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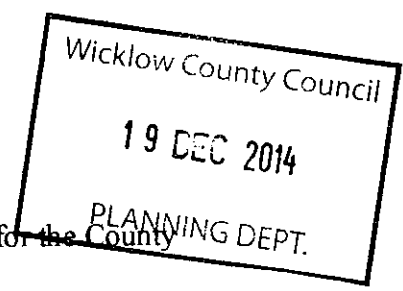
Website: www.alphaplandesign.com

Reg. Vat. No. IE3212037H

RE: Submission to the County Development Plan 2016-2022

Dear Sir / Madam,

I wish to make the following submission for inclusion in the draft for the County Development Plan 2016-2022 currently under preparation:



URBAN DEVELOPMENT:

I suggest that the current trends for housing requirements be taken into consideration at planning stage instead of the current policy whereby it appears that developments have been constructed in some urban areas which are not suitable to a particular area. These include developments such as apartment blocks in mainly housing areas where there is no demand for such living accommodation. I feel that while it may be necessary to accommodate apartment blocks in highly pressured areas for space economy, such as the commuter belts or town served by DART, it is not yet necessary to have apartment blocks in areas other than town centres where apartment living is the norm. I would suggest that apartment living in villages is unnecessary where housing land is available and plentiful. It is my experience that apartments located at areas other than town centres hold no interest for people requiring permanent accommodation.

The zoning currently used in urban areas appears to be well thought out and acceptable as it allows good special accommodation for housing developments and in particular the use of open space which must be usable and not banks or inaccessible areas. The acceptance of adaptable attic space to living accommodation in high density areas introduced in the last CDP was a positive move in economic use of space and preservation of garden area.

Current trends for different areas should be considered when assessing a planning application. This would mean a study of current requirements for living accommodation for a particular area based on research carried out by estate agencies and housing providers and proposed at planning stage. For instance the current trend in Wicklow Rathnew is for three and four bedroom semi detached dwellings. There is little or no interest in terraced type dwellings in this area and little interest in two or five bedroom dwellings. The lending institutions will accommodate mortgages easier for three and four bedroom dwellings with private gardens and off street parking. In other areas this trend may

differ and study of accommodation requirements may be proposed at planning application stage. The current trend of a three bedroom dwelling with attic convertible space gives a "home for life option" whereby a family home can grow with the family from a three to a possible five bed house or not as the case may be without taking up precious garden space.

On street parking which provides for general car parking remote from dwellings is a bad idea as parents of young children struggle to get from the car to the house in poor weather conditions.

RURAL HOUSING:

The Objectives under RH14 of the current CDP are acceptable but it always a constant struggle to satisfy the planning dept to accept the details of an applicant credentials. The submission of a birth certificate and all local connections and clarifications of schools attended etc should be enough and any doubts should be alleviated by contacting the local councillor for the area instead of the constant clarifications sought on further information requests.

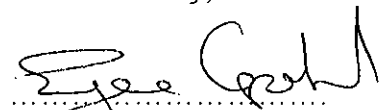
I also propose that the 5.5m floor to ridge height restriction of a rural dwelling should be removed to allow future attic living accommodation to be provided in a rural dwelling. This could be allowed if the dwelling is under 185 sq.m. and would therefore be unnecessary to take up further land use if an extension was required at a later date. It is my experience that attic accommodation can be provided in most cases at a height of approx 6m floor to ridge height. It would be minimal adjustment for such a large potential gain. It is difficult to tell from a road whether a dwelling is 5.5m high or 6m high in reality. Planning permission would still need to be sought to develop the attic space but the carbon footprint of the building would be unaltered.

ENTERPRISE AND EMPLOYMENT:

I suggest that lands zoned employment at the edge of towns might be open for consideration for enterprise / business park / office accommodation or even residential and not just strictly industrial. An example is the entrance to Wicklow Town from Rathnew whereupon there is a stretch of land at Knockrobin between the graveyard and the railway bridge which is zoned employment. This land can at present accommodate large warehouse / factory type buildings which would not enhance the approach to the town. It would be better in my opinion to have this land open for consideration to allow for an office district or residential or a mixture of both on the approach to Wicklow Town. From an employment viewpoint it make mores sense if it was proposed as office accommodation as large factory / warehouse type units can be run by a small amount of people whereupon business parks employ much larger numbers. The possibility of a railway station at this location should not be disregarded as a commuter stop for the Dublin train since this area of Rathnew has become highly populated over the past ten years.

Finally thank you the opportunity to make this submission and perhaps it may be of some relevance when the final assessment is prepared.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Eugene Copeland", written over a dotted line.

EUGENE COPELAND

Architect / Project Manager

19th December 2014

Ashford Property Services
The Square Ashford. Co, Wicklow.
Phone / Fax. 0404-49094.
Mobile 087-2775923.
Email: oconnor.ashford@gmail.com

12/22/2014



COUNTY WICKLOW
Development Plan 2016 – 2022
Submission.

That the traditional rural settlements of Ashford parish are recognized in the new development plan and provision be made for small clusters of houses.

i.e.

Nunscross.

Cronroe / Ballycullen, Ballylusk

Killoughter. Coinscross

All of these areas had their own shops and schools in the past

Wicklow County Development Plan 2010-2016 Written Statement

Volume 1 Chapter 6 Rural Housing & Development

CHAPTER 6 RURAL HOUSING AND DEVELOPMENT

This chapter of the plan deals with development strategies, objectives and standards for rural development and housing, that is, development located in Levels 6-10 of the County Settlement Hierarchy. One in three of the County's residents reside in such areas (approximately 35,500 people) and it is expected that the number of people living in these areas will continue to rise. While Wicklow has a good network of rural towns and villages, that provide infrastructure and support services to the wider rural area, such settlements only accommodate approximately 5,200 of this 35,500 rural population and have not in the last 10 years absorbed significant levels of rural growth. Therefore in accordance with the principles of the National Spatial Strategy

2002 – 2020, it is a goal of this plan to attract growth in rural settlements to both support local economies and to accommodate rural housing needs.

Strategic Objective To support appropriate and sustainable development in rural areas and to direct new development into existing rural settlements, while recognising the social and economic needs of those living outside of settlements.

6.4.2 Small Villages / Rural Clusters

These small settlements for the most part do not have a structured or identifiable village centre and all new development will therefore in essence be greenfield type developments. This will essentially mean that in most cases there will be little existing development from which to draw inspiration or reference for new developments.

This will in effect therefore place a higher responsibility on the designer to come up with a design that fits with its surroundings and complements any existing development in the settlement. Particular consideration should be given to Set back from the public road. Excessive set back can dislocate the new development from the existing settlement, even where the structure of the settlement is weak or undefined. The new structure should be part of the settlement and the set back proposed shall reflect this relationship. For example, in the small villages of Annamoe and Valleymount, there is a village core and existing buildings are tight to the road. New dwellings here should replicate this trend. However, in Moneystown, where there is no established village fabric, new dwellings should be sufficiently close to the road frontage to create a connection with the 'street' but would not necessarily be required to create new street frontage

**Ashford Property Services t/a
Pat O'Connor & Associates.
Planning, Architectural and
Property Consultants**

Pat O'Connor .Dip Arch.
Rory O'Connor. BSc (Hons) Con. Man. MIEI.
Ross Boyce. Architectural Technician

Ashford Property Services

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12/22/2014



COUNTY WICKLOW

Development Plan 2016 – 2022

Submission.

Proposed amendment to Objective RH 14 Development plan 2010-2016.

Family farm:

Where a family member is entitles to build a home on the family farm and the farm is relocated that this entitlement transferred to the new farm.

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12/22/2014



COUNTY WICKLOW
Development Plan 2016 – 2022
Submission.

That the strategy of locating nursing home sites in prime residential areas is no longer viable as is evident by the no's of applications for change of use of previous granted permissions for nursing homes to residential. In most other counties the preferred option is a rural setting, as is the preferred option of the HSE.

Proposal:

That nursing home sites within a 5 km radius of existing settlements be considered

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Planning, Architectural and
Property Consultants

Pat O'Connor .Dip Arch.
Rory O'Connor. BSc (Hons) Con. Man. MIEI.
Ross Boyce. Architectural Technician

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 22 December 2014 14:54
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 14:54 Submitted by anonymous user: [109.76.230.7]
 Submitted values are:

Name: Shelley O'Connell
 Organisation, Group, Company, etc : Ashford Studios
 Address: Ashford Studios, Ballyhenry, Ashford, Co. Wicklow
 Email: shelley@ashfordstudios.com

--Topics--

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

Submission - If you wish to make comments on a topic, please fill in the box below:
 Alternatively you can attach your submission (10MB limit on attached files):
<http://www.wicklow.ie/sites/default/files/webform/County%20Development%20Plan.docx>
 Attachment No.2 (10MB limit on attached files):
 Attachment No.3 (10MB limit on attached files):

--Town / Settlement Plans--

- : Ashford
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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/Ashford%20Town%20Plan.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/50>



Ballyhenry, Ashford, Co. Wicklow
Ph: 00353 (0) 404 78700 Mobile: 00353 (0) 86 1021966
Email: shelly@ashfordstudios.com

FAO: Administration Officer,
Planning & Development,
Wicklow County Council,
County Buildings,
Wicklow Town

19th December 2014

Re: County Development Plan

Dear Sirs,

I am representing Ashford Studios Ltd., which is a dedicated film studio in Ashford, Co. Wicklow. The studios opened in May 2012 and our first production, *Vikings* started immediately. Due to the TV series success the *Vikings* have returned for three seasons, employing up to 400 full people during peak production.

During this time there has been many enquiries from large international film production companies, such as Disney and Warner Bros, looking to use the facility and avail of Section 481. Accommodating these companies is not currently possible as the studios are at capacity with just one large production using the facility. The intention is to provide further large, modern, purpose-built film infrastructure in Ashford, to accommodate for this demand.

The next phase of Ashford Studios caters for 3 large productions to run simultaneously and providing work for 1200 people. We would hope in the future that Ashford has the potential for growth in terms of employment particularly due to the possibility of expansion of the film sector. If this potential is managed correctly employment could be up to 5000 direct jobs and 5000 indirect jobs. It is important that infrastructure is in place to cater for this.

