out in both Kilkenny and Louth. It is recommended that the tourist sector engage with the AFC&C Programme so that operators can participate in such schemes which can in turn assist them in effectively marketing their product as age friendly.
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Additional points for consideration and / or inclusion in Tourism Policy under Chapter 3

In looking for new classification and rating systems for tourism, Age Friendly Ireland would recommend age friendly principles be considered, e.g. a hotel classified as Age Friendly would indicate such a designation in its promotional material i.e. recognised as “Age Friendly” and

therefore suitable for the whole community from older adults, to parents with young children, to people with a disability.

5 A Central role in Tourism for Local Authorities and Communities

5.1 The AFC&C Programme can contribute much to the tourism experience at a local level.

Each Age Friendly City or County has an Alliance, chaired at the outset by the Local Authority CEO. The Alliance which brings together a partnership of senior decision makers from the key Government agencies (Local Authority, Health Service Executive, An Garda Síochána), Third Level Institutions, employers, older people and voluntary and private organisations that have a role to play in transforming their communities.

Each programme encourages the involvement of local businesses, many of them tourist based, hotels, restaurants, tourist attractions etc. The steadily increasing number of cities and counties that have actively engaged with the Programme to date have developed an evolving blueprint for how relevant state agencies, working under the aegis of the Local Authorities, can engage more effectively together in ensuring that their combined resources are used to their optimum, delivering necessary services to and products for older people within their own local communities. Conscious that the design and delivery of plans and services on a fragmented, silo-basis has proven to be inefficient - particularly at a time when public budgets are increasingly tight - the pursuit of a more joined-up, collaborative approach to planning and service delivery at a local level lies at the heart of the Programme.

5.2 Suggestions for consideration and inclusion - Chapter 4

Draft Policy Ref #	AFI suggestions for consideration and / or inclusion in the National Tourism Policy
4.2.1 – 4.2.3	For the National Tourism Policy for Ireland / Tourism Ireland to recommend that tourist services in local areas participate in their local AFC&C Programme and in particular within the Age Friendly Business programme.
4.1.2 – 4.2.3	AFI run national projects, such as the Age Friendly Towns (AFT) Initiative whereby local towns and village’s carryout a “deep dive” process which assists these towns in becoming more age friendly. One example of a tourist related activity from the AFT initiative featured the development of an “Age Friendly Restaurant

	Guide” for both Ballinasloe and Kilkenny. In Galway the City Museum has commenced the process of becoming an Age Friendly Museum and Cultural Centre.
4.2.3	Nationally Age Friendly Ireland has established a network of AFC&C programmes where best practice is shared amongst programmes.

6 The Wider contribution of Government to the future of Tourism in Ireland (Chapter 5)

6.1 Age Friendly Ireland endorses the statement that “Tourism does not operate in isolation”. Tourism is influenced by a range of socio economic factors that can impact positively or negatively on its performance: a growing economy with inward investment, government policies that support the growth of tourist products, the quality of the tourist service, a taxation system that allows people to have access to disposable income both nationally and internationally and an industry that is mindful of the Equal Status Acts that prohibit discrimination in the provision of goods and services under the nine grounds, including the ground of age. A process of joined-up planning and policy development by Government at central and local levels is important and needs to take into consideration the older market and their needs.

6.2 Suggestions for consideration and inclusion - Chapter 5

Draft Policy Ref #	AFI suggestions for consideration and / or inclusion in National Tourism Policy
5.1	Support initiatives that assist the growth of ‘age friendly’ tourism products both to the domestic and international market (TOURage examples)
5.1.1	Protect and actively promote existing incentives that are available to older people both within Ireland and from abroad such as free travel on public transport.
5.1.3	Encourage transport operators to review and ensure that their products are ‘age friendly’ and develop special packages to attract older people to Ireland.
5.2.4	Encourage access points into Ireland to work towards becoming ‘age friendly’ e.g. airports, ports, train and bus stations.

7 The International Context (Chapter 6)

7.1 Age Friendly Ireland recommends that Tourism Ireland engage closely with EU initiatives to promote tourism amongst older people. EU initiative such as TOURage are positive pan EU programmes that promote the sharing of best practice and facilitate the linking up of different regions within the EU to partner in age related tourism partnerships.

7.2 Suggestions for consideration and inclusion - Chapter 6

Draft Policy Ref #	AFI comments for consideration and / or inclusion in National Tourism Policy
6.1.1 – 6.1.2	Support the tourism sector and regional authorities to partner in EU wide tourism related initiatives such as TOURage in order to develop networks throughout the EU and to share best practice.
6.1.2	Tourism Ireland to support the tourist sector with practice/how to guides on accessing EU funding opportunities to assist operators in the development of rural tourism.
6.1.3	Tourism Ireland and its UK equivalent to consider jointly how to market both countries to the older tourist.
6.1.4	Tourism Ireland to promote Ireland as an Age Friendly Destination abroad.

8 Governance Model of Tourism (Chapter 7)

8.1 Suggestions for consideration and inclusion into Chapter 7

Draft Policy Ref #	AFI comments for consideration and / or inclusion in Tourism Policy
7.1.1	The Department of Tourism, in acknowledging the potential of this fast growing market segment, to consider including in criteria for any further funding a section for funding for initiatives aimed at developing the senior tourist product through the proposed Multi-Annual Framework for Tourism.

7.1.2	Tourism Ireland / Tourism Agencies to develop a more formal/defined relationship with the AFC&C programme at both a national ¹ and local level.
7.1.3	The two tourist bodies in Ireland to consider how the relevant boards might communicate with representatives from the older people's organisations such as Age Friendly Ireland in order to respond to the needs of this growing market segment.

9 Conclusion

In this submission, Age Friendly Ireland has outlined the case for a specific focus within the National Tourism Policy for Ireland on the older tourist, in particular the 65+ segment of the market.

The statistics outlined in this submission speak for themselves in terms of illustrating the expanding market share that older tourists currently occupy. They have the free time, the resources and a curiosity to travel, both at home and from abroad. The Irish tourism industry must grasp the opportunity to unlock the full potential of the rapidly expanding market segment, and the National Tourism Policy for Ireland can provide a blueprint for achieving this.

Age Friendly Ireland believes that the best way in which to ensure that the full potential of this market segment is realised is through the application of an Age Friendly approach to delivering high quality, accessible and value for money tourist products that will appeal to the older tourist while simultaneously appealing to other groups such as young families, people with disabilities. Age Friendly Ireland, through the experience of developing and rolling out the Age Friendly Cities and Counties Programme and associated initiatives, can offer the guidance and practical supports needed make Age Friendly tourism in Ireland a reality.

¹ As of January, 2014 the Age Friendly Programme is now governed by a Board and advised by a National Implementation & Integration Group whose members include senior representatives from; the Local Authority sector (three City/County Managers); the Department of An Taoiseach, the Department of the Environment, Community and Local Government and the Department of Health (three Assistant Secretaries); the Health Service Executive (Director level); An Garda Síochána (Assistant Commissioner); the third/fourth level sector (a University President) the NGO sector (two NGO Chief Executives) and Business (Chief Executive of Chambers Ireland).

10 References

- Age Friendly Ireland - www.agefriendlyireland.ie
- European Commission, COM(2010) 352 final (Brussels, 30.06.2010, page 5) - <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52010DC0352>
- Eurostat 1 (2010) - <http://epp.eurostat.ec.europa.eu>
- Eurostat 43(2012) - <http://epp.eurostat.ec.europa.eu>
- Eurostat 49/(2011) - <http://epp.eurostat.ec.europa.eu>
- Irish Hospitality Institute - Age Equality, Untapped Potential: Enhancing Age Friendly Service Provision in the Irish Hospitality Sector – <http://www.ihl.ie/media/documents/FinalAgeismReport.pdf>
- TOURage, Good Practices of Senior Tourism – INTERREG IV - <http://www.tourage.eu/>
- WHO- Global Age Friendly Cities a Guide – http://www.who.int/ageing/publications/Global_age_friendly_cities_Guide_English.pdf

For further information on this submission, please contact Pat Doherty, Age Friendly Ireland at or on

Bray Head Residents' Association

Submission to the County Wicklow Development Plan 2016-2022

The Bray Head Residents' Association (BHRA) appreciated the opportunity to attend a briefing meeting on the Public Consultation phase of the Wicklow Development Plan and welcomes the opportunity to submit the following brief submission to this initial phase of the process.

As the name indicates, our organisation's remit is focused on the Bray Head area and we recognise that detailed development plans for the Bray area will occur later in the process. However, as a designated Special Area of Conservation of local, National and European importance protected under the EU Habitats Directive and a Special Amenity Area Order, the preservation and enhancement of Bray Head is of strategic importance to the development of County Wicklow and, as such, requires particular consideration in the drafting of the County Development plan.

For generations, the climb up Bray Head or the walk along the cliff walk from Bray to Greystones have been leisure activities of choice for thousands of locals, Dubliners and tourists. For many, this is their first – and often only – experience of the riches of the Wicklow hills and coastal landscape.

"First impressions last", and the more memorable and pleasant this experience is the more likely people are to return and to be positively disposed to further exploration of other areas of the County. Thus, the effective management and appropriate enhancement of the Bray Head area is a crucial building block in the development of Wicklow's outdoor leisure amenities. In this context it is imperative that:

- Development and enhancement of the area is kept strictly in line with the requirements of the SAAO and that any unauthorized development is dealt with in a manner that adheres to SAAO requirements.
- A comprehensive Management Plan for the area is formulated and adequate resources made available for the implementation of the plan. This plan to include:
 - improvement and maintenance of existing footpaths and bridleways and the provision of suitable signage, footpath surfaces, notices and maps
 - development of a way-marked trail system and the creation of additional public footpaths and walkways with, where appropriate, increased accessibility for the mobility impaired
 - preservation of existing areas of heathland, maritime grassland and woodland areas
 - preservation and protection of the archeological heritage of the area, particularly Raheen a Cluig
- Plans for the enhancement of the area are integrated with town plans for Bray and Greystones and with plans for the development and enhancement of natural landscape and coastal amenities throughout the County.

Wicklow County Development Plan 2016-2022 Pre-Draft Submission

Context

In preparing this submission we understand that the 2000 Planning and **Sustainable Development** Act requires that all Regional Authorities make Regional Planning Guidelines (RPGs). We also understand that the Regional Planning Guidelines aim to give regional effect to the National Spatial Strategy and to guide the County Development Plans (CDP) for each county. As such we note that the new Wicklow CDP will set out a strategic spatial framework for the proper planning and **sustainable development** of Wicklow for the six-year period 2016-2022.

We also note that while the RPGs focus on concentrating development in the hinterland area of Dublin into growth towns and setting population and housing targets which must be adhered to (published June 2010), these targets were prepared prior to Census 2011 and as such are now due to be reviewed. As such the existing RPGs will need to be replaced.

The key phrase in the above context is that of **sustainable development**.

Sustainable Development

Sustainable development is the single most important aspect that the new CDP needs to address. This is recognised from the very name of the legislation down to the over-arching aim of the County Development Plan. Sustainable development is most frequently defined as ***“development that meets the needs of the present without compromising the ability of future generations to meet their own needs”***. This phrase is one which should be kept in mind and used as a check against all policies put forward in the new CDP.

A key aspect of sustainable development is sustainable transport and in this regard there is a fundamental issue to be addressed for the Greystones/Delgany/Kilcoole area within Wicklow.

Sustainable transport does not mean car based commuting – high quality public transport connections are vital. There is a presumption that Greystones/Delgany/Kilcoole being served by the existing rail line is a suitable location for growth. However, peak-hour Dart services and commuter trains are already at capacity with standing room only in a.m. peak services. It must be kept in mind that the rail line is a single coastal corridor link to eastern parts of Dublin. Public transport links to other parts of the GDA are very limited, with the result that there is a huge car based commuting community using the N11, which is also over capacity in peak periods already.

This presents a fundamental issue in that, for any further significant residential development to be considered sustainable this simply must be preceded by a step-change in public transport connections. Without this the need of the present (housing) will compromise the ability of future generations to be able to travel – with capacity reached in the public transport services the result is increased car travel which cannot be accommodated on the road network. This step-change in public transport must include:

- Increase in frequency of Darts and rail links
- Provision of frequent express bus links to link with LUAS at Carrickmines/Sandyford
- Provision of frequent express bus links to west Dublin

Without this, future development will be car based which is not sustainable and contrary to RPG's, leading to further problems on the N11, which itself cannot have further capacity added south of Kilmacanogue.

The conclusion has to be that Wicklow County Council MUST insist that this step-change in public transport is in place BEFORE further residential developments are granted permission. This requirement needs to be a corner stone of the new sustainable development plan for this part of the county. If this cannot be achieved then Wicklow County Council must lobby for the new RPG's to recognise that the finite capacity of the transport network to Greystones / Delgany / Kilcoole has already been reached – indeed this applies to the entire eastern coastal strip of Wicklow. Specifically, in recognising this, as part of the review of the RPG's the County Council must press for Greystones / Delgany to be removed from the Metropolitan Area and left as hinterland in the Greater Dublin Area, the same as Kilcoole and the rest of Wicklow county. This would enable the Growth Level of Greystones to be reduced from "Large" to "Moderate" and Delgany from "Growth Town" to "Small Town".

We would add that, in relation to how WCC processes applications for planning permission, there appears to be a presumption that because land is zoned for development it should automatically be developed to meet the maximum amount of development specified in the relevant zoning. This is simply wrong - the zoning in fact should be treated as a maximum theoretical amount. There is absolutely no obligation to grant permission for development on the zoned lands simply because they have been zoned. Many areas of zoned land in Greystones/Delgany have serious issues with drainage, water supply and ground conditions, hydrogeology and variable underground watercourses. Along with the transportation problems highlighted already, these issues may well mean that the theoretical maximum development of these zoned lands cannot be achieved – the new CDP needs to make this clear. All developments must be required to demonstrate clearly how sustainability is achieved. The new CDP needs to make this clear.

Delgany Village

Focussing on Delgany specifically the big issue for the village is to halt further diminution of the character of Delgany as a result of insensitive development. The CDP needs to set in place policies to rescue and enhance residential and community life in the village and its surrounds by fostering a strong identity for the



village. The traffic and safety issues in the village have been repeatedly highlighted and documented in the last 10-15 years and yet nothing has been done to address the village centre. This remains a big issue, but also provides a big opportunity to enhance the centre with a village improvement scheme that strengthens the heritage feel of the village at the same time as addressing the traffic issues.

We are fully supportive of the Architectural Conservation Area (ACA) status assigned to the village core. However, this has not prevented development of an inappropriate scale and style appearing on the periphery of the village. The Delgany Community Council is seeking Heritage Status and also developing a Village Design Statement and believes the extents of the current ACA should be extended in order to preserve its identity, history and heritage. Developers must be required to conform to a planning scheme. We are developing the basis for a blueprint for that scheme. We believe there must be clear guidelines for building heights and lines, patterns of materials, construction systems and architectural elements in order to create and maintain a sense of heritage.

We firmly believe that a protected and enhanced Delgany village provides an opportunity to bolster tourism in this part of Wicklow. This would greatly assist the sustainability of the village businesses and those in the wider area.

We note that County Wicklow now has a Play Policy and while we support this fully, the absence of any play facilities in Delgany is an issue that needs to be addressed.

Conclusion

In submitting this proposal for inclusion in the Wicklow County Development Plan 2016-2022 we strongly advise Wicklow County Council to consider the capacity of the Greystones / Delgany / Kilcoole area to absorb further large scale development. We also submit that development in this region has to be sustainable and must demonstrate this, prior to receiving planning permission. Such sustainability must take account of the underlying topographical issues inherent in many of the areas that have been rezoned for development in this area. Finally, we urge Wicklow County Council to take cognisance of the piece-meal erosion of the integrity of this heritage village, by its inappropriate inclusion as part of the Metropolitan Area, and exhort WCC to press for Greystones / Delgany to be removed from the Metropolitan Area and left as hinterland in the Greater Dublin Area.



22nd December 2014

Mr Edward Sheehy
CEO
Wicklow County Council
County Buildings
Station Road
Co. Wicklow

Re. Pre-draft Submission – Wicklow County Development Plan 2016-2022

Dear Mr Sheehy,

I am the secretary of a local voluntary group in Greystones called DAG-T which stands for '*Disability Action Greystones –Together*'. Our aim is to build an inclusive community by increasing accessibility to all that Greystones has to offer and bring disabled people, sick people, elderly people and non-disabled people TOGETHER in all our fun activities.

We made a short presentation to the Greystones Municipal District County Councillors at their monthly meeting on the 25th of November about the *Greystones Gold Star Awards* in order to seek their support for the initiative. Cathaoirlach Mr Tom Fortune invited us to attend a further meeting in the New Year to review progress.

The Gold Star Initiative originated in Cashel in County Tipperary and we aim to model the *Greystones Gold Star Initiative* on this very successful project. The aim of the project is to work together to improve disability awareness and equality and the full integration of people with disabilities in the social and cultural life in Greystones by assisting business and community groups in ensuring all premises and activities are accessible and welcoming to all.

We wish to make the following pre-draft submission to the Wicklow County Development Plan 2016-2022:

1. Social, Community and Cultural Development
 - 1.1 We would ask that Wicklow County Council support the *Greystones Gold Star Awards* which will acknowledge businesses and community groups that take steps to make their businesses and facilities more accessible for people with disabilities; and that the *Gold*

DAG:T is a local group in Greystones working towards
Building an Inclusive Community
by increasing Accessibility to all that Greystones has to offer

Star Awards would be introduced by the Council to the other towns and villages in the county in the lifetime of the Development Plan.

1.2 We would suggest that Wicklow County Council look at the option of having a key access system for public accessible toilets for disabled people in the county, similar to other local authorities.

1.3 We would suggest that Wicklow County Council adopt a policy to provide at least one item of accessible play equipment in every Council playground in the county.

2. Tourism

2.1 We would ask that Wicklow County Council promote accessible tourism in all visitor attractions and towns and villages in the county, in particular by undertaking to ensure universal access to all public buildings and tourist attractions in the county;

2.2 and by looking at options for making accessibility information available to visitors ahead of their journey to a particular location, for instance on the new *Access Earth* website (www.accessearth.org).

3. County Wicklow Retail Strategy

3.1 We would ask that Wicklow County Council review all Access Audits carried out previously in the towns and villages of the county to assess progress to date and re-engage with local communities in each town and village on how their area can be made more accessible. This is something that we have asked the Greystones Municipal District Councillors to consider for the Greystones area and we would suggest that if a period of several years has passed since the last Accessibility Audits were carried out in other towns and villages that there would be a substantial benefit to those communities in reviewing what has been accomplished in the interim, and what remains to be done. There will be an obvious benefit to local businesses in making it easier for all members of the public to access their premises.

3.2 We would also ask that a review of the number, location and design of all public disabled parking spaces be carried out throughout the county, as part of the review of the Access Audits.

We look forward to reading the draft Wicklow County Development Plan 2016-2022 and to participating in the further stages of public engagement on this important document.

Yours Sincerely,

Catherine Dollard
Secretary DAG-T

Contact Details: Catherine Dollard

(please retain these contact details as private)

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 23 December 2014 11:47
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 23, 2014 - 11:46 Submitted by anonymous user:
[109.76.38.91] Submitted values are:

Name: Kieran Conlon
Organisation, Group, Company, etc : Enniskerry Forum
Address: c/o 80 Eagle Valley, Enniskerry, Co. Wicklow
Email: enniskerryforum@gmail.com

- Topics--
- : Vision_and_Core_Strategy
- : Housing
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- : Infrastructure
- : Local_Plans
- : Town_and_Settlement_Plans
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Submission - If you wish to make comments on a topic, please fill in the box below:

The "Vision" for Enniskerry as stated in the current Enniskerry LAP is considered suitable. However, the following observations are made:

- 1) While Enniskerry is a "Category 5" town, consideration should be given to its suitability as a "Category 6" village. It is of a similar size to other Category 6 villages such as Roundwood. While it is proximate to Bray, it has an entirely separate eco-system and should not be "developed" as a satellite of Bray but rather preserved as a small, independent village with a Victorian heritage.
- 2) Enniskerry lacks the infrastructure to support further housing development on any significant scale. Any proposed housing development in the hinterland of Enniskerry should take cognisance of the implications for existing residents of Enniskerry.
- 3) Several sight lines around Enniskerry need to be protected in addition to those already protected (which need continued protection). For example, the view from Kilmolin/Parknasilloge north east towards the sea and Carrickgollogan should be included as a view to be protected as it benefits many more of the public including tour buses and cyclists.
- 4) The population growth proposals as stated in the Stage One Public Consultation document are considered grossly excessive for Enniskerry. Enniskerry is, notwithstanding its proximity to large urban centres such as Bray, a rural village in dimension, culture and community. This is an invaluable heritage that should be treasured and preserved. People who choose to live in Enniskerry do so because of these attributes. There is a significant risk that poor planning that ignores this backdrop would see Enniskerry's heritage lost to a suburban sprawl.

5) Tourism is key to Enniskerry. However, the village centre lacks the basic traffic management and parking infrastructure to optimise the experience for visitors. A modest but well planned investment could bring about vast improvements that help to protect Enniskerry's heritage while also facilitating good access for visitors.

6) Facilities for children: Enniskerry lacks basic amenities such as a playground for children. The new development plan should consider catering for both young children and teenagers through the provision of playgrounds, structured green spaces, etc

7) Streetscapes in Enniskerry should be afforded greater planning protection. This should include suitable stipulations concerning the design of shop frontages within the village centre.

Thank you for this opportunity to contribute to the planning process. Enniskerry Forum is willing and keen to engage with Wicklow County Council, on behalf of the community of Enniskerry, in the preparation of the new County Development Plan. Alternatively you can attach your submission (10MB limit on attached files):
Attachment No.2 (10MB limit on attached files):
Attachment No.3 (10MB limit on attached files):

--Town / Settlement Plans--

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Submission - If you wish to make comments on a Town / Settlement Plan please type into the box below: Please see above.

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

The results of this submission may be viewed at:
<http://www.wicklow.ie/node/810/submission/62>

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 16 December 2014 17:09
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 16, 2014 - 17:09 Submitted by anonymous user:
 [86.40.140.31] Submitted values are:

Name: Glendalough and District Development Association Organisation, Group, Company, etc :
 Brockagh Resource Centre
 Address: Laragh Glendalough
 Email: brockaghresourcecentre@gmail.com

--Topics--

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- : Social_Community_and_Cultural_Development
- :
- : Infrastructure
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Submission - If you wish to make comments on a topic, please fill in the box below:
 We wish to make a submission for a play area for children in the area.
 To ask that the council take charge of the road from Ballard to Trooperstown as the residents have maintained this road

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

- Attachment No.2 (10MB limit on attached files):
- Attachment No.3 (10MB limit on attached files):

--Town / Settlement Plans--

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Submission - If you wish to make comments on a Town / Settlement Plan please type into the box below:

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

The results of this submission may be viewed at:
<http://www.wicklow.ie/node/810/submission/38>

THREE TROUT STREAM WALK:

The Greystones Tidy Towns Group is extremely keen to establish a river walk along the north side of the three trout stream linking Greystones to Delgany. We are currently trying to establish land ownership along this stretch, with the hope of being given a narrow corridor for the river walk.

Many reasons for the desirability of such a river walk include:

1. The WCC Local Development Plan states: "The Three Trout Stream is a Salmonoid fishery that contains migrating sea trout, eels, and supports grey heron, dipper and others protected under Annex 11 of the Habitats Directive."

"The Three Trout Stream flows for 4 km approximately within the Greystones / Delgany area and forms one of, if not the most important wildlife corridor / refuge from Glen of the Downs SAC to the sea and is recognised as important for the migration of sea trout to the point where it reaches the N11.

The importance of maintaining a corridor for "the migration of eels" is also mentioned.

In addition to sea trout and eels, the corridor is very rich in insect life, damselflies, butterflies and birds, while deer and pheasant have also been seen.

2. The LDP further states that as the stream leaves Delgany it flows through "a small fragment of native Irish woodland, a habitat which is in serious decline and for this reason should not be impacted on further". By establishing the river walk we would rigidly stick to this directive and plan a planting programme to preserve and improve bio-diversity and the general woodland environment.
3. The LDP also highlights that "this stream is shallow and predominantly gravel-based with very few pool areas. As such it is sensitive to extreme temperatures in summer, resulting in lower oxygen levels and it is also sensitive to siltation of gravel areas (possible egg-laying/nursery areas). The removal of native vegetation from the sides of the banks increases both of these threats significantly.

It is essential to the stream that the practice of scrub removal from either side of the bank is halted immediately and in areas that it has been removed, that these are replaced with similar native species."

Again, by planting, tidy towns will work to restore the natural vegetation equilibrium.

4. Tidy towns also understands the importance of "a 'flyzone' for bats and owl species" as pointed out in the LDP.
5. The LDP draws attention to a "littering" problem. The tidy towns group is well versed in dealing with litter and would be able to maintain a litter-free zone right along the river walk.

6. Crucially, the LDP states that “the stream is not currently treated as an asset by the local community and this philosophy should be changed as soon as possible. The inclusion of a walkway from Delgany to Greystones and education initiative in local schools along the stream could assist.”

This aspiration sums up clearly what we are trying to do. Our close association with the primary schools in the area, including our involvement in the presentation of a water experiment kit from Veolia to St. Brigid’s NS, have made us acutely aware of the need for primary school students to become acquainted with the delights of freshwater ecology. The primary school curriculum stipulates that students must study a local freshwater river.

This fostering of environmental awareness and sensitivity at a young age would be one of the most important benefits of a river walk.

7. The walk would open up the rich historical and archaeological heritage of this stretch of river. Two Bronze Age enclosure sites have been found close to the river here; Bronze Age and Early Christian artefacts from this stretch have been sent to the National Museum. Two Bronze Age fulacht fiadh-type pot-boilers have been unearthed –one of these still has not been excavated. Gully systems, stake-holes, flints, and shards of very coarse Bronze Age pottery have been found.
8. Records also show that this area was the site of the famous Battle of Delgany in 1022, when Ugair, King of Leinster, overthrew Sitricus, the Danish king of Dublin. A hoard of Anglo-Saxon coins found near Delgany in 1874 consisted of silver pennies of Eadbearht, Cuthred, and Baldred, kings of Kent A.D.794-828.
9. The river walk would link Greystones directly to Eamon de Butlear’s Delgany Heritage Trail, whose delights include Jacob’s ladder over the river, Kindlestown Castle, an ancient burial ground, La Touche’s Christ Church, the Carmelite monastery, and the gateway to Belleview demesne.
10. From Delgany, it is only 1.5 km to Kindlestown Wood forest trail to the east and Glen of the Downs forest trail to the west. A further 2.5 km would bring the keen walker back to the ancient Rathdown / St. Crispin’s site and the cliff walk, providing a circular return to Greystones, or a 3km journey to Bray.
11. It is proposed that the River Walk will link up with the Tidy Towns Greystones Heritage Walk. This walk will link Delgany with Greystones, taking in historic buildings such as Kindlestown Castle, Killincarraig Mill, Redford Cemetery, St. Crispin’s Cell and places associated with Samuel Beckett, Jack B. Yeates and Eamon de Valera.

12. Clearly, for tourists and locals alike, the river walk would provide a gateway to all of these lovely walks. Proximity to DART and bus services, park and ride and picnic area, at the Greystones end, is another obvious advantage.

Irish Heart Foundation

**Submission to the *Wicklow County*
Development
*Plan 2016-22***

December 2014





About the Irish Heart Foundation

The Irish Heart Foundation is the national charity dedicated to fighting heart disease and stroke. Today in Ireland more people die from heart and stroke-related illnesses than from any other cause of death. Against this background we work to bring hope, relief and a better future to families all over Ireland. We give vital patient support through our Heart & Stroke helpline and we provide high quality public information for all.

We support pioneering medical research, campaign for improved patient care, and promote positive public health strategies. We work in hospitals, schools and workplaces to support, educate and train people to save lives. As a charity we are dependent on the generosity of the public to continue our vital good work. You can fund our work by making a donation, give of your time to volunteer or learn the skills needed to save a life through our courses.

SUBMISSION TO WICKLOW COUNTY COUNCIL

Wicklow Development Plan 2016-2022

December 2014

The Irish Heart Foundation (IHF) welcomes the opportunity to input into this consultation on the Wicklow Development Plan. The IHF's submission will focus on how the Development Plan could be used to improve the public health of people living in Wicklow and in particular to ensure that children and young people are healthy and active.

Under the Government's 2013 health and wellbeing framework – *Healthy Ireland 2013-25* – planning authorities have a responsibility to promote healthy communities.

Part 1 of this submission considers why public health objectives should be integrated into the Development Plan. Part 2 highlights the need for the environment around schools to support healthy lifestyles for young people.

PART 1

Public health and the Wicklow Development Plan

The IHF is calling on Wicklow County Council to place health at the centre of the Development Plan, to give new generations the best start in life and to help make Wicklow the healthiest County in Ireland.

Local authorities have a particular duty to support parents and children by introducing policies, services and funding to ensure this generation of children and their families enjoy the best of life chances.

The Irish Heart Foundation's is focused on three areas that affect children's health - obesity, tobacco and alcohol.

- 1 in 4 girls and 1 in 5 boys are overweight or obese.¹ Children from disadvantaged areas are more likely to be obese.²
- Differences in health in children from richer and poorer areas are obvious from as early as three years of age.³
- Only 20% of children say they eat fruit and vegetables more than once a day.⁴
- 12% of school children smoke. Disadvantaged children are more likely to smoke.⁵
- Just over half of children exercise four, or more times a week.⁶
- 21% of school children currently drink alcohol. 18% were drunk in the last 30 days.⁷

¹ See Irish Heart Foundation (2012, in press) *Childhood nutrition guidelines and food related behaviour for preventing cardiovascular disease*.

² Layte, R. and McCrory, C. (2011) *Growing up in Ireland - Overweight and obesity among 9-year olds*. Dublin: The Stationary Office.

³ Growing Up in Ireland (September 2013) *Development from birth to three years*. http://www.growingup.ie/fileadmin/user_upload/documents/Second_Infant_Cohort_Reports/ES_Development_from_Birth

⁴ Self-reported by children & young people surveyed. Kelly, C., Gavin, A., Molcho, M. & Nic Gabhainn, S. (2012). *The Irish Health Behaviours in School-aged Children study (HBSC) study 2010*. Dublin: Department of Health.