Overall strategy

Strategic Goals – We would consider Goal 7 to be most important overall. Improvement in transport and communications are essential in order to encourage

the growth of employment, enterprise and economic activity in the county. Goal 4 and 5 are also significant as housing and servicing retail and amenities will be needed to cater for the increase numbers of residents in Ashford and surrounding areas due to the film sector.

Hierarchy in Wicklow – Ashford should be given a higher status. Overall, consideration needs to be taken based on the infrastructure that will be needed to support and service the business brought in by the expansion of Ashford Studios.

Land Zoning & housing – As stated in the aforementioned, Ashford Studios currently caters for 400 crew. These people are either commuting to Ashford or staying in holiday homes for the duration of the production. Already the lack of housing in Ashford and the surrounding areas is an issue. The amount of people employed is set to triple with the studios expansion creating a definite need for land to be zoned for housing.

Enterprise and Employment – There is no doubt that the desire to work in Wicklow County rather than commute is already evident. There is a definite lack of a hub where a large number of people are employed in the county and this has a negative effect on local business and retail as many travel outside of the county to work.

It is also important to mention that improvement of communications, i.e. fiber broadband, is imperative in encouraging enterprise and employment in the county and will help ensure the success and sustainability of businesses.

Tourism – Wicklow County has a lot to offer in terms of tourism. We have beautiful landscapes, walking trails, beaches, historical buildings and a long-standing history of film production in the county that already attracts many visitors. With both of Irelands film studios in Wicklow County there is a brilliant opportunity to encourage visitors through a film brand attraction also.

However, transport within the county needs to be improved to enable accessibility to the various attractions.

It may also be beneficial to continue using all our current tourism websites but use the Wicklow.ie domain as a portal page that provides links to tourism websites, accommodation websites, food websites and council websites etc. It is the easiest and most relevant domain name for people looking for information when coming to the county and would be relatively easy to set up a portal page rather than redesigning an entirely new database and website for the county.

Retail – There is no doubt that an increase in service businesses is required in the county as populations increase. Broadband infrastructure needs to be in place to encourage these businesses to the county and help in their viability.

Rural Development – Phase 1 of Ashford Studios was intentionally built in such a way as to blend in with its surroundings and enable commercial, residential and agricultural lifestyles to work seamlessly side by side. This has proved very successful. It is important that development is attractive, done tastefully and adds to the landscape rather than diminishes it.

Infrastructure – We currently have an excellent road infrastructure. However, as already mentioned, transport within the county needs to be acted upon, more of which, is mentioned in our Ashford Town Plan submission.

Communications, specifically fiber broadband, is essential in all areas of the county in order to encourage new businesses to the county and the sustainability of these businesses going forward.

Other Comments – It is essential that the decision making process be improved, for example, as in the case for Financial Services and Docklands. A proactive and rapid planning process should be put in place to help get proposals through the system within reasonable periods of time. The current planning is so robust and consultative that it is extremely difficult to get anything cleared and decided upon in an acceptable timeframe.

Should any further information be required in relation to this submission please don't hesitate to contact me directly on the details below.

Kind Regards,

Shelley O'Connell
Managing Director
Ashford Studios
Ballyhenry
Ashford
Co. Wicklow
Ireland
Ph: +353 (0) 404 78700
DDI: +353 (0) 861021966
Email: shelley@ashfordstudios.com
Website: www.ashfordstudios.com

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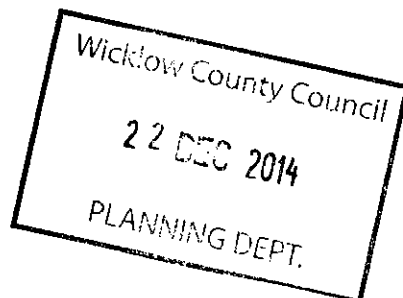
Craigie Cottage,

Monastery,

Enniskerry.

Co. Wicklow.

19th. December 2014.



Forward Planning Section,
Wicklow County Council,
County Buildings,
Wicklow.

PRE DRAFT SUBMISSION WICKLOW COUNTY DEVELOPMENT PLAN 2016/2022.

A Chara,

My name is Noel Barry. My address is Craigie Cottage, Monastery, Enniskerry, Co. Wicklow. My submission relates to the Enniskerry area and is as follows;

: In view of the proposed housing developments at Monastery and County Brook, that the Northern development boundary for Enniskerry shall be south of the Ballyman Road, which is the natural Village boundary, and that the existing protected view of the Scalp and the Scalp Valley from the Ballyman Road be retained in the proposed new County Development Plan which is being prepared:

Yours sincerely,

Noel Barry

Noel Barry

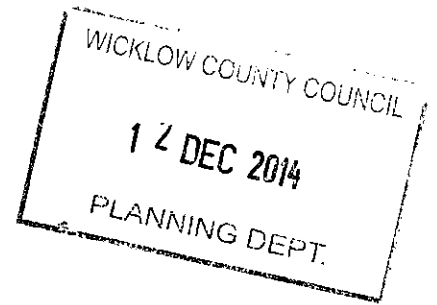
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Submission on county development plan review

Category: Settlement Strategy

Small Villages - Ballycoogue

FAO: Forward planning,



Under the last county development plan, the issue of who could live in small villages was restricted to a strict local only definition, whilst the larger villages were permitted a less restrictive county local definition.

In Ballycoogue, despite the council granting permission for approx. 10 houses, no development took place. I believe this is because the settlement strategy is too restrictive.

Ballycoogue has a new, underutilised, sewage treatment plant and an upgraded water supply. Nearby towns like Aughrim and the village of Avoca have no spare sewage treatment capacity and Arklow has none at all. Considering that the county has a serious housing crisis, I believe that the council should relax the restriction on housing in Ballycoogue by moving it up a level in the hierarchy to the large village status, similar to Thomastown/Johnstown.

Ballintemple National School has lobbied in the last review of the CDP to allow expansion in the village in order to safeguard the long term viability of this rural asset. Goal 6 of the county development plan states "to protect and enhance the county's rural assets and recognise the housing, employment, social and recreational needs of those in rural areas". Surely a more relaxed settlement strategy and an increase in the number of permitted houses in Ballycoogue could preserve this rural asset.

My interest is ownership of approximately 3 acres of land within the Ballycoogue development boundary.

Yours faithfully,

Elizabeth Battye.

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Leonora Earls

From: MICHAEL JOSEPH BAYNES [REDACTED]
Sent: 20 December 2014 11:28
To: Planning - Development Plan Review
Subject: Wicklow Co. Development Plan 2016 - 2022

Pre-Draft Submission - Wicklow County Development Plan 2016 - 2022

Name: Michael J. Baynes

Address: 14, Glenwood, Herbert Road, Bray, Co. Wicklow.

Email: [REDACTED]

Submission:

Re: Housing in Towns and Planning Principles:

Some Town Development Plans contain statements of principle to the effect that where there has been a grant of planning permission providing a certain ratio of development to open space or amenity space in a housing estate, such open spaces or amenity spaces cannot be subsequently built on or developed.

This is a very reasonable planning provision which gives some security to residents and house owners alike in the purchase and choice of living environments. Unfortunately however, An Bord Pleanála has had to restrain a Town Council in County Wicklow from breaching its own Plan in such matters.

I submit that it is necessary to incorporate a statement of principle in the determination of planning applications to the effect that residents and house owners can rely upon such a statement in order to continue to preserve the open space or amenity space for the future and without some retrospective decision to remove some or all of the same. The Wicklow County Development Plan 2016 - 2022 should contain such a statement for the good interests of all.

Yours sincerely,

Michael J. Baynes

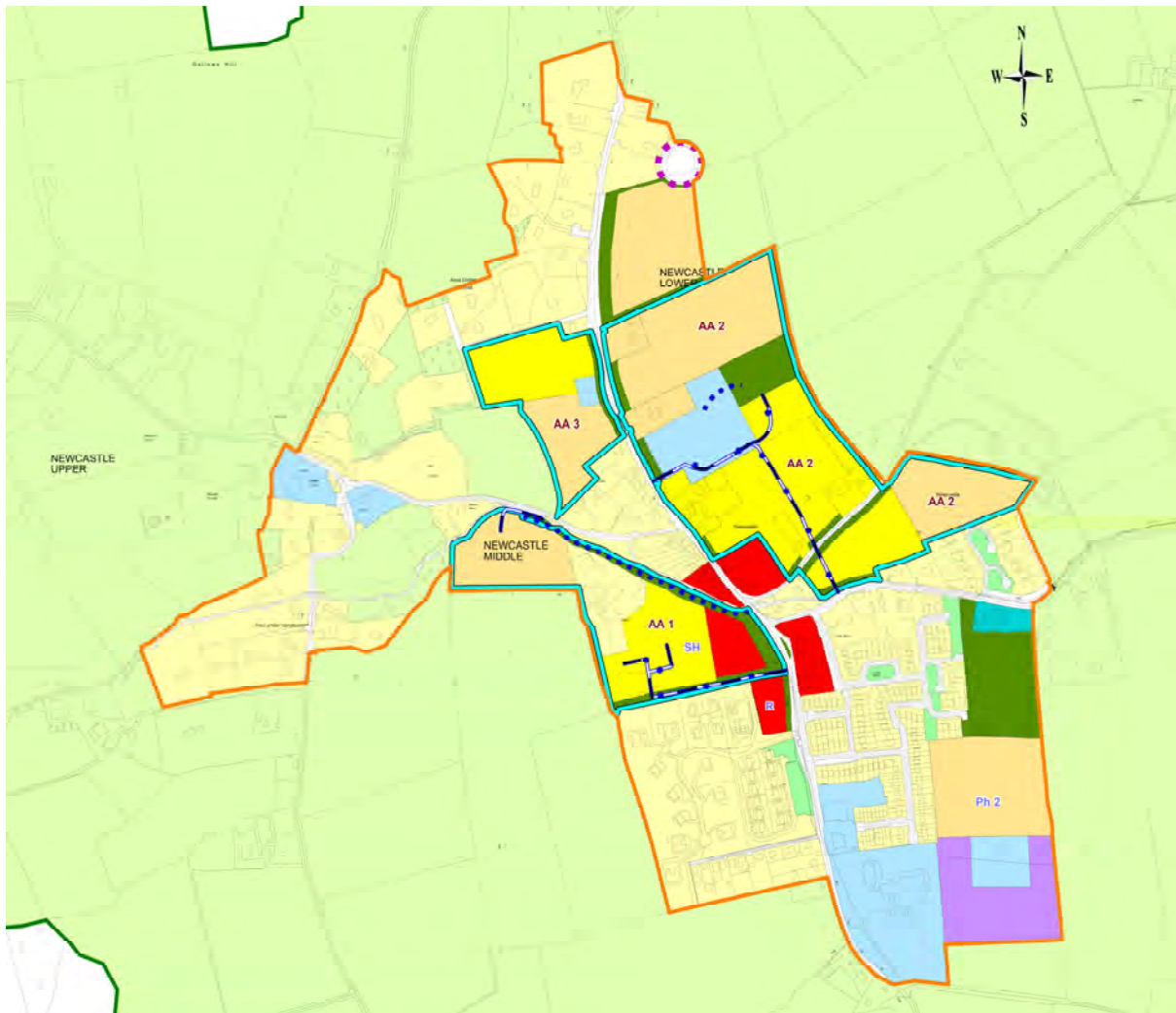
20 December 2014

acknowledged
[Signature]

Town Planning Submission

Strategic Consideration of Newcastle, Co. Wicklow Statutory Review Wicklow Development Plan 2010-2016

22nd December 2014



Blackditch Ltd.,
Blackditch Farm,
Newcastle,
Co. Wicklow



Hughes Planning & Development Consultants

The Mash House, Distillery Road, Dublin 3
www.hpdc.ie

1.0 Introduction

Hughes Planning and Development Consultants, The Mash House, Distillery Road, Dublin 3 on behalf of Blackditch Ltd., Blackditch Farm, Newcastle, Co. Wicklow wish to make this submission to the Wicklow County Council review of the County Development Plan 2010-2016 and towards the preparation of a new County Development Plan for its functional area for the period 2016-2022.

We request that the recommendations of this submission be given full consideration in preparation of the forthcoming County Development Plan 2016-2022 in accordance with Part II Section 11 of the Planning and Development Act 2000 (as amended). This submission has regard to p51-52 of the Wicklow County Council Issues Booklet (Stage 1 Public Consultation), which relates to the strategic designation of the settlement of Newcastle, Co. Wicklow.

2.0 Pre-Draft Public Consultation Issues Booklet

2.1 Vision and Development Strategy

It is noted that the issues paper published with the initial call for submissions at the pre-draft stage of the development plan indicates that the draft plan will include a strategic vision for Newcastle, which will underpin all other objectives of the plan. Blackditch Ltd. are a substantial landowner of approximately 200 acres of zoned and unzoned lands immediately adjacent to the built up area to the southeast of the town.

Blackditch Ltd. have commenced a substantial programme of refurbishment of existing heritage buildings on their lands on foot of consents obtained earlier in 2014 and intend to bring forward development proposals for zoned lands within their ownership over the life of the draft plan. Accordingly, the opportunity to participate in shaping the vision for the town and the strategic designation of Newcastle as a settlement in the Wicklow development hierarchy is welcomed. It is also the intention of Blackditch Ltd to bring forward specific proposals in relation to their lands on publication of the draft development plan in 2015.

The issues paper poses the question *"what is your 'vision' for the future role and function of Newcastle?"*. Blackditch Ltd. consider Newcastle to constitute a vibrant settlement with a good critical mass capable of supporting local services, retailing, employment and a strong population base while taking advantage of the location of the settlement and heritage features of the town to promote local tourism. Blackditch Ltd. requests that the draft development plan adopt a dynamic and progressive approach to the development of the settlement over the plan period with a series of policy initiatives and measures to be included in the draft plan. These measures should proactively encourage development and to facilitate engagement with landowners and employers who can bring forward proposals consistent with the vision for the town.

2.2 Population and Town Development

Under the current Wicklow Development Plan 2010-2016 Newcastle is designated a Level 6 'Rural Town'. This settlement type is defined as *'strong rural towns, with a good range of infrastructural services that are suited to accommodating a significant element of urban generated housing demand, with necessary controls in place to ensure that local demand can also be met. Rural towns should aim to attract smaller local type investment, in primarily 'product' type or manufacturing based industries. Retail services and community facilities shall provide for the local needs of the immediate population and its catchment.'*

The town has been set a population growth target of 1500 people by 2016 and 1750 people by 2022 in the current plan. This would represent an increase of 53% over the recorded population of 2011. The issues booklet with regard to the development of the town asks: *'Is the role and function of Newcastle, as a Level 6 'rural town', in line with future aspirations for the town for the period 2016-2022 and beyond?'*

Blackditch Ltd. consider the settlement to have a significant role to play in the settlement hierarchy of the county. The designation of the settlement within the Regional Planning Guidelines for the Greater

Dublin Area 2010-2022 as a 'Small Growth Town'¹ along with settlements such as Aughrim, Baltinglass, Carnew, Enniskerry, Kilcoole and Tinahely is noted. These towns are accordingly designated as Level 5 - Small Growth Towns in the current development plan to correspond with their designation within the Regional Planning Guidelines. These settlements have also been provided with population targets for 2022 as follows: Aughrim (2,000); Baltinglass (3,500); Carnew (2,000), Enniskerry (5,000); Kilcoole (5,000) and Tinahely (1,550). Newcastle is conspicuous by its absence from the Level 5 settlement class particularly when regard is had to the location of the settlement, existing critical mass and availability public transport (Dublin Bus) and road transportation links to the national road network via the M11 motorway/national primary road.

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

Figure 1.0 Wicklow Settlement Strategy

¹ p6, Wicklow County Council Pre-Draft Public Consultation Issues Booklet, October 2014

It is considered that having regard to the current development plan population target (of 1,750 persons being in excess of that for Tinahely) and the RPG designation for Newcastle combined with the existing critical mass and potential of the town that Newcastle should be re-designated as a 'Level 5.0 - Small Town' in the draft development plan. This revision would allow an appropriate allocation of resources to address the provision of infrastructural and social services and facilities allow the settlement to achieve its potential and population targets for 2022.

2.3 Growth Targets

The current growth targets for the town indicate that the population of Newcastle is targeted to grow to 1,500 people by 2016 and 1,750 people by 2022. The new county development plan will review these existing targets and set out new population growth targets up to 2028.

The current growth target is considered to be reasonable, however it is considered that provision for further planned population increase should be made for the period 2022 to 2028 in the draft plan. An appropriate target for 2028 would be to facilitate the gradual and organic growth of the settlement having regard to the expected average increase in the national population. According, we submit that an appropriate population target for Newcastle for the period up to 2028 would be 2,500 persons. this would facilitate moderate and planned growth of the settlement over time and the phased delivery of the necessary infrastructure, housing and supporting services to accommodate this growth.

2.4 Retail, Services and Community Facilities

Under the 'Retail Hierarchy for County Wicklow' set out in the current development plan, Newcastle is designated a Level 4 'Local Centre – Small Town'. The town is served by local shops, services, community and educational facilities and includes a garage/ local convenience shop, a hair salon/ beauticians, pub, churches, primary school, crèche, playground/MUGA, GAA grounds and community centre. The public consultation issues paper notes that *'it is important that new and improved services and facilities are provided apace with the needs of the future population of the town and its hinterland.'* and poses the question: *'what shops, services, facilities and infrastructure is needed to provide for existing and future populations, e.g. shops, community, sports, recreational, roads etc.?'*

We consider that the existing range of services and retailing serving Newcastle is not adequate to provide for the planned needs of the community over the life of the draft plan. Consummate with the proposal to adjust the position of the town in the county settlement hierarchy, we submit that the designation of Newcastle as a Level 4 centre, defined as normally containing *'one supermarket / 2 medium sized convenience stores with a limited range of supporting shops and services to provide for the needs of the local population'* is inadequate and will promote trade leakage and unnecessary trips to other locations. Accordingly we request that Newcastle be included in the draft development plan as a Level 3 - Tier 2 centre defined as follows: *'Level 3 centres have a good range of retail services, excluding large department stores or centres.'*

It is noted that other settlements such as Rathdrum with a current (2011) population of 1,638 is designated as a Level 3 - Tier 2 centre and provision should be for Newcastle to be re-designated according due its planned 2022 population of 1,750 persons to allow for the appropriate level of retail and other services to be provided in tandem with population growth.

	METROPOLITAN AREA	HINTERLAND AREA
Level 1	n/a	n/a
Level 2	Major Town Centres Bray	County Town Centres Wicklow
Level 3	Town/District Centres Greystones	Sub County Town Centres Tier 1 Towns serving a wide district: Arklow, Blessington, Baltinglass Tier 2 Towns serving the immediate district: Newtownmountkennedy, Rathdrum
Level 4	Neighbourhood Centres Bray area: Boghall Road/Ballywaltrim, Vevay, Dargle Road, Dublin Road/Little Bray, Albert Road and Walk, Fassaroe, Southern Cross Road Greystones area: Delgany Village, Blacklion, Charlesland, Bellevue Road, Killincarrig, Victoria Road, Eden Gate	Local Centres-Small Towns Ashford, Aughrim, Avoca, Carnew, Donard, Dunlavin, Enniskerry, Kilcoole, Kilmacanogue, Newcastle, Rathnew, Roundwood, Shillelagh, Tinahely
Level 5	Corner Shops	Villages Barndarrig, Ballinacash, Coolboy, Glenealy, Hollywood, Johnstown/Thomastown, Kilpedder/Willowgrove, Kiltegan, Knockananna, Laragh-Glendalough, Manor Kilbride, Redcross, Stratford

Figure 2.0 Wicklow Retail Hierarchy

2.5 Employment

In terms of employment provision the issues paper states the following:

'Newcastle is located within close proximity to the larger towns of Bray, Wicklow and Greystones and to the Dublin metropolitan area. As such, it is reasonable to expect that a considerable amount of the town's population will commute to these locations for work. Within the town, there are relatively limited job opportunities. In line with the projected increase in population, it is a requirement to ensure new employment can be facilitated capable of meeting the requirements of the existing and future residents.'