⁵ Kelly, C., Gavin, A., Molcho, M. & Nic Gabhainn, S. (2012). *The Irish Health Behaviours in School-aged Children study (HBSC) study 2010*.

⁶ Kelly, C., Gavin, A., Molcho, M. & Nic Gabhainn, S. (2012). *The Irish Health Behaviours in School-aged Children (HBSC) study 2010*. Dublin: Department of Health.

National public health objectives and the Wicklow Development Plan

Development plans are a central means of implementing national policies in communities across Ireland. For this reason it is crucial that the Wicklow Development Plan reflects the Government's 2013 health and wellbeing framework, *Healthy Ireland 2013-25*⁸ which is seeking cross-sectoral working to achieve a healthy population.

If the *Healthy Ireland Framework* was implemented, by 2019 there could be 100,000 more children at a healthy weight across Ireland. Almost a million Irish people would be active and eating their recommended amount of fruit and vegetables per day. And there would be 500,000 fewer smokers.

Healthy Ireland has made improving and protecting health a responsibility for all Government Departments, Local Authorities and all sectors of society. Under this national framework, planning authorities have a responsibility to promote healthy communities. The timeframe of the Wicklow Development Plan runs almost concurrently with the *Healthy Ireland* framework and will be one of the critical ways that the framework can be rolled out in Wicklow.

Healthy Ireland – actions relevant to the drafting of Development Plans

Action 1.9

Draw up specific proposals in relation to the potential role of local authorities in the area of health and wellbeing, having regard to the principles set out in Paragraph 2.5 of the Action Programme for Effective Local Government. Partners: DH, DECLG, local authorities, HSE Directorates.

Action 2.3:

Health and wellbeing impacts will be assessed locally and an integrated Social Impact Assessment approach at the local level will be mandated. Tools and supports for local authorities will be developed, to assist them in working across sectors at national and at county level in undertaking health and wellbeing assessments.

Partners in this role: DSP, DH, DECLG, Local authorities, HSE Directorates, County and City Managers' Association.

The 2014 national policy framework for children and young people – *Better Outcomes, Brighter Futures*⁹ (Department of Children and Youth Affairs) also includes commitments to use the planning system to support healthy childhoods:

⁷ Self-reported by children & young people surveyed. Kelly, C. et al. (2012). *The Irish Health Behaviours in School-aged Children (HBSC) study 2010*.

⁸ Department of Health (2013) *Healthy Ireland – a framework for improved health and wellbeing 2013-25*. Dublin: The Stationery Office. <http://health.gov.ie/wp-content/uploads/2014/03/HealthyIrelandBrochureWA2.pdf>

⁹ http://www.dcy.gov.ie/documents/cypp_framework/BetterOutcomesBetterFutureReport.pdf

Better Outcomes, Brighter Futures - actions relevant to the drafting of Development Plans

Government commits to:

- Develop child- and youth-friendly communities through Local Government adopting appropriate policies and objectives in County/City. Development Plans and further supported by the preparation and issuing of National Guidelines on Planning for Child-friendly Communities.
- Support children, young people and their parents to make healthier choices through education, addressing food poverty and ensuring that all educational and State institutions providing food and drink to children, whether directly or through franchised commercial services on-site, have a Healthy Foods policy and provide food that meets basic nutritional standards. (DES, DCYA, DSP)

In policy at local level, under the **Local Area Plans - Guidelines for Planning Authorities**¹⁰ issued under section 28 of the Planning and Development Act 2000-2012, there is also an onus on local authorities to incorporate a focus on active and healthy living in their communities.

Local Area Plans - Guidelines for Planning Authorities (2013, p.32)

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

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

In addition to the guidance extracted above, the IHF would recommend that any new schools developed in Wicklow also be linked to walking and cycling networks. Local area plans could also incorporate future development of additional Irish Heart Foundation's Slí na Sláinte (Path to Health) walkways and maintenance of the existing network of County Slí na Sláinte.

¹⁰ Department of Environment, Community and Local Government (2013) *Local Area Plans - Guidelines for Planning Authorities*.

Making a strong commitment to public health in the Development Plan

The IHF believes that given the increased emphasis on public health in national and local policy the Wicklow Development Plan should more fully recognise the wide potential for planning to improve health outcomes and to reduce health inequalities within the community. To-date the development planning process seems to have adopted a relatively narrow view of public health, primarily limited to the promotion of active travel and the provision of open spaces. The physical and built environments, including infrastructure planning, availability and accessibility of healthy foods, transport networks and the design of streets, can all affect the health and well being of individuals and communities.

The current vision of the Wicklow Development Plan is:

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 IHF believes that health should be moved up in priority listing within the vision statement. The promotion of health should also be stated as one of the Development Plan's strategic goals. Currently, the Wicklow Development contains 10 strategic goals, none of which relate to health beyond active travel.

In addition, the IHF recommends the inclusion of a health objective within the Wicklow Development Plan's core strategy. This could ensure that the subsequent Local Area Plans will include a focus on promoting good health for local communities. Including a specific health objective would ensure that land use decisions, the planning process, etc within the draft strategy will be 'health checked'. This 'health checking' should include a commitment to invest money in infrastructure which promotes public health and reject proposals which will negatively impact the health of the community in Wicklow.

The Issues Booklet developed for this consultation references a number of impact assessments which need to be undertaken as part of the Development Plan process, however there is no reference to health impact assessment (HIA). The IHF recommends that HIA be incorporated into the assessment process undertaken by Wicklow County Council.

The development plan should also include a commitment to addressing health inequalities amongst the population in Wicklow. Good health is not distributed equally amongst the population in any area of Ireland.

-
- **An Institute of Public Health study of chronic conditions in the island of Ireland found that local socio-economic circumstances strongly affect the prevalence of chronic conditions in an area. For all the chronic conditions considered in the study, people living in more deprived areas are more likely to be affected.¹¹**
-

¹¹ Institute of Public Health (2010). *Making chronic conditions count.*

-
- In particular, inequalities during childhood can have lifelong consequences.
 - People in the most deprived areas have the lowest life expectancy.¹² Coronary heart disease is almost 2.5 times more prevalent and stroke 2.2 times more prevalent in the most deprived areas than in the least deprived areas.¹³
-

Continued commitment to active travel

Active travel is the area of public health which is most regularly referenced in the issues booklet for this consultation. Creating an environment conducive to active travel in communities which tend to be inactive could play a significant role in reducing health inequalities. Poorly accessible neighbourhoods (including lack of accessible pavements and cycling paths) can impede older people and people with disabilities in particular from being physically active. Walking and cycling are cheap and potentially accessible to all.

The IHF encourages physical activity, in particular walking and cycling, in the community and works in partnership with Local Authorities across the country. The IHF's Slí na Sláinte (Path to Health) initiative currently has 220 routes nationwide and has been extended to include to cycling routes, in addition to 'Time to Walk' and 'Time to Cycle' signs. In conjunction with the National Heart Alliance, the Irish Heart Foundation published a report, *Building Young Hearts – physical activity, young people and the built environment*¹⁴, addressing the interplay between the physical environment and levels of physical activity amongst young people. The paper aims to show how the physical environment can improve young people's opportunities for physical activity and it recommends that the promotion of physical activity should be the key focus of policy for local authorities and Government. The paper refers to a number of recommendations, including: pedestrian and cyclists priority zones; lower speed limits in the proximity of all schools; and the introduction of 'park and walk/ 'park and stride' zones directly outside schools, all of which should be considered for inclusion in the Wicklow Development Plan.

¹² Life expectancy is correlated with a person's social class, the affluence of the area in which they live and educational attainment. People with disabilities and carers also die younger, as do single persons and those who are widowed and divorced. CSO (2010) 'Mortality Differentials in Ireland' http://www.cso.ie/en/media/csoie/census/documents/Mortality_Differentials_in_Ireland.pdf

¹³ Balanda, K. et al. (2010). *Making Chronic Conditions Count: Hypertension, Stroke, Coronary Heart Disease and Diabetes*. Dublin: Institute of Public Health in Ireland.

¹⁴ Irish Heart Foundation and National Heart Alliance (2010) 'Building Young Hearts'. Dublin: Irish Heart Foundation. http://www.irishheart.ie/iopen24/pub/building_young_hearts_final_pdf_2010.pdf

PART 2

Creating healthy school environments

- One in four girls and one in five boys are now overweight or obese in Ireland.¹⁵
 - One fifth of Irish children's energy intake comes from sweets, snacks and biscuits.¹⁶
-

Restricting fast food outlets opening close to schools

A current priority for Local Authorities is the provision of schools for areas with growing populations. Attention should also be paid to ensuring that the environment around new and existing schools is healthy and suitable for children. In the drafting of the Development Plan, the IHF calls on Wicklow County Council to use its authority for land zoning and land use to limit access to fast food and the promotion of unhealthy foods in the vicinity of schools.

The IHF is increasingly concerned about the ongoing threat to the wellbeing of children posed by the increasing number of fast food restaurants located in close proximity to schools. At a national level, the IHF is advocating for planning regulations to restrict the number of outlets selling fast foods in a particular area, especially adjacent to schools. The need for action to protect Irish children is strong. As shown by the Department of Children and Youth Affairs Growing up in Ireland study, more Irish children are overweight than in most European countries.¹⁷ Growing Up in Ireland also clearly shows that social inequalities increase the risk of overweight and obesity from an early age. In such a context, the IHF believes that it is important that health concerns be admissible in planning decisions, especially where these relate to sites adjacent to schools.

The issue of new fast food outlets in the vicinity of schools has been once again highlighted by a planning application to Wicklow County Council (Number: 14/2034) for a McDonald's restaurant and drive-through adjacent to the three school complex (Educate Together and Irish primary schools and the planned Church of Ireland secondary school) at Blacklion Manor, Greystones. This is three times bigger than a previous application by the same company for the same site, which was strenuously opposed by local people concerned for their children's welfare and rejected on planning technicalities.

¹⁵ Results from the 2011 *Growing Up in Ireland Study*, showed that out of 8,568 9-year old children, 19% were overweight and 7% were obese. Girls were more likely than boys to be overweight (22% compared with 17%) or obese (8% compared with 5%). Results from the *Growing Up in Ireland, Infant Cohort*, also reveal that a quarter of Irish 3 year olds are overweight or obese for their age (19% and 6% respectively). The most recent results come from the National Pre-School Nutrition Survey, 2012, which reported that 16% of 2-4 year olds were overweight and 7% were obese. A higher percentage of boys were classified as overweight or obese (25%) compared with girls (21%).

¹⁶ Irish Universities Nutrition Alliance (IUNA) (2005) National Children's Food Survey.

¹⁷ P. 18, Layte, R. and McCrory, C. (2011) *Growing up in Ireland - Overweight and obesity among 9-year olds*. Dublin: The Stationary Office.

The planning process, fast food outlets and public health

There are several reasons why the presence of fast food outlets may be undesirable from a public health perspective, with implications for planners. For example:

- many hot food takeaways may generate substantial litter in an area well beyond their immediate vicinity
- discarded food waste and litter attracts foraging animals and pest species
- hot food takeaways may reduce the visual appeal of the local environment and generate night-time noise
- short-term car parking outside takeaways may contribute to traffic congestion
- improving access to healthier food in deprived communities may contribute to reducing health inequalities

Source: Public Health England, Chartered Institute of Environmental Health and Local Government Association (2013), 'Obesity and the environment: regulating the growth of fast food outlets', p. 5).

The school environment is vital to the development of healthy children and young people. However without protection, schools provide a growing marketing for foods high in fat, sugar and salt (HFSS). The recent Health Behaviour in School Aged Survey¹⁸ shows that already almost half of secondary schools have a fast food restaurant within a 1km radius. Without proper regulation this situation can only deteriorate further given the business value to fast food outlets of being sited near schools. Research conducted for the IHF in 2007¹⁹ indicated the high penetration of food stuffs in Irish schools – 45% of schools had drinks vending machines, 74% of schools provided confectionary for sale, 57% salty snacks and crisps and 52% fizzy drinks.

As discussed above, the need for local planning to support healthy childhoods is supported by national level policies, including *Healthy Ireland* which mandates local authorities to undertake health and wellbeing assessments and to use an integrated Social Impact Assessment approach (action 2.3). Further, the national policy framework for children and young people – *Better Outcomes, Brighter Futures* (Department of Children and Youth Affairs, 2014) includes a recommendation on the need for the planning system to support healthy childhoods:

Develop child and youth-friendly communities through Local Government adopting appropriate policies and objectives in County/City. Development Plans and further supported by the preparation and issuing of National Guidelines on Planning for Child-friendly Communities.

Planning authorities can influence the built environment to improve health and reduce the extent to which it promotes obesity. During the drafting of the Development Plan, the IHF suggests that an audit of local authority licensing and catering arrangements in Wicklow be undertaken with the intention of developing formal recommendations on reducing the proximity of fast food outlets to schools and other places where children congregate.

¹⁸ Kelly, C. et al. (2012) 'School food environments: exploring fast food chain restaurants around post-primary schools in Ireland'. *Proceedings of the Nutrition Society*, 71 (OEC2), E213. doi:10.1017/S0029665112002704

¹⁹ Kelly, C. and NicGabhaunn, S. (2007) *Marketing of Foodstuffs in Post-Primary Schools in Ireland*. www.irishheart.ie

In England and Wales, local planning policy may control the development of unhealthy hot food takeaways through local planning policy documents which place limits on the concentration of takeaways in a town or local centre, as well as their proximity to each other along a defined frontage and completely restricting any new hot food takeaway within a defined area (e.g. near schools). Even where there is no local planning policy on hot food takeaways, a local planning authority may be able to refuse an application where it might have an adverse health impact on the community.²⁰ In London, Waltham Forest Council has recently led the way, refusing 82% of fast food outlets and asserting that planning permission will usually be refused for shops within 10 minutes walk of schools, parks and youth centres.²¹

Promote food growing as a sustainable and health promoting use of green space

The issues booklet for this consultation makes no mention of the need to ensure local communities have access to healthy food. This access may require local fresh food shops, public transport to large supermarkets, local food markets, as well as opportunities for people to grow their own food.

The Growing up in Ireland study shows that children from disadvantaged areas tend to live further away from larger supermarkets, with more fresh food such as fruit and vegetables.²²

Planners can play a significant role in the development of 'healthy-weight environments'. The Town and Country Planning Association (TCPA) describe healthy-weight environments as supporting people in avoiding being overweight or obese through how an area is designed and what it provides. The TCPA set out guidance for how planning authorities can support healthy-weight environments²³ through movement and access; open spaces, recreation and play; food; neighbourhood spaces; building design; and local economy. In terms of the food environment they suggest the following elements which could be incorporated into the Wicklow Development Plan:

- Development maintains or enhances existing opportunities for food growing;
- Development avoids over-concentration of hot food takeaways and restricts proximity to schools or other facilities aimed at children and young people;
- Shops / food markets sell a diverse offer of food choices and are easy to get to by bike, walking or public transport.

In addition, the IHF recommends that the Wicklow Development Plan commits to the provision of allotments for food growing. Such growing can provide access to healthy food and can also have wider environmental and social benefits for local people and can improve the aesthetic appearance of unused land. The Development Plan could include actions to support private and public landholders to loan unused land to community groups to cultivate.

Conclusion

The IHF welcomes the opportunity to comment on the development of the Wicklow Development Plan 2016 – 2022.

²⁰ See Development control on the website of Healthy Places, <http://www.healthyplaces.org.uk/themes/access-to-healthy-food/hot-food-takeaways/development-control/>

²¹ Robinson, D. and Horwitz, W. (2014) 'Changing London – a healthy city'. <http://www.change-london.org.uk/london-papers/5-healthy-city/>

²² Layte, R. and McCrory, C. (2011) *Growing up in Ireland - Overweight and obesity among 9-year olds.*

²³ TCPA and Public Health England (2014) 'Planning healthy-weight environments'. http://www.tcpa.org.uk/data/files/Health_and_planning/Health_2014/PHWE_Report_Final.pdf

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The information provided in this publication was correct and accurate at the time of publication to the best of the Irish Heart Foundation's knowledge.

SUBMISSION TO WICKLOW ISSUES PAPER

Information about Keep Ireland Open

KIO is a voluntary organisation whose aim is to lobby for the legal right to reasonable access to the countryside which is the norm in virtually all European countries but is denied to us. Our membership covers a broad spectrum of recreational users of our countryside, rural organisations and environmental groups including An Oige, Scouting Ireland, Catholic Guide of Ireland, An Taisce, Friends of the Irish Environment, Federation of Local History Societies, Irish Hang Gliding & Paragliding, United Farmers & Irish Rural Link. See our web-site: www.keepirelandopen.org.

We are members of Comhairle na Tuaithe.

We make this Submission as a national body but also on behalf of our members living in the county.

Scope of Submission is limited to access to the countryside and directly related issues.

Other county plans

While you are obliged to take into account plans in adjoining counties, you may care to take into account plans in other counties particularly those within the Great Dublin Region. Please note that the final version of the Leitrim Plan is not yet available

Review of Plans in adjoining counties

We presume that you will be monitoring the reviews of Plans in Sth Dublin, Carlow & DLR which have commenced and that you will liaise with their planners to ensure that the plans are compatible, where appropriate. We may make a supplementary submission(s) following the publication of draft/adoption of their Plans.

As our submission is very focused on issues of walking/cycling, public rights of way and better access to the countryside rather than answering the questions therein, we are basing our submission on a critique of the 2010 Plan.

However, we would like to comment on the question posed on **Public Rights of Way**. As, according to 2010 Plan there are no public rights of way in the county, the first step is to identify them.

CRITIQUE OF EXISTING PLAN

We presume that you will use the 2010 Plan as the basis for the new one as it contains much excellent material. It does, of course, require expansion and updating. We presume that the Draft will comply with the Greater Dublin Area Regional Planning Guidelines.

The mention of a section in the Plan, without comment, means that we support the wording with appropriate up-dating.

Counties in **bold** are adjoining or in the Region.

FORMAT

Index We submit that you should provide an Index as recommended in the **Development Plan Guidelines** (5.15). See **Fingal, Sth Dublin & DLR**.

Layout The Plan can be improved by sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties when referring to particular points. This document is a legal document not just a glossy information brochure. It is also a working document.

SECTION A

Chapter 1 **Introduction**

1.2 **Plan Composition**

2nd para As this only a partial list, we submit that you should include a complete list with the full wording from the Planning Acts. See **Sth Dublin** App 1 & **Meath** App 2.

1.4 **Enforcement** We submit that this should be replaced by: *The council has extensive powers under the Planning and Development Act 2000 to take enforcement action where unauthorised development has occurred, is occurring or, where permitted, development has not, or is not being carried out, in compliance with the planning permission granted or any conditions. Planning legislation will be enforced to ensure that the environment is not jeopardised by inappropriate and environmentally damaging development and ensure that the policies and objectives of the Plan are implemented and adhered to. Ensure that the integrity of the Planning System is maintained and that it operates for the benefit of the whole community and that the environment is not jeopardised by inappropriate and environmentally damaging development and ensure that the policies and objectives of the Plan are implemented and adhered to. Take enforcement action in cases of unauthorised development, where it is appropriate to do so, consistent with the provisions of Part VIII of the Planning and Development Act, 2000. Under planning legislation any development which requires permission and does not have that permission is unauthorised development, as is development which has been or is being carried out in breach of conditions specified in a planning permission. In carrying out its enforcement functions, the Council will:*

1 Issue Warning Letters, in relation to any non-minor unauthorised development of which it becomes aware, within 6 weeks;

2 Carry out an investigation into alleged unauthorised development, after the issuing of a Warning Letter;

3 *Make a decision, as expeditiously as possible, as to whether or not to issue an Enforcement Notice. This decision to be made within 12 weeks of the issue of a Warning Letter;*

4 *Enter any decision to issue an Enforcement Notice, including the reasons for it, in the Planning Register;*

5 *Notify complainant(s) regarding the decision to issue an Enforcement Notice. Where the decision is not to issue an Enforcement Notice the developer and the complainant will be informed of the reason for this decision.*

6 *May carry out periodic site visits in order to ascertain compliance. Proceedings for non-compliance with and Enforcement Notice will be taken in the District Court in most cases. However, where appropriate, injunctions will be sought in the Circuit Court or High Court. In all cases involving legal proceedings the Council will seek to recover its costs, in addition to any fines imposed by the courts. Based on **Sth Dublin** 0.4.6, Louth 12.7 & **Kildare** 19.1.1.*

1.5 Ministerial Guidelines

We submit that you should include an additional para: *This Plan has been drawn up to be, as far as practicable, consistent with the DoECLG Guidelines and relevant strategies, guidelines, plans, policies and objectives of other Ministers. Development proposals shall be subject to National guidance and policy.* Based on **Planning Act 2000** Sec 9(6), Meath 1.5 2nd para, **Sth Dublin** 0.3.1 1st para 1st sentence, Cavan 1.5 5th para & **Wexford** 1.2 2nd para last pt.

Note We are aware that the wording in the Planning Acts uses the phrase *have regard to* whereas we are suggesting *to be consistent with* as the former is open to misinterpretation. There is no obligation to use the wording in the Planning Acts.

We submit that you should include additional sub secs:

A **National Spatial Strategy**

This Plan has been drawn up to be consistent with this Strategy. Based on **DPG** 2.3, Nth Tipp 1.4.1 last para & 1.5 Cavan 5th para.

B **Adjoining counties**

This Plan has been drawn up to take into account plans of adjoining counties. Based on Sec 9(4) **2000 Planning Act** & **Meath** 1.5 2nd para 9th line use the phrase *have regard to*.

Note We are aware that the wording in the Planning Acts uses the phrase *have regard to* whereas we are suggesting *to be consistent with* as the former is open to misinterpretation. There is no obligation to use the wording in the Planning Acts.

We also submit that the names of the counties should be included. See **Sth Dublin**, **DLR** 1.3.4 2nd para & **Meath** 1.5 2nd para last sentence.

C We submit that you should mention the **Two year Review** required by Sec 15(2) of the **2000 Planning Act**. See **Wexford** 1.5 2nd para.

D **Financial Resources**

Strive to secure the financial resources to implement the pols and objs. Taken from Laois 1.7.

We note that riders are added to some Objs *subject to the availability of financial resources*. We submit that where this appears in the Draft it should be deleted as most Objs have financial implications, and it is invidious to single out particular ones.

E The Plan must include a statement in accordance with **Sec 28 of the Planning & Development Act**(as amended by Sec 20 of the 2010 Act) as to how the Plan has implemented or not implemented the policies and objectives of the Minister. See **Wexford** App B Sec 28 Ministerial Guidelines Introduction 1st para & **Kildare** Table of Contents xi.

Chapter 2 **Context**

2.2.1 **RPGGDA**

1st para

We submit that you should include additional **Text**: *This Plan has been drawn up to be consistent with RPG and development proposals shall be subject to Regional strategies.* Based on Donegal 10.1.1 & **Meath** 1.5 2nd para 8th line.

2.3.5 **Local Plans and other studies**

We submit that you should include additional **Text**:

1 *The current Heritage Plan should be **reviewed** prior to its expiry and the new Plan be set within the context of the National Heritage Plan and that in preparing the Plan it will be an objective to ensure a balance between protection of heritage and the implementation of other, often competing, policies in the Development Plan.* Based on **DLR** 9.3.2 Pol LHB6, **Meath** 9.4 last para 7th line & **Kildare** 13.3.2.

2 We submit that the **main objectives** of the Plan should be mentioned. See Roscommon 7.2 2nd para, Sth Tipp 6.3.7 end of page 71 & 6.5 & Leitrim 3.7.10.3 2nd para.

3 **Implement, promote and support**, *in partnership with all relevant stakeholders (including the Co Heritage Forum, the Heritage Council, community groups and the wide public) the aims, objectives and actions contained in the Plan and any revision thereof and take cognisance, in assessing planning applications and preparing development plans, the provisions of the Plan.* To which you should add: *See our web-site* (insert address). Based on **Fingal** 5.1 Obj NH O2, **Kildare**13.8.1, **Sth** Dublin 4.3.7.xiii Pol LHA15, **DLR** 9.3.2 Pol LHB6, **Meath** 9.5 CSA SP 4, Galway 9.1.1 Pol HL3 & Mayo 3.1.5 Heritage O/H-G1.

4 ***Continue to employ a Heritage Officer and to fill vacancies as they arise.***

Note Grants may be available from the Heritage Council. Also it might be possible to employ an intern.

SECTION C

Chapter 8 **The Rural Economy**

8.2 **Context**

Agriculture

We submit that this should be repositioned in 8.3.2.

Forestry

We submit that this should be repositioned in 8.3.3.

3rd para 3rd pt We submit that this should be replaced by: *Encourage, promote, provide, facilitate and protect access to forestry and woodlands, including private forestry, in co-operation with Coillte, the Forest Service and other agencies, for walking routes(including long distance and looped walks), mountain trails, nature trails, mountain bike trails, bridle paths, hiking, orienteering and other non-noise generating recreational activities for the benefit of local people and tourists and take into account the Forest Service 2006 publication "Forest Recreation Guide for Owners and Managers". The council will support the development of purpose built trails and cycle tracks. Regulate development to maximise recreational amenity and community uses.*

Note We submit that it is only reasonable to include private forestry in view the substantial grants available.

Based on **NSS** 5.2.3 3rd pt in 2nd list of pts, **Meath** 9.7.8 NH OBJ7 & 10.10 RD POL 17, **Sth Dublin** 4.3.9.x, Fingal 8.4 RE 07, **Kildare** 10.5.5 FT11, **Wexford** 15.5 Obj RS 12 & 14, Nth Tipp 4.5. Pol ENV 26f), Kilkenny 6.5 last para, Westmeath 3.41 P-F3 & 6.21 P-LLM 10, Cavan 8.8.1 NHEO32, Waterford 8.26 Pol NH 23, Limerick 6.11 COM031b), Laois 7.13 P42, **Carlow** Chpt 9 Forested Areas last para & Leitrim 3.6.3 5th para.

Extractive

We submit that this should be repositioned in 8.4.5.

8.3.2 **Agriculture**

We submit that you should include **Text:**

1 *Recognising the increasing demand for recreational space, provision should be made for the recreational use of agricultural land, particularly commonage and other rough grazing land which shall be regarded primarily as a recreational resource.* Based on Kilkenny 6.2 Commonage Land, Sligo 4.2.3 P-AGD-1 & Nth Tipp Agriculture 4.4.1h).

2 *Farmers will be encouraged to see themselves as custodians of the countryside and the rural landscape which are valuable to present and future generations.* Based on **NSS** 5.2.3 last pt in 1st list of pts on page 101, Louth 3.4 RD14, Cavan 3.5 EDO6 1st sentence & Leitrim 3.7.7 2nd para.

3 *Agriculture is an integral part of the management of the management of large parts of the rural environment and landscape and provides an amenity for enjoyment of the general population.* Taken from Leitrim 3.6.2 2nd para.

Obj AGR1

We submit that the 2nd part of the Obj after *development* on 3rd line should be replaced by *ensuring that rural amenities, important archaeological and heritage features, visual amenities, eco-systems, conservation areas, landscape and scenic views are protected from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that they are appropriate in nature and scale, and ensure it does not have an undue negative impact on the visual/scenic amenity of the countryside. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines.* Based on **Kildare** 10.5.2 AG 2 & 10.6 RDO4, Offaly 10.11 P10-03, Louth 3.4 RD10, Cavan 3.4 EDO6 2nd sentence, Limerick 5.6.1 ED 019 (a), Waterford 6.7.1 2nd para (a), (d) & (e), Roscommon 6.2.1 Obj 181 & Monaghan 5.5.4 AGO 4.

2 *Promote, at national level, the adoption of a **Land Use Strategy**.*

Note All EU countries(including Ireland) are under increasing pressure from the EU to comply with various EU Directives. In response to this Scotland adopted a Strategy in 2011. See the 2014 Report of the Joint Oireachtas Committee on Agriculture, Food and Marine page 10.

8.3.3 Forestry

Text

We submit that you should include **Text:**

1 *Recognise the **recreational and tourism** potential of forestry.* Based on **NSS** 5.2.3 3rd pt in 2nd list of pts, Roscommon 12.31 1st para 1st line, Cavan 3.9 2nd para 5th pt Monaghan 5.6.2 FYO 2 & Kilkenny 6.5 1st para.

2 *The Council would welcome a **revision of the planning regulations** that would bring forestry plantations under the control of the planning system as nothing alters*

a landscape more than large scale forestation, yet such planting is largely outside the control of Councils . Initial forestation is classified as an exempt development under the 2001 – 2013 Planning Regulations , while an EIA is only required for planting of more than 50 hectares. Taken from Leitrim 3.6.3 1st para.

3 **Coillte's "open forest" policy** allows the visitor to access and enjoy woodland areas. Taken from **Carlow** Chpt 9 Forest Areas. Also **Wexford** 15.9 last para 2nd para.

4 *The council has a role both in planning for initial forestation and expansion; planning permission is required where an EIA is required. Applications to the forest service for planting are referred to the council for its observations. Taken from Leitrim 2.6 3rd para.*

Table

We submit that you should include a Table of:

Recreational/amenity forests. See **Meath** 4.6.1 2nd para 5th pt, ***DLR** App G Recreation Access Routes, **Carlow** Chpt 9 Forested Areas 1st & 2nd para & Kildare 14.11.3(i).

*With Maps

Objs

FTY2 2nd pt We submit that this should be replaced by:

*Forestry will not be permitted on ridge lines and should be monitored in elevated landscapes and being conscious of the potentially negative visual impact of forestry development on landscape quality and on the surrounding area in terms of its nature and scale (including clear-felling activity) protect from injury scenic and exposed/elevated landscapes, scenic routes, views, prospects and vistas(including to water and valley approaches to the hills), in SPAs, SACs, NHAs, Geological sites and in Primary and Secondary Amenity Areas, archaeological sites, historic monuments/sites and heritage features and geological sites. Ensure that exclusion zones are applied to sites of archaeological importance. The Council will seek to have such planting and felling conducted in a manner which takes into account best practice in forestry planting and felling in the context of landscape design. Based on **Sth Dublin** 4.3.7.xiv Pol LHA 16 1st para 2nd sentence, **Wexford** 6.4.8 Obj ED22, Sth Tipp 9.20(i) & (ii) & 2nd para 4th pt, Roscommon 12.31 1st para 2nd line, Nth Tipp 4.5.1 4.5.1e) in list of pts & f) in list of pts & Pol ENV 26a) & e), Mayo 4.11.4 3rd para, Monaghan 5.6.1 FYO 3, Sligo 4.2.1 FOR-7, Laois 7.13 P46 & Leitrim 3.6.3 Table 3-3 3rd para) & 3.03.09 3rd para.*

FTY3 We submit that you should omit *timber production* on 4th line. Many forests in the county have major recreational use. There is little evidence that timber production is unduly inconvenienced by recreational users. We submit that the inclusion of timber production might well give an excuse to forestry operators to close off entire forests for recreational use.