We do not dispute that it is likely that a considerable portion of the population will continue to commute to large centres for work. However this is also the case for service provision and retail functions.

It is considered that in order to create a more self sustaining settlement the draft development plan should include a suite of policies and specific objectives to facilitate the development employment generating activities which are viable and can be sustained in Newcastle. In particular the plan should be flexible in encouraging a broad range of employment uses on suitably zoned lands and provide measures to remove constraints to development, such as infrastructural or site access constraints.

2.6 Built and Natural Heritage

We would like to draw the planning authority's attention to the ongoing refurbishment and upgrading of traditional buildings currently underway on the Blackditch Ltd. lands at southeast Newcastle. It is noted that Newcastle has a variety of built and natural heritage both within the town itself and within the hinterland of the plan area.

Blackditch Ltd. agree that the protection and enhancement of the town natural and built assets is key to the future development of the town in a sustainable manner. It is requested that the development plan include objective which require a high standard of both traditional and contemporary architectural in the development of all lands within the town.



Figure 1.0 High quality contemporary architecture should be actively encouraged by the Draft Wicklow Development Plan 2016-2022



Figure 2.0 Contemporary architecture has the potential to enhance the form and vitality of established settlements within the county and should be promoted under the draft plan.

2.7 Infrastructure

The issues paper considers infrastructural provision within Newcastle as follows:

'Infrastructure within a town includes a wide variety of services and functions, without which it could not function socially and economically. Infrastructure is essential in order for a town to grow and fulfil its potential. The existing water and wastewater infrastructure of the town is sufficient for current needs, however upgrading would be required to accommodate targeted population projections. The public realm in Newcastle could be improved, for example with more attractive street furniture, increased pedestrian links and connections between the core area and neighbouring natural amenity areas or nearly recreational facilities.'

We also note the provisions of the Newcastle Town Development Plan which provides the following commentary in respect of Water Supply and Waste Water respectively:

'Water Supply

Newcastle is currently supplied by the Vartry Scheme via a Reservoir to the west of Newcastle, which has capacity of approx 90 m3. It is intended to upgrade this reservoir to 450m3 as part of the Newtownmountkenedy Regional Water Scheme, and upgrade distribution mains accordingly. These works are expected to be completed by 2010. The existing supply is capable of servicing new development until the new scheme is commissioned.

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expected to be in place before 2011. No new significant development can take place until this infrastructure is in place.'

The issues paper does not pose any questions or appear to seek views on the role of the development plan in term of the provision of infrastructure to serve Newcastle. We submit that the draft plan has a very significant role to play in the strategic planning of regional infrastructure provision by Irish Water and the associated allocation of funding and timing of development. Blackditch Ltd. request that the draft plan include provisions which promote the active engagement between the planning authority, landowners and Irish Water to secure the timely provision of infrastructural services. It is also requested that specific policies be introduced to the plan to allow permission to be granted to allow phased development on all lands within the settlement on a market led basis and subject to individual proposals for service provision and connection.

3.0 Conclusion

We request that this submission be considered in the preparation of the County Development Plan 2016-2022.

Blackditch Ltd. would like to indicate their availability to discuss the contents of this submission with the officers of the planning authority if required and look forward to the publication of the draft development plan in due course.

Should you require any further information please do not hesitate to contact the undersigned.



Kevin Hughes MIPI MRTPI
Director
for HPDC

Forward Planning Section,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
County Wicklow.

19th December 2014

Dear Sir/Madam,

RE: COUNTY WICKLOW DEVELOPMENT PLAN 2016-2022

Introduction

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Our clients own a substantial portion of land within Enniskerry. The subject lands are located at Kilgarran Hill. Under the current Enniskerry LAP, the subject lands are designated as an Action Area Plan area. It is stated in the LAP that this Action Area is located west of Enniskerry town centre and immediately north of Kilgarran housing development, in the townland of Parknasilloge and has an area of c. 16.25ha. It is stated that this action area shall be developed as a residential, open space, employment and community zone. Our clients are currently finalising a comprehensive AAP for the lands which will be submitted shortly to Wicklow County Council for approval.

Review of the Wicklow County Development Plan 2016 - 2022

We have reviewed the Issues Paper associated with the review of the County Plan. This notes that it is intended to replace the current Enniskerry LAP 2009-2016 with a new plan for Enniskerry, which will form part of the Wicklow County Development Plan (CDP) 2016-2022.

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Executive Director: Erika Casey BA (MOD) MRUP MIPI

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.
Registered in Ireland No. 396306. Registered Office: 50 Upper Mount Street, Dublin 2. VAT No. IE 6416306U

The Issues Paper sets out the following questions regarding the future growth of Enniskerry. It states:

“Q. Is the role and function of Enniskerry, as a Level 5 ‘small growth town’, in line with future aspirations for the town for the period 2016-2022 and beyond ?

The growth targets set out in the current CDP indicate that the population is targeted to grow to 2,500 by 2016 and 3,000 people by 2022. The new CDP will review these existing targets and set out new population growth targets up to 2028.

Q. How big should Enniskerry be allowed to grow? Are the current growth targets appropriate and reasonable? Would it be appropriate to slow the pace of growth allowed in the existing plan? What should the target for 2028 be?”

Settlement Hierarchy

It is respectfully submitted that Enniskerry should retain its role within the settlement hierarchy as a level 5 small growth town.

Enniskerry is well served by existing physical and social infrastructure and it is in accordance with the principles of sustainable development to consolidate development within such settlements.

The Regional Planning Guidelines for the Greater Dublin Region support a policy of consolidation and that all future housing expansion should be directly connected to existing settlements within the GDA. A settlement hierarchy is set out in the guidelines and in this context, Enniskerry would be considered a small town. It is noted in the guidelines that within this category of settlement there are a range of types, with local commuter type towns located close to other larger centres and small commercial towns, remote from core commuter areas and having strong trading tradition serving a large rural hinterland. Enniskerry would fall within this latter category.

The guidelines encourage that Development Plans recognise the key local importance of such economically active independent towns and that investment in social infrastructure is provided for such settlements due to the large rural hinterlands that such centres serve. The guidelines also recommend that levels of growth in such towns be managed in line with the ability of local services to cater for any growth.

Despite its designation as a small growth town under the current Enniskerry LAP, the town has experienced relatively little development over the plan period. In this regard there is adequate capacity for the town to support additional housing and development over the next plan period. The continued designation of zoned lands within the town to be developed in accordance with an AAP will ensure the planned, co-ordinated and phased development of further residential development in tandem with appropriate associated infrastructure over the next plan period.

In this context, the population targets set out in the current core strategy as they relate to Enniskerry are considered appropriate and will allow for the sustainable expansion of the town.

Educational Facilities

It is noted that since the publication of the LAP in 2009 a new primary school has been developed in Enniskerry. Recent discussions with the Department of Education in the preparation of the AAP for the lands have revealed that the Department do not foresee the need for a further primary school in the town in the near future. In this regard, the new plan for Enniskerry should consider the requirement for additional educational facilities in the town. In particular the requirement on the current Kilgarron AAP lands for 1.2 ha to be provided for either the extension or relocation and expansion of St. Mary's and St. Gerard's national school should be reviewed as part of an overall audit of the likely future requirements for additional educational and social facilities for the town.

Conclusion

In conclusion it is requested that Enniskerry retains its designation within the settlement hierarchy as a small town and that the population projections set out in the current core strategy are retained. This will facilitate the planned and sustainable expansion of the town.

Secondly, it is requested that the future requirements of additional education facilities on the town is reviewed as part of the plan process.

We would be grateful if our submission could be considered in the preparation of the plan.

Yours sincerely,

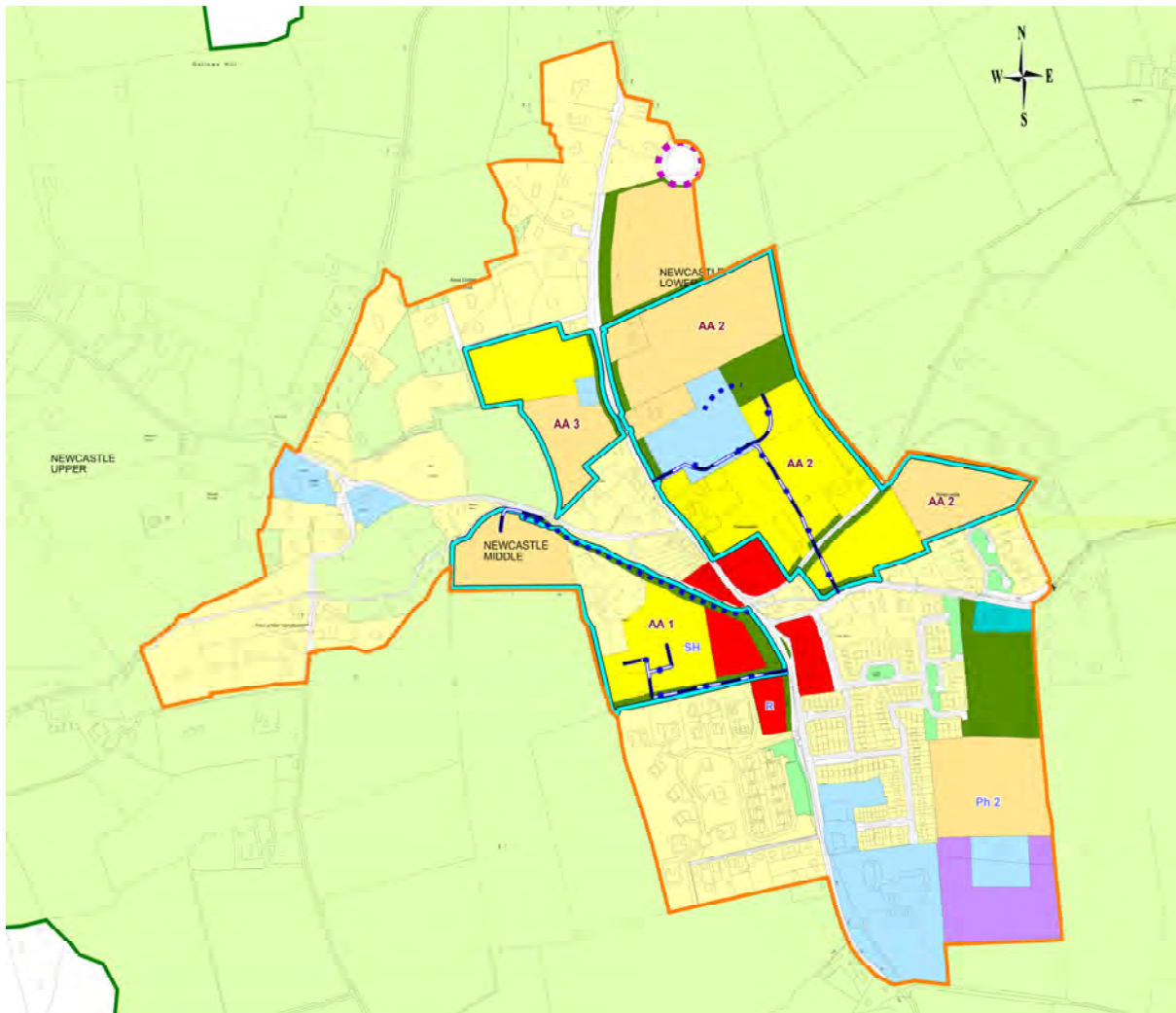


John Spain Associates

Town Planning Submission

Strategic Consideration of Newcastle, Co. Wicklow Statutory Review Wicklow Development Plan 2010-2016

22nd December 2014



Blackditch Ltd.,
Blackditch Farm,
Newcastle,
Co. Wicklow



Hughes Planning & Development Consultants

The Mash House, Distillery Road, Dublin 3
www.hpdc.ie

1.0 Introduction

Hughes Planning and Development Consultants, The Mash House, Distillery Road, Dublin 3 on behalf of Blackditch Ltd., Blackditch Farm, Newcastle, Co. Wicklow wish to make this submission to the Wicklow County Council review of the County Development Plan 2010-2016 and towards the preparation of a new County Development Plan for its functional area for the period 2016-2022.

We request that the recommendations of this submission be given full consideration in preparation of the forthcoming County Development Plan 2016-2022 in accordance with Part II Section 11 of the Planning and Development Act 2000 (as amended). This submission has regard to p51-52 of the Wicklow County Council Issues Booklet (Stage 1 Public Consultation), which relates to the strategic designation of the settlement of Newcastle, Co. Wicklow.

2.0 Pre-Draft Public Consultation Issues Booklet

2.1 Vision and Development Strategy

It is noted that the issues paper published with the initial call for submissions at the pre-draft stage of the development plan indicates that the draft plan will include a strategic vision for Newcastle, which will underpin all other objectives of the plan. Blackditch Ltd. are a substantial landowner of approximately 200 acres of zoned and unzoned lands immediately adjacent to the built up area to the southeast of the town.

Blackditch Ltd. have commenced a substantial programme of refurbishment of existing heritage buildings on their lands on foot of consents obtained earlier in 2014 and intend to bring forward development proposals for zoned lands within their ownership over the life of the draft plan. Accordingly, the opportunity to participate in shaping the vision for the town and the strategic designation of Newcastle as a settlement in the Wicklow development hierarchy is welcomed. It is also the intention of Blackditch Ltd to bring forward specific proposals in relation to their lands on publication of the draft development plan in 2015.

The issues paper poses the question *"what is your 'vision' for the future role and function of Newcastle?"*. Blackditch Ltd. consider Newcastle to constitute a vibrant settlement with a good critical mass capable of supporting local services, retailing, employment and a strong population base while taking advantage of the location of the settlement and heritage features of the town to promote local tourism. Blackditch Ltd. requests that the draft development plan adopt a dynamic and progressive approach to the development of the settlement over the plan period with a series of policy initiatives and measures to be included in the draft plan. These measure should proactively encourage development and to facilitate engagement with landowners and employers who can bring forward proposals consistent with the vision for the town.

2.2 Population and Town Development

Under the current Wicklow Development Plan 2010-2016 Newcastle is designated a Level 6 'Rural Town'. This settlement type is defined as *'strong rural towns, with a good range of infrastructural services that are suited to accommodating a significant element of urban generated housing demand, with necessary controls in place to ensure that local demand can also be met. Rural towns should aim to attract smaller local type investment, in primarily 'product' type or manufacturing based industries. Retail services and community facilities shall provide for the local needs of the immediate population and its catchment.'*

The town has been set a population growth target of 1500 people by 2016 and 1750 people by 2022 in the current plan. This would represent an increase of 53% over the recorded population of 2011. The issues booklet with regard to the development of the town asks: *'Is the role and function of Newcastle, as a Level 6 'rural town', in line with future aspirations for the town for the period 2016-2022 and beyond?'*

Blackditch Ltd. consider the settlement to have a significant role to play in the settlement hierarchy of the county. The designation of the settlement within the Regional Planning Guidelines for the Greater

Dublin Area 2010-2022 as a 'Small Growth Town'¹ along with settlements such as Aughrim, Baltinglass, Carnew, Enniskerry, Kilcoole and Tinahely is noted. These towns are accordingly designated as Level 5 - Small Growth Towns in the current development plan to correspond with their designation within the Regional Planning Guidelines. These settlements have also been provided with population targets for 2022 as follows: Aughrim (2,000); Baltinglass (3,500); Carnew (2,000), Enniskerry (5,000); Kilcoole (5,000) and Tinahely (1,550). Newcastle is conspicuous by its absence from the Level 5 settlement class particularly when regard is had to the location of the settlement, existing critical mass and availability public transport (Dublin Bus) and road transportation links to the national road network via the M11 motorway/national primary road.

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

Figure 1.0 Wicklow Settlement Strategy

¹ p6, Wicklow County Council Pre-Draft Public Consultation Issues Booklet, October 2014

It is considered that having regard to the current development plan population target (of 1,750 persons being in excess of that for Tinahely) and the RPG designation for Newcastle combined with the existing critical mass and potential of the town that Newcastle should be re-designated as a 'Level 5.0 - Small Town' in the draft development plan. This revision would allow an appropriate allocation of resources to address the provision of infrastructural and social services and facilities allow the settlement to achieve its potential and population targets for 2022.

2.3 Growth Targets

The current growth targets for the town indicate that the population of Newcastle is targeted to grow to 1,500 people by 2016 and 1,750 people by 2022. The new county development plan will review these existing targets and set out new population growth targets up to 2028.

The current growth target is considered to be reasonable, however it is considered that provision for further planned population increase should be made for the period 2022 to 2028 in the draft plan. An appropriate target for 2028 would be to facilitate the gradual and organic growth of the settlement having regard to the expected average increase in the national population. According, we submit that an appropriate population target for Newcastle for the period up to 2028 would be 2,500 persons. this would facilitate moderate and planned growth of the settlement over time and the phased delivery of the necessary infrastructure, housing and supporting services to accommodate this growth.

2.4 Retail, Services and Community Facilities

Under the 'Retail Hierarchy for County Wicklow' set out in the current development plan, Newcastle is designated a Level 4 'Local Centre – Small Town'. The town is served by local shops, services, community and educational facilities and includes a garage/ local convenience shop, a hair salon/ beauticians, pub, churches, primary school, crèche, playground/MUGA, GAA grounds and community centre. The public consultation issues paper notes that *'it is important that new and improved services and facilities are provided apace with the needs of the future population of the town and its hinterland.'* and poses the question: *'what shops, services, facilities and infrastructure is needed to provide for existing and future populations, e.g. shops, community, sports, recreational, roads etc.?'*

We consider that the existing range of services and retailing serving Newcastle is not adequate to provide for the planned needs of the community over the life of the draft plan. Consummate with the proposal to adjust the position of the town in the county settlement hierarchy, we submit that the designation of Newcastle as a Level 4 centre, defined as normally containing *'one supermarket / 2 medium sized convenience stores with a limited range of supporting shops and services to provide for the needs of the local population'* is inadequate and will promote trade leakage and unnecessary trips to other locations. Accordingly we request that Newcastle be included in the draft development plan as a Level 3 - Tier 2 centre defined as follows: *'Level 3 centres have a good range of retail services, excluding large department stores or centres.'*

It is noted that other settlements such as Rathdrum with a current (2011) population of 1,638 is designated as a Level 3 - Tier 2 centre and provision should be for Newcastle to be re-designated according due its planned 2022 population of 1,750 persons to allow for the appropriate level of retail and other services to be provided in tandem with population growth.

	METROPOLITAN AREA	HINTERLAND AREA
Level 1	n/a	n/a
Level 2	Major Town Centres Bray	County Town Centres Wicklow
Level 3	Town/District Centres Greystones	Sub County Town Centres Tier 1 Towns serving a wide district: Arklow, Blessington, Baltinglass Tier 2 Towns serving the immediate district: Newtownmountkennedy, Rathdrum
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In conclusion it is requested that Enniskerry retains its designation within the settlement hierarchy as a small town and that the population projections set out in the current core strategy are retained. This will facilitate the planned and sustainable expansion of the town.