We submit that you should include additional **Objs**:

1 *Retain **existing rights of way** and **identify them** and established walking routes before planting commences and maintain them as Rights of Way/Walking Routes.* Taken from Cavan 3.9 EDP15 & EDO 31, Mayo 3.1.2 Forestry P/ED A 5, **Carlow** Chpt 7 Public Rights of Way 6th pt, Laois 7.13 P45 & Sligo 4.2.1 P-FOR-6.

Note If this isn't done walking routes tend to become subsumed into the network of forest roads thus making it very difficult, over time, to establish the existence of these routes.

2 *Promote, encourage and support **Neighbourhood** Schemes by identifying suitable areas and support other initiatives that aim to establish and enhance woodlands for recreational purposes in partnership with local communities.* Based on **Kildare** 10.5.5 FT 9, Westmeath 3.41 O-F3, **Meath** 10.10 RD OBJ 4, Leitrim 2.07.08 Pol 7.8b, Monaghan 7.4 RAO 15 & Cork 5.5 ECON 5-8

3 *Engage with Coillte in developing **off-road cycling trails** at (local) in accordance with Coillte' Off-road Cycling Strategy(2012).* Taken from **Wexford** 15.6 Obj RS28.

4 *Seek to identify areas of forestry that could be developed or **protected as amenity areas**.* Taken from Galway 10.2.1 Pol AM9.

5 *Forestry shall not **obstruct existing public rights of way**, traditional walking routes or recreational and tourism amenities and facilities.* Based on Kilkenny 6.5.2 3rd pt, Westmeath 3.41 P-F5, Monaghan 16.12 AFP 7, Sligo 4.2.1 P-FOR-5, Nth Tipp 4.5.1 ENV26, Leitrim 4.5.1 3rd para, Laois 7.13 P 43 & Kildare 10.5.5 FT 5.

6 *Protect **access routes to upland walks and rights of way**.* Taken from Laois 7.13 P48.

7 *On **steep slopes** above the 300 metre line planting will be strongly discouraged especially where the land slopes to a water body or where the land contains deep peaty soil. Where possible, existing areas under forestry will be reduced and/or redesigned following clear felling.* Taken from Waterford 10.36.5 last pt, Laois 7.13 P47, *Leitrim 3.6.3 Table 3.3 Strategy 2nd para) & Sligo 4.2.1 P-FOR-7.

* mentions particular areas

Limerick 5.6.2 Pols recommends different height limits for each area.

8 ***Discourage new forestry development**, except for broadleaf, in proposed/candidate and adopted NHAs,SACs and SPAs in designated Sensitive Rural Landscapes and Visually Vulnerable Areas, along designated Scenic Routes(Broadleaf forestry will be open to consideration in these areas).* Taken from Sligo 4.2.1 P-FOR-2.

9 *Adhere to(or comply with or be in accord with)the relevant **guidelines published by the Forest Service**.* Taken from **Meath** 10.10 RD POL 15.

10 *Forestation will only be considered in areas identified as suitable for such development in the **Landscape Character Assessment**.* Taken from Galway 11.33.2 & Leitrim 3.6.3 last para.

11 *Where **cumulative limits of 50ha** is reached the Council will request an EIS.* Taken from Limerick 7.2.6 last para.

8.3.5 Extractive Industry

We submit that you should be repositioned in 8.4.5.

Strategic Obj

Obj EX1 We submit that you should add: *Applications for new development, including associated processes, shall identify existing public rights of way and established walking routes which may be impacted on are adjacent to the development site. They shall be kept free from development as Rights of Way/Walking Routes. Ensure that tourist, natural or recreational amenities will not be materially affected.* Based on **Meath** 11.14 1st para & last pt in list of pts, **Kildare** 10.8 EI 5 last pt, **Wexford** 18.16 3rd pt, **Carlow** Chpt 7 Public Rights of Way 6th pt, Cavan 3.8 EDO25, Mayo 3.1.2 & Extractive Industry P/ED-EI 3 & 5, Galway 4.6.1 Pol ED18 & Sligo 4.2.4 P-MEQ-2.

Note Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected.

EX4 We submit that this should be replaced by: *The following **National Guidelines** (as may be superseded and/or updated) should be complied with:*

- A Environmental Management(EPA 2006);*
- B Quarries and Ancillary Activities: DOECLG Guidelines 2004);*
- C Environmental Code(ICF 2006);*
- D Geological Heritage Guidelines(ICF & GSI 2008);*
- E Archaeological Code of Practice((ICF & DOECLG 2009).*

Taken from **Carlow** Chpt 5 QUARRY INDUSTRIES 15th line.

8.4.6 Extractive Industry

Table

We submit that you should include a **Table of Guidelines**. Waterford 10.36.4 last para has a partial list.

General

1st pt We submit that this should be replaced by: *Development will not be permitted in SACs, SPAs, NHA.s, High Amenity Areas(including buffer zones), in the vicinity of recorded monuments, World Heritage Sites and zones of archaeological*

*potential. In other areas development will be permitted only when it is carefully sited and designed and when the environment and the character of the landscape, particularly sensitive landscapes, natural heritage and archaeological heritage, areas of geological or geomorphological interest, areas of ecological importance, national monuments, listed views and prospects, lakes, river corridors and associated wetlands and places of natural beauty or interest are safeguarded, preserved, conserved and protected to the greatest possible extent and that development does not adversely affect amenities for local people and visitors. Applicants for new or extensions to existing quarries shall submit a detailed landscape and visual assessment which shall identify the area of visual influence and include details of impacts on designated amenity areas and indicate the use of hills and existing trees or other screening to be retained or removed and any proposed screening, grassing or planting of trees or scrubs and proposals for their maintenance, must be carried out and used to determine the extent of the area of visual influence and this screening whether by natural or by alternative means must be retained for the life of the planning permission. The Planning Authority will place the onus on the developer to prove that the proposed development can be accommodated in the landscape without detracting from its character and will impose strict conditions on planning permissions relating to the avoidance or mitigation of visual and other environmental impacts operations should not have a detrimental environmental effect on designated or proposed conservation sites and do not adversely affect European Conservation Sites. The Council will have regard to landscape sensitivity ratings. Based on **Meath** 10.12 RD POL 27, 11.14 last para, 6th & 9th pts, **Kildare** 10.8 EI, 5 & 9, **Wexford** 6.4.5 Obj ED09 & 18.16 3rd pt, **Sth Dublin** 3.2.21.i. Operation of Extractive Industries & 3.2.22.ii. Proposals for New Extractive Industry, Cork 5.5 ECON 5-13(b), Limerick 5.6.3 Obj EDO26 a) & b), 10.8.2 3rd para 16th pt, Cavan 3.8 EDO 23 & EDO26, Sth Tipp 5.6.2 4th line, (i) & (iv), Galway 4.6.1 Pol ED16 & 11 DMS 35.11.6 & 11 & Offaly 19.8 3rd para 3rd & last pts.*

Extractive Industry in Zone of ONB

Application Requirements

Content of Applications

Land & Mineral Interest

Nature of Development

Nature of Deposit

Ancillary Operations and Development

Environmental effects of proposal

Restoration, After Care and After Use

Conditions attached to permission

We submit that you should include **Objs:**

1 *Positively engage inter-alia with **lobby groups**, local amenity groups, other local authorities, National Park and Wildlife Service an ensure that d state bodies in on-going development and review of the Council's management and control.* Taken from **Wexford** 6.4.5 Obj ED16.

2 ***Advice from the relevant statutory body** will be sought and considered.* Taken from Kerry 7.2.3.1 2nd last line.

3 *The visual impact of a quarry or a mine is likely to **extend beyond the boundaries of the primary visual unit** within which the development lies. A detailed landscape and visual assessment must be carried out and used to determine the extent of the area of visual influence and submitted with any planning application and permission will not be granted if it adversely affects the amenity value of adjoining and neighbouring land.* Based on Kerry 13.19.3, Waterford 6.21 2nd sentence, Leitrim 3.6.7 Pol 69 & Westmeath 3.43 P-E17. Also **Meath** 10.12 RD POL 24.

4 *An **EIS** will be required as part of a planning application where the thresholds outlined in Schedule 5 of the Planning and Development Regulations 2000 are met. The Planning Authority will also exercise its powers under Article 103-subsection (1) to require an EIS for sub-threshold development where it is considered that the development would be likely to have significant* effects on the environment or heritage. Appropriate mitigation measures and details of re-instatement after use must be included.*

**material would be better*

Based on Longford 4.6 3rd para, Waterford 10.36.4 10th line, Cavan 3.8 EDP9 1st sentence, Nth Tipp 10.14.1, Galway 11.35.9, Mayo 4.10.4 3rd para, Kerry 13.19.4, Roscommon 12.30 2nd para & Laois 12.12 3rd para.

5 *Consideration must be given to the **EU guidance** on "Undertaking on Non Energy Extractive Activities in accordance with Natura 2000 Requirements July 2010.* Taken from Monaghan 15.18 EIP 2.

6 *Permit the **manufacture of aggregate products**(including the processing and delivery concrete and tarmac) provided that the activity will not have an adverse environmental impact and has due regard for visual amenities.* Based on Kerry 7.2 NR 7-10, **Wexford** 6.4.5 Obj ED12 & Leitrim 3.6.7 para under Pols.

7 *Minimise the impact of extraction through rigorous application of licensing, development management and **enforcement requirements** for quarries and other developments affecting visual impacts, impacts on amenities and the phasing, re-instatement and landscaping of worked sites.* Based on Nth Tipp 4.7 3rd para & **Carlow** Chpt 5 QUARRY INDUSTRIES 2nd para 3rd pt.

8 *The **Archaeological Code of Practice**(DoECLG/ ICF 2009) Guidelines will be used in the archaeological assessment of extractive development application, with best practice adopted.* Taken from Westmeath 3.42.5.

9 *Refer applications for development to **GSI** for mineral extraction, quarrying developments/extensions and any developments involving excavations greater than 50,000m or one ha in area.* Taken from Louth 3.8 RD 29.

10 *Where a development proposal is likely to have a significant effect on a European site, an **Appropriate Assessment** will be required. Appropriate mitigation measures and details of re-instatement after use must be provided.* Based on Kerry 13.19.4 & Cavan 3.8 EDP9 2nd sentence.

8.4.5 Forestry

We submit that this should be repositioned in 8.3.3.

Chapter 9 Tourism & Recreation

2nd para

9.1 Introduction

2nd para

We submit that you should include additional **Text**:

*Recreation is an important **component of modern living** and has a valuable social role in modern society.* Taken from Cork 4.15.1 1st sentence.

9.3 Strategic Objs

1st para

9.3.1 General Objs

TR1 & 2 We submit that these should be merged rewritten to include: *As environmental heritage is an important amenity upon which tourism depends, and it has intrinsic values which outweigh its value as a tourist asset so that it can be enjoyed and cherished by future generations and that developments are appropriate in scale, are sited, designed to a high standard, maintained and landscaped so that they do not have an undue negative impact on natural and archaeological heritage features, appearance and character of landscapes, sites of nature conservation importance, environmentally sensitive areas, scenic amenities or degrade or alter the natural environment. Developments should be appropriate in scale and appropriate to the character of the area, be clustered to form a distinct and unified feature in the landscape, utilise suitable materials and colours, and be readily absorbed in its surroundings by taking advantage of existing vegetation and/or topography, and be satisfactorily assimilated into the landscape. Facilitate infrastructure for water-related activities providing that it is consistent with natural and recreational values of the water body and any heritage designations.* Based on **Meath** 4.6.8 ED POL 27, **Wexford** 14.4.3 L08 5th line, Kilkenny 6.2.4 1st pt & 3rd pts, 7.3 1st para 1st & 5th

pts, Limerick 5.5.2 last para, Monaghan 4.4 LPP3 & 15.20 TOO 5, Longford 4.4 AGR 2, Louth 3.3 RD 6, Cork Chpt 5 ECON 6-7(a) 8th line & Sth Tipp 5.6.1 5th para (ii), (iii) & (iv).

TR3 1st sentence

9.3.3 Integrated Tourism Complexes

Obj ITLR3 We submit that you should include an additional pt: *An overall Master plan will be required which will include proposals for the preservation/conservation of natural amenities eg woodlands, watercourses/waterbodies, designated sites, national monuments and other structures of historic merit. It should be of a high architectural standard of layout, design and landscaping should retain the open nature and rural character of open countryside, of key views and prospects and should ensure that rights of way or walking routes are not impinged.* Based on Nth Tipp 6.11.2 ECON 17(a) (b) & (c), Cavan 9.8 1st to 4th pts & **Meath** 11.6 last pt.

9.3.6 Themes and Products

We submit that you should include **Text**: *The growth of rural tourism(including agri-tourism) is critical to the local economy and is directly and positively linked to its economic, social and natural resources. There is strong potential for **eco-tourism**. This approach promotes enhanced awareness and positive appreciation of local resources, traditions, ways of life and opportunities to optimise the use of amenities and share the benefits throughout the area. Rural tourism can play an important role in supporting and diversifying the economy of rural communities and is based on local amenities and natural heritage.* Based on **Wexford** 7.4.5 1st para 1st & 2nd sentences, **Meath** 4.6.5 2nd para, Kilkenny 7.9.3 2nd para & Laois 3.3.2 Agri-tourism.

TTP1 & 2 We submit that theses should merged and rewritten to include: *Encourage, support, facilitate and promote the development and expansion of rural tourism including agri-tourism, farmhouse accommodation, open-, pet-farms, horse trekking centres, walking, cycling, bird watching and eco-, geo- & green-tourism.* Based on **Meath** 4.6.8 ED POL31 & 4.6.5 2nd para 7th line, **Kildare** 5.9.8 ECD 44 & **Wexford** 7.4.5 Obj TM19.

TTP3 We submit that:

1 This Obj should be re-positioned in 11.3.

2 The 1st part should be replaced by: *Recognising the importance and potential of walking and cycling from a local as well as a tourism perspective, create, provide, promote, improve, develop, sustain, support, enhance, encourage and facilitate the creation of dedicated network of cycling/walking routes and tourist trails (including looped walks, local walks, community walks and medium/long distance walks)and public/rural footpaths, in rural areas (including suitable linear lands along cutaway*

*bogs, established rights of way, strategic green corridors and other off-road routes). Ensure that these routes are convenient and provide a pleasant environment by maintaining and enhancing existing facilities. Enhance and extend existing routes, by utilising links from residential areas through parks and open spaces to facilitate a secure green network and linking with Sli na Slainte and existing or new public rights of way, to provide access to scenic, coastal, mountain, lakeshore and river features and views of special interest, particularly where these have a historical association and to open up diverse landscape. Create more people friendly places, walking/cycling routes should be designed to incorporate current thinking and best practice from experience in other locations. Off-road walkways can be established by informal, formal agreements with landowners or by acquisition. Based on **Dev Plan Guidelines** 3.5 Box 3 B Infrastructure 3rd pt, **Meath** 4.6.8 2nd para, ED POL 40, ED OBJ9 & 6.9 TRAN POL15, **Wexford** 15.6 Obj RS19, **Sth Dublin** 1.3.36.xiii Text, 4.3.9.iii & xii LHA36 & 1st para, **Fingal** 4.1 TO 4 5th line, TO14 & 8.4 RE 31 & 32, **Kildare** 6.5.2 ST 2 & 8, Cavan 9.6.1 RTO 3, RTO19 1st para, Longford 5.1.3 PED 3, Offaly Pol 15-06, Roscommon 10.3.1 2nd – 5th para & Pol 311, Kerry SG 9-32, **Carlow** Chpt 7 Bealach Siúlóide (Walking Routes) 2nd para 3rd pt in list of pts, Waterford 6.13 Obj ECD 5, Laois 10.7 P62, Mayo 3.1.3 P/TI-PC 1 & Donegal 4.1.3 Pol T-P-40.*

3 The 2nd part should be replaced by *Support, promote and encourage the development of new and existing, walking and cycling routes including facilities ancillary to trails and including medium and long distance routes and cycle touring routes, in conjunction with the Irish Sports Council, IW and Failte Ireland, to provide and develop linkages with trails, particularly those with a historical associations and in areas of high amenities, from Wicklow to adjoining counties, including cross border counties, in partnership with their councils, the state, private and voluntary sectors.* Based on Cavan 9.6.1 RTO19 2nd para, **Kildare** 14.12.1 CR4, **Sth Dublin** 4.3.9.xii LHA36 2nd last para, Monaghan 7.5 CR 9, Laois 10.7 P59 & Sligo 4.4 P-TOU-8.

Please note that we have omitted *driving* as no undue encouragement should be given to activities which are not environmentally sustainable.

3rd part We support.

We submit that you should include additional **Objs**:

1 *Ensure that all built elements of **agri-tourism** are appropriately designed and satisfactorily assimilated into the landscape, conserve natural heritage, protect the environment and do not have an undue negative impact on the **visual/scenic amenity** of the countryside. Ensure that buildings/works shall be designed, located and screened will not take away from the rural character and appearance of the area. Buildings in visually sensitive areas must address the surroundings.* Based on Galway 4.7.1 Pol ED33, Kerry 6.6 T 6-38, Monaghan 15.20 TO04, Cork 5.6.15 16th line, Nth Tipp 4.4 .3 Pol ENV 22a & (d) & 6.11.2b) & d), **Wexford** 6.4.6 Obj ED19 & **Kildare** 10.5.2 AG2.

2 *Preserve, improve and extend **recreational amenities** and explore the potential for rural recreational tourism in conjunction with Tourism bodies, WI, FI and NPWS.* Based on **2000 Planning and Development Act** Sec 10(2)(j) & Westmeath 6.21 P-LLM 2 5th line.

3 *Development proposals for **Noise Generating Sports** will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation.* Taken from Kilkenny 7.7.2 last para 3rd pt. To which you should add: *Adopt Bye-laws banning the use of motor bikes and quads (except for bona fide agricultural purposes) in privately- owned areas of rough grazing (including commonage)*

Note Louth have adopted bye-laws.

4 *Ensure that **golf course development** does not impinge on existing public rights of way or walking routes by identifying them prior to development.* Based on **Kildare** 14.12.2 RW 3 & Sligo 6.5 P-SRO-13.

Note Recreational users and golfers don't mix! While there are rights of way over golf courses, they aren't satisfactory: walkers run the risk of being hit by golf balls and golfers are distracted by people talking and moving about.

We submit that you should include an additional sub sec: **Public Rights of Way.**

Text

1 *Public Rights of Way constitute **an important recreational amenity** for local people and visitors. They enable the enjoyment of high quality landscape and cultural heritage and provide a valuable link to natural assets such as lakes bogs and forests. A public right of way is a person's right of passage along a road or path, even if the route is not in public ownership.* Based on Cavan 8.10 1st para 1st & 2nd sentence, Westmeath 7.14 1st para, **Kildare**14.11.3 (iv) & **Wexford** 15.9 1st para.

2 *The **preservation of public rights of way** which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location **on a list appended to the development plan.*** Taken from **2010 Planning and Development (Amendment) Act** Sec 7(b)(ii)(o) & Cavan 8.10 1st para 2nd sentence.

Listing and Mapping

Counties who have complied so far:

A In Plan: **DLR App G, Meath** A pp14, Roscommon Map 19, Donegal 10.13(routes not properly described or mapped), Sth Tipp 6.3.7 3rd para(not marked on maps), Westmeath App 8, Cavan 8.10, Kilkenny App D & Cavan 8.10.

B In Draft Plan: Kerry App B.

The following should be appended to the list or provided in the written statement:
*The **omission of a right of way** from this list shall not be taken as an indication that such right of way is not a public right of way.* Taken from **Meath** 9.7.9 2nd para.

Notes 1 We would point out that the wording in the Planning Act is quite clear: each new development plan must fulfil the above requirement and no deferment will be permitted. See DOCELG letter to all Councils of 25/10/12 (PL 09/12).

2 We submit that the listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of the failure of walking tourism to reach its full potential.

3 There is an excellent modus operandi for listing taken from **Wexford**15.9 Obj RS 34:

Identify the existing public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity using the following methodology:

Place an advert in local papers seeking submissions from the public to identify public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational utility.

Identify existing rights of ways, paths, and access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity.

Identify access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity which the Council have maintained or repaired with a view to identifying public rights of way.

Carry out a desktop analysis of public records, maps, aerial photographs and newspaper accounts to identify reputations of public rights of way.

Once the list is compiled, advertise and put it on display. The public will be invited to make submissions on the validity of the public rights of way.

Endeavor to verify and list the public rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended).

Vary the Plan to include the list and map showing the public rights of way.

Objs

1 **Create** additional rights of way and extend existing ones, by undertaking a review of walking and cycling routes and bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way particularly in areas of high amenity

to areas of high amenity, the coast, uplands, lake shores, river banks, forests, heritage sites, areas of historic or archaeological importance, National Monuments, to create a meaningful network. Promote their greater use and designate traditional walking routes to the coast as public rights of way. Provide linkages from built up areas to the countryside and to link with public rights of way in adjoining counties. Based on **Sth Dublin** 4.3.9.xi 2nd last para & 4.3.9xi LHA35, **DLR** 9.4.6 LHB22 2nd & 3rd pts, **Fingal** 8.4 Obj RE 35, **Kildare** 14.12.2 RW1, Westmeath 7.15 O-PROW3, Sth Tipp 6.3.7 Pol AEH10, Longford 6.4 AM4, Sligo 6.5 P-SRO-11, Kilkenny 7.3.5 2nd para, Nth Tipp 8.3.5 1st para, Mayo 3.1.4 Access to Enjoyment of Amenities P/HC-ACC1 & Laois 13.12 P 95.

2 *Provide adequate **signposting and waymarking** on rights of way.* Based on Laois 13.12 P94, Mayo 3.1.3 PEDESTRIANS & CYCLISTS Obj O/TI- PC 1, **Fingal** 8.4 RE 38, Kerry 9.7.7 Obj SG 9.30, Westmeath 7.15 O-PROW4 & Roscommon 10.3.1 Pol 314.

Note It is most important that public rights of way are marked on the ground because:

- 1 As a notification to the public that a right of way exists. Walkers cannot be expected to access Co Development Plans
- 2 Signage would alert local residents to planning applications affecting the integrity of rights of rights of way
- 3 Directional signage during the course of the route would prevent involuntary trespass on private property and prevent walkers getting lost which might impinge on walker safety.

3 *Protect and promote **Greenways** and consider designating them as public rights of way.* Taken from Laois 13.12 P36 & Sligo 8.4.P-CW-5.

4 ***Identify and map on an ongoing basis public right of way** and incorporate them in the Plan by way of a Variation.* Based on from Westmeath 7.15 O-PROW1 & **Meath** 9.7.9 NH OBJ 9.

5 *Ensure that development does not **impinge on public walking routes** and existing public rights of way and keep them free from obstruction by prohibiting development. Enforce, by legal action, if necessary, any unauthorised attempt to inhibit access.* Based on **Wexford** 15.9 Obj RS36, **DLR** 9.4.6 LHB22 4th pt, Galway 8.5.1 CS26 & Laois 10.7 P56.

6 *Look favourably on planning applications which include proposals to **improve the condition and appearance** of existing rights of way.* Taken from **DLR** LHB 6th pt & **Kildare** 14.12.2 RW 4.

7 ***Existing Public Rights of Way and established walking routes shall be identified** prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments and any other development*

capable of affecting the respective right of way. Based on **Kildare** 14.12.2 RW 3 & Sligo 12.7.13 1st para.

8 *Development will not be permitted where a public right of way will be affected unless the level of amenity is maintained by:*

*(i) the footpath/bridleway being **diverted** by the minimal practical distance and the route continues to be segregated from vehicular traffic;*

*(ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it. Taken from **DLR** 9.4.6 LHB22 5th pt.*

9 *Recognizing the importance of maintaining established public rights, specially in tourist areas of way and to encourage cycling and walking, **protect**, preserve, conserve, enhance and improve, for the common good, public rights of way, and ensure that they are effectively maintained by controlling undergrowth, trees and bushes. Based on **Meath** 4.6.8 2nd para & 9.7.9 NHPOL 20, **Sth Dublin** 4.3.9.xi LHA35, **Kildare** 14.11.3(iv) & 14.12.2 RW 1, Roscommon Pol 314, Kilkenny 7.3.5 2nd para, Monaghan 7.4.1 RAO 10, Westmeath 7.15 P-PROW1 & Cork 4.15.4.*

SECTION D

Chapter 11 **Roads & transportation**

11.3 **Cycling & Walking**

We submit that you should subdivide this as following:

A Cycling only

B Walking only

C Walking & Cycling

A Cycling

Text

1 ***The National Cycle Policy Framework (Department of Transport, 2009)*** aims to create a strong cycling culture which would provide health benefits, a more friendly environment for cycling and improved quality of life. One of its aims is to provide designated high quality rural cycle networks, including inter-urban routes, to encourage cycling for leisure and recreation for both visitors and local people by ensuring that the needs of cyclists should be articulated in county development plans. Based on **Sth Dublin** 2.2.12 2nd para 1st sentence, **Wexford** 15.6 5th para & Westmeath 8.10 1st para.

Monaghan 6.2.3 sets out, in detail, the specific objs.

2 ***FI's Strategy for the Development of Irish Cycling Tourism (2007)*** recommends the designation of a cycling network around the country and the

improvement of existing routes with better sign posting, road surfaces and greater safety for the cyclist. The National Cycle Policy Framework (DOT 2009) includes a policy to construct this National Cycle Network and to expand it to include rural recreational routes, paying special attention to the opportunities of using the extensive disused rail networks as cycling / walking routes. The development and expansion of the network will be implemented by various Government bodies including local authorities. Taken from **Wexford** 15.6 6th para.

3 *There is a need for to identify more **dedicated cycle routes** across the country which can compete with other European Routes such as "the Danube Cycle Path" in Austria and "C2C Cycle Route" in Britain.* Taken from Cork 5.16.3 11th line.

4 *Failte Ireland notes that cycle tourism represents a growing and valuable market for rural areas as it offers opportunities for the development of cycle hire and cycling holiday operations. Cyclists stay longer in an area, and since they cannot carry much provisions, they need to shop locally.* Taken from **Wexford** 15.6 7th para.

Objs

1 *As visitors and local people are not being provided with **safe and traffic-free cycle routes**, promote, facilitate, safeguard and encourage the development and expansion of safe cycling facilities and cycle routes (including adjoining counties). Support and implement FI's Strategy for the Development of Irish Cycle Tourism(2009) and liase with the Sports Council, the NTA and other bodies in the development of cycling touring routes particularly in tourist areas and areas of high amenity, implement the relevant policies of the DoTT's National Cycle Policy Framework(2009), support the development of the National Cycle Network and enhance and maintain these routes with better sign posting, lighting and road surfaces, including signing/lining and the use of coloured surfaces, separation from vehicular traffic, the provision of cycling maps and the promotion of looped routes. Investigate the possibility of developing linear cycle routes utilizing existing natural or manmade corridors such as riversides and abandoned road and rail infrastructure. Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Improve driver education and driving standards so that there is a greater appreciation for the safety of cyclists and improve enforcement of traffic laws. Routes should, where possible, follow off-road tracks and quiet country roads.* Based on **FI's Strategy for Development of Cycling Tourism** Executive Summary(2007) 3rd pt page 6 & 4.2.3 page 23, **DoTT's National Cycle Policy Framework (2009)** OO Breadth of Interventions page 7 6th pt on right hand col, 7th & 8th pts, Pol 3.4 on page 22 & Pol 6.2 page 26, **Sth Dublin** 2.2.13, **Kildare** 14.12.1 CR 9 & ST 17 6.5.2, **Fingal** 4.1 CYCLING & WALKING last para 2nd last line & 4.1 TO 10, **Wexford** 15.6 Obj RS26 & 27, Louth 8.16 TC 31, Laois 10.7 P53, Westmeath 8.13 O-WC8, Waterford 6.13 Obj ECD 5, Offaly 13.4 Cycle Ways, 16.4.03, Donegal 4.1.3 T-P-41, Leitrim 3.7.11.8 Obj 116 & Kerry 9.7.6, 9.7 SG 9-29 & SG 9-33.

Also we submit that you should include a list of the **Objs of the NCPF** including in particular:

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

Taken from **DoTT's National Cycle Policy Framework (2009)** page 22 & Monaghan 6.2.3 2nd para.

2 *Assign an officer at appropriate senior level as a "Cycling Officer".* Taken from **DoT's National Cycle Policy Framework (2009)** Pol 17.3.

3 *Support the implementation of the DTO Cycle Policy.* Taken from **Sth Dublin 2.2.13.**

4 *Support the implementation of the Strategy for the Development **Irish Cycle Tourism - East Coast Midlands.*** Taken from Louth 6.7.2 1st para & RA 17.

B Walking

Objs

1 *Support, develop, enhance and promote the **Irish Trails Strategy** and the Walks Scheme in conjunction with the Irish Sports Council(National Waymarked Ways Committee) and other national programmes, designate and seek to protect medium and long distance walking routes and local waymarked Ways in partnership and local/regional tourism interests, adjoining local councils and the DoTT because of their recreational and tourism potential.* Based on **Kildare** 14.12.1 CR 4, **Fingal** 8.4 RE 36, **Kilkenny** 7.3.2 5th para 3rd line, **Roscommon**10.3.1 Pol 315, **Westmeath** 3.16 O-ST3, **Galway** 4.7 Pol ED45, **Carlow** Chpt 7 Bealach Siuloide 2nd para 1st line, **Cork** 4.15 RCI 15-2 2nd line & **Sth Tipp** 7.1.4 3rd para.

Note It should be realised that access on these Ways unless they are public rights of way are at the discretion of landowners.

2 *Support and promote the holding of a **Walking Festival** to attract visitors and celebrate the diverse landscape and heritage of the county.* Based on **Roscommon** 10.3.1 5th para & **Laois** 10.7 A COUNTRY WALKING STRATEGY 2nd para.