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Yours sincerely,



John Spain Associates

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 22 December 2014 14:03
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 14:02 Submitted by anonymous user: [86.46.96.14]
Submitted values are:

Name: Joan Campbell
 Organisation, Group, Company, etc : Personal
 Address: Drummin View, Blackberry Lane, Delgany
 Email:

--Topics--

- : Vision_and_Core_Strategy
- :
- : Enterprise_and_Employment
- : Tourism
- : Retail
- :
- :

Strategic_Environmental_Assessment_Appropriate_Assessment_and_Strategic_Flood_Risk_Assessment

- : Social_Community_and_Cultural_Development
- : Built_and_Natural_Heritage_including_Landscape
- : Infrastructure
- :
- :
- :

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

First, I would like Wicklow County Council to address congestion on the N11. A great number of residents in Delgany commute every day in to Dublin City in order to work and earn a living. Many of us are in jobs that require us to be available in person from 8.30am or 9am at the latest; we are in jobs where we cannot be late because the knock-on effect on others is serious. To be certain that one can be in town by 8.30am or 9am one must leave Delgany by 6.30 am. Otherwise one gets caught in traffic and can spend a great deal of time sitting on the N11. If one leaves no later than 6.30 one can get into town by 7.15 am but that is of no great advantage when one is required to be present and available during office hours from 8.30 to 6pm. If you leave town at 6pm it takes well over an hour on a good day to get home. If it is raining it can take two hours to get home. Delgany is a nice place to live but although many of us have residences in Delgany we do not get to spend much time here. Please, please address congestion on the N.11. When drafting the new County Development Plan it is essential that Wicklow County Council work with the NRA and public transport authorities.

Secondly, if Wicklow County Council were to purchase Stylebawn House and gardens in Delgany it could achieve a variety of different strategic aims, for example it could address serious flood risk, develop tourism by creating a green-way cycle-path along Three Trout stream all way from Stylebawn to the sea; it could protect both Built and Natural Heritage by restoring buildings on Stylebawn that are as old as Powerscourt; restore the beautiful gardens and contribute in an imaginative way to Social Community and Cultural Development by providing a public space and play area in the heart of our village. Delgany has many hundreds of new families in new housing with young children but we have no public space or play area. Stylebawn House should be developed as a mini Powerscourt or Avoca.

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/49>

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 05 December 2014 21:49
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Friday, December 5, 2014 - 21:48 Submitted by anonymous user: [86.46.73.180]
 Submitted values are:

Name: michael carey
 Organisation, Group, Company, etc : Individual
 Address: Furze Lodge, Newcastle, Co Wicklow
 Email:

--Topics--

- :
- : Housing
- :
- : Tourism
- :
- : Rural_Development
- :
- :
- : Built_and Natural_Heritage_including_Landscape
- : Infrastructure
- :
- : Town_and_Settlement_Plans
- :

Submission - If you wish to make comments on a topic, please fill in the box below: Provision of footpaths and cycle lanes are critical near small towns and villages. Road signage viz key tourist areas badly needs to be addressed. Key heritage sites should be identified and highlighted in order to enhance tourism 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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- : Newcastle
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- :
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Submission - If you wish to make comments on a Town / Settlement Plan please type into the box below:

Footpaths and cycle lanes badly needed. At present the cycle traffic from Greystones through Newcastle on weekends is substantial and a serious threat to cyclists, locals and other travellers. Accidents are waiting to happen.

Establish safe walking areas from village to Birdwatch (East Coast Nature Reserve) and other areas in the vicinity of the village. Big tourist spinoff. Revisit boundaries between urban and rural; present boundaries do not make any sense in parts of the area surrounding the village, particularly on the north west side of village-Leabeg Middle.j 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/31>

Leonora Earls

From: Richard Clune
Sent: 22 December 2014 10:00
To: Planning - Development Plan Review
Subject: Proposal regarding wind turbines

"That the impact of concrete used during the construction of wind turbines, especially in relation to domestic water supplies, be assessed in the same way as environmental and safety issues are assessed"

Frank & Catherine Clune

12 3

44

Sorcha Walsh

From: hendrik van der Kamp
Sent: 19 December 2014 09:16
To: Planning - Development Plan Review
Subject: Submission Wicklow County Development Plan
Attachments: Submission Wicklow County DP.doc

Please find attached a submission on behalf of Eamonn Coleman. I would appreciate if receipt can be acknowledged. Thank you, Hendrik van der Kamp.

Hendrik W van der Kamp, MScEng, FIPI, MIEI
Town Planner
1, Woodstown Court
Knocklyon
Dublin 16

Director of Services
Planning Department
Wicklow County Council
Station Road
Wicklow Town

by e-mail, 19/12/2014

Submission regarding the review of the existing plan and the preparation of a new County Development Plan. The submission is made on behalf of Mr Eamonn Coleman.

Introduction

This submission is in response to the invitation by Wicklow County Council to make submissions regarding the review of the County Development Plan and the preparation of a new county development. Plan. This submission is strategic in nature and addresses the following broad issues specifically in relation to the town of Enniskerry:

- The *strategic goals* as stated on page 5 of the issues paper.
- The *population projection* for the town as stated on pages 6-7 of the issues paper
- The approach to the proposed town plan as stated on pages 45-46 of the issues paper.

Strategic Goals: Enniskerry as a Compact Town

It is important that in the new County Development Plan Enniskerry will be kept a compact settlement retaining its existing character and providing high quality new development and a high quality public realm. Such a development policy for Enniskerry town, would respond to the strategic goals nos. 3, 4 and 5 in the following way.

Strategic Goal 3

This goal states the following:

*"To integrate land use planning with transportation planning, with the dual aim of reducing the distance that people need to travel to work, shops, schools and places of recreation and social interaction, and facilitating the delivery of improved public transport."*¹

¹ County Wicklow Development Plan 2016-2022 Issues Booklet, Wicklow County Council, 2014, p.5.

To retain Enniskerry a compact town, using existing vacant land opportunities for development rather than extend the town out further using new greenfield land, would facilitate not only local journeys on foot or by bicycle but also ensure that future residents would be in walking distance from the single public transport facility that the town has in the form of the bus service.

Strategic Goal 4

This goal states the following:

*"To enhance existing housing areas and to provide for high quality new housing, at appropriate locations and to ensure the development of a range of house types, sizes and tenures in order to meet the differing needs of all in society and to promote balanced communities."*²

To retain Enniskerry a compact town, using existing vacant land opportunities for development would facilitate the provision of a variety of house types for different categories of households, incl. older people, young single persons as well as families with children. The larger areas of development land located on the outskirts of the town tend to be less suitable for this range of housing demand whereas housing provision that is integrated in the urban fabric of the existing town can achieve this much better.

Strategic Goal 5

This goal states the following:

*"To maintain and enhance the viability and vibrancy of settlements, to ensure that towns and villages remain at the heart of the community and provide a wide range of retail, employment, social, recreational and infrastructural facilities."*³

To retain Enniskerry a compact town, using existing vacant land opportunities for development rather than extend the town out further, would facilitate the effective functioning of the town as a community by ensuring that as many people as possible live in close proximity to services that are provided in the town, thereby improving the long term viability of such services but also to ensure an active street life thereby resulting in a public realm that is felt to be safe.

In conclusion therefore, the strategic goals are supported as being very important and relevant. It is suggested that these strategic goals should be referred to when policies for individual settlements in the county plan are being proposed.

Population Projection for Enniskerry

In relation to the settlement strategy, this submission supports the settlement strategy shown on page 6 of the issues paper and it is not suggested that Enniskerry should be given a higher or lower status to that of 'small growth town'. However, it is noted that the table on page 7 suggests that Enniskerry grew in population by approx. 3.1 percent during the 2006-2011 period. These figures do not correspond with the relevant population data as published by the CSO. The 2011 census results indicated a 'shrinkage' in the town's population during the 2006-2011 period from 1881 to 1811 persons.⁴ Even if the full population of the electoral division of which the town forms part is considered, the growth in population was no more than 2.6%. See for additional details the Appendix.

² County Wicklow Development Plan 2016-2022 Issues Booklet, Wicklow County Council, 2014, p.5.

³ County Wicklow Development Plan 2016-2022 Issues Booklet, Wicklow County Council, 2014, p.5.

⁴ Census 2011 – Population Classified by Area, Central Statistics Office, 2012, table 12, p. 140.

It is considered important that these population figures are looked at again.

Approach to the Proposed Town Plan for Enniskerry

The issues paper lacks clarity regarding the role of Enniskerry. The following is stated:

*"Under the current CDP Enniskerry is designated a Level 5 'small growth town'. Within this category of towns there are a range of settlement types, including local commuter type towns close to larger settlements and small commercial towns, remote from core commuting areas that have a strong trading tradition serving a large rural hinterland. Given Enniskerry's proximity to Bray and the Dublin metropolitan area coupled with ease of access to the N11, **it is considered to fall into the second category** and the development policies for the town must be framed in that context."*⁵ (emphasis added)

If Enniskerry falls into the second category of Level 5 type town as is suggested, it would be defined as a 'small commercial town remote from core commuting areas that have a strong trading tradition serving a large rural hinterland'. However, its proximity to Dublin and Bray and ease of access from the N11 suggest that it could equally be seen as a local commuter type town, i.e. the first category. The issues paper is unclear what is meant here. Given the discrepancy on the population figures noted above, it would appear that the town has not functioned as a commuter town in the recent years.

The population targets stated on page 46 of 2,500 by 2016 and 3,000 by 2022 seem unrealistic given the CSO population figure for the town in 2011 of 1811. See Appendix for more detail.

The objectives stated on page 46 to improve the public realm, improve pedestrian links and connections between the core area and the neighbouring amenity areas, maximising existing amenity routes, and the protection of the natural and built assets of the town, are supported. It is suggested that the new town plan should seek to build on the attractive urban fabric and develop improved pedestrian permeability by providing new routes and links and as much as possible develop high quality new buildings, incl. residential development, in the central area of the town. This policy would be the opposite to the policy that was adopted in the previous local area plan where areas were zoned that were primarily on the outskirts of the town⁶. A continuation of the latter policy would create the risk of moving the population from the central part of the town to its outskirts thereby reducing the vitality and viability of services in the town centre.

⁵ County Wicklow Development Plan 2016-2022 Issues Booklet, Wicklow County Council, 2014, p.45.

⁶ See for example areas AA1, AA2 and AA4 as shown on the Local Area Plan zoning map on page 45 all of which have remained undeveloped to date.

Conclusion

- Enniskerry should be kept as a compact town, using existing vacant land opportunities for development. Such a policy would be a good way to achieve the strategic goals 3, 4 and 5 of the issues paper. These goals are supported.
- The policy adopted in the previous local area plan to zone lands primarily on the outskirts of the town run counter to the strategic goals referred to above. This policy should be reviewed.
- The settlement strategy shown on page 6 of the issues paper and the designation of Enniskerry as a 'small growth town' is supported and it is not suggested that Enniskerry should be given a higher or lower status.
- The issues paper lacks clarity on page 45 in deciding whether the town is a *small commercial town* remote from core commuting areas or a *local commuter type town*.
- The population figures on page 7 of the issues paper do not correspond with the relevant population data as published by the CSO. It is considered important that these population figures are looked at again and clarified.
- The population targets stated on page 46 of 2,500 by 2016 and 3,000 by 2022 seem unrealistic given the CSO population figure for the town in 2011 of 1811.
- The new town plan should seek to build on the uniquely attractive urban fabric and develop improved pedestrian permeability by providing new routes and links and as much as possible develop high quality new buildings, incl. residential development, in the central area of the town.

Please direct all future correspondence to the undersigned.

Yours sincerely,

Hendrik W van der Kamp.

Appendix A – Population of the Town of Enniskerry

The table on page 7 of the issues paper suggests that Enniskerry grew in population by approx. 3.1 percent during the 2006-2011 period:

Enniskerry 2006 population: 1881
Enniskerry 2011 population: 1940
Growth 2006-2011: 3.1%⁷

However, these figures do not correspond with the relevant population data as published by the CSO. The 2011 census results indicated a shrinkage in the town's population during the 2006-2011 period from 1881 to 1811 persons.

Enniskerry 2006 population: 1881
Enniskerry 2011 population: 1811
Growth 2006-2011: -3.7%⁸

According to the CSO census publication, the town population forms part of the Electoral Division 33 Enniskerry. Even if the full population of the electoral district of which the town forms part is considered, the growth in population was no more than 2.6%.

Enniskerry ED 33 2006 population: 2696
Enniskerry ED 33 2011 population: 2765
Growth 2006-2011: 2.6%⁹

These discrepancies have consequences for the assessment of the suggested population targets for the town in the issues paper. The population targets stated on page 46 of 2,500 by 2016 and 3,000 by 2022 seem unrealistic given the CSO population figure for the town in 2011 of 1811 and would result in a population growth of more one third of the 2011 population up to 2016 and two thirds up to 2022.

Enniskerry 2011 population: 1811
Enniskerry 2016 population: 2500
Enniskerry 2022 population: 3000
Growth 2011-2016: 38%
Growth 2011-2022: 66%.¹⁰

⁷ *County Wicklow Development Plan 2016-2022 Issues Booklet*, Wicklow County Council, 2014, p.46.

⁸ *Census 2011 – Population Classified by Area*, Central Statistics Office, 2012, table 12, p. 140.

⁹ *Census 2011 – Population Classified by Area*, Central Statistics Office, 2012, table 6, p. 77.

¹⁰ *County Wicklow Development Plan 2016-2022 Issues Booklet*, Wicklow County Council, 2014, p.46.

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 22 December 2014 16:26
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 16:25 Submitted by anonymous user: [86.128.218.9]
Submitted values are:

Name: Mark Colley
Organisation, Group, Company, etc : Enniskerry Resident
Address: The Lodge, Lovers Leap Lane, Enniskerry , Co.Wicklow
Email:

--Topics--

- : Vision_and_Core_Strategy
- : Housing
- :
- : Tourism
- :
- : Rural_Development
- :
- : Built_and_Natural_Heritage_including_Landscape
- :
- :
- :
- :

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

In relation to the Town/Settlement Plan for Enniskerry I wish to make the following submission . The future development and population growth of Enniskerry seems to be very rarely taken from an overall perspective. Rather specific subjects are viewed in isolation and decisions taken which may not be the correct decisions / direction. The whole of Enniskerry is in a rather unique position in relation to the historic nature of the

village , the largest tourist location in Leinster (Powerscourt) and the jumping off point for hundreds of thousands of tourists both national and international to the greater Wicklow area. When considering future population growth of the village the plan appears to be small in relation to population growth however has this considered the 250,000 visitors (and growing) to Powerscourt in 2014 alone. Has the plan considered the hundreds of thousands of visitors to the village and area for the purposes of walking , cycling , hiking and recreation of various other varieties including horse riding.

My submission is that the overall population growth of the village needs to be limited where possible , large scale development of housing in this area will strain an already creaking infrastructure , roads , sanitation and utilities . Throwing additional traffic into an already congested village (3 converging roads) will cause huge health and safety issues as the local and indeed tourist traffic both vehicular and pedestrian continues to grow each year . The village and surrounds need to be treated almost as a national heritage site, the flora , fauna , monuments and existing historical buildings need to be protected from over urbanisation or the village will lose the character which attracts so many visitors each year .

Sporadic development in the area needs to be controlled and quickly , whether one of houses or mini - medium , quick win , estates do little to enhance the touristic attractiveness of the area and detract from the numerous areas of outstanding natural beauty and amenity in the area .

The key to developing Enniskerry is not in building more houses to increase the population but is to develop tourist amenities in the area such that access to the area is improved (feeder links from the Dart and Luas) , car parks for additional visitor parking (which is a serious issue in the village) , bicycle racks for cyclists to the village , a tourist information centre .Renovation of the historic shop fronts and in particular renovation of the many stone walls (which have fallen into disrepair) which border all roads into the village and also development of the many pedestrian walks in and around Enniskerry as an amenity to be enjoyed by the existing and future visitors . Improving access to the village , amenities in the village and the physical attractiveness of the area will increase hugely the number of visitors to the area and to the whole North Wicklow area as a result from an amenity perspective .

Thanks .

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/53>

Corrella
St. Vincent Road
Greystones
Co. Wicklow



December 23, 2014

Address for correspondence:
The Manor House
Norwich Road
Swaffham
PE37 7QR
England

SUBMISSION: County Wicklow Development Plan 2016-2022

Dear Sir/Madam,

I wish to make the following submission regarding the County Wicklow Development Plan 2016-2022.

THE RECORD OF PROTECTED STRUCTURES

In the Issues Booklet, it is stated: "the Planning Authority has a legal responsibility to prepare a RPS which is a record of structures of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The Council facilitates the preservation and protection of the structures included in the RPS. This includes protecting the character and setting of the protected structure itself through the control of alterations to it, and through the control of the design of adjacent buildings and surroundings." In this connection, I wish to make the following comments.

Q. Are there any structures you think should be on the RPS? Where are they located and why should they be included?

The dwelling house Corrella and its attendant grounds, situated on St. Vincent Road, Greystones, should be placed on the Record of Protected Structures. The house and its grounds are almost the sole remaining property retaining its garden and the original setting in tact within the ACA of the Burnaby. It is an excellent example of Domestic Revival or Arts and Crafts architecture in the Burnaby. My family has owned Corrella for 40 years and I have been forced recently to fight very hard to protect the property from speculative development proposals. It is at imminent risk. The property is listed as reference 16304070 on the NIAH register. A photograph is included at the end of this submission.

Corrella, St. Vincent Road, Greystones, Co. Wicklow, was built in 1899-1900 by Lady Charlotte Ball-Greene, widow of Sir John Ball-Greene, the Commissioner of Valuations in Ireland. The house is in the Domestic Revival style and the garden was laid out as in the Arts-and-Crafts fashion of the period, with wide herbaceous borders and a maze of tiny paths traversing the park and the small woodland.

The other protected structures (e.g. Moorlands, Whitshed Road, Greystones) in the Burnaby ACA either have had their gardens destroyed by development or are under threat. In the case of Khiva, Pavilion Road, Greystones, we flag the contested decision by the Wicklow County Council and An Bord Pleanala, references 4/1258 and 09/1329. I add further observations on this matter below in the rubric on ACAs.

Q. Do all existing structures in the list merit protection?

On a relative basis, it is clear that Corrella is a superior example of Domestic Revival or Arts and Crafts architecture than, for example, Moorlands, which is listed on the RPS, NIAH reference 16304099. If there were some quota, then on relative merit, it would be preferable to include Corrella, rather than Moorlands.

Q. Is the RPS representative of the range of built heritage structures in the county?

No. The RPS contains no example of an Arts and Crafts house with its original attendant grounds. However, Corrella, with its original attendant grounds, St. Vincent Road, Greystones, is a near perfect example but is missing from the RPS.

ARCHITECTURAL CONSERVATION AREA (ACA)

In the Issues Booklet, it is further stated that "a place, an area or group of structures or townscape, that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, or that contributes to the appreciation of a protected structure, may be designated an ACA. ACAs aim to preserve and enhance the appearance of an area. ACAs have been established in: Wicklow Town (5 areas), Bray (2 areas), Enniskerry, Tinahely, Dunlavin, Rathdrum, Blessington, Greystones (3 areas) and Delgany."

Q. How do we strike the right balance between protecting potential ACAs and the active use of buildings and places?

There are several issues. In my view, there have been notable failures to protect existing ACAs, in particular, the Burnaby, Greystones, where permissions have been granted in an inconsistent and apparently random way, without evidence of due attention to the explicit heritage guidelines and without evidence of vigilant critical scrutiny of the documentation supplied in applications for development permission within ACAs. Let me give a specific recent illustration of bad practice in this regard.

Consider the planning reference 14/1258, where an initial application, reference 09/1329, was first made and represented as not falling within an ACA. Permission was duly granted, despite the misrepresentation relating to the ACA status. A further application for a larger structure, reference 14/1258, was then made, also on the same erroneous basis, supported by an arboreal assessment that was out-of-date and invalid. Four parties, pointing out the issues and flaws in the application, lodged detailed and carefully prepared objections. Yet, permission was duly granted, and a subsequent appeal was rejected without any explicit consideration of the apparent misrepresentation relating to ACA status or the use of invalid documentation. The appeal judgement simply reiterates the same text of the Council's judgement, admitting that some injury to the amenity would be caused, but ignoring the

other elements relating to an application that had been submitted asserting that no ACA was involved. This is a public disgrace. It is well known that the Burnaby is a designated ACA and there is an active Burnaby Preservation Society. If an application relies in any way on false information relating to the well-known status of an ACA, it should be rejected out of hand, since the balance of probability is that such applications are attempts to mislead the Council in order to secure permission.