Counties with Festivals include Kilkenny Laois Mayo Cavan

3 *Employ a **Walks Officer** at an appropriate senior level.*

Note Many counties employ one.

4 *Promote walking by continually upgrading the **condition of existing footpaths** in all areas and provide controlled and uncontrolled crossings, where warranted, at all major crossings.* Taken from **Fingal** Chpt 4 WALKING & CYCLING T09.

See also Walking & Cycling Obj 3

C Cycling & Walking

Text

We submit that you should include additional Text:

1 *There is an urgent need to **encourage walking and cycling** to enable individuals to incorporate more physical activity into their lives. These activities could improve the health of both individuals and society and tackle sedentary lifestyles.* Taken from **Fingal** 4.1 CYCLING & WALKING 1st para.

2 Monaghan 6.2.1 3rd and 4th paras mentions the aims and actions of the **DoTT's Smarter Travel**. Also **Kildare** 1.4.1(iv) which mentions some.

3 *Development of cycle and walking tourism presents a particular opportunity to bring the **economic benefits of tourism** to rural areas as it has the potential to grow considerably. Cyclists, walkers and backpackers stay longer in an area, and since they cannot carry much provisions they need to shop locally. Compared with other European destinations the range of infrastructure is inadequate.* Based on Kilkenny 7.9.2.2 5th line & Cork 5.6.1 & 5.16.4. Also Kerry 9.7.1 which mentions backpackers.

4 *Walking and cycling represent a way to discover and enjoy **the pleasures of rural areas**.* Taken from **Fingal** 8.4 CYCLING & WALKING 1st line & Monaghan 7.5 2nd para last sentence.

Table of Walking & Cycling Routes See **DLR** App G & Maps. Also **Wicklow** 17.8 AW3, **Sth Dublin** 4.3.9.xii 1st para, **Wexford** 15.6 1st para, **Fingal** 4.1 Obj TO12 6th line, **Kildare** 14.11.3iii, Leitrim 3.7.11.7 1st para & 2.09.08 1st para & 3.7.11.8 1st para which mention some.

We submit that you should add: *Set up a database of walking and cycle trails(including Sli na Slainte routes).*

Wexford 15.6 4th para has already set one up.

Objs

CW1 to 3 We submit that these should be merged and re-written to include: *Walking and Cycling will be promoted by maintaining and enhancing existing facilities securing the development of a network of quality cycle routes and footpaths on existing roads and on new road improvement schemes and on routes reserved exclusively for pedestrians and cyclists. Provide, improve and extend the network of cycle lanes and pedestrian routes on existing roads, on all new regional, local distributor and local collector roads and on roads being up-graded, to create a safer, more convenient, pleasant and more user-friendly environment. Road safety will be*

improved by lower speed limits and priority over motorized transport. Ensure that the needs of walkers and cyclists are given full consideration in proposals to upgrade public roads. Provide/ extend lighting on footpaths on the outskirts of towns and villages(including, where appropriate, off-road routes and along public rights of way) in accordance with the best international standards. Continually upgrade the condition of footpaths, and provide controlled and uncontrolled crossings, where warranted, at all major crossing points, advise other road users on the need for safe behaviour near pedestrians and cyclists. Based on Wexford 8.3 Obj TO9 last pt, **Fingal** 4.1 TO 4, 7 & 9, **Sth Dublin** 2.2.14 14th para & 15th para 2nd sentence, **Meath** 6.9 TRAN POL 22, **Kildare** 6.5.2 ST 13 & 14, Westmeath 2.3.1 Principle Aims 3rd pt, Kerry 9.7.2 SG 9-26 & Laois 10.5 P08.

We submit that you should include additional Objs:

1 *Encourage and promote walking and cycling as a recreational activity to facilitate **healthy lifestyles** and well-being, create a healthier population, promote more active lifestyles and increase participation levels across all ages and different levels of fitness by providing quality green space for walking and cycling. Support awareness campaigns promoting walking and cycling. Support, upgrade and expand **Slí na Sláinte** routes in consultation with community groups, local/regional tourism interests and the DOTT. A list should be included.* To which you should add: *in view of the obesity and diabetes crisis.* Based on **DLR** 12.1.12 Pol T12, **Sth Dublin** 2.2.14 1 2pt 1st sub pt, **Meath** 9.7.3 2nd para 4th pt, **Kildare** 6.5.3 ST2, **Fingal** 4.1TO 7 & 8.4 RE 36, **Wexford** 8.3 Obj T09 1st pt, Westmeath 7.13 O-REC13, Roscommon 10.3.1 Pol 312, Louth 6.7.1 1st para 4th line & Limerick 8.2.5 1st para 1st line.

2 **Signpost and waymark Walking and Cycle Routes.** Based on **Sth Dublin** 2.2.14 15th para 2nd line & **Fingal** 8.4 RE 31 5th line.

3 *Promote existing **historic and other themed trails**(including pilgrim paths) (named) and protect them from inappropriate development. Explore the feasibility of developing them as long distance walking routes in co-operation with the Irish Sports Council, FI and other local councils.* Based on **Kildare** 14.12.1 CR 8, Monaghan 7.5. CWO 4, Longford 4.5 8th para & 5.1.3 PED3, Westmeath 3.14 O-GT6 2nd last line, Galway 4.7 Pol ED44 6th line, Cork 5.16.3 14th line & Offaly 14.11 O3.

4 *For the benefit of local people and visitors, support and encourage **cycling and walking groups** to work in co-operation with the Regional Tourism Authority, Inland Waterways and community groups in the development, expansion and enhancement of routes(including Sli na Slainte) to provide a network of walking routes and rural footpaths and improved access for mountaineering and hill walking.* Based on **Sth Dublin** 2.2.14 12th para 1st pt & 4.3.9 xii LHA 36 & 1st para, **Kildare** 6.5.2 ST8, **Wexford** 15.6 Obj RS20, Laois 10.7 P71, Leitrim 3.5.3 2nd para 2nd sentence & 3.7.11.8 Pol 113), Roscommon 10.1.3 Obj 316, Fingal 8.4 RE 43 & Limerick 6.10.3 Obj COM 027a).

5 *Develop and promote walking trails and cycle/greenways utilising existing disused transport links including **abandoned road** infrastructure.* Based on **Fingal** 8.4 RE 39, **Meath** 6.9 TRAN OBJ8(i) & Louth 6.7.1 RA 13.

6 *Develop an overall **Walking and Cycling Policy/Strategy** within two years of the adoption of the Plan, working in partnership with state, private and voluntary sector, walking clubs and community groups. The Strategy should list National Trails Network, Sli na Slainte, Pilgrim Paths and other defined walking trails and walking routes, disused roads, canals, river banks, railways, and undertake to carry out a feasibility study to investigate the recreational use of these routes and the potential of establishing walking and cycling routes, maps showing walking and cycling routes.* Based on **Kildare** 14.12.1 CR 3, **Fingal** 4.1 TO 13, **Kilkenny** 7.3.2 7th para & **Laois** 10.7 COUNTY WALKING STRATEGY & P 64.

Note Galway Waterford & Louth have already adopted Walking Strategies.

7 *Provide **car parking** and/or lay-by for cyclists, walkers and mountain climbers and walkers at* (from your local knowledge name important locations) *and other appropriate points to access amenities and scenic areas.* Based on **Fingal** 8.4 RE39 & 41, **Kildare** 14.12.1 CR 14, **Kerry** 9.7.7 SG 9-26b), **Sligo** 4.4.2 P-TOU-5 & **Longford** 6.4 AM 1.

Note The absence of car parks can cause unnecessary friction between landowners and recreational users.

8 *Establish new Walkways and cycle routes on a **legal and permanent basis**.* Taken from **Sth Dublin** 2.2.14 15th para 1st line & **Laois** 10.7 P70.

To which you should add: *by use of CPOs, where appropriate.*

9 *Encourage and promote the provision bicycle renting, **guided walks and walking/cycling tours** in partnership with state, private and voluntary sectors.* Based on **Mayo** 3.1.2 P/ED-T8, **Limerick** 6.10.3 Obj COM O27b) & **Roscommon** 10.3.1 3rd para.

10 *Investigate **funding opportunities**, including Leader, and the imposition of a development levy, for the development of walking/cycling trails, including off-road trails, inter-county waymarked walking and cycle routes*(mentions names of routes). Based on **Kilkenny** 7.3.2 5th para 1st line, **Carlow** Chpt 7 Bealach Siuloide last pt & **Westmeath** 3.14 O-GT6.

11 *Prepare and implement on a progressive basis the development of **bridle paths** that are attractive and traffic free.* Based on **Fingal** 4.1 TO 14 & **Kerry** 9.7 SG 9-26.

12 ***Maintain** National Waymarked Ways, trails which have historic associations, public footpaths and walking and cycling routes in co-operation with representative bodies and encourage walking and cycling by ensuring that a network of maintained walking routes, cycle ways and footpaths are provided in tourist areas.* Based on **Meath** 4.6.8 2nd para,

Roscommon Pol 314, Kerry 9.7 Obj SG 9-27, Cavan 9.6.1 RTO3, Mayo 3.1.3 O/ TI-PC 1, Sth Tipp 7.1.4 3rd para & Monaghan 7.5. CWO 4.

13 *Protect and promote **Greenways and provide linear parks** to facilitate the spread of rural landscape into urban areas.* Based on **Fingal** 8.4 RE 43, Sligo 8.4 P-CW-5, Leitrim 3.5.3 Pol 46) & Donegal 9.3 Pols CCG-P-18.

14 *Maintain a **register of walking and cycling routes**(including waymarked ways), keep it updated and promote their greater use.* Based on **Wexford** 15.6 RS21 & Roscommon 10.3.1 Pol 310.

Note This list is no substitute for the listing of public rights of way.

15 *Preserve, support and protect existing or potential walking routes(including local walks, long-distance walks, waymarked Ways) and cycleways and keep them free from development by **prohibiting the intrusion of development** along these routes particularly those in scenic areas)and take appropriate action to prevent attempts to close them off and take into account the impact of proposed development when considering applications for permission for developments in their vicinity. Protect listed walks from developments that create or have the potential to create dis-amenities.* Based on **Wexford** 8.2.1 Pol WR1, **Kildare** 14.12.2 RW 2, Roscommon10.3.1 Pol 310, Donegal 4.1.3 T-P-36, Laois 10.7 P56 & 57, Mayo 3.1.3 O/TI-PC 1, Sligo 8.4 P-CW-6 & Monaghan 7.5 CWO 5.

Chapter 14 **Energy & telecommunications**

14.3.2 (1) **Wind Energy**

Obj WE1 2nd pt.

We submit that you should include additional **Objs**:

1 ***Identify existing public rights of way and walking routes** and prohibit development which would interfere with them and with access to the countryside and carry out an Environment Impact Assessment when required by regulations.* Based on **Fingal** 4.3 EN 05, Cavan 4.7.3 PIO117.8 & Offaly 19.12 Wind Energy 2nd para.

Note Pending a complete list of public rights of way, walking routes, as prospective rights of way, should be protected.

2 *Planning applications shall **comply with the DECLG Guidelines(2006)** or any future guidelines.* Taken from **Meath** 11.15.2 1st para.

(3) **Hydro Energy**

We submit that you should include an additional **Obj**: *Have regard to the impacts of **Hydro Energy Schemes** on public rights of way and walking routes.* Taken from **Kildare** 8.11.3 HD 3 3rd pt.

Note Hydro Energy Many counties have a policy and we submit that you should do likewise especially in view of the proposal made in 2009 by the Spirit of Ireland Group about pump storage/hydro schemes. In many schemes the minuscule amount

of power produced doesn't compensate for the environmental damage and loss of access rights for recreational users.

14.6 Mast & Telecommunications DS

Need for new installation

Location

Rural locations

Access Roads and power supply

Mast/antennae design

Site layout/design

Obsolete structures

We submit that you should include **Objs:**

1 ***Existing Rights of Way** and established walking routes will be identified prior to any new developments which will be prohibited if they impinge thereon or on recreational and environmental amenities or public access to the countryside.*

Based on **Carlow** Chpt 7 Public Rights of Way 6th pt, **Fingal** 4.4 IT 11, Cavan 4.8 PIO123, Westmeath 10.16 P-ICT5 & Longford 5.5.3 2nd para 1st pt.

2 *Not to permit **satellite dishes** in areas which would cause unacceptable harm to visual amenities or would materially harm the character of rural areas. The design and visual appearance of masts, antennae of satellite dishes and their associated equipment shall be as unobtrusive as possible. Cumulative effect of dishes in the area should be considered.*

Based on Waterford 10.12 Development Standards last pt, Cork 6.8.4, Pol SERV 32, Louth 8.17.8 TC 41 & **Kildare** 19.9.3 2nd para 9th pt 11th line.

3 *Where masts are located in areas of high amenity, landscapes of exceptional or high value or international or national importance and high sensitivity as indicated in the **Landscape Character Assessment**, there shall be a presumption to provide a "Landscape Impact Report" to allow proper assessment of the visual impact. Surrogate(coniferous trees) shall be considered. Taken from **Meath** 12.12 5th para 6th line.*

4 *Strive to reduce the number of telecommunication structures by ensuring that **ComReg's Code of Conduct** is implemented. Taken from **Meath** 8.2.3 EC POL 31.*

5 *When the owner of a site **disposes** of it they will be required to inform the Council so that they will be in a position to enforce any continuing conditions. Taken from **Meath** 8.2.3 last para.*

6 *Council require a justification for the **height** of the mast. Taken from Waterford 10.39 2nd para 4th pt.*

7 *Demonstrate the significance of the proposed development as part of a **national communications network**. Taken from **Fingal** 4.4 IT09 2nd pt.*

8 *Discourage the development of individual telecommunications support structures and antennae for **private use**.* Taken from **Kildare** 8.12.1 TL 11.

9 *Seek the establishment of an appropriate body at regional or national level to **monitor** installations regarding proliferation, co-location and the use of the best available technology to prevent negative environmental impacts.* Taken from Longford 5.5.3 TEL 7.

10 *Set up and maintain a **register** of approved telecommunication structures to provide a useful input in the assessment of future developments and to maximise the potential for future mast sharing and co-location.* Taken from Kilkenny 9.4.2.2.

SECTION E

Chapter 16 **Built heritage**

We submit that you should add(*including archaeology and Architectural Heritage*) to reflect the contents of the chpt.

16.3 **Archaeology**

Text We support this.

We submit that you should include additional text:

1 *The DoAHG publication "**Framework and Principles for the Protection of Archaeological Heritage**" states that archaeological considerations need to take full account of the development process.* Taken from Waterford 8.38 2nd para.

2 *Our archaeological heritage consists of known and as yet unidentified sites, monuments, round towers, high crosses, burial sites, ringforts, towers houses, Fulacht Fia, raths, court tombs, portal tombs, wedge tombs, cairns, earthworks, abbeys souterraines. A monument can be defined as a man-made structure or group of structures or a natural structure altered by man.* Taken from Cavan 7.5.1.

3 *Categories of monuments under the National Monuments Acts:*

1 *National Monuments in the ownership or guardianship of the Minister or a county council which are subject to preservation orders.*

2 *Historic monuments or archaeological areas recorded in the Register of historic monuments.*

3 *Monuments recorded in the RMP.* Taken from Cavan 7.5.2 2nd para & Louth 2.7.1 2nd para.

Tables

We submit that you should include Tables of:

1 **Historic Graveyards** See Donegal 10.10 Table 28.

- 2 **Preservation Orders on Monuments** See **Kildare** Table 12.5.
3 **Areas of Special Archaeological Interest** See Louth 2.7 Table 2.9.

Objs

AR1 & 3 We submit that these should merged and replaced by: *Protect, support, conserve, enhance, preserve, maintain and safeguard for present and future generations, in co-operation with the Department of Arts Heritage & the Gaeltacht, archaeological heritage including the intrinsic value, character, amenity, integrity, settings of and views from National/Recorded Monuments or newly-discovered archaeological sites and/or sub-surface archaeological remains, of known and unknown archaeological areas(including areas or zones of archaeological potential and areas of special archaeological interest), sites(and their settings and landscapes and either above or below ground), in the ownership or guardianship of the State or the Council, including those identified in the RMP, battlefields, castles, monuments and features of historic interest National Monuments that are the subject to Preservation Orders, by prohibiting development which might be detrimental to the character of the site and its settings by reason of its location, scale, bulk or detailing. In general, developments within or adjacent to sites or which might affect them and in particular those within a 20m radius of National Monuments included in the RMP and Zones of Archaeological Potential will not be permitted and proposed development within 75m discouraged. Ensure that development is sensitively sited and designed appropriately and extend this protection to cover additions or alterations that may arise during after the adoption of this Plan and impose conditions on development that might impact on sites of archaeological potential to ensure that appropriate measures are taken to mitigate impacts. Developments which would injure, destroy, alter or damage monuments or archaeological sites or cause inappropriate change to their settings and character will be prohibited or which is seriously injurious to its cultural or educational value. All planning applications for new development (including redevelopment, any ground works, refurbishment and restoration) within areas of archaeological potential and within close proximity of recorded monuments will take account of the archaeological heritage of the area and the need for mitigation. Protect and safeguard historic landscapes, which would unduly sever or disrupt their relationship, connectivity and/or inter-visibility between sites. Require applicants to take into consideration the impacts of development on the landscape and demonstrate that their proposal has been designed to take account of the heritage resource of the landscape. Ensure that provision is made through the development control process for the protection of previously unknown archaeological sites and features.* Based on **2000 Planning & Development Act** Sec 10(2)(c) & First Sch Part IV 6, **DPG** 4.26 1st para 3rd line & 4.27 1st pt, **Kildare** 12.8.4 AH3 1st line, 12.9 AAO 14 &16 & 14.10 P14-05, **Sth Dublin** 4.2.7.i Pol AA1 & 4.2.7iv and last pt, **Wexford** 14.5 AH01 & AHO6, **Carlow** Chpt 8 Underwater Archaeology(sic) 1st, 2nd & 6th pts, **Meath** 9.6.9 CH OBJ 7,& CH POL 7, Kerry BH 10-3, Westmeath 5.33 0-AH8 & 9, Louth 2.7.1 CON 21, Donegal 6.3.2 AH-O-1 & AH-P-3, Cavan 7.5.2 Pol BHP5, Laois 14.3 O03, Galway 9.2.5.1 HL23, 26 & 30 1st pt, Roscommon 7.8 Objs 230, 231 & 7.8.4 2nd pt, Mayo 3.1.5 Archaeological Heritage P/EH-AH 1a) & e), Monaghan 4.12.2 Obj AHO 2, Nth Tipp 8.4.6 HERT 26, Leitrim 3.7.10.8 Obj 96 & Longford 6.2.1

ARC 1 & 11.

AR2 We submit that this should be replaced by: *Require an Archaeological Assessment to be carried out, by a suitably qualified/licensed archaeologist, prior to the commencement of any activity, in respect of development in areas in or adjacent to (minimum of 30m) a Recorded Monument in State care or other archaeological heritage or within a zone of archaeological potential, that may, from its size, location, bulk, detailing or nature, have a significant effect on the surrounding landscape, upstanding structures, buried structures and deposits, those that are extensive in terms of areas (ground disturbance of ½ ha or more) or length (1km or more) and developments that require an EIA or an EIS. If permission is granted, a suitably qualified archaeologist must carry any necessary archaeological work. The Council, as a condition on such developments, may also consider the preservation of all or part of the archaeological remains in the area covered by the permission. Each planning application for development within the Zone of Archaeological Potential or importance and within close proximity to recorded archaeological sites shall be assessed on its own merits. An archaeological assessment shall establish the extent of archaeological material associated with the monument or site and shall ensure that the development can be designed so as to avoid or minimise any potential effects on archaeological heritage. If a monument or site included in the RMP is incorporated into a development the monument and attendant buffer area shall be ceded to Local Authority Ownership once the development and associated landscaping works are complete so that the future protection of the monument can be assured. Development taking place either above or below ground which is within or adjacent to or might affect sites and features of historic and archaeological interest shall respect the character of the site and its settings and designed with care for their character. Development will only be permitted where the Council, in consultation with the DoAHG, considers it acceptable as per the assessment and subject to any mitigation measures proposed to prevent adverse impact on the monument and/or its settings. Strictly control development proposals on unzoned lands which may be detrimental to any area, site, structure or monument or detract from its setting. An assessment will be required – to be carried out by a licensed archaeologist – of developments which may impact on a national or recorded monument, the designated zone of archaeological importance surrounding any monument or other site of archaeological significance. The Council will use planning conditions and agreements to enable an archaeological assessment, on site monitoring testing and/or excavations by a licenced ecologist.* Based on **DPG** 4.28 2nd para, **DLR** 16.8 1st para, **Fingal** 6.2 AH08, **Kildare** 12.8.4 AH3, **Meath** 11.18 1st pt, **Wexford** 14.5 AH04, Leitrim 3.7.10.8 2nd part & Obj 97, Cork 7.3.10, Limerick 10.10.2 2nd para, Longford 6.2.1 ARC 6, Sth Tipp 9.26 Archaeology 1st para, Kilkenny 8.3.1 Dms 3rd pt 2nd sentence, Waterford 10.47, Roscommon 7.8.2 1st & 2nd paras, Mayo 4.16.3 3rd para, Offaly 14.7.5 & Westmeath 5.33 O-AH7.

AR4 We submit that this should be replaced by: *Recognising the importance of archaeology and National Monuments as part of our heritage and inheritance, provide, promote, enhance, facilitate, encourage, support, and protect public access to archaeological sites National monuments, battlefields historic burial grounds and graveyards and sites of historic interest, in direct ownership, guardianship or control*

of the Council and/or the State or private ownership. Appropriate signage will be put in place. Information on access to sites will be made available on the Council's web-site. (Insert address). Based on

Fingal 6.4 Obj AH38, **Meath** 9.6.9 CH POL 6, **Wexford** 14.5 AHO6 & 9, Westmeath 5.33 P-AH4, Laois 8 Tourism TM8/P15 & 14.3 001 & 002, Longford 6.2.1 ARC 4 & Sligo P-AH-8.

We submit that you should include additional **Objs**:

1 **Protect, preserve, improve and maintain existing public rights of way to archaeological sites and designate traditional walking routes as public rights of way and in other cases, routes will be acquired by agreement with landowners or by way of compulsory powers.** Based on **Carlow** Chpt 8 Underwater(sic) Archaeology 2nd para 9th pt, Laois 14.3 002 4th line, Mayo 3.1.5 ARCHAEOLOGICAL HERITAGE P/EH-AH1(i) & **Sth Dublin** 4.2.7 i (b).

2 **Promote and support the concept of Archaeological Landscapes, protect them from inappropriate development and seek to designate them within two years of the adoption of the Plan, particularly landscapes containing several Recorded Monuments or very important sites (including the complex of hill forts in West Wicklow), in consultation with the DOECLG, other Government Bodies and State agencies as part of the updated Landscape Character Assessment to be prepared following publication of the National Landscape Strategy/National Landscape Character Assessment.** Based on Galway 8.2.5.2 HL17 3rd line, **Kildare** 12.8.4 AH 7, **Wexford** 14.5 Obj AH08 & Westmeath 5.33 O-AH6.

3 **Promote archaeological heritage as a tourism resource in partnership with the Regional Tourism Authority.** Based on Leitrim 3.7.10.7 Obj 95 & Westmeath 3.16 P-ST3.

4 **Conserve, protect, preserve, rehabilitate and maintain historic graveyards and historic burial grounds (including those which are recorded monuments) in co-operation with the Heritage Service and continue to encourage, support, promote and assist communities in the care, maintenance, rehabilitation, management and conservation of these graveyards in accordance with conservation principles and best practice guidelines and through the Historic Graveyards Grants Scheme. Development may be restricted or conditions imposed requiring substantial excavation in and adjacent to them. Provide public access. Maintain all burial grounds in the Council's charge in good condition.** Based on **DLR** 11.2.7, **Meath** 9.6.9 CH OBJ 11, Limerick 6.7 COM O18, **Carlow** Chpt 8 Historic Graveyards, Galway 9.2.5.1, Sligo 7.2.6 Pol P-AH-6 & Leitrim 3.3.5 1st para 1st sentence & Pol 28.

5 **The Content of Archaeological Impact Assessment and Method Statement will be required to establish the extent of archaeological material associated with the monument or site. This assessment shall also define the buffer area or area contiguous with the monument which will preserve the setting and visual amenity of the site, clarify the significance of the site (in accordance with Sec 3.6 of the**

*Government's "Framework and Principles of Archaeological Heritage), address measures that will be taken to protect the significance of the site and identify the likely impact of the proposed development on both upstanding and buried structures and any archaeological fabric and suggested mitigation measures to address these impacts. The area of the monument and buffer shall not be included as part of the open space requirement demanded of a specific development but shall be additional to the required open space. If a monument or place included in the RMP lies within the open space requirement of a development, a conservation plan for that monument is required as part of the landscape plan for that proposed open space. If a monument or site included in the RMP be incorporated into a development the monument and attendant buffer area shall be ceded to Local Authority Ownership once the development and associated landscaping works are complete so that the future protection of the monument can be assured. Based on **DLR** 16.8 1st para, Monaghan 4.12.2 AHP 5 & Sth Tipp 9.26 Archaeology 1st para (i), (iii) & (iv).*

6 *Any **proposed new development**, redevelopment (including any ground works, refurbishment, restoration works) which may impact on the integrity and/or setting of any monument, site feature or area of archaeological, historical or heritage importance, within areas of archaeological potential and within close proximity to sites under the protection of this Plan, on sites not yet included in the RMP or where an archaeological assessment is required, shall be **submitted to the DoAHG**, An Taisce, the Heritage Council and/or the National Museum, accompanied by a comprehensive report by a licensed archaeologist, and to prescribed bodies(as set out in the Planning and Development Act 2000), two months before commencing work, for their observations/comments prior to a planning decision being made. Any proposal development which may impact on the integrity and/or setting of any monument, site or area of archaeological, historical or heritage importance under the protection of this Plan and/or the DOCELG shall be referred to this department for observation/comment prior to a decision on any planning decision being made. Require that proposals for linear development over 1km in length or proposals involving extensive ground clearance must be referred to the relevant Prescribed Bodies. Comply with their observations, recommendations, advice and guidance, as to whether or not to grant Planning Permission or of any condition(s) to be imposed and take into account the views of other interested bodies. Based on **Fingal** 6.2 AHo8, **Wexford** 14.5 AH04, Cavan 7.5.2 BHO22 to 24, Leitrim 3.7.10.8 1st para 2nd & 3rd sentences, Galway 11.8.45, Offaly 14.10 P14-06, Monaghan 4.12.2 AHP 3, Limerick 10.10.2 1st para 5th line, Longford 6.2 HER 5 & Kerry 10.1.7 1st para.*

7 *Have regard to and consider archaeological concerns when considering proposed public **service schemes/infrastructure** (including transport, electricity, sewerage, telecommunications and water supply and road works) located in or close to Recorded Monuments and Places and to the zones of archaeological potential. Based on Laois 14.9.2 P21, Cork 7.3 ENV 3-4, Clare 18.3.4 CDP 18.8 & Monaghan 4.12.2 AHP 7.*

8 *Where it is proposed to undertake ground works within an area of archaeological potential the Council will require the preparation of an **archaeological field evaluation** by a licensed archaeologist which will comprise details of the archaeological and historic background of the site, an evaluation of the its nature, importance, extent and location and of the likely impacts of the development proposals, where there is evidence that archaeological remains are present particularly if the proposed development is in or adjacent to a zone of archaeological potential.* Based on Nth Tipp 8.4.6 last para & Laois 14.9.4 2nd para 2nd pt.

9 *Development applications shall be assessed against **Archaeological & Development Guidelines** for Good practice for Developers and the DoECLG/ICF Archaeological Code of Practice (2009).* Taken from Westmeath 3.42.5.

Carlow Chpt 8 Archaeological Heritage mentions *the Heritage Council's Framework and Principles for the Protection of the Archaeological Heritage(1999).*

10 *Where a development would result in **ground disturbance** within a Zone of Archaeological Potential and in sites on or abutting Monuments identified in the RMP, or a previously unknown archaeological feature the retention of a licensed archaeologist will be required and if he/she deems that development threatens the site, **work must be immediately suspended** and the appropriate Government Agency informed and planning conditions may be applied If the site works proceed a licensed archaeologist should be employed to supervise and monitor the development.* Based on Westmeath 14.86 (iv) & (v), Cavan 7.5.2 BHO21 2nd pt, Laois 14.9.2 2nd para 3rd & 4th pts, Offaly 14.10 P14.07 & Limerick 10.10.2 3rd para.

11 *In areas of archaeological interest listed **in the RPM**, developers **shall consult with the Council** at the earliest possible stage prior to development works, including the digging of trenches and foundations.* Taken from **Carlow** Chpt 10 Archaeology 1st para 3rd line.

12 *In cases where permitted works will impinge on known archaeological sites and monuments, their settings and archaeological remains, the developer will be required to employ a **suitably qualified/licenced archaeologist**, at the applicants expense, to carry out trial excavations and surveys and submit a report in advance of development or where permission is granted for development that requires mitigation of impacts on archaeological heritage. Where necessary, the Council may impose conditions that will affect sites of archaeological potential to ensure that adequate measures are taken to identify and mitigate the impact of development, by requiring professional supervision and encouraging the supplying of an archaeological assessment and method statement outlining the construction procedures. Ensure that a suitably qualified archaeologist carries all archaeological works that require mitigation of impacts.* Based on Kilkenny 8.3.1 Dms 2nd pt, **Kildare** 19.12.4 3rd para, **Wexford** 18.24 2nd para, Westmeath 5.33 O-AH9, Cavan BHO21 3rd to 5th pts & Sligo 7.2 objs 0-AH4.

13 *Appropriate **signage** will be put in place.* Taken from Laois 14.3 BH 002 5th line. Also Kildare 18.8.4 AH9.

14 *Cognisance will be taken of the "Code of Practice between ESB National Grid and the Minister for the Environment in relation to Archaeological Heritage.* Taken from Cavan 7.5.2 BHO19.

15 *Have regard to **Historic Landscape Character Assessments** in assessing planning applications.* Taken from Monaghan 4.12.2 AHP 8.

16 *Encourage and promote **management and maintenance** of archaeological heritage in accordance with conservation principles and best practice guidelines.* Taken from **Meath** 9.6.9 CH OBJ 11.

17 *When considering development proposals, within areas of Archaeological Potential and on, or in close proximity to, sites of known archaeological significance, regard will be had to **Sec 12 of the National Monuments(Amendment) Act, 1994** or as may be amended.* Taken from **Kildare** 19.12.4 1st para.

18 *Within areas of Special Archaeological Interest and other sites of archaeological potential, the council will require applicants, as part of their planning application to include an assessment of the likely archaeological potential and may require that an **on site assessment** is carried out by trial works.* Taken from Louth 2.7.1 CON 22. Also **Meath** 9.6.9 CH POL 7

16.5 Historic & Cultural heritage

Obj HC3 We submit that you should add after *lines, Arklow to Shillelagh and Tullow to Dunlavin.*

We also submit that this should be repositioned in 11.3 and expanded to include:

Text

Disused rail lines can provide excellent amenities for walkers, cyclists and horse riders for local people and visitors. These should be listed in the Plan.

Obj: *Actively encourage the development of disused railways including related signage and waymarking, **as long-distance walking and cycling routes** in cooperation with CIE, F I and the National Waymarked Ways Committee without compromising their possible re-opening. Protect, safeguard and preserve them from development by prohibiting development which would affect their integrity, and where part of the route has been compromised development on adjacent land which could be used to bypass the obstruction shall not be permitted. Ensure that landscape impacts are minimise by designs and materials. The project will be subject to Appropriate Assessment.* Based on **FI Strategy for Development of Cycle Tourism Executive Summary** 9th last line on page 26, **Kildare** 14.11.5 CR5, **Meath** 6.9 TRANS OBJ 8(i), **Wexford** 15.6 Obj 25, **Fingal** 8.4 RE 39, Westmeath 8.13 O-WC4, Donegal 4.1.3 Pol T-P-30, Limerick 8.2.4 Obj IN O5 d), Sth Tipp Pol INF3 last sentence, Clare 11.10a), Sligo 8.4 P-CW-4 & Leitrim 3.5.3 2nd para 2nd last sentence.

You should add: *Where feasible, provide separate trails for walkers and cyclists in the interests of safety and convenience with appropriate surfaces for each type of user.*

Notes 1 Progress so far:

Limerick: About 40k of the former Limerick-Tralee line from Rathkeale Co Limerick to the Kerry border

Mayo: Westport to Achill Sound.

Donegal 01.12: provides rough walkways along the old Loughmore to Barnesmore, Cloghan to Glenties and Barnesbeg Gap to Glenties Lines.

Galway has commenced the development of a walkway/cycleway along the former Galway to Clifden line

2 The separation of walkways and cycleways is the practice in other countries particularly in Austria, Germany and Switzerland.

Chapter 17 **Natural heritage**

17.5 **Water systems**

Text

We submit that you should include additional Text: *Inland waterways, which include **lakes, rivers and streams**, contribute significantly to the character and amenity of the county and support tourism, recreation and quality of life for local people and visitors.* Based on Westmeath 5.15 1st para & Kilkenny 8.2.6 1st para.

Tables

We submit that you should include Tables of:

1 **The main rivers.** See **Wexford** 7.4.3 3rd line & **Kildare** 14.1 2nd para 11th line.

2 **The main lakes.** See **Wexford** 7.4.3 3rd line.

3 Existing or potential **riverside and lakeside walks/cycle** routes. See **Kildare** 5.9.5 ECD 29 & **Carlow** Chpt 7 Bealach Siuloide 7th line.

4 **Main Lakeside and Riverside Amenity Areas.** See Cavan 8.8.1 & Map 11 & Monaghan 4.9.8.

Obj WT5 We submit that you should add to the 1st part:

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

activities. Based on **Sth Dublin** 4.3.7xx. LHA22, **Kildare** 5.9.5 ECD 34 & 14.12.1 CR 7, **Wexford** 15.6 Obj RS24, Cavan 8.9NHEP21 7th pt, Laois 6.2 P13 & 10.7 P62, Offaly 15.13 4th pt, Leitrim 3.5.3 Obj 29 & 3.7.11.4 1st para, Westmeath 7.13 O-REC9 & Longford 6.2.2.7 ILW 9.

We submit that you should include additional Objs:

1 *In partnership with NPWS, local Wildlife Rangers, WI, community groups and other relevant stakeholders, provide, preserve, promote, support, encourage, develop, facilitate, increase and improve **public access** to and around lake and navigational and non-navigational waterway corridors (together with wetlands, rivers and streams and valleys) to provide amenities and recreational facilities for visitors and locals and focusing on linear features such as river banks and walking paths. Reserve land adjacent to river and canal banks and lakeshores to act as buffer zones between new developments and river corridors and other water bodies.* Based on **Carlow** Chp 8 Inland Waters 2nd para 2nd pt, **Wexford** 15.5 Obj RS12, **Sth Dublin** 4.3.7.xx Pol LHA22, **Meath** 9.7.10 NH POL 21, **DLR** 9.3.6 Pol LHB10 4th line, **Kildare** 5.9.5 ECD 29, **Fingal** 5.2 BD 26, Cavan 8.9NHEP21 8th pt, Sth Tipp 6.3.4 Pol AEH 7, Longford 6.2.2.7 ILW6, Leitrim 3.7.11.3 Obj 100, Kerry 6.4 Obj T 6-29, Limerick 6.12 Obj COM O32a), Clare CDP 17.10b), Waterford 8.23 Pol NH 16 & Westmeath 3.16 P-ST6 & 5.16 & 6.27 O-LM2.

2 *Protect, enhance and improve **existing public rights of way**, where appropriate, and investigate the provision of additional rights of way to inland lakes and waterways to facilitate the creation or expansion of walking/cycling routes.* Taken from Longford 6.2.2.7 Pols ILW 4 & 5.

3 **Width of Riparian Corridors**

Fingal 5.2 Obj BD 24 provides a minimum of 30m from each riverbank outside urban centres on main rivers (named).

4 *In respect of both navigable and non-navigable waterways, maintain, preserve, protect, conserve, enhance waterway corridors, including floodplains and valleys of rivers, streams, lakes and other watercourses (including shorelines, in immediate adjoining area and skyline development on surrounding hill crests) and keep them free from **inappropriate development** and incompatible use, including clearance and storage of materials taking place within a minimum distance of 10-15m from each bank of any river, stream or watercourse, to ensure that public use is not prejudiced by incompatible use, such as facilities for noise-generating sports and interference with public walking and cycling routes and public rights of way. Protect, maintain and enhance their natural heritage and landscape character and archaeological heritage and avoid adverse visual impacts so as to maintain their ecological, amenity and tourism and recreational values. Create and maintain buffer zones and riparian corridors and keep them in an open state and discourage culverting or realignment. Prohibit developments which are likely to have significant adverse visual impacts, either individually or cumulatively, on the character of River*

*Valleys and where there is no overriding need for the development to be in that particular location. Ensure that, where an overriding need is demonstrated for a particular development in the River Valleys, careful consideration is given to site selection. The development should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Take into account any landscape, nature or archaeological designations. Locate new development in water corridor landscape character areas towards existing structures and mature vegetation. Seek during redevelopment the creation of a riparian buffer strip, where practicable. Promote the natural amenities of (name rivers) for the benefit of recreation and tourism. Development must not adversely affect the river's function as a green infrastructure corridor. Protect existing wetlands from destruction, infilling, fragmentation and degradation. Adopt a regional approach in the protection of watercourses by co-operating with neighbouring counties. Based on **Wexford** 14.4.3 L03, 5 & 6, **Carlow** Chpt 7 Riverside Development (3) & Chpt 8 Inland Waters 2nd para 1st pt, **Fingal** 5.2 BD 23 & 26, **Kildare** 13.8.6 1 W5, 14.8.5 WC 1 & 3, 14.8.6 IW 2 & 14.9.2 WV 4, Leitrim 1.8.2g), Cavan 8.5.2 NHEP16, 8.8.1 NHEO33 & 34 & 8.9 NHEP21, Kerry 6.3 T 6-24, Galway 9.3.4.1 HL56, Kilkenny 7.3.3 2nd para, 7.3.4, 1st & 5th pts, 8.2.6 last para 1st line & Dms 1st & 2nd pts, Westmeath 5.16 P-RLC3, 4 & 14, Laois 10.7 P56 & Longford 6.2.2.7 ILW 1& 8,*

5 *Require that developments along rivers and watercourses provide for set aside land for walking/cycling routes to provide linear parks and to form an **interconnecting network** of green open spaces and corridors by linking existing fragmented green spaces to towns and other settlements in their vicinity, to link with existing parks and open spaces and extend to adjoining counties forming **inter-county tourism links**, in cooperation with their planning authorities. Based on Leitrim 3.7.11.3 2nd para, 5.2 **Fingal** BD 25 & 29, **Carlow** Chpt 7 Bealach Siuloide 1st para 5th line & 4th pt, **Kildare** 14.12.1 CR 7 & 14.12.3 OS 5 & Laois 13.1 P007 & 13.9 LCT 3 P52.*

6 ***Improvements to access** will be taken into account when considering development proposals that increase, secure, improve and enhance public access, including the development of walking/cycle routes to inland waterways, including regional/linear parks and river valley landscapes provided that developments are appropriate in scale and are sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Based on Kilkenny 7.3.4 2nd pt, **Carlow** Chpt 7 Riverside Development (1) & (3) & **Wexford** 14.4.3 L08.*

7 *As **Water sports** cover a wide range of activities from tranquil uses such as angling, sailing, canoeing, rowing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying uses and may introduce bye-laws restricting or prohibiting **jet-skiing and water skiing**. Based on Kilkenny 7.3.4.1, **Carlow** Chpt 7 Development associated with Water Sports 2nd para 1st line, & Leitrim 3.7.11.3 4th para).*

Note Mayo has bye laws

8 **Development proposals adjacent to waterways and inland lakes will only be permitted when all the following criteria are met:**

1 *Facilities are compatible with existing use of the water, including non-recreational uses*

2 *Will not result in damage to sites of nature conservation importance or features of archaeological heritage*

3 *Development can be satisfactory into the landscape*

4 *Will not have an unacceptable impact on visual impact especially in areas of high amenity or other scenic areas*

5 *Development will not in over intensification leading to excessive noise and nuisance.* Taken from **Carlow** Chpt 7 Development Associated with Water Sports 1st para.

9 **Consult with WI, NPWS, DoECLG, IW and local communities on development proposals that may affect inland waterways, rivers, lakes or water courses.** Taken from Westmeath 5.16 P-RL8 & Cavan 8.9 NHEO41.

17.6 Geology

Text

Objs

GY2 We submit that you should add: *Identify sites of geological interest and preserve, enhance, maintain, manage and conserve the character and integrity of these sites for their amenity, scientific and historic values(including County Geological Sites and sites that may become designated) and areas of geomorphological, by restricting incompatible development. Proposals should be accompanied by a detailed report from a competent person setting out their potential impact. Where significant harm is deemed likely, permission will not be granted unless there are overriding considerations of public importance. Assess all proposed developments with respect to Geology (individually or in combination with other proposals) which are likely to impact on CGSs that become designated during the lifetime of the Plan. Further enhance geodiversity by additional measures to conserve geosites.* Based on **Planning Act 2000** First Sch Part IV 6, **Carlow** Chpt 8 Geological Sites 2nd para 1st, 2nd, 4th & 5th pts, Kilkenny 8.2 last para, Sligo 7.1.8 O-NH-24, Offaly 15.15 O15- 08, Westmeath 5.8 P-GEO2, Donegal 7.1.2 G-P-1, Leitrim 3.7.3.8 Pol 79, Mayo 3.1.5 NATURAL HERITAGE P/EH-NH 1d), Galway 9.3.2.1 Pol HL 40, Cavan 8.5 8.5.1 NHEO12, 8.8.1 NHEO27 & 9.6.1 RTO11 & Clare 17.3.7 CDP 17.6.

GY3 We submit that this should be replaced by: *Avoid inappropriate development though **consultation with the GSI** in advance of proposals which are likely to impact on sites particularly those involving major developments entailing significant ground excavation, such as quarrying, road excavations, tunnels, major drainage works and foundations for major buildings.* Based on **Carlow** Chpt 8 Geological Sites 2nd para 3rd & last pts & **Meath** 9.7.7 NH POL12.

GY4 We submit that the 1st part should be replaced by: *Encourage, promote, facilitate and support access and public rights of way to geological and geomorphological features of heritage value, rock trail and co-ordinate the continuing development of strategic walking routes, trails and other recreational activities.* Based on **Fingal** 5.3 Obj GH 02, Galway 9.3.2.1 Pol HL 40, Kilkenny 8.2.4 Dms, Westmeath 5.8 P-GEO4 & Cavan 8.5.1 NHEO11.

GY5

We submit that you should additional **Objs**:

1 *Encourage and facilitate the development of **geo-tourism** by conserve and managing geological resources.* Taken from Cavan 8.5.1 NHEP14 & NHEO10.

2 *Have regard to the **Guidelines for Geological Heritage, GSI/ICF.*** Taken from Nth Tipp 8.4.6 2nd para under Pol last sentence.

17.8 Recreational use of natural resources

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

Objs

AW3

AW4 We submit that this should be replaced by: *Preserve, maintain and protect the amenity value, visual integrity and rural character of open/unfenced landscape of the **uplands, areas of rough grazing** and commonage, particularly areas above 350 meters, and secure access thereto. Discourage inappropriate development in open countryside and prohibit developments which are likely to have significant adverse visual impacts, either individually or cumulatively, on the character of the uplands, unless there is no overriding need for the development to be in that particular location. Where an overriding need is demonstrated ensure that it is appropriate in bulk and scale and is sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Ensure that development will not significantly interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts (including site selection and design) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have regard to the potential for screening vegetation when evaluating proposals.* Based on **Kildare** 14.8.3 LU 1, 4 & 5, **Wexford** 14.4.3 LO3, 5 & 6, **Sth**

Dublin 4.3.7.viii & 4.3.9.xii last para, Mayo 3.1.2 AGRICULTURE P/ED- A4 & Galway 4.71 ED27 & 9.4.2.4 Pol HI 95.

AW5 We submit that this should be repositioned in Chpt 9 entitled: **Coastal**

Table

We submit that you should include a Table of the **main beaches**. See **Wexford** 7.4 2 1st para.

Objs

1 *Promote, facilitate and support, in conjunction with adjoining counties and the National Trails Advisory Committee, the development and use of a waymarked **coastal path** along the entire coastline, as a tourist and recreational amenity, as a casual walk and as a link between coastal areas, including where feasible, use by cyclists and will improve and upgrade it the with the status of a public right of way. In furtherance of this objective a study group will be set-up within one year of the adoption of Plan. Based on **Fingal** 4.1 Obj TO12, **Wexford** 13.7 CZM21 & 15.5 RS22 & 23, Sligo 4.4 O-CZT-5, Mayo 3.1.2 Pedestrians & Cyclists P/TI-PC4 & 3.1.4 Coastal Zone O/EH-CZ 3, Galway 8.5.2 Obj CS11 & 9.3.4.2 HL36.*

Note A Coastal Path constitutes a magnificent amenity for local people and visitors and would generate much needed tourist revenue.

Wexford (See 15.6 1st para) has a Coastal Path(Sli Caman), in England the Cornwall/Devon cliff path in England brings in annual revenue of £325M and in Wales there is a coastal path around entire 870 mile-long coastline which attracts 100,000 tourists annually,

2 *Provide, support, actively promote, maintain, protect and improve **access** to the coast, seashore by identifying existing and/or potential coastal routes which can be developed as tourism attractions and as local amenities, in co-operation with statutory and relevant organisations for recreational activities including walking, cycling, pony trekking, whale/dolphin watching and bird-watching, and these routes will ideally be permanent, of high quality and adequately managed and should allow for further expansion and provide links to other activities and facilities and designate traditional walking routes thereto as public rights of way. Based on **Wexford** 13.7 CZM22, 24 & 26, 13.9 CZM31,14.4 L08 & 15.6 RS 23,*

Meath 9.7.11 NH OBJ10, **Fingal** 5.5 CT 20 & 28, **DLR** 9.4.3 3rd para, Sligo 6.5 P-SRO-9, 11 & 12, Louth 2.7 CON33 & Waterford 6.13 Pol ECD 24.

3 **Exclude motor vehicles from beaches** except for parking and develop green parking areas in appropriate locations, i.e soft areas that can be left in their natural state during the off season and used to provide over-flow facilities during peak periods and exclude land- and marine-based sporting activities from beaches and support the implementation of the Council Bye-laws which should be expanded to include all beaches. Based on Sligo 4.4.2 O-CZT-1 to 3 & **Meath** 9.7.11 NH POL 23.

4 **Prohibit development** on or adjacent to beaches where such development would interfere with public access and the coast or would cause damage to or degradation of beaches or sand dunes and its recreational and amenity values both for visitors and local people, will not be visually obtrusive by impacting on skylines and where it allows the character, quality and distinctiveness of seascapes to be conserved, and in particular would not overlook or intrude on unspoilt coastline protect views of special amenity Ensure adequate protection of the coastal zone as areas of natural heritage, amenity value, recreational use or alter the character of boreens which lead to the foreshore. Prohibit developments which are likely to have significant adverse visual impacts, either individually or cumulatively, on the character of coastal landscape or and where there is no overriding need for the development to be in that particular location. Ensure that, where an overriding need is demonstrated for a particular development in an Coastal landscape careful consideration is given to site selection and the development should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Promote the retention of features of coastal heritage where these contribute to the character of the area. Based on **DLR** 11.3.9 Pol AR7,

Fingal 5.5 CT 21, **Wexford** 14.4.3 L03, 5 & 6, Leitrim 3.2.3 para below Pol 3rd pt, Kerry 6.3 T6-24, Clare 15.3.6 CDP 15-5b) & Galway 9.3.4.1 HL53, 59 & 61 & 10.3.1 AM12.

5 Consider appropriate rural recreational and tourism related **developments** which would **facilitate public access** to Coastal Landscapes. Developments should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Taken from **Wexford** 14.4.3 L08 & Sligo 14.4 L08.

6 Ensure that beaches, sand dunes, wetlands and estuaries are not compromised by inappropriate **coastal protection works** or development. Taken from **Meath** 9.7.11 NH POL24.

AW6 We submit that:

1 1st part should be replaced by: *Protect and enhance the amenity of the Bray Head SAAO in accordance with the Order and implement the Management Plan in consultation with all relevant stakeholders.* Based on **Fingal** 5.4 SPECIAL AMENITY AREAS SA 01 & SA 04.

2 that in the 2nd part after *County* you should add *such as the Sugar Loaf*

We submit that you should include additional **Objs**:

1 *Recognizing the role played by natural amenities and landscape, as part of our heritage and as a major resource both for visitors and local people, provide, support, maintain, promote, encourage, protect, preserve, improve, safeguard, facilitate and enhance **public access** to our natural heritage including mountains, commonage and other hill land, moorlands, forests, rivers, lakes, valleys, 2000 Natura sites, nature reserves, other natural amenities and to the countryside generally by creating*

a meaningful network of access routes as the opportunity or need arises. Consider appropriate rural recreational and tourism related developments which would facilitate public access to sensitive landscapes. This will be done in co-operation with state agencies, other interested bodies and local community groups. Based on Wexford 14.4.3 L08 1st line, Sth Dublin 4.3.9.xii last para, Kildare 14.12.1 CR 11, Carlow Chpt 8 Natural Heritage 2nd pt, Fingal 5.1 NH02, Cavan 8.17 Pols 6th pt & Sth Tipp 6.3.7 Pol AEH10.

17.9.1 Landscape Characterisation

Text

We submit that you should include additional Text:

*1 **Landscape Character Assessment** sets out guidance and recommendations to assist the development of planning policies and strategies. Taken from Meath 9.9.3 4th para.*

*2 **The enjoyment of landscapes, particularly rivers and the uplands**, as they are highly scenic and of significant visual amenity value contribute to a high quality of life for both local people and a positive experience for visitors. Landscape is an important part of people's giving individuals and the local community and bestowing a sense of place in their surroundings. The key to a successful landscape policy is the ability to manage change in a way that respects of the natural environment and rural areas. Based on Sth Dublin 4.3.3 1st pt & 4.3.4 1st para, Wexford 14.4 1st para 3rd sentence & Kilkenny 8.2.10 3rd para 1st sentence & 8.2.10.4 2nd para.*

We submit that you should include additional Objs:

*1 **Review the Landscape Character Assessment** and the Landscape objectives in the Plan, after the publication of the National Landscape Strategy and future guidelines issued by a Minister of the Government with respect to landscapes. Taken from Wexford 14.4.3 L02.*

*2 **Recognizing the diverse and unique landscape character of the county and in accordance with Sec 204 of the 2000 Planning and Development Act, designate/zone Landscape Conservation Areas (mention local areas) in partnership with DoECLG and the Heritage Council, within two years of the adoption of the Plan, in order to achieve its objective of protecting and enhancing the landscape. Physical development shall not adversely impact on areas designated as visually important/sensitive.***

Note See Sec 204.-(I) of the 2000 Planning Act

Based on **Meath** 9.11 2nd para, **Monaghan** 4.4.1 LPO 2 & **Longford** 6.1.1 LCA 2.

*3 **Preserve, maintain and protect the amenity value, visual integrity and rural character of open/unfenced landscape of the uplands, areas of rough grazing and commonage, particularly areas above 350 meters, and secure access thereto. Discourage inappropriate development in open countryside and prohibit developments which are likely to have significant adverse visual impacts, either individually or cumulatively, on the character of the uplands, unless there is no***

*overriding need for the development to be in that particular location. Where an overriding need is demonstrated ensure that it is appropriate in bulk and scale and is sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape. Ensure that development will not significantly interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts(including site selection and design) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have regard to the potential for screening vegetation when evaluating proposals. Based on **Kildare** 14.8.3 LU 1, 4 &*

*LU 5, **Wexford** 14.4.3 LO3 & 6, **Sth Dublin** 4.3.7.viii & 4.3.9.xii last para, Mayo 3.1.2 AGRICULTURE P/ED- A4 & Galway 4.71 ED27 & 9.4.2.4 Pol HI 95.*

4 *Safeguard and **protect skylines** and ridgelines from development by resisting development which do so. Based on **Fingal** 5.2 LC 06 & Donegal 6.1.3 Pol NH-P-12.*

5 *Ensure that the visual impact of developments on **steep slopes**(i.e >10%) or elevated sites(e.g. reservoirs or telecommunication structures) are minimized or mitigated and will not be conspicuous or have a disproportionate or dominating visual impact(due to excessive bulk, scale or siting) on the environment as seen from public areas, scenic routes, viewpoints or settlements and that there may difficulties in establishing and maintaining screening vegetation. Based on **Kildare** 14.8.3 LU 2 & Kilkenny 8.2.10 DMS 4th to 6th pts.*

6 ***Protect**, sustain, conserve, preserve, manage, promote and enhance the diversity, distinctiveness, scale, character, appearance, sensitivity and visual and scenic quality, amenity value and beauty of the **landscapes** and the natural environment in accordance with relevant government policy and guidelines, by ensuring that they meet high standards of siting and design and are holistic and in the interest of the common good for current and future generations for the benefit of both local people and our visitors and a major economic asset. Applicants shall satisfactorily demonstrate that new development can be adequately absorbed into its surroundings without significant adverse visual impacts to its overall landscape value, nature conservation and archaeology and that they are appropriate in scale and sited, designed and landscaped having regard to their settings in the landscape so as to ensure that any potential adverse visual impacts are minimised, where there is no overriding need for the development to be in that particular location. Encourage appropriate development which would enhance an existing degraded landscape and/or which would enhance and introduce views to or from a Landscape of Greater Sensitivity from public viewpoints. Developments which fails to appropriately integrate into the landscape with due regard to visual impact shall be resisted. Adopt a regional approach in the protection of the environment, co-operating with neighbouring counties in the protection of the landscape*

*Based on **2000 Planning & Development Act 1st Sch Part IV 7, Fingal LANDSCAPE CHARACTER ASSESSMENT OBJS LCo5, **Meath** 9.8.3 last para 4th line, 9.8.6 LC SP 1, **Kildare** 14.8 LA 2, 14.8.3 LU 2 & 14.10 LO 4, **Carlow** Chpt 8***

Landscape 1st pt, **Wexford** 14.4 2nd para 4th line, 14.4.3 LO3, 4 & 7, Leitrim 1.8.2g), Cavan 8.7 NHEP19, Kilkenny 8.2 2nd para, 8.2.10.1 Obj 8G & 8.2.10 4th pt last sentence, Kerry 12.1 ZL 1 2-1, Monaghan 4.4.1 LPO 1 & LPP 3, Westmeath 3.14 P-GT5, 6.21 P-LLM1 & 2 3rd pt & Mayo 3.1.2 Tourism P-ED-T9.

7 **Protect**, conserve and enhance the visual integrity, distinctiveness, character, scenic and recreational values and visual quality of areas of the **sensitive** and outstanding **landscapes**, scenic areas, areas of natural beauty or interest, High Amenity Areas and the environs of geological and geomorphological, archaeological or historic sites from intrusive and/or unsympathetic developments by prohibiting development where it would be injurious or detract from natural and tourism amenities. Resist development such as houses, forestry, masts, extractive operations, landfill, caravan parks and large agricultural/horticultural units which would interfere with the character of highly sensitive areas. Ensure that, where an overriding need is demonstrated for a particular development in the vicinity of sensitive landscape careful consideration is given to site selection. The development should be appropriate in scale and be sited, designed and assimilated into the landscape in a manner which minimises potential adverse impacts on the landscape. Proposed developments, where located within or adjacent to sensitive landscapes, may be required to provide a landscape report detailing how the proposal will impact on the landscape and mitigation measures to be taken. Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from its scenic value. New development will not be permitted if it causes unacceptable visual harm, or introduces incongruous landscape elements. Support efforts to identify and designate vulnerable landscapes and maintain their

Based on **Fingal** LANDSCAPE CHARACTER ASSESSMENT OBJS LC o3 & 4, **DLR** LHB2, **Kildare** 14.8.1 LA 1, **Meath** 9.8.5 LC OBJ 1, **Carlow** Chpt 8 Landscape 2nd pt, **Wexford** 14.4.3 L06, Cavan 8.7 NHEO23, 24, NHEO25 except last sentence & 8.8.1 NHEO26, Kilkenny 8.2.10 DMS last pt, Westmeath 3.14 P-GT6 & 6 P-HAA5, Longford 6.1.1 LCA 1, Donegal 6.1.2 NH-O-5 & 8, Sth Tipp 6.3.1 Pol AEH4, Nth Tipp 4.2 & Clare 16.4.5 CDP 16.5.

8 Support and implement the provisions of the **National Landscape Strategy** and provide for sustainable management of landscapes including archaeological, coastal and upland landscapes. Based on Waterford 8.2 Pol ENV 2 & **Meath** 9.8.2 LC POL 1.

9 Ensure the preservation and protection of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of the of a landscape when determining planning applications. Have regard to the **Landscape Sensitivity Classification** in considering any significant development proposal. Ensure that development reflects and, where possible, reinforce the distinctiveness and sense of place of the landscape character types by taking into account elements such as geology scenic quality, historic heritage and tranquility. Ensure that proposed developments would not conflict with the policies and objectives set out in the **Landscape Character Assessment** and associated map. Ensure the preservation of the uniqueness of a landscape character type by having regard to

the character, value and sensitivity of the landscape when determining planning applications. Based on **Fingal** 5.4 LANDSCAPE CHARACTER ASSESSMENTS OBJS LCo1 & 2, **Wexford** 14.4.3 LOI 1 1st line, **Kildare** 14.10 LO 1 & **Meath** 9.8.5 LC SP 1.

10 *Protect character of the landscape the landscape by ensuring that proposed developments would not conflict with the policies and objectives set out in the **Landscape and Landscape Assessment Guidelines for Planning Authorities (2000)** and any updated versions of these guidelines published during the lifetime of the Plan.* Based on **Sth Dublin** 4.3.5.i LHA1, **Wexford** 14.4.3 L01 1st line & **Carlow** Chpt 8 Landscape Chpt 8 4th pt.

11 *Consider appropriate rural recreational and tourism related **developments** which would **facilitate public access** to landscapes particularly Upland Landscapes and should be appropriate in scale and be sited, designed and landscaped in a manner which minimises potential adverse impacts on the landscape.* Taken from **Wexford** 14.4 L08.

12 *Applicants for development, particularly in areas of landscape vulnerability or sensitivity and in uplands and river valleys, will be required to prepare a **visual impact assessment** to include photomontages, on-site height poles and Landscape/Visual impact statements setting out alternative sites that were considered and proposals to mitigate negative impacts.* Based on **Fingal** LANDSCAPE CHARACTER ASSESSMENT OBJS LCo7, **Meath** 9.8.5 LC POL 2, **Carlow** Chpt 8 Landscape Character Assessment 2nd para 2nd pt, **Kilkenny** 8.2.10 DMS 2nd pt, **Kildare** 14.8 LA 3 & Nth Tipp 4.2.1 para after Pol.

13 *Provide for recreational use by local communities and for natural resource tourism in High Amenity Areas.* Taken from Westmeath 6.23 P-HAA2 & 3.

14 ***Co-operate with councils** to support the co-ordinated designation of sensitive landscape particularly where transboundary vulnerabilities are identified.* Taken from Louth 2.4 CON 9 & Cavan 8.7 NHE025 last sentence.

17.9.2 **Views & prospects**

Text

1st para We submit that you should add: *Outstanding views and prospects are an important **tourism resource**. They are not restricted to public roads.* Taken from Leitrim 3.7.9 Text.

Obj VP1 We submit that this should be replaced by: *Protect, preserve, safeguard, improve, enhance and conserve the character and quality of views and prospects, designated Scenic Routes, from the public realm and particularly from adjoining public roads(although not restricted thereto) and river valleys, to or from the sea, lakes, lakeshores, rivers, unspoilt mountains, uplands, coastal landscape, views of historic significance, of high or special amenity value or interest by prohibiting*

*intrusive development that would interfere with the character and visual amenity of the landscape or adversely affect tourism and enhance them by removing derelict sites under the provisions of the Derelict Sites Act 1990 and structures and eyesores and by ensuring that structures or other developments do not seriously obstruct these views Applicants must specify materials to be used demonstrate that proposed development does not negatively impact on the character of a scenic route and that the views towards visually vulnerable or sensitive areas are not obstructed or degraded. Protect scenic amenity routes from insensitive and excessive levels of roadside development by integrating them into landscape areas. Curtail development along river banks that could cumulatively affect the quality of a designated view. Applicants in the environs of a scenic route and/or an area with important views and prospects must demonstrate that there be no adverse obstruction or degradation of views of views towards and from vulnerable landscape features and that the design, site layout and landscape of the proposed development must be appropriate, along with mitigation measures, to prevent significant alterations to the appearance and character of the area. Due regard will be paid in assessing applications to the span and scope of the view/prospect and the location of the development within that view and prospect. Encourage appropriate landscape and screen planting for developments along scenic routes and ornamental landscaping may be required. Ensure that developments in river valleys will not adversely effect or detract from protected views(especially from bridges) or distinctive linear sections of river valleys(including floodplains when viewed from settlements. Based on **Planning & Development Act 2000** FIRST SCH PART IV 7, DLR 9.2.4 1st para & Table 9.1, **Kildare** 14.9.1 SR 1, 14.9.2 W 1 & 2, 14.9.3 HV 1 & 14.10 LO 5 to 7, **Meath** 9.10 LC OBJ 5, Cavan 8.8.1 NHEO28 & 29, Kilkenny 8.2.10.6 9th para, Westmeath 6.25 P-VP3, Limerick 7.3.7 j EH 017(a) & (c), Cork 7.2 ENV 2-9 11 to 13(a), Leitrim 3.7.9 Pol 99, **Carlow** Chpt 8 Views and Prospects & Nth Tipp 4.2.1 ENV 3 (a) & (b).*

We submit that you should include additional sub secs:

A Green Infrastructure

Text

*Green Infrastructure is a strategically planned and interconnected network of green space that conserves natural ecosystems including rivers, inland waterways, floodplains, wetlands, the coast and natural conservation areas. It should provide a better quality of life with positive economic and health benefits, should protect the rural environment and should provide safe and attractive routes for walking and cycling. Taken from Cavan 8.11 1st sentence & **Wexford** 14.3.*

Objs

1 ***Design, conserve, facilitate and manage*** green infrastructure, including natural heritage, landscape and environment in recognition of its importance as a non-renewable resource, to encourage, promote, develop, enhance and facilitate physical activity and improved health and well-being by providing green spaces for walking, cycling and other active recreational activities and by providing attractive

and safe routes linking key green space through parks, woodlands, open spaces and heritage and landscape features, where feasible and appropriate. Provide additional green infrastructure, where possible. Based on **Kildare** 14.12.6 GI 1, **Meath** 9.7.3 2nd para 4th pt on list of pts, **Fingal** 3.2 Obj 06, **Kilkenny** 8.2.2 2nd para 2nd pt, **Waterford** 8.18 Pol NH 2, **Laois** 13.3 1st para 2nd line & **Monaghan** 4.10.1 GIO 3.

2 *Develop and implement a **comprehensive Green Infrastructure Strategy**, during the lifetime of the Plan in consultation with key stakeholders and the public, ensure that it protects existing green infrastructure and ensures that it integrates existing communities through appropriate planning, ongoing management and governance.* Based on **Cavan** 8.11 NHE046 & **Fingal** 3.2 Obj GI01 2 & 5.

See also very detailed Strategy in **Wexford** 14.3.2.

3 ***Resist development that would damage, degrade, fragment, or prejudice the green infrastructure network.***

Taken from **Monaghan** 4.10.1 G & **Cavan** 8.11 NHEP25 4th line.

4 *Require that all **Land Use Plans** protect, manage and provide, where possible, green infrastructure in an integrated and coherent manner.* Taken from **Cavan** 8.11 NHE049.

B National Parks

Text

You should name the **Wicklow Mountains National Park**. See **Donegal** 8.1.2 World Class Tourism Products last para(1).

Objs

1 *Promote the extension of the **Wicklow Mountains National Park** and cooperate with relevant bodies.* Based on **Sth Dublin** 4.3.9.iv & **DLR** 9.4.8 Pol LHB24.

2 *Ensure that the character of the **Wicklow Mountains National Park** **is protected** and enhanced and prohibit any development which would impair its character.* Based on **Mayo** 3.1.5 Natural Heritage P/EH-NH & **Clare** 17.3.8 CDP 17.7.

C Natural Heritage & Amenities

Text

*The county has a **rich and diverse heritage** that includes the countryside, rivers, lakes, woodlands, seas, geology, and islands and special elements on our landscape and is a core component of green infrastructure. Protection of our heritage not only has environmental benefits and benefits for the health, well-being and quality of life for local people, but it also brings economic benefits for visitors to enjoy.* Based on **Kilkenny** 8.1 2nd para, 8.2 1st para & 8.2 2nd para & **Cork** 7.1.1,

Pol

Protect, conserve, preserve, manage, enhance and safeguard the quality of the environment and natural amenity assets and natural heritage features for current and future generations and in particular proposed SACs & proposed NHAs, while maximising their recreational, amenity and tourism potential for the present generation by resisting development that may have a negative impact. Avoid unnecessary harm and reduce the effect of harm where it cannot be avoided. Based on **2000 Planning & Development Act** Sec 10.2 ©, **Sth Dublin** 4.3.3 Strategy 2nd pt, **Meath** 4.6.8 ED POL 29, Leitrim 1.8.2 b) & 3.7.1 2nd para i. to iii, Kilkenny 8.2 2nd para, Galway 9.1 Pol HL 1, Westmeath 7.13 P-REC1, Monaghan 4.6.7 BDP 1 & Cavan 8.2 NHEP1.

D Peatlands

Table

We submit that you should include a Table of significant bogs. See Offaly Table 16.3f).

Pol *Recognising that boglands are important natural, amenity, heritage, landscape, tourism resource, ecological archaeological resources, **protect** and conserve them free from inappropriate development in conjunction with the Bord na Mona, NPWS, Coillte and other bodies. Ensure that peatland areas which are designated under international and national legislation are conserved and managed. Seek hydrological reports for significant developments within or close to peatlands to assess potential impacts on the integrity of the peatland ecosystem.* Based on Kilkenny 8.2.7 DMS, **Kildare** 14.8.2 LL4, **Meath** 9.7.6 1st para 2nd sentence, Offaly 10.2 1st para, 15.14 P15-12 & 17-16 P17-06, Nth Tipp 4.8 2nd para 1st line & 4.8 2nd para 7th line & Westmeath 5.12 P-PTL1 & 2 & 5.12 O-PTL3.

Chapter 18 **Coastal Zone Management**

We support this Chpt.

KEEP IRELAND OPEN

Dec 2014

Leonora Earls

From: Wicklow County Council [r
Sent: 22 December 2014 16:59
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submisson - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 16:59 Submitted by anonymous user:
[137.191.229.105] Submitted values are:

Name: Monica Byrne
Organisation, Group, Company, etc : Roundwood & District Community Council
Address: Roundwood, Bray, Co Wicklow
Email: info@roundwood.ie

--Topics--

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

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

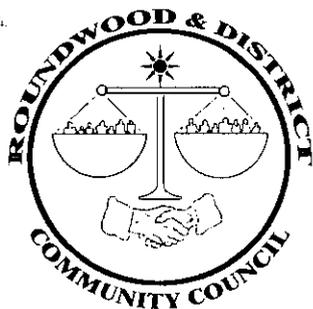
--Town / Settlement Plans--

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Submission - If you wish to make comments on a Town / Settlement Plan please type into the box below:

Alternatively you can attach your submission (10MB limit on attached files):
<http://www.wicklow.ie/sites/default/files/webform/dev%20plan%20sub%202014.docx>
Attachment No.2 TP's (10MB limit on attached files):
Attachment No.3 TP's (10MB limit on attached files):

The results of this submission may be viewed at:
<http://www.wicklow.ie/node/810/submission/54>



ROUNDWOOD & DISTRICT COMMUNITY COUNCIL

**The Forge
Roundwood
Co. Wicklow**

**Email: info@roundwood.ie
Telephone: 086 8055040**

Mr Edward Sheehy
Senior Executive Officer
Wicklow County Council
County Buildings
Wicklow

Re: Submissions on Wicklow draft County development plan 2016-2022

Roundwood village & hinterland

Dear Sirs

The Roundwood & District Community Council represent Roundwood and district representing approximately 2000 people. Under our guidance the community have met regularly over the last 6 months. We wish to submit the following proposal for inclusion in the final development plan as follows:

- That a partnership approach should be the basis for a way forward
- That any development plans for Roundwood should be agreed with the Roundwood community and Roundwood and District Community Council
- The population figures for the area are not realistic given that no further development can take place until the capacity of the sewage treatment plant and water supply is upgraded.

- **Housing**

Small cluster development favoured out from village to meet local need

Keep density of housing relatively low around village in order to keep rural feel to the area.

There should be no further housing development in Ashwood/Vartry Heights until there is full provision of recreational facilities for the area

All future development should be mixed, incorporating private, social and affordable housing with associated recreational facilities

- **Rezoning**

Decisions on the zoning of land in the village are critical, particularly in the centre of the village. Any plan should seek to preserve the character of the landscape and provide a focal point where people can appreciate the village and enjoy the view of the reservoir. Possibly the creation of a park and picnic facilities should be considered for the centre of the town. These facilities along with some shops which are appropriate to the area and provision of adequate parking would encourage tourists to stop and spend some time in the village.

- **Planning**

Need for adequate flexibility around planning guidelines to allow local young people to settle in the area and build homes rather than moving out.

- **Industry / Local Economy**

Some land should be zoned for enterprise development in order to provide sustainable local employment

Infrastructure Needs

All re-zoning plans should make adequate provision for:

- **Parking** facilities to cater for village centre and access to recreation areas and small parking areas are needed specifically at the Health Centre and Roundwood National School

The plan should also incorporate provision for:

- Further **Traffic Calming** is required within the village
- In any improvements made to the **sewerage system** it is important that the works carried out are adequate to sustain the revised population figures.
- Improvement to the quality and quantity of the **water supply** to Roundwood Village area to facilitate any proposed further development
- Improved roads in the Roundwood and district area
- Improved communication network involving the upgrading of broadband to the area

- Improve and expand current recycling facilities and re-instate the monthly mobile recycling collection.

Development of Local Resources, Tourism and Recreational facilities

The plan must also incorporate the following:

- Retain and restore historical and listed buildings in the area
- In the rezoning process identify which buildings are suitable for the provision of a local Visitor Centre, Historical and Arts centre
- Capitalise on the resources and beauty of the area.
- Rezone land for recreational purposes in order to provide adequate playing and sporting facilities.
- The provision of a playground for Roundwood
- Working with Irish Water to repair and expand the walks around the Vartry Reservoirs
- Improve access to the recreational areas through the provision of footpaths from the village to Water's Bridge and the Vartry Grounds Soccer pitch.
- In order to encourage visitors to stop in Roundwood the provision of a public car park in the centre of the village is essential.

We would welcome an opportunity to discuss any of the issues raised above.

Yours sincerely

Monica Byrne
Secretary
22 January 2014

Leonora Earls

To: Wicklow County Council
Subject: RE: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

-----Original Message-----

From: Wicklow County Council [mailto:michael@indytech.ie]
Sent: 18 December 2014 23:09
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Thursday, December 18, 2014 - 23:08 Submitted by anonymous user:
[86.43.195.193] Submitted values are:

Name: Bernie Ivers
Organisation, Group, Company, etc : Vale of Avoca Development Company
Address: The Old Courthouse, Main St, Avoca Co Wicklow
Email: cherrybandb@eircom.net

--Topics--

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- : Rural_Development
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- : Built_and Natural_Heritage_including_Landscape
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- : Local_Plans
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Submission - If you wish to make comments on a topic, please fill in the box
Below: Please find attached submission on behalf of Vale of Avoca Development Company for submission in the Development Plan 2016 - 2022 Alternatively you can attach your submission (10MB limit on attached files):

<http://www.wicklow.ie/sites/default/files/webform/SUBMISSION%20TO%20WCC%20Dec%202014%20development%20plan%202016%20-2022.docx>

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

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

--Town / Settlement Plans--

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Submission - If you wish to make comments on a Town / Settlement Plan please type into the box below:

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

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

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

The results of this submission may be viewed at:

<http://www.wicklow.ie/node/810/submission/40>



Vale of Avoca Development Company

Submission to Wicklow County Council for inclusion of Avoca Courthouse and The Peoples' Park in County Wicklow Development Plan 2016 -2022

The Vale of Avoca Development Company formally requests that the Old Courthouse and adjacent park in Avoca be included in the Record of Protected Structures and afforded associated protection under Built & Natural Heritage.

○ The building dates from approximately 1850. It is an iconic structure and a core feature in the architectural character and built heritage of Avoca village. The building has survived largely intact through many different events in Irish history and we wish to recognise both its historical and architectural importance to the village of Avoca.

○ It is currently owned and held in trust by the Vale of Avoca Development Company on behalf of the community and currently operates as a Community IT Learning Centre together, Tourist information Centre and it also houses a collection of artefacts of times past in Avoca. This collection has been assembled by donations from members of the community and has an emphasis on the long mining history and industrial heritage of Avoca.

We also formally request that the Peoples' Park, adjacent to the Old Courthouse Heritage Centre be afforded similar protection as it is the only common, open space within the village that offers an area for rest and recreation to visitors, tourists and residents. It is the only area where the river can be viewed from the street and it is a core feature in the visual character of the village and it also defines and highlights the overall character of the Courthouse.

Together, the Courthouse and Peoples' Park are anchor structures that define the visual and heritage character of Avoca Village.

The Peoples' Park is also held in trust for the community by Vale of Avoca Development Company and should remain an area of recreation for the community long into the future.

Attachment No.2 TP's (10MB limit on attached files):
Attachment No.3 TP's (10MB limit on attached files):

The results of this submission may be viewed at:
<http://www.wicklow.ie/node/810/submission/61>

Submission on behalf of Wicklow Town and District Chamber of Commerce

The current WCDP has seen a very turbulent period in our nation's history from a development and socioeconomic point of view. The impact this has had on a human level has been devastating for many with lives and ambitions on hold for the duration of the current development plan.

A lesson to be learned from this is the importance of taking a long term view and using it to evaluate the short term decisions. It is our view that going forward development plans need to be structured in such a way as to see beyond the purely statutory requirements and their relatively short term view of five years. It is essential to make plans and provisions that take into account what effect our decisions today will have on our lives and our children's lives in the future. We would strongly advocate that this plan should consider the implication of our decisions today and how they might be viewed in say twenty five years time.

Economies never perform like a straight line on a graph and while Co Wicklow is only a small part of our nation and an even smaller part of Europe it is crucial that we do the best we can for the people of Wicklow and the country as a whole. It is also crucial that the performance of the past should not automatically be the yardstick for the future.

We think it is important to ask what is hoped to be achieved by this plan. Is it just to satisfy statutory obligations and tick the boxes or is it a process to help make the county prosper? We earnestly hope it's the latter.

This plan comes at an ideal time, with the recession showing signs of ending and the green shoots of new growth emerging. Now is the time to be courageous, constructive and innovative. So we have a choice: more of the same or something new. There is a bigger picture here, like all plans this plan needs to outline what is and isn't allowed, impose standards and regulations, protect the environment and recommend goals for different objectives.

What this plan really needs to do along with the above is to encourage positivity and intertwine the ongoing need for a positive constructive approach with the aspirations of the plan.

A large proportion of our population is commuting out of the county to work and as a result we are losing in retail spend as well. There needs to be strong incentives built into the plan to encourage new business to set up in the county and existing business to develop and grow.

The vital importance of Broadband connectivity must be specifically recognised and must not be underestimated. We need to develop excellent communication in the form of broadband

connectivity with a minimum of 10 gig capacity to be available to all business. To be an attractive location to modern business broadband is not just a requirement - it's the basic necessity, with many businesses requiring multiple access so as to guarantee constant connectivity. The east coast is fortunate in having three main independent supply options. Yet this is of little benefit at the present time due to an inadequate number of connection points.

This plan provides a real opportunity to recognise and rectify this.

We repeatedly talk of the "quality of Life" this county has to offer and generally attempt to 'sell' the county on this basis. Yet we seem to be quite content to accept that it is extremely challenging on many levels for so many people who leave for work early in the morning and don't return till late at night as a result of commuting to work.

The current position actually facilitates a daily 'Brain Drain' from our communities. Quite apart from the personal challenges faced by commuters, this also results in an alarming loss of 'spend' within the county in addition to a significant and undesirable environmental impact.

A survey of commuters carried out by Wicklow COCO some years ago highlighted that not only did the majority not enjoy the commute, they were actually prepared to take a wage reduction to work nearer home.

The current plan contains a number of Visions and Goals. However the question has to be asked, is there really a willingness and commitment to provide the required funding to support their implementation. Visions and Goals are of little or no use unless there is a fundamental and genuine desire to ensure they are actually implemented within a reasonable time frame. In the current context it's not just 'Goals' we need. It is deliverable targets with realistic timelines and clear direction as to how and when they are to be implemented.

We believe that it is worth pointing out that the Core Strategy is either being ignored or misunderstood as in terms of its affect on Wicklow Town. Wicklow Town is the most important town in the county after Bray (ref Settlement Hierarchy).

County Wicklow is given a target population allocation as part of the National Spatial Strategy plans for the country. It is then a matter for Wicklow Co Co to allocate this 'target population' to the various settlements throughout the county.

The population growth for Wicklow Town as proposed, is very significant and possibly optimistic, though not so much that it is encouraged to grow significantly ahead of its neighbours as proposed in the national strategic plans. The fact is that this policy is actually dividing opportunity and weakening the east of the county by not allowing Wicklow Town to achieve its designated role as County Town and **Primary Growth Development Centre**.

In recent times, Arklow has been encouraged to develop well ahead of Wicklow Town with a list of notable and significant attractions including a modern shopping centre, cinema and multiple convenience and employment opportunities.

Greystones has grown in population since the millennium into what is best described as a commuter town with a vibrant village centre.

Wicklow Town is virtually unchanged since it was designated a Primary Growth Centre with the exception of the growth in population. Little has been added by way of opportunity for employment and retail offer is actually retracting. This may be further compromised by the rapid development of Rathnew within the Wicklow Town Rathnew LAP. However we believe it still has tremendous potential.

The result of this is a lack of opportunity for jobs, education, community services, retail spend and general quality of life. As a county we simply do not provide adequate opportunity to work near to where we live. We provide a very disjointed retail offer lacking in most instances the modern offer provided by our neighbours and thus we lose the spend to the county.

The Chamber would like to see the following points recognised within the plan:

Position of Wicklow Town within the WCDP

Wicklow Town is the County Town and is the Primary Growth Hinterland Development Centre for the County. It now needs practical and realistic proposals to ensure that balanced development of the sort envisaged by the Strategic Planning Guidelines for the Greater Dublin Area can be delivered.

It is incredible that well in excess of €100 Million has been spent on Roads, Water and Sewerage improvements in the Wicklow Town Environs, yet the Town's heartland remains largely unchanged. Arklow on the other hand has grown expediently yet has limited sewerage treatment facilities. Greystones and Newtownmountkennedy have also expanded exponentially.

"Core principles" for a Primary Growth Development Centre in the Hinterland area of the GDA such as Wicklow Town is are

"Development in the Hinterland Areas will be focused on the high quality integrated growth and consolidation of development in key identified towns, separated from each other by extensive areas of strategic green belt land devoted to agriculture and similar uses. These towns will have high levels of employment activity, high order shopping and full range of social services, with good road and bus linkages to other towns and by high quality public transport to the City and play key roles in serving the

It is clear from the above that while Wicklow Town may have increased its population it falls along way short of the mark on practically every other requirement.

NOW is the time to address this and the WCDP is crucial to this, as it sets the guidelines for the review of the Local Area Plan for the Town.

Population targets

It is noted that Bray is the Metropolitan Primary Growth Development centre within the county and that Wicklow Town is the Primary Growth Development Hinterland Centre within the county. Arklow is a level 2 Hinterland Growth Town.

It is also noted that the population of Arklow is to increase to 23,000 While Wicklow Town is only targeted to reach 24,000. This split, while as a percentage of the existing population may seem sufficient, does not reflect the objectives of the guidelines for the GDA.

We also question how this amount of new development will be serviced in practical terms as it appears a decision has been made to scrap the existing Planning for the Arklow Treatment plant and start the process again.

Retail

Wicklow Town

Regrettably, Wicklow Town has become a retail black spot in recent years as it has been unable to improve its offer, with no development outside the main street and very little within the town centre either. Ongoing developments in Arklow and in South Co Dublin have left consumers voting with their feet. While we understand there is a LAP for the Wicklow Town area it is incumbent on this plan to implement National strategy and therefore if the Town centre is not to die altogether it is essential that this plan reinforces the principles laid out in the National Plans. The vacancy of significant local buildings such as the court house and town hall do nothing to promote vibrancy in the town and need to be addressed.

Retail

Retail Boot Camp

As part of a retail strategy for the county we would advocate the establishment of a new program possible run jointly by Wicklow Enterprise Park and LEO and possibly named the Co. Wicklow Retail Boot Camp

The object of this program will be to prepare serious entrepreneurs with strong retail concepts for successful launch of their 'brick-and-mortar' business. The program should enable entrepreneur's success not only through training, but also through access to critical start-up capital, affordable space and on-going business support.

The Boot Camp will cover choosing the right location, merchandising, sound fiscal management, customer service, marketing, tax, insurance, planning and business modelling to developing the right pitch.

Employment

Broadband

The preparation of this plan justifies examination of the rationale for improving employment opportunities within the county. Providing suitably zoned land on its own has not solved the problem. It is worth pointing out that we have the most expensive rates compared to our neighbours and this does not help.

Any realistic and meaningful consideration given to the prospect of generating employment and providing facilities for employment raises two very significant and important issues. These stand out and overshadow almost everything other issue: Broadband and Planning. (As highlighted at the recent CWTT)

For Wicklow to succeed it needs better communication in the form of broadband connectivity.

All zoned employment sites, need to be treated as priority in terms of broadband connection with a minimum of Ten GB capacity to be available to all business. Many businesses do not just require a single source of broadband at this level. They look for multiple access points to guarantee constant connectivity.

It is within the power of the council to encourage and incentivise operators to provide required infrastructure now. The significant improvement required needs to be achieved with this plan.

We are already lagging behind, - catching up is simply not enough progress. The requirement in future will be even greater than it is at present.

Broadband connectivity is a fundamental consideration for those wishing to locate in Wicklow or indeed for existing business wishing to expand their operations. There is a real opportunity for Wicklow to do something special in this regard. Wicklow can create an environment which will

Set the standard nationally.

Employment

Planning

Though maybe not directly part of the scope of this plan, Planning is an issue that needs to be reviewed, demystified and made customer friendly. The procedures need to be reviewed and clarified, planners and all other relevant departments need to be available to discuss projects, particularly if they have employment potential. Any obstacles to an efficient planning regime need to be identified and removed on an ongoing basis.

Employment

Outreach or Satellite Offices

Many of our commuters are spending hours traveling to and from work when it should be possible to develop outreach or satellite offices in the county. This proposal has the potential to provide much cheaper office space, contented and productive staff and numerous other benefits for employers and employees. At the same time it would serve to increase the rates base for the council and facilitate the retention of the 'spend' locally. However, without proper communication and fast track planning we will lose out.

Availability of disposable income locally has a dramatic effect on local business and community affairs. The plan needs to drive and underpin various initiatives, which will result in local disposable incomes.

It is of value to point out that not only is revenue lost to the community when people are forced to commute, the council is also a significant loser as a result of reduced collectable rates and the loss of building levies (as there are less developments happening). It also leads to increased use of our roads, and impacts negatively in terms of good environmental practices.

Employment

Clermont

Clermont is an opportunity of considerable scale that needs to be driven forward with vision and entrepreneurship to capitalise its value to the county. Visions and goals without a commitment to funding and setting definite targets is no longer adequate.

Employment

Live / Work units.

The Chamber would like to see provisions in the plan for Live Work units in housing estates and other commercial areas if requested by developers, this has proved to be a very

successful way of incubating new business in other countries and we feel it has potential in Co Wicklow as well.

Ports

One of the key features that set County Wicklow apart is that it has four harbours, two of which are commercial. Wicklow Town enjoys the unique position of having three transport modes converging at one point. With the completion of the port access route Wicklow now has a convergence of rail, road and sea on the murrrough area. Traditionally we appear to have turned our back on the sea. However, here is a huge opportunity to develop these maritime facilities for a number of reasons.

Dublin Port will reach capacity again in the not too distant future and a requirement for additional capacity on the east coast will become more and more relevant in future years.

While there were plans for the building of a new port at the Bremore location north of Dublin, this has since been shelved. It appears obvious that using existing port facilities and infrastructure should be given priority over the construction of a new facility and all that such a project would entail.

Strategically, Wicklow can provide efficient facilities which are well positioned to service the greater Dublin area and other provincial areas through the national primary network.

Most importantly the proposed developments of very large Offshore Wind Farms will require unprecedented investment in construction and long term servicing.

We therefore propose that as a matter of urgency this plan puts in place the framework to provide for the development of Wicklow harbours and instigates a study to assess the feasibility and scale of the projects. It is considered that all of this needs to happen now so that should funding become available the projects could start with the minimum of delay.

It is also vital that nothing in the development plan can act as a disincentive or obstacle to development of port facilities in the future.

The Murrrough

Storms over the last number of years have done significant damage to the shore line. If this is allowed to continue unchecked it could result in the loss of the outer shore line to the sea. In turn this would result in the closure of the railway line from Greystones south. It would also destroy the NHA area.

While a report was prepared for the Murrrough area some years ago it is felt that events have moved on and the aftermath of recent storms have undermined its findings. The Chamber

proposes that as part of this plan a review of the report in light of the damage done to date and the increased threat of global warming should be initiated.

A part of this report should be an assessment of the effect of a new pier in Wicklow Harbour which we are led to believe could have very significant benefits for the protection of the coast line.

Should the Murrough as we know it fall to the sea we not only lose the railway line and a valuable community recreational area and NHA area, we also have to consider the effect on the new sewerage facility in addition to industrial and enterprise buildings which may be adversely affected.

It is also worth considering what could happen the river which flows through the town.

European funding is available for projects where the protection of vital infrastructure is required. The cost of not taking any action versus the ultimate cost of providing a new mainline route from Greystones to Rathnew must also be taken into consideration.

Tourism

County Wicklow is blessed with some of the loveliest landscape anywhere in the world and yet access to a lot of it is not always as good as it should be. This is an issue this plan should address. A tourist wishing to take a train to Wicklow Town or Arklow and wanting to get to Glendalough by public transport must first return to Dublin. There is a massive need for improved connectivity between the settlements within the county particularly during the tourist season.

The absence of connectivity between the sites at Glendalough and Wicklow Gaol is a perfect example.

Many visitors now come on cycling holidays and where better than Wicklow for that. Waterford have developed series of Tours, Trails and Courses for Cycling holiday makers. This would be a relatively inexpensive way of really adding value to our wonderful county.

We would like to see specific routes such as the Blessington Lakes and the Murrough supported in the plan, and the addition of new routes such as along the coast and around major settlements. The Westport Greenway is an excellent example of what can be achieved.

On the subject of Cycling and Walking - while motorways are an excellent addition to the road network they can act as a divide between communities, attempting to cross the motorway on the bridges can be very dangerous for both cyclist and pedestrians. The addition of crossing points on the roundabouts and cycle ways on the bridges would be a worthwhile standard to adopt in the WCDP.

Social Community and Cultural Development.

The Chamber feels very strongly that better use should be made of expensive public and school buildings and facilities in addition to other infrastructure. Such facilities could have another 'after hours' life and that this should be a condition of planning. The amount of under utilised space supported by tax payers is highly questionable. Such buildings are provided at very significant cost. Yet they are only used for at most eight hours per day while various community groups and sport clubs are starved of space.

As mentioned above improved transport links are essential.

As it stands an employee of a business in Wicklow Town or other areas can only get to work by car as all the Bus and Trains are only heading north. The DART service should be extended to Wicklow Town from Greystones. It is still a single line track to Greystones so why can't the trains run further south?

The mobile phone network relies on the cooperation of Wicklow Co Co in order to operate its

Communication masts. However in recent months the signal for much of the county is reduced and consequently phone users are constantly having to battle with poorer coverage and dropped calls for no apparent reason. It is within the Council's powers when granting planning permission to stipulate that the service provided is of sufficient standard to provide an acceptable level of coverage.

Built and Natural Heritage

ACA

While the chamber generally supports ACA it can be a difficult balance between progress (delivering a competitive modern offer) and a ghost town. Any such proposals require detailed consultations with the owners of the properties. Any further additions need to balance the long term viability of the area.

Other

Oil & Gas

A policy is needed to facilitate the bringing of Oil and Gas ashore. Significant reserves have been located further north, however public concerns (and recent cyclical price fluctuations) have delayed the delivery of these reserves. It could be very beneficial to the local economy to have a protocol in place to deal with such an event. Again the plan must ensure that no obstacles to future opportunity in this sector are introduced.

Interconnector

An opportunity exists when the Offshore Wind farms get operational that the electricity will need to come ashore before being either connected to the grid here or sent to the UK by an Interconnector. Again the WCDP should include a protocol for these eventualities.

Energy

While Co Wicklow is renowned for its natural beauty, this beauty can also provide a source of energy. The Chamber believes as part of this plan a study of our streams and rivers should be carried out to assess the potential for small scale hydro electric power generation. Hydro is an ideal form of power generation as it tends to produce more power in the colder months of the year. This could bring real benefits to rural communities.

A policy for the development of wood fired electricity generation (including Miscanthus) should also be evaluated as we have the largest percentage of our land area covered with forestry and Miscanthus of any county in Ireland. We also have an extensive forestry processing industry which produces significant residues which could further help the viability of such a project.

Energy Efficiency

It is the Chamber's view that national building standards should be sufficient for all developments within the County. It is important to remember that developers in Wicklow are competing with other counties and any extra costs will have to be borne by the purchaser.

Ends.

The Chamber is grateful for the opportunity to contribute to the proposed revised WCDP. Chamber remains fully committed to the provision of opportunity, cooperation and positive support for the socioeconomic development of County Wicklow in the future.



Submission to Wicklow County Development Plan 2016 - 2022

Stage 1 – Pre-Draft Public Consultation, 23rd December 2014

1. Introduction

Wicklow Uplands Council welcomes the opportunity to submit on the preparation of the Draft County Development Plan 2016-2020 and has prepared a brief submission with a strategic focus for stage 1 of the consultation process. Subsequent more in depth submissions will be prepared as the consultation process progresses. It should also be noted that Wicklow Uplands Council has just completed its submission to the Local Economic and Community Action Plan (LECP) and it is expected that the LECP will inform the preparation of the new County Development Plan.

Wicklow Uplands Council is ideally structured to make a well informed, grassroots contribution to this process. The organisation is an independent, voluntary organisation which represents the shared interests of over 50 member groups and individuals. It takes a partnership approach to sustainable development and promotes projects which bring value to people who live and work in the Wicklow Uplands and those who use it for recreational purposes.

Our mission is:

‘To support the sustainable use of the Wicklow uplands through consensus and partnership with those who live, work and recreate there’.

2. Wicklow Uplands Council Strategic Priorities

Through the development of its Strategic Plan 2014-2016, Wicklow Uplands Council has identified local needs and priorities within the uplands and continually seeks to provide a co-ordinated response to the issues and challenges facing the area. It also provides a common voice for people living, working and recreating in the area. Of particular importance to Wicklow Uplands Council is the need to involve local people in the statutory decision making processes that affect their local area in the spirit of Local Agenda 21. We would like to see our strategic priorities reflected in the new County Development Plan 2016-2022. The priorities identified in our three year Strategic Plan 2014-2016 are:

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

The development of the new County Development Plan should be an inclusive process with broad stakeholder consultation at each stage of its development. The Council needs to be proactive in seeking input from communities regarding their individual needs through the preparation of the LECP. The development of local community development/action plans should be encouraged and supported. Communities are best positioned to identify their needs and must be consulted in a meaningful way in the spirit of Local Agenda 21.

3. Strategic Recommendations

3.1 Population

The decline of agricultural population and agricultural activity in the Uplands poses a profound threat for the economic and environmental sustainability of the Wicklow hills region. The life and landscape of the Uplands is inextricably linked to the numbers of people living and working there. A policy revision of the Development Plan Population and Settlement Strategy is necessary to facilitate population growth in remote areas within the context of the next National Spatial Strategy (NSS) 2002-2020 due for revision in 2015-2016.

3.2 Rural Housing, Design Standards

The rural landscape has always been a living landscape which has supported homes, livelihoods and recreation. In the CPD, consideration should also be given to:

- The development of a 'Rural Design Guide for Wicklow' to support good design and to facilitate a positive architectural contribution to Wicklow's rural landscape. Much of the concern about visual impact of housing in rural areas could be addressed by more appropriate and vernacular design. This would help to address the concern that the current vision for rural house design is unduly influenced by the urban design mindset.
- Encourage rural cluster housing with group services. Clusters/hamlets are more reflective of tradition and community. This type of development would facilitate a single off road entrance and assists in addressing the issue of rural security as householders can see each others houses, a difficulty with ribbon development.
- With appropriate design and mitigation, families who have lived in rural areas should be facilitated to build one off rural housing in the area which they have grown up or on land owned by the family. Impediments to the maintenance and growth of rural populations need to be removed to ensure that rural communities and the landscape they live in survive and flourish.
- Sensible interpretation of the new building control regulations including energy efficiency and sustainability. WCC should ensure that individuals are not precluded from self building due to over restrictive regulation.
- As housing has continued to develop in some rural areas, there is a greater need for the upgrade and maintenance of unsealed roads servicing these areas to be taken over by Wicklow County Council. One case in point is the Trooperstown/Ballard road which currently services 10 rural dwellings in addition to providing local access for other road users. Responsibility for upgrade and maintenance of these roads should be reviewed periodically.

3.3 Tourism, Recreation and Wicklow's Economy and Health

The importance of outdoor recreation for our health and well-being, to encourage appreciation and awareness of the natural environment and stimulation of enterprise and tourism is widely

recognised. This is a growing sector both in terms of Ireland's domestic and overseas tourism industry and the number of Irish people getting active and seeking local opportunities for outdoor recreation. The development and maintenance of outdoor recreation facilities in Wicklow should be prioritised in the new plan. Given the high level of publicly owned land in Wicklow (Coillte, NPWS and WCC) there is an opportunity to develop and promote Wicklow as the adventure capital of Ireland. Development of off road walking and cycle routes should also be considered within the context of the Draft Transport Strategy for the Greater Dublin Area. A number of key recommendations are outlined below.

- A co-ordinated approach is needed to develop and manage the existing trail network which is already well established in Wicklow. Ongoing support and facilitation of the Wicklow Outdoor Recreation Committee is a key in this regard. A review of the Wicklow Outdoor Recreation Strategy 2009-2013 is also recommended.
- Future funding must be earmarked to support trail development, maintenance and promotion and to develop the overall outdoor recreation infrastructure and spinoff sustainable rural tourism opportunities that can contribute to the economic sustainability of rural Wicklow.
- As proximity to a walking trail is a key factor in people becoming active it is recommended that priority support is given to trail development projects that link directly with our towns and villages. According to research commissioned by the Irish Sports Council 'individuals who have access to trails increase their recreational activity on average by 44 %' *National Trails Strategy 2007*.
- Key strategic long distance walking and cycling trail linkages between Wicklow's Towns and villages should also be encouraged and supported. Trails that link with bus or rail public transport should also be prioritised as they provide a means for independent visitors to access the Uplands by foot/bike and extend their stay in the area.
- During consultation with our member organisations over the last two years it evident that there is a clear demand for longer distance off road cycle routes in Wicklow. The number of cyclists taking to the public road is a clear indication for this demand and with it comes a public safety issue for all road users. The development of off road cycle routes/greenways should be actively encouraged.
- Trail hubs / honeypot locations such as that provided in Glendalough by NPWS are an important aspect of the trail infrastructure in Wicklow particularly at pressurised locations. These hubs provide a variety of well signed and maintained trail options for different users depending on their fitness level, mobility and challenge sought. The provision of clear interpretation, signage, car parking and toilet facilities should be supported in such areas.
- There is a need to support pedestrian links from the Wicklow Way to towns and villages which it passes nearby. This will serve to increase economic benefits of the route whilst enhance the visitor experience.
- Outdoor recreation events and festivals should also be supported given their contribution to the local economy. Research carried out during the Wicklow Walking Festival held in Co Wicklow in 2002 showed that the festival generated €76,000 over the weekend in the local community, *National Trails Strategy, 2007*

Further specific recommendations have been outlined in the WUC submission to the LECP (also attached).

3.4 County Wicklow Retail Strategy

One of the aims of the retail strategy should be to support the survival of retail outlets and other services in the more rural towns and villages throughout County Wicklow. The decline of services such as post offices, garda presence, health facilities, supermarkets, petrol stations (the only petrol station from Rathdrum to Kilmacanogue is situated in Laragh) is clearly evident in the Wicklow Uplands. The fabric of rural communities depends on these services and more and more people are travelling to the fringes of the county to shop or to shop online. This compounds the decline of these areas and drains their economies as money is not spent locally. This is a difficult issue to address but the CPD should aim to encourage and support small businesses and rural enterprise by every means possible.

3.5 Rural Development – Best management of upland habitats through farming

Throughout Ireland as in Wicklow, traditional hill sheep farming is in decline. Coupled with this has been the rise in the extent and frequency of unregulated burning; resulting in part from restrictive permissible burning dates which has had a detrimental effect on the biodiversity and agricultural values of the uplands. Uncontrolled wildfires threaten the conservation status of the Natura 2000 sites including designated SACs and SPAs and pose a serious threat to forestry and private upland properties and public safety. As seen with wildfires in other parts of the country in recent years, the costs are substantial. Forest and gorse fires in Donegal in 2012, cost Coillte over €2.5 million and the and firefighting costs to the local authority mounted to €400,000.

In response to the challenges facing the uplands, cross community discussions have been taking place in Wicklow over the last three years to develop a new consensus based approach to upland management which seeks both to restore biodiversity and support a recovery in upland farming. A working group with representation from local and national stakeholders including NPWS, Teagasc, the Irish Uplands Forum and local farmers was formed to address the issues. This culminated in the production of a LEADER funded ['Study to Identify Best Management of Upland Habitats in County Wicklow'](#) prepared by Mary Tubridy and Associates on behalf of Wicklow Uplands Council. The report outlines key recommendations which are critically poised in light of the current review of the Common Agricultural Policy and is available to download at www.wicklowuplands.ie.

- A locally targeted Sustainable Uplands Agri-environment Scheme (SUAS)
- A change in the permitted dates for controlled burning of vegetation and the establishment of controlled burning groups.
- Parallel Study Areas - to identify novel and cost effective practical management techniques to maximise the benefits to biodiversity and upland farming.
- Research Needs and Policy Changes

3.5.1 Locally Led Environmental Schemes under the Rural Development Programme

Wicklow Uplands Council has been submitting consultation responses to the Draft Rural Development Programme 2014-2020 with the hope of securing a 'Locally Led Environmental Scheme' for the Wicklow Uplands. Provision has been included in the Draft RDP for the development and funding of such local schemes. Once the draft programme is approved by the European Commission there will be a call for applications for locally targeted schemes. This initiative has the potential to incentivise the continuation of upland sheep farming in Wicklow and to assist in sustaining its rural population and economies.

A detailed specification for the proposed scheme is outlined in the 2013 report including payments linked to the quality of biodiversity and the achievement of specific management tasks. This work was informed by discussions with the Working Group, experts in hill sheep farming and upland ecology in addition to reviewing good practice from the UK, Northern Ireland and the Burren example. What is put forward is an improved integrated vegetation management system including controlled burning, swiping, grazing and other practical vegetation management methods to ensure a productive and sustainable upland pastoral economy while improving the biodiversity of upland habitats.

3.5.2 Uncontrolled Burning in the Wicklow Uplands

The report also recognises that the current permissible vegetation burning dates are unsustainable and that legislative and procedural changes need to be implemented. It clearly outlines how the Irish dates are out of line with Northern Ireland and the UK and with the support of other upland areas the Council has and will continue to lobby for these changes. Using the case built in the 2013 study, Wicklow Uplands Council has lobbied government to urgently request a change to the Wildlife Act 2000 to review the current burning dates and return to the controls which operated prior to 2000. Given the increase in uncontrolled wildfires across the country and the momentum that has gathered to address this issue and the Uplands Council welcomes the opportunity to participate in a public consultation process that has been recently announced as part of the Review of Section 40 of the Wildlife Act. This section is based on the period 1st March to 31st August when certain restrictions apply to cutting or burning vegetation.

3.5.3 Controlled Burning Groups

The establishment of local fire management groups is also recommended to support good practice in controlled burning with the objective of improving productivity of the hills while preventing damage to biodiversity, forestry, private property and public safety. Groups would comprise farmers and representatives of regulatory authorities to implement fire management plans for their local area supported by training for those involved. As the local fire authority, Wicklow County Council would play a key role in the formation and management of these groups.

3.5.4 Farm diversification/Rural Enterprise

Sensible national and WCC regulations are essential for artisan and small scale food processing. The new Development Plan should reflect this and aim to encourage cottage industries. A key example of this is small scale abattoirs which have been pushed outside Wicklow due to overregulation and unduly restrictive conditions. A common sense approach is required for on farm food processing. The CPD must take a pro-active approach to the development of rural enterprise.

3.5.5 Wicklow's Forest Strategy

In line with the new Irish Forestry Programme for the period 2014 – 2020 the CPD should:

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

3.6 Community Facilities & Open Space

There is a need to gather information on the demographics of our local communities to establish their needs and to set criteria to make provisions for these needs. This requires a shift towards an evidence based approach to planning. An example of this is the need for playgrounds based on the number of children in an area e.g. Laragh has 110 pupils in its primary school and is clearly in need of a playground for the area. There is a clear need for playgrounds for small communities across the county.

Planning of green space and connectivity between developments needs to be a mandatory consideration of planning applications for new business and housing developments. Although Wicklow enjoys a high level of access to publicly owned Coillte forests and NPWS reserves proximity to green spaces also needs to be considered and provided for under the CPD. There is a notable lack of usable green spaces in Wicklow's towns and villages and this is something which future development needs to provide for.

3.7 Built and Natural Heritage, Including Landscape

3.7.1 Wicklow Landscape Strategy

The absence of a National Landscape Strategy for Ireland was a major information gap in the development of the last County Development Plan. This has left Wicklow exposed in terms of guidance and regulation for the development of electricity pylons and wind turbines. Although a Wind Energy Strategy was part of the last plan this was not set within the context of a National Landscape Strategy. The opportunity to develop renewable energy and to provide the necessary infrastructure for services such as electricity must be balanced with the protection of landscape, the environment and with consideration for our rural communities. The scale and location of such developments need to be considered in the context of the high visual amenity of the Wicklow landscape which provides the backdrop for the tourism and film industries and contributes significantly to our local economy.

Although consultation took place this year on a National Landscape Strategy this work has not yet been completed. When a final draft is available it will need to be interpreted at a local county level to assist planners in assessing applications for wind and pylon developments or any other large scale development in the rural landscape.

This also has implications for the need for a trained landscape architect/ planner(s) to be employed by Wicklow County Council as this is a specialised area of expertise which is significantly different to urban planning.

3.7.2 Protecting Upland & Rural Environments - PURE Project

The PURE Project and PURE mile is a model for active engagement of local communities and ongoing support for the PURE project will ensure that Wicklow can present a clean green image for visitors to the area and to facilitate the ongoing enjoyment of the uplands by those who live, work and recreate there. The project allow all the project partners including Wicklow County Council to have a 'zero tolerance' policy for illegal dumping and fly tipping and are assured that Wicklow's landscape is presented at its best at all times. The project is the most cost effective and efficient way to address these issues. Wicklow Uplands Council plays an important role in the project by representing the interests of private landowners, administering the project account and it also employs the Project Manager Ian Davis.

3.7.3 Deer Management Strategy

The CPD should support the Wicklow Deer Management Strategy and assist in resourcing the co-ordinated management of deer in Wicklow alongside the other statutory stakeholders. Implementation of the strategy and control of the deer population is urgently required.

Deer are an important resource in Wicklow which, if sustainably managed, are of significant economic, social and heritage value to a wide variety of stakeholders. Unfortunately, current population levels of deer are considered unsustainable resulting in economic and ecological damage and reduced sporting value. For this reason, deer require management and this is best achieved through collaboration between land owners / managers, hunters and the relevant authorities. For a number of reasons, Wicklow is at the forefront of deer management issues in Ireland. The number of deer harvested in Wicklow is consistently over 40% of the national deer harvest and the number of licences issued for deer shooting in Wicklow is significantly greater than for any other county.

3.8 Renewable Energy

The new County Development Plan should support the development of small scale renewable energy production in businesses and homes throughout Wicklow. It is not currently possible to sell energy to the national grid from small scale production facilities. This is unacceptable and contrary to government targets to move away from dependence on non-renewables. Local authorities should be raising this issue with central government and encourage the local production of solar energy, photo voltaic energy and small scale wind energy production.

3.9 Communications

Provision and maintenance of efficient broadband service across the county should be a priority within the CPD as it underpins the ongoing survival of rural economies allowing people to work from home, to promote their businesses and to communicate effectively and efficiently.

4.0. Conclusions

Wicklow Uplands Council has prepared this submission on the basis of consultations undertaken in the development of its strategic Plan 2014-2016 to provide an overview of issues and challenges facing the uplands over the coming years. It has also outlined potential solutions and opportunities to maximise the social and economic benefits to the Uplands whilst cherishing our environment. We recommend direct consultation with communities to identify their individual needs.

Wicklow Uplands Council represents the shared interests of the Wicklow Uplands and seeks to influence and develop local and national policy. It continues to develop strategic alliances with statutory bodies and other agencies and to work in partnership with them to address common issues and challenges facing the uplands and should be supported in continuing to do so with support of Wicklow County Council.

5.0 Further Information

Wicklow Uplands Council would be happy to elaborate on, or discuss, any of the ideas contained in this submission. Please contact:

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Submission to the County Wicklow Local Economic and Community Plan

18th December 2014

1. Introduction

Wicklow Uplands Council welcomes the preparation of a Local Economic and Community Plan for County Wicklow and is ideally structured to make a well informed, grassroots contribution to this process. Wicklow Uplands Council is an independent, voluntary organisation which represents the shared interests of over 50 member groups and individuals. It takes a partnership approach to sustainable development and promotes projects which bring value to people who live and work in the Wicklow Uplands and those who use it for recreational purposes.

Our mission is:

'To support the sustainable use of the Wicklow uplands through consensus and partnership with those who live, work and recreate there'.

2. Identification of the Needs and Priorities of Local Communities

Through the development of its Strategic Plan 2014-2016, Wicklow Uplands Council has identified local needs and priorities within the uplands and continually seeks to provide a co-ordinated response to the issues and challenges facing the area. It also provides a common voice for people living, working and recreating in the area.

The priorities identified in our three year Strategic Plan 2014-2016 are:

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

A number of communities have completed Local Community Development/Action Plans which clearly identify the local needs of their communities. e.g. Enniskerry, Tinahely. The LECP should support the ongoing development of these plans at community/village level and support communities in addressing the needs identified. Of particular importance to Wicklow Uplands Council is the need to involve local people in the statutory decision making processes that affect their local area in the spirit of Local Agenda 21.

3. Local strengths and opportunities, weaknesses and deficiencies in the Wicklow Uplands

Over fifty groups and individuals are represented on the Uplands Council four panel structure which annually elects a 27 person board of directors. It actively engages with and builds consensus between these sometimes conflicting interest groups. The four panels (outlined below) meet twice a year to discuss upcoming issues and to seek potential solutions. Table 1 below is informed by discussions within these structures.

- Farming and Landowning
- Economic and Tourism
- Environment and Recreation
- Community

Table 1.

<p>Strengths</p> <ul style="list-style-type: none"> ▪ Beautiful scenic landscape with a National Park its centre – large areas designated Area of Outstanding Natural Beauty (AONB), Special Area of Conservation (SAC), Natural Heritage Area (NHA) ▪ The people of the uplands – vibrant, active communities ▪ Glendalough is Wicklow’s most visited tourist destination and Ireland’s second top designation for tourists. It is also a honeypot for participants in outdoor recreation activities. ▪ Active representation of shared interests in the Uplands and a forum to build consensus through Wicklow Uplands Council ▪ Co-operation initiatives in place between the partners to address common upland issues e.g. PURE project, Police Liaison, Outdoor Recreation Committee etc. ▪ Private Forest Owners Group established and co-operating to co-ordinate sale of thinnings which are now ready for harvest ▪ Wicklow County Tourism via www.visitwicklow.ie is a very successful platform to promote all aspects of Wicklow. 	<p>Weaknesses</p> <ul style="list-style-type: none"> ▪ Restrictions arising from designations limit activities and can cause economic loss to landowners, difficulties with planning etc ▪ Antisocial behaviour given proximity to urban centre e.g. Flytipping/dumping, theft/ car break-ins, dog control, ▪ Pressure on recreational facilities and trails compounded by lack of resources for maintenance. This can also result in conflict between recreational users. ▪ Day visitors/tours who do not spend in Wicklow ▪ Traffic management arising from visitor pressure ▪ Threat to aesthetic value of the landscape from pylons and wind turbines ▪ Loss of sheep farmers actively managing the hills and lack of support for them ▪ Threat of wildfire from accumulation of upland vegetation. ▪ Small businesses under threat from online shopping and people travelling to shop ▪ Restricted access in the Uplands during severe Winter Weather events ▪ Signage -There is a clear need for coordinated signage?
<p>Opportunities</p> <ul style="list-style-type: none"> ▪ Proximity to Dublin – need to capitalise on overnight visitor potential, extended visitor stays and the use of the wider hinterland by overnight visitors. ▪ Greater level of access to Coillte and 	<p>Deficiencies</p> <ul style="list-style-type: none"> ▪ Parking facilities in areas of high amenity ▪ Support for hill sheep farmers to encourage best management of the upland habitats through farming (Locally targeted Upland Environmental Scheme – this is a

<p>NPWS land for recreation given landownership structure (walking and off road cycling).</p> <ul style="list-style-type: none"> ▪ Private landowners are amenable to agreed access given history of walking in Wicklow ▪ Recreational potential of large water bodies at Poulaphouca and Roundwood reservoir e.g. walking/cycling/ other? ▪ Potential for green energy in appropriate locations and at an appropriate scale 	<p>possibility under new RDP)</p> <ul style="list-style-type: none"> ▪ Although there are limited designated off road facilities for mountain bikers e.g. Ballinastoe – a long distance off road cycle route is needed ▪ Playgrounds for small communities across the county. Laragh has 110 pupils in its primary school and is clearly in need of a playground for the area. ▪ Very few hotels in the uplands ▪ Health facilities being pushed to the fringes/ removed ▪ Petrol stations in the uplands (one in Laragh) ▪ Loss of Garda presence in small communities in recent years ▪ As housing has continued to develop in some rural areas, there is a greater need for the upgrade and maintenance of unsealed roads servicing these areas to be taken over by WCC. One case in point is the Trooperstown/Ballard road which currently services 10 rural dwellings in addition to providing local access for other road users. Responsibility for upgrade and maintenance of these roads should be reviewed periodically.
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4. The following key actions and projects have been identified by Wicklow Uplands Council for priority support for the period of the LECP. These actions support sustainability and encourage diversification and employment in rural areas.

4.1 Development of Opportunities and Facilities for Outdoor Recreation

The importance of outdoor recreation for our health and well-being, to encourage appreciation and awareness of the natural environment and stimulation of enterprise and tourism is widely recognised. This is a growing sector both in terms of Ireland’s domestic and overseas tourism industry and the number of Irish people getting active and seeking local opportunities for outdoor recreation.

The Economic Value of Trails & Forest Recreation in Ireland was quantified by economic consultants Fitzpatrick Associates in 2005 and key results outlined that: ‘The total annual direct economic impact of trail usage by Irish residents is estimated at €307 million the total annual non-market (national well-being) value of trails is estimated at €95 million and the total annual economic value of international walking and cycling tourism is estimated at €218 million’.

Key Recommendations:

- A co-ordinated approach is needed to develop and manage the existing trail network which is already well established in Wicklow. Ongoing support and facilitation of the Wicklow Outdoor Recreation Committee is a key in this regard. A review of the Wicklow Outdoor Recreation Strategy 2009-2013 is also recommended.
- Future funding must be earmarked to support trail development, maintenance and promotion and to develop the overall outdoor recreation infrastructure and spinoff sustainable rural tourism opportunities that can contribute to the economic sustainability of rural Wicklow.
- As proximity to a walking trail is a key factor in people becoming active it is recommended that priority support is given to trail development projects that link directly with our towns and villages. According to research commissioned by the Irish Sports Council 'individuals who have access to trails increase their recreational activity on average by 44 %' *National Trails Strategy 2007*.
- Key strategic long distance walking and cycling trail linkages between Wicklow's Towns and villages should also be encouraged and supported. Trails that link with bus or rail public transport should also be prioritised as they provide a means for independent visitors to access the Uplands by foot/bike and extend their stay in the area. Wicklow's proximity to Dublin has traditionally resulted in majority of day visitors to the area which contribute significantly less to the local economy. A Dublin Institute of Technology study on the Kerry Way and the Wicklow Way found the average daily spend by overseas walkers in Kerry was €53 compared to that in Wicklow at €33 *National Trails Strategy, 2007*. This will serve to increase business for accommodation providers, coffee shops, pubs etc and create a demand for new enterprises such as outdoor shops, bike hire shops, bag transfer businesses, taxi services as per the Western Greenway. The Fitzpatrick Report 2011 commissioned by Fáilte Ireland notes that the Great Western Greenway contributed 'a projected 7.2 million in spend in the local economy over a full year in 2011'.

A recent study visit by Wicklow Uplands Council to the Western Greenway clearly demonstrated the economic and social benefits to the local community and to rural revitalisation of the area. County Mayo is currently considered to be the adventure capital of Ireland and locals have taken increased pride in their area and were winner of the 2014 Tidy Towns competition. There are now also 'blueway' trails for snorkelling and kayaking in the area.

- During consultation with our member organisations over the last two years it evident that there is a clear demand for longer distance off road cycle routes in Wicklow. The number of cyclists taking to the public road is a clear indication for this demand and with it comes a public safety issue for all road users. The development of off road cycle routes/greenways should be actively encouraged and as outlined in section 5, routes such as the proposed Rathdrum-Laragh Trail should be upgraded to cycle routes as funding becomes available.
- Trail hubs / honeypot locations such as that provided in Glendalough by NPWS are an important aspect of the trail infrastructure in Wicklow particularly at pressurised locations. These hubs provide a variety of well signed and maintained trail options for different users

depending on their fitness level, mobility and challenge sought. The provision of clear interpretation, signage, car parking and toilet facilities should be supported in such areas.

- There is a need to support pedestrian links from the Wicklow Way to towns and villages which it passes nearby. This will serve to increase economic benefits of the route whilst enhance the visitor experience.
- Outdoor recreation events and festivals should also be supported given their contribution to the local economy. Research carried out during the Wicklow Walking Festival held in Co Wicklow in 2002 showed that the festival generated €76,000 over the weekend in the local community, *National Trails Strategy, 2007*.

5. Specific Project Proposals

5.1 Avonmore Way (Rathdrum to Laragh/Trooperstown)

Wicklow Uplands Council has a successful history of working with communities and private landowners to open up access for walking on privately owned land particularly in areas of high amenity e.g. the Tinahely Railway Walk (first section) and the Glenmalure Zig Zag access to Lugnaquilla.

The Uplands Council is currently working with private landowners, the communities in Laragh, Claravale and Rathdrum, Coillte and the National Parks and Wildlife Service to develop an off-road walking trail from Rathdrum to Laragh/Trooperstown Wood. From a strategic viewpoint a trail linking Rathdrum with Laragh is one of the most important connections in Wicklow's trail network. Rathdrum is a key access point to the Wicklow Uplands as it services the only inland rail link in the county. The proposed route will provide an important strategic link to the uplands serviced by the train station in Rathdrum. The long term vision for the route is an '**Eastern Greenway**' with potential to link south to Woodenbridge and Arklow, north to Marley Park via the Wicklow Way, west to Blessington via St Kevin's Way and the Blessington Greenway and to the east via Roundwood, Kilmacanogue and Bray/Greystones. This initiative fulfils some of the priority aims in the Wicklow Uplands Council Strategic Plan 2014-2016 to develop opportunities for sustainable recreation, encourage best management of our natural heritage, encourage rural employment and promote the Wicklow uplands.

Over time this trail may also be upgraded to a cycle route with the support of the National Transport Authority (NTA) which is interested in cycle trails as a means of transport especially where they link with public transport.

5.2 Avoca – Glendalough Mining Heritage Trail

The mining heritage groups in Avoca and Glendalough have also expressed an interest in developing a mining heritage trail from Avoca to Glendalough to link and promote the mining heritage of both areas.

5.3 Provision of Parking Facilities at High Amenity Areas

Availability of secure parking facilities in high amenity areas is an issue across the county. Wicklow Uplands Council plans to investigate opportunities to develop parking facilities in partnership with private landowners in high amenity areas using Neils' Yard in the Macgillycuddy Reeks as a model.

Given the very high incidences of car break-ins in 2013/2014 and associated negative publicity for Wicklow, this initiative would help to provide security for walkers and other recreational users to continue to visit and enjoy the Wicklow Uplands. When a potential pilot site(s) is identified, funding support and facilitation from Wicklow County Council as the relevant planning authority would assist the development of this project.

5.4 Dog Control Awareness/ Provision of Dog Friendly Recreational Sites

Increased recreational usage of the Uplands has resulted in conflicts arising between recreational users, landowners, livestock and wildlife. Wicklow Uplands Council undertakes an annual public awareness campaign to promote responsible dog ownership to reduce sheep worrying and dog attacks on livestock and wildlife. In addition to providing signage for private landowners the Uplands Council would like to positively engage dog owners and provide information on dog friendly sites where people can walk their dogs off lead. 36% of Irish people are dog owners who will drive an average of 19 minutes to find a site to walk their dog off lead, *Stephen Jenkinson, Access and Countryside Management Specialist, 2014*. Potential project partners include Coillte, NPWS, WCC and private landowners and all support for this initiative is welcomed.

6 Ongoing Initiatives Requiring Support

6.1 PURE Project

The PURE project is a partnership project and the first of its kind in Ireland which was established to combat illegal dumping/fly-tipping in the Wicklow/Dublin Uplands. The project is a partnership between statutory and non-statutory organisations, including; *Wicklow County Council, Dun Laoghaire Rathdown County Council, South Dublin County Council, Coillte, National Parks & Wildlife Service, and Wicklow Uplands Council* and funded by The Department of Environment Community and Local Government. The project was officially launched in September 2006 and to date has received over 7,200 reports of illegal dumping, collected waste from over 7,000 individual sites and removed over 2,370 tonnes of rubbish from the landscape. Wicklow Uplands Council plays an important role the project by representing the interests of private landowners and administering the project account. Wicklow Uplands Council also employs the Project Manager Ian Davis.

The hugely successful PURE Mile Competition initiated by the PURE Project encourages communities in Wicklow to keep a mile of road (approx. 1.6km) and the immediate environment litter free. The PURE Mile is a model for active engagement of local communities and ongoing support for the PURE project will ensure that Wicklow can present a clean green image for visitors to the area and to facilitate the ongoing enjoyment of the uplands by those who live, work and recreate there. To date 68 groups have participated in the PURE mile competition.

6.2 Vegetation Management Project

Throughout Ireland as in Wicklow, traditional hill sheep farming is in decline. Coupled with this has been the rise in the extent and frequency of unregulated burning; resulting in part from restrictive permissible burning dates which has had a detrimental effect on the biodiversity and agricultural values of these uplands. Uncontrolled wildfires threaten the conservation status of the Natura 2000 sites including designated SACs and SPAs and pose a serious threat to forestry and private upland properties and public safety.

In response to the challenges facing the uplands, cross community discussions have been taking place in Wicklow over the last three years to develop a new consensus based approach to upland management which seeks both to restore biodiversity and support a recovery in upland farming. A working group with representation from local and national stakeholders including NPWS, Teagasc, the Irish Uplands Forum and local farmers was formed to address the issues. This culminated in the production of a LEADER funded ['Study to Identify Best Management of Upland Habitats in County Wicklow'](#) prepared by Mary Tubridy and Associates on behalf of Wicklow Uplands Council. The report outlines key recommendations which are critically poised in light of the current review of the Common Agricultural Policy.

- A locally targeted Sustainable Uplands Agri-environment Scheme (SUAS)
- A change in the permitted dates for controlled burning of vegetation and the establishment of controlled burning groups.
- Parallel Study Areas - to identify novel and cost effective practical management techniques to maximise the benefits to biodiversity and upland farming.
- Research Needs and Policy Changes

6.2.1 Locally Led Environmental Schemes under the Rural Development Programme

Wicklow Uplands Council has been submitting consultation responses to the Draft Rural Development Programme 2014-2020 with the hope of securing a 'Locally Led Environmental Scheme' for the Wicklow Uplands. Provision has been included in the Draft RDP for the development and funding of such local schemes. Once the draft programme is approved by the European Commission there will be a call for applications for locally targeted schemes. This initiative has the potential to incentivise the continuation of upland sheep farming in Wicklow and to assist in sustaining its rural population and economies.

A detailed specification for the proposed scheme is outlined in the 2013 report including payments linked to the quality of biodiversity and the achievement of specific management tasks. This work was informed by discussions with the Working Group, experts in hill sheep farming and upland ecology in addition to reviewing good practice from the UK, Northern Ireland and the Burren example. What is put forward is an improved integrated vegetation management system including controlled burning, swiping, grazing and other practical vegetation management methods to ensure a productive and sustainable upland pastoral economy while improving the biodiversity of upland habitats.

6.2.2 Uncontrolled Burning in the Wicklow Uplands

The report also recognises that the current permissible vegetation burning dates are unsustainable and that legislative and procedural changes need to be implemented. It clearly outlines how the Irish dates are out of line with Northern Ireland and the UK and with the support of other upland areas the Council has and will continue to lobby for these changes. Using the case built in the 2013 study, Wicklow Uplands Council has lobbied government urgently requesting a change to the Wildlife Act 2000 to review the current burning dates and return to the controls which operated prior to 2000. Given the increase in uncontrolled wildfires across the country and the momentum that has

gathered to address this issue and the Uplands Council welcomes the opportunity to participate in a public consultation process that has been recently announced as part of the Review of Section 40 of the Wildlife Act. This section is based on the period 1st March to 31st August when certain restrictions apply to cutting or burning vegetation.

6.2.3 Controlled Burning Groups

The establishment of local fire management groups is also recommended to support good practice in controlled burning with the objective of improving productivity of the hills while preventing damage to biodiversity, forestry, private property and public safety. Groups would comprise farmers and representatives of regulatory authorities to implement fire management plans for their local area supported by training for those involved.

6.2.4 Parallel Study Areas

Other recommendations include practical management trials to identify novel and cost effective techniques to maximise the benefits to biodiversity and upland farming with a focus on control of vegetation and identification of optimal stocking on the different upland habitat types.

The study is available to download at www.wicklowuplands.ie

6.3 Village Interpretative Panels

Over the past six years, Wicklow Uplands Council has worked with a number of local communities to develop a network of interpretative panels which promote and raise awareness on the natural and built heritage in towns and villages throughout County Wicklow. This project is a partnership between village communities, Wicklow County Council and Wicklow Uplands Council. Interpretative panels have already been developed in Aughrim, Blessington, Dunlavin, Laragh, Rathdrum, Roundwood, Kilmacanogue, Rathdangan, Newtownmountkenedy, Enniskerry, Tinahely, Newcastle and Baltinglass. Communities in Ashford, Glenealy and Avoca have also expressed an interest in developing panels for their area and given available funding; Wicklow Uplands Council will continue to work with these communities in 2015 and 2016. There is also potential to use and promote the information gathered through this project on other media and products.

7. How to Improve Local Service Planning and Delivery

- Wicklow Uplands Council represents the shared interests of the Wicklow Uplands and seeks to influence and develop local and national policy. It continues to develop strategic alliances with statutory bodies and other agencies and to works in partnership with them to address common issues and challenges facing the uplands and should be supported in continuing to do so with support of the LCDC.
- The development of local community development/action plans should be encouraged and supported under the LECP. Communities are best positioned to identify their needs and must be consulted in a meaningful way in the spirit of Local Agenda 21.
- There is a need to gather information on the demographic of our local communities to establish their needs and to set criteria to make provisions for these needs. An example of this is the need for playgrounds based on the number of children in an area e.g. Laragh has 110 pupils in its primary school and is clearly in need of a playground for the area.

- Planning of green space and connectivity between developments needs to be a mandatory consideration of planning applications for new business and housing developments.

8. Conclusions

Wicklow Uplands Council has prepared this submission on the basis of consultations undertaken in the development of its strategic Plan 2014-2016 to provide an overview of issues and challenges facing the uplands over the coming years. It has also outlined potential solutions and opportunities to maximise the social and economic benefits to the Uplands whilst cherishing our environment. We recommend direct consultation with communities to identify their individual needs.

Wicklow Uplands Council recommends that the LCDC also consults with both statutory and non-statutory stakeholders on an ongoing basis as there may be additional opportunities and factors to consider with the passing of time. A review of the plan should be incorporated after five years. This will ensure co-operation between stakeholders and the optimal outcome for Wicklow's communities and visitors to the area.

9. Further Information

Wicklow Uplands Council would be happy to elaborate on, or discuss, any of the ideas contained in this submission. Please contact:

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SUBMISSION:

Q. What actions, with a land use remit, can help promote the development of the Kildare-Wicklow destination project?

- **Develop Heritage and Culture offering in Wicklow:**

The theme around the new Failte Ireland's East Coast Destination is Heritage & Culture. Most of the marketing efforts will be around that theme. Wicklow's Heritage has a tremendous wealth of heritage sites. Our main objective is to make sure we develop, interpret and maintain such offering. Wicklow needs to work on the maintenance, signage and accessibility of those sites. We must be able to "tell the story". Wicklow must work along with the Heritage Council, OPW and local tourism board to make the most of our amazing heritage.
- **N/M11 to become major artery for Southern Access to New Failte Ireland's destinations:**

The development of the new Failte Ireland's destination will put major focus on the various locations South of Dublin: Kilkenny, Wexford, Waterford & Cork. Wicklow must work at developing the N/M11 as the preferred route to access the Southern destinations (rather than currently the M9 or M7). Strong tourism signage & tourism information points along the M11 should be then put in place to secure proper exposure to traffic heading south.
- **Increase access and promotion to Heritage Sites along the N81.**

West Wicklow is steeped in Heritage. There are some amazing sites along the N81 that are not properly signed or accessible. For example, Seefin and other burial monuments are difficult to access; There is no proper parking at the "Piper Stones"; The Baltinglass Abbey offers no access. The "Heritage Corridor" along the N81 has the potential to be developed as a major tourist trail that would perfectly fit within Failte Ireland's East Coast destination.
- **Blessington Lakes Greenway as major project for West Wicklow:**

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

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

There is also great potential in rivers, lakes and sea angling and Fishing in Wicklow. Locations like the Blessington Lakes, Vartry, Loughdan, Irish Seas offer attractive and challenging opportunities to attract visitors.
- **Public Transport to link East Coast, West Wicklow and Kildare:**

The vast majority of overseas visitors to Ireland do not rent a car. With no public transport

in place, there is very little opportunity for tourists to roam around the Kildare-Wicklow destination. Both Counties have to come up with a public transport infrastructure solution.

- **Destination Signage:**

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

Q. How can the correct balance be achieved in terms of exploiting the county’s assets through the promotion of tourism activity, whilst protecting the natural and built environment of the county?

- **Support from local Planning authority:**

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

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

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

- **Blessington Greenway as new major development:**

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

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

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

- **Secure off road parking:**

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

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

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

Q. Should large scale integrated tourism developments be encouraged or should the focus be put on encouraging smaller domestic/ agricultural tourism products?

- **Blessington Lakes Greenway:**

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

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

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

- **Support local communities and local projects:**

Following from the previous point, rural communities around Wicklow have proven to be highly efficient in delivering and managing local tourism projects: Tinahely with the development of Walker's Welcome initiative, Avoca with the recent launch of a loop walk, Blessington with the Greenway are just a few examples. Such projects take advantage of existing assets and are extremely good for the local economy.

- **Promote existing tourism infrastructure:**

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

Q. How can the plan best facilitate the expansion of existing and the development of new amenity routes?

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

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

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

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

Q. What key advantages has Wicklow to offer to help distinguish it from other areas and attract increased tourist numbers to the area? Are there any particular niche tourism products that Wicklow can deliver and should be facilitated?

- **Wicklow's Great Outdoor:**

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

- **Heritage and Culture:**

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

- **Film industry:**

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

- **Access to Dublin:**

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

Q. What areas within the county have the potential to be developed as key tourism attractions in a sustainable manner?

- **Blessington Lakes Greenway:**

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

Q. What areas within the county have the potential to form part of the development of a comprehensive tourist trail within the county and how in your opinion could this be developed?

- **West Wicklow Heritage Trail:**

West Wicklow finds itself at the centre of the new Kildare / Wicklow destination. The N81, along with the N/M11 has the potential to become one of the main arteries linking Dublin to southern destinations along the East & South Destination being developed by Failte Ireland. West Wicklow hides amazing archaeological treasures, some older than the pyramids in Egypt: Early Celtic settlements, Pre-Christian holy sites, Early Christian monasteries, rebellious past locations. West Wicklow offers an amazing journey through Irish History. This project could be developed in partnership with the local Heritage Council, OPW, Local tourism board and the local communities along the N81. Define the main heritage sites, develop access and interpretation.

- **Walking & Cycling network around Wicklow**

Wicklow has the potential to become the Outdoor Capital of Ireland. Wicklow must support and coordinate the various local initiatives to develop local walks and cycling trails with the ambition to create a network of trail connecting the various town and villages and the main walking routes & hubs (Wicklow Way, Glendalough, Blessington Lakes, Tinahely). This could

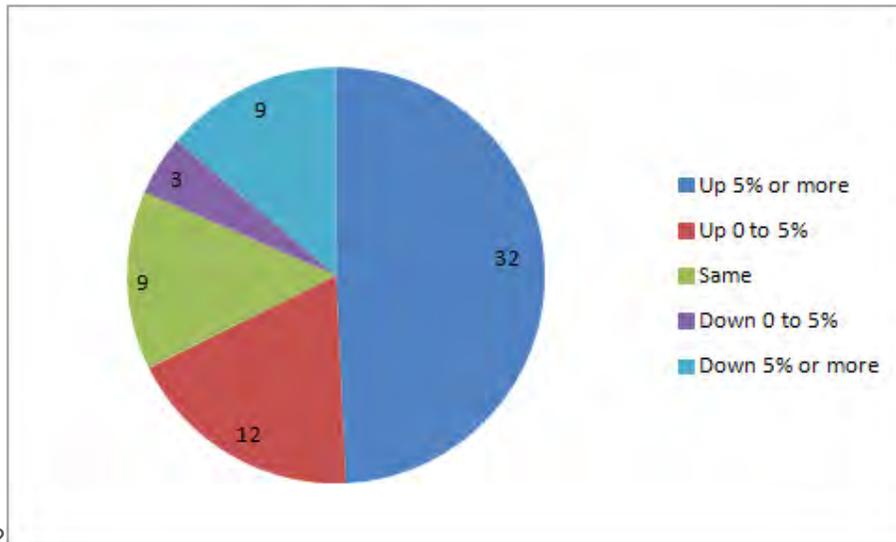
be supervised by the local Outdoor Recreation Office in partnership with local communities, with the support of the Tourism Board, Local Sports Partnership, Coillte and the National Parks.

- **The Avoca Valley:**

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

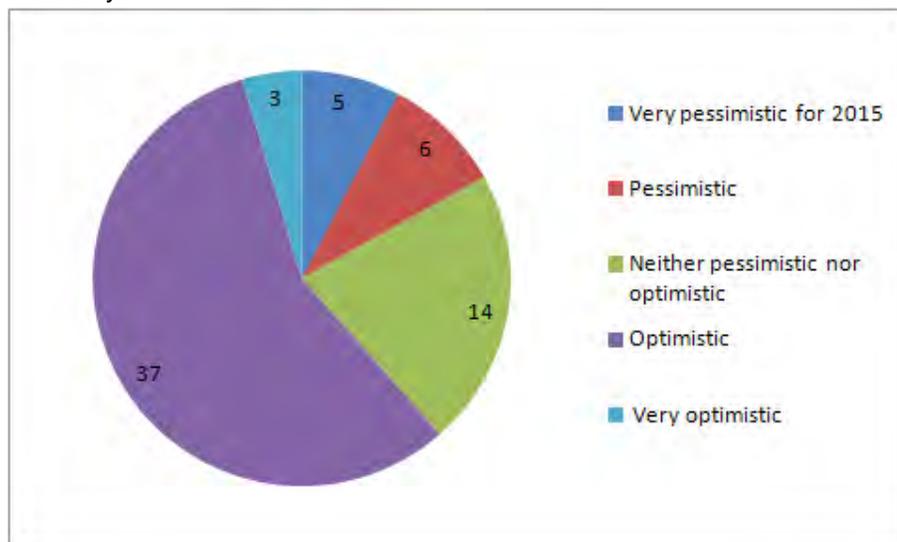
2014 Season's Performance

- How do you compare 2014 against



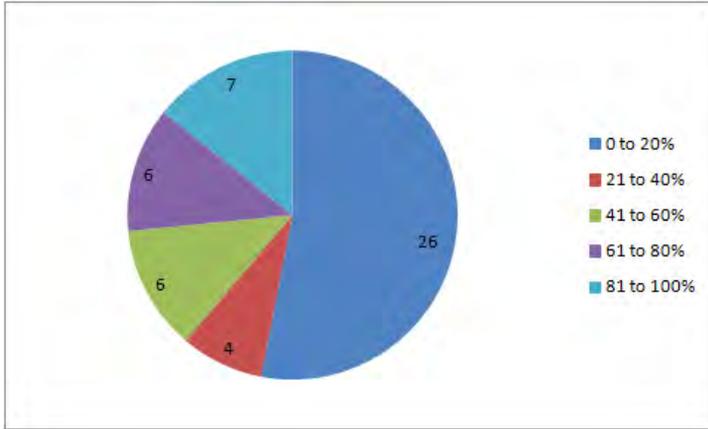
2013?

- What is your outlook for season 2015?

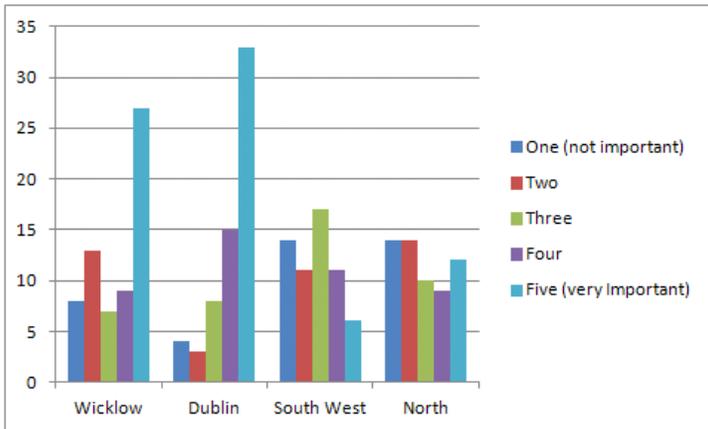


Domestic v. Foreign Visitors

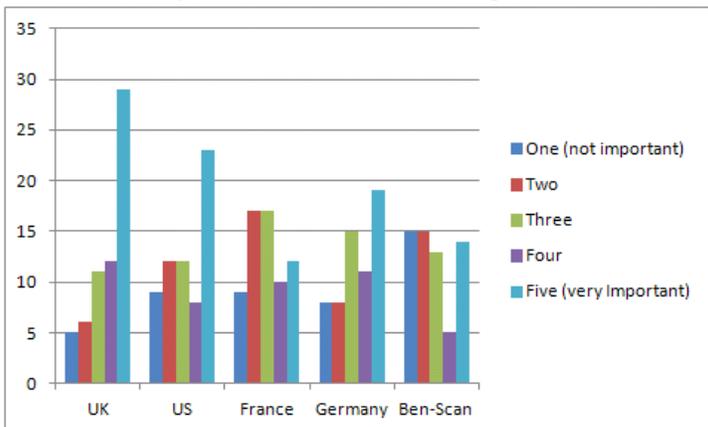
Estimated overseas business:



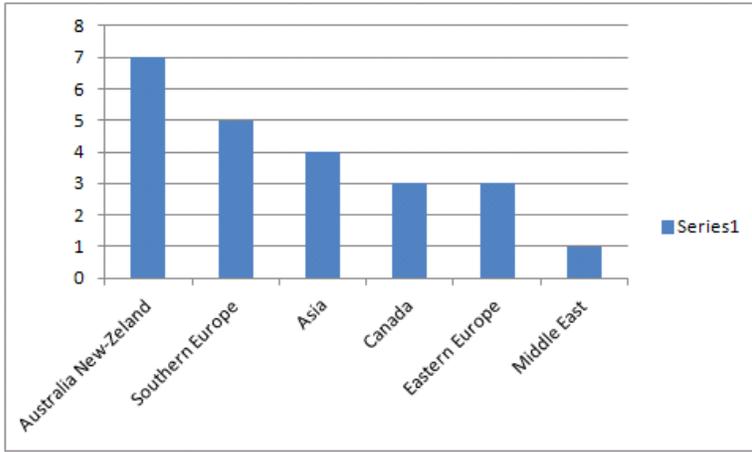
Define the importance of the domestic market for your business?



Define the importance of the following overseas markets

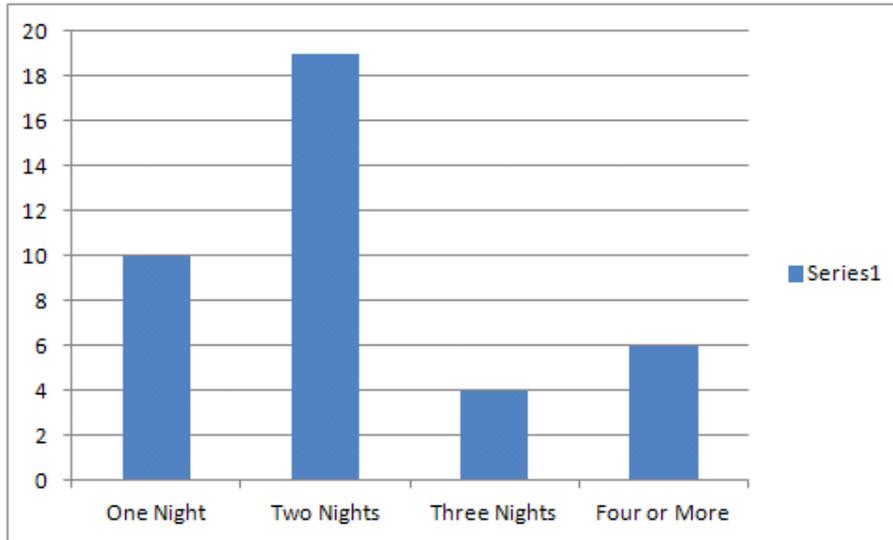


Other Countries:

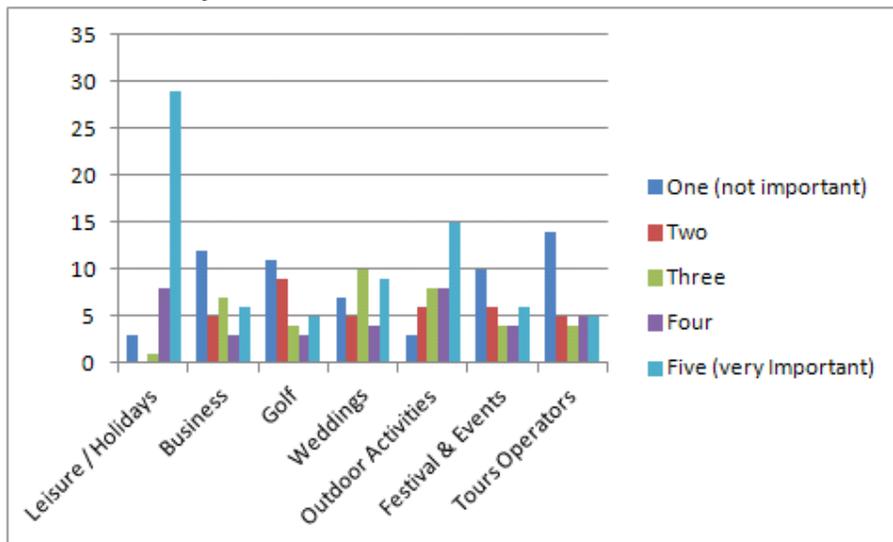


Accommodation Providers Survey

What is your average visitor's length of stay?



Reasons to stay?

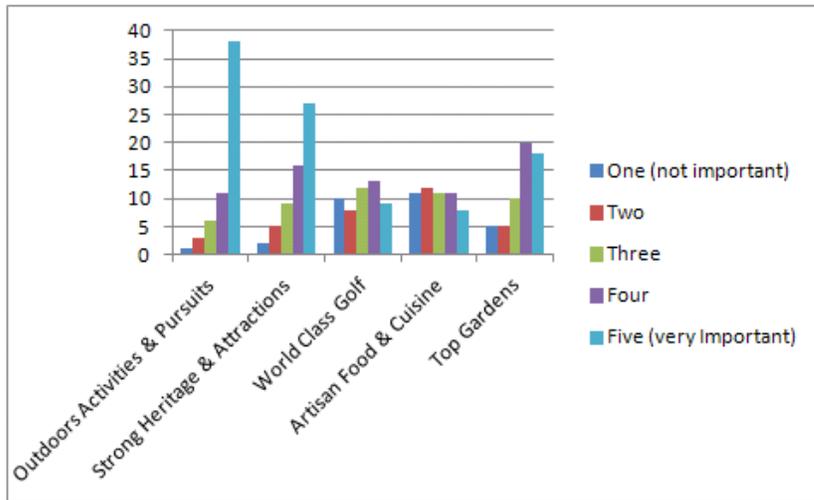


Others:

- Film
- Genealogy
- Food
- Visiting Family
- Study

Tourism Promotion

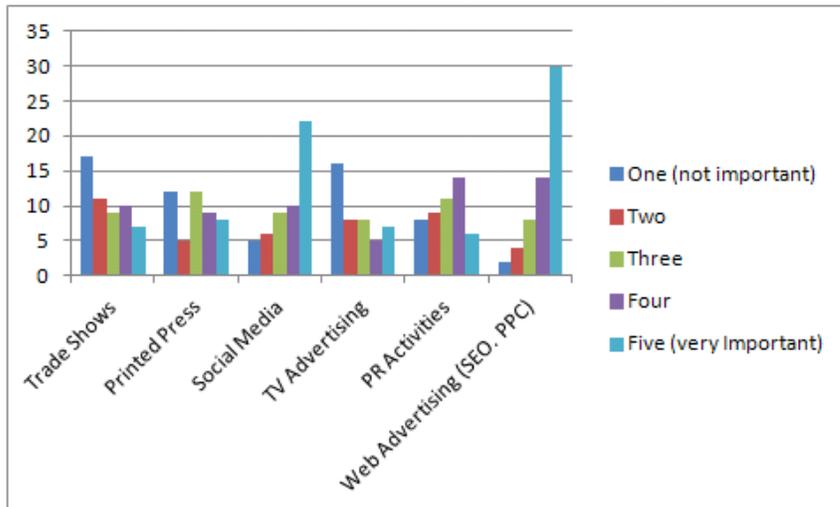
Which of the following offers the best opportunities to attract visitors to stay in County Wicklow?



Others:

- Scenery
- Cultural Events
- Genealogy
- Film Locations
- Family Reunions
- Peace and Quiet, Relaxation

Advertising: according to you, what media is most efficient and offers best value for money?



SWOT ANALYSIS

Strength:

- **Fantastic Sceneries:**
Wicklow offers a fantastic diversity of sceneries within a small area: mountains that climb up close to 1000 meters, sea with cliffs and sandy beaches, rivers and lakes, forests, etc. Most areas are within easy reach and offer a perfect playground for various outdoor activities.
- **Good destination for the domestic market:**
Wicklow, known as the Garden of Ireland, enjoys a brand that is widely recognised in Ireland. It has been a holiday destination for decades, especially visitors from the greater Dublin Area.
- **Strong destinations for day tripper from Dublin:**
This situation is true for the Dublin area visitors especially at weekends. It is also true for overseas visitors staying in Dublin and enjoying our County for day tours.
- **Best Outdoor destination on the East Coast:**
County Wicklow entertains more people for Outdoor Activities each week than anywhere else in the Country. Our County enjoys some of the best infrastructures. The diversity of our landscape offers great diversity in the amount of activities on offer: Walking, Cycling, Fishing and Angling, Mountain Biking, Golf, surfing, kayaking, Sailing, Running, Equestrian and more.
- **Strong Heritage and Culture:**
Our historic homes and gardens are regarded as some of the best in the world. Wicklow has been marketed by history and time, with vestiges of the various eras that market the rich Irish history. This includes Passage Graves older than the pyramids in Egypt, Early monastic settlements, ring forts, medieval castles, historic homes and jail, and many more.
- **Top Irish attractions:**
Wicklow is home to some of Ireland's most visited attractions: Glendalough Monastic Site, Powerscourt House and Gardens, Russborough House, Bray Sealife and more attracting millions of visitors every year.
- **Proximity to Dublin:**
34% of the Irish population lives on Wicklow's doorstep. Our main market has been coming from the Dublin Area for generations.

Weaknesses:

- **Limited overseas overnight market:**
Wicklow gets on average 200,000 overseas overnight visitors annually. To put into perspective, Clare gets 485,000, Kerry 877,000, Galway 1,028,000 or Limerick 420,000. Wicklow has as much if not more to offer than the counties listed above, and should be competing against those destinations.
- **Limited impact to local economy by day visitors:**
Although Wicklow enjoys a very high volume of day visitors, their economical impact can be very limited, especially overseas visitors staying in Dublin. A large number of companies

operate organised day tours into the most scenic areas of Wicklow. Most of those tours do not offer much opportunity for their clients the opportunity to spend within our County.

- **Poor East to West public transport:**

Although the East Coast of Wicklow enjoys a very decent public transport service (train and bus), there is no public transport link between Wicklow's East Coast and West Wicklow. This situation turns Dublin the main hub for County Wicklow by default. For example, it is far easier to get a trip to Glendalough from Dublin, than it is from anywhere in Wicklow.

- **Proximity to Dublin:**

This is a double edge sword. Being so close to Dublin, means that many visitors might choose to stay in the capital, rather than use an accommodation in Wicklow. Whether we like it or not, Wicklow is part of the Dublin's tourism offering.

- **Poorly recognised destination to overseas visitors:**

Outside of Ireland, Wicklow enjoys close to no recognition. Our "Garden of Ireland" brand means nothing to the French or German market. Wicklow enjoys very little exposure abroad when compared with destinations like Galway, Clare, Kerry or Cork.

- **Not enough "Traditional Irish" activities:**

Overseas visitors chose to come to Ireland for its people, craig and music. Traditional Ireland is part of the Clare, Galway or Kerry's tourism offering. The overseas business demands such offering. It is very difficult for visitors to find out where in the County they can listen to traditional Irish music as very few offer such service at regular times.

- **Antisocial activities in the uplands for outdoor activity users:**

Antisocial activities in the uplands have increased over the last few years. Many cars have been broken into at popular outdoor activities car parks. Such activities have long lasting effect for visitors, and can destroy efforts to attract users.

- **Weak tourism signage within Destination Wicklow and traffic management:**

When driving through Wicklow, there is no sign to suggest you are in one of the top tourism destinations in Ireland. Glendalough gets very congested on busy days, when other areas lay empty.

Opportunities:

- **Tourism Growth**

Ireland welcomed 7.3 million visitors in 2014 (8% increase from 2013). The objective for 2015 is to increase those to 7.7 million visitors and the long term plan is to welcome 10 million visitors by 2025. Wicklow has to fight for a piece of that growing pie.

- **Failte Ireland South & East new destination**

Early in 2015, Failte Ireland is to unveil its plan for the packaging and promotion of a larger destination that will go from Cork to the Boyne Valley. Following from the great investment and success of the Wild Atlantic Way, there is great hope that the "South and East Destination" can achieve substantial exposure for our region. The main theme for that destination will be around Heritage and Culture, and Wicklow as great assets to feature on these. Also, there is an opportunity to develop our own unique selling point around the Outdoors.

- **Kildare Wicklow destination under the above**

The Wicklow-Kildare destination is to feature under the larger destination being developed by Failte Ireland. There will be great opportunities for extensive overseas promotions to sell Wicklow.

- **More visitors to Dublin**

Dublin is currently working at revamping its marketing and promotion to help compete against European destinations like Barcelona or Amsterdam. With more visitors coming to Dublin, there will be more visitors to Wicklow.

- **Growing market for Outdoor activities:**

Part of Failte Ireland's studies show that the demand for outdoor activity is increasing, especially from the European markets.

- **Film Tourism destination opportunity:**

Wicklow is the Hollywood of Europe. With two films studios and so many productions coming out of our County, there is a tremendous opportunity to attract visitors on the back of such exposure.

Threats:

- **Lack of coordinated approach from various local organisations and authorities:**

There are too many organisations working disjointly for the development and promotion of the County. Many efforts are duplicated and do not achieve top results from lack of coordination and joint resources.

- **Lack of promotional resources and activities:**

There is no point at being the best if no one knows about it! Very little resources are currently dedicated to promotion of Tourism in Wicklow. We will not attract visitors unless substantial advertising and promotional campaigns are developed.

- **Very little return from day visitors:**

Increased day visitors to Wicklow will increase pressure on our infrastructures. Over usage of our facilities can threaten the visitor's experience and the facilities themselves (Glendalough, Wicklow National Parks, etc.). Wicklow needs to plan for an increase of day visitors and how it can benefit from it.

- **Very little impact at decision makers within Failte Ireland, Tourism Ireland, Irish Government.**

Wicklow has to be more involved at decision-makers levels. We won't have an opportunity to compete against other Irish destinations unless we become influential at Failte Ireland, Tourism Ireland and the government's levels. We need to regularly interact with them and push for Wicklow's interests.