This type of decision-making is the wrong way to strike a balance between protecting ACAs, existing and future, and the active use of buildings and places. It makes a total mockery of the concept of an ACA.

Inconsistent rulings damage ACAs. Let me supply a further example also relating to the Burnaby ACA.

Compare the two applications, references 13/8971 and 14/1258, both of which concern two contiguous sites on the Pavilion Road in the Burnaby ACA. In its request (18/02/2014) for further information relating to application 13/8971, the Planning Authority explicitly states the following grounds for probable refusal of an application: (1) variance with existing pattern of development; (2) adverse impact on the existing character of the ACA; (3) proximity to an existing single-storey dwelling, and (4) failure to adopt policy railings. Here, the Planning Authority gives guidance, but fails to apply the same rules in relation to the application for permission to develop an immediately proximate site targeted by 14/1258.

The Council states clear grounds for a probable refusal, yet in the case of 14/1258, these are totally ignored and omitted from any mention in the various decisions relating to 14/1258. This is a glaringly inconsistent application of clear guidelines. It results in bad planning decisions. It undermines the status of ACAs generally, and of the Burnaby ACA in particular.

In conclusion, I wish to emphasise the **general principles of good planning decisions relating to the RPS and ACAs**. I have illustrated the important issues, insofar as they are known to me in the case of the ACA of the Burnaby, Greystones. I hope this will be of service to you in your new Plan and that you may perhaps draw to the attention of the appropriate oversight bodies those specific issues which I have raised in connection with the Burnaby ACA.

Sincerely,

Dr Eoin Coleman.

Corrella, St Vincent Road, Burnaby, Greystones, Co. Wicklow.



Corrella, St. Vincent Road, Greystones, Co. Wicklow, was built in 1899-1900 by Lady Charlotte Ball-Greene, widow of Sir John Ball-Greene, the Commissioner of Valuations in Ireland. The house is in the Domestic Revival style and the garden was laid out as in the Arts-and-Crafts fashion of the period, with wide herbaceous borders and a maze of tiny paths traversing the park and the small woodland.

47

Leonora Earls

From: skarencowan [redacted]
Sent: 20 December 2014 10:36
To: Planning - Development Plan Review
Subject: Suggestions for developmeny plan

Outdoor recreation areas.

Aim: To increase health and fitness of the nation, including both mental and physical health. To instill an appreciation in our natural surroundings from birth.

Developments needed: outdoor gym on the seafront with open access to all- not locked away from it all at charlesland.

Grill pit/ barbecue areas for all to use similar to those found in all swedish canadian and australian parks and seaside walks. With rubbish bins +/- public toilets nearby, and instructions for extinguishing fires if needs be. Play park with hills for play in summer/ sleighs etc, open area for football.

Bike parking beside all public parks/ green areas and bike lanes to and from.

Larger areas with picnic tables eg beside south beach arch, Glen of the downs walk area, kindlestown forest etc. Other countries acheive this and deal with anti social behaviour as it arises.

Art- employ community artists to paint murals on boarded up buildings such as the la touche hotel. Wall murals are a tourist feature in a french village which generates tourist revenue- the same could work with window views painted on boarded up windows.

Visitor/ tourist info offices centre for greystones.

School in charlesland- primary.

There are so many examples in the nordic countries on improving use of our out door resources for physical mental health. I would also stronly recommend having a health advisor/ health promotion officer or dietitian to be involved in the councils development plans. We are not very effective in treating obesity and many health problems. We need to work eforemely hard to prevent it for ecomonic reasons as well as moral.

Kind regards,
Karen cowan
Dietitian

Acknowledged
KC

Sent from Samsung Mobile

VISION, CORE STRATEGY AND GOALS

High Level Goal

Missing from the Vision and Core Strategy is any mention of the role Wicklow, in particular the Wicklow Mountains and coastal areas, plays in meeting the leisure needs of the residents of Dublin and the Greater Dublin area, and of tourists to Ireland. The capital city has over a million residents and is very dependent on Wicklow for leisure, sport and access to wilderness on the city's doorstep -- one of its major assets as a capital city: e.g. EG Goal 6 just refers to the recreational needs of rural population.

Core Strategy

The **Settlement Hierarchy** definition is unclear. Why are different hierarchy's proposed for villages: Avoca is classified as village but Enniskerry a village also is classified as a small growth town! Enniskerry is of very limited size (core village could only have a population of less than 300) and provides only limited services to the area (no bank, post office or cash machines). Furthermore, Roundwood, much larger in size is only given County Level Development Plan 6 whereas Enniskerry is given level 5: This seems to clearly mean that planners are to be allowed to zone more land for housing in Enniskerry than Roundwood which has greater flat land for expansion than Enniskerry deep in a hillside valley between two rivers. The hierarchy also fails to mention other issues such as environmental issues, protection of outstanding areas of natural beauty and tourist considerations in setting the hierarchy.

Enniskerry should be given a lower status as a village with development level 6.

Population

It is very difficult to assess the population figures given as the basis of 2006 is unrealistic. The most recent census details should have been used. Future figures must be more realistically based. Moreover catchment area for Enniskerry village appears to include major rural zones. Which does not appear to be the case for other towns and villages e.g. Roundwood's population (790 in 2011) seems to be low compared to that of Enniskerry (1900 in 2011) given it also has housing estates.

Land Zoning

Geographical and climate change constraints must be taken into account: e.g. housing should not be built along river valleys or their banks and hillsides. Enniskerry is the victim of substantial and unacceptable water run-off and erosion and road deterioration in some areas due to the construction around it in recent years. Little account was taken in the past of the effect of insertion of new estates and houses on existing roads. All zoning must include impact statement on flood control, roads and traffic and implications for inhabitants.

Housing Policies

One-off or housing clusters in the countryside should not be allowed in sensitive scenic areas and where they 'suburbanise' a rural landscape that has up to now remained open. Large bungalows on high platforms without any planting around them remains the norm in Ireland and are a blight on the landscape. More stringent planning

requirements to site new building lower into hillside sites with strict planting regimes could alleviate some of the blight. (As is done in other countries).

Development and Design Standards

Large sprawling bungalows are inefficient and wasteful of resources. More compact housing in keeping with traditional models but modernised with regard to light and heat should be encouraged. This should be included in regulations. Protected structures in the County should be monitored for deterioration especially when left empty.

Wicklow is a zone of outstanding natural beauty and efforts continued to ensure this for future generations.

Tourism Potential

Enniskerry-Powerscourt has a major potential for development. Enniskerry with its buslink to Dublin is a major entry point to Wicklow. Unfortunately until now there has been little linked up planning between the village and Powerscourt estate to jointly manage problems generated by increased traffic and draining by the estate of tourism revenues from the village.

Enniskerry is a major destination for walkers and cyclists for whom no safe pathways or walking routes out of the village to the mountains currently exist. Instead they are forced onto narrow roads with no footpaths which is dangerous and a deterrent to development of tourism. These are currently the main groups that bring revenues to the village. Safe walking paths and cycle tracks are needed into the Glencree and Glencullen valleys. The Dargle and Glencullen river valleys could be major tourist attractions. In particular the stunning rock gorges along the Dargle should be opened up for walkers and rights- of- way brought back into more general use. The road (now closed off) that runs all the way alongside the river from the N11 to the Powerscourt Waterfall could also be a major walking and cycle access up from Bray. (It was a major Victorian tourist attraction).

Both the Dargle and Glencullen valleys should be designated Special Areas of Amenity/Conservation and protected for future generations.

Currently there are dangers posed by a major development under consideration by Wicklow County Council on a AA4 designated site along the Cookstown Road overlooking the Dargle river which poses a direct threat to the Dargle valley and views of the Sugarloaf.

Built and Natural heritage including landscapes

Green infrastructure

The Glencullen and Dargle river valleys should be officially protected. The focus should be on preserving natural areas, habitats, use for recreation and as greenways. (Currently only the Knocksink reserve provides any protection to the Glencullen river near Enniskerry.

Landscape.

Wicklow is endowed with wonderful landscape of natural beauty and interest.

Yes there must be different policies for development to protect the vulnerable areas of natural beauty which have historic resonance and recreation and tourism potential.

Areas of outstanding natural beauty and Areas of Special amenity must be subject to strict planning laws that are non-negotiable by planners. There is sufficient space for developers outside these areas so there should be no case made for development where an area is designated. For too long Ireland has been blighted by such exceptions.

Wicklow should also be seeking to develop more coastal pathways for walkers as Wales has done which has immense tourist potential.

Rights of Way.

The Coucil can facilitate the preservation of these rights by officially mapping them and defending walkers rights in court rather than leading it to individuals and walkers to try to keep them open. For too long Ireland has allowed these rights to be steadily eroded by landowners.

Submitted on Wednesday, December 24, 2014 - 15:04 Submitted by anonymous user:
[82.141.249.85] Submitted values are:

Name: Cunnane Stratton Reynolds Ltd
Organisation, Group, Company, etc :
Address: 3 Molesworth Place Dublin 2
Email:

--Topics--
-: Vision_and_Core_Strategy
-:
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-: Town_and_Settlement_Plans
-:

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

Hi,

Can we suggest that the emerging County Plan set as one of its key objectives economic investment and economic regeneration in the strongest or clearest possible terms?

This can be harnessed and achieved in the context of the proper planning and sustainable development of the County.

We would respectively suggest that all development control (more recently called 'development management') standards be reconsidered for town centres in particular. We believe that there is a greater degree of flexibility that can be applied to car parking, open space and density standards etc without compromising the objective of quality development and indeed best planning practice. Such a loosening of these standards in these locations (but not at the expense of achieving quality development) will act as counterfoil to what are still very strict limitations on development in the countryside. The proper planning and sustainable development of town centres can be achieved where for example car parking standards are maxima and not minima or where open space may not be provide where significant amenities are located nearby.

Such standards might also be set aside if there are other compelling reasons for development being granted planning permission.

You might also please advise on whether this submission will be retained as I am not sure I see a save function.

Regards and thanks,

Eamonn Prenter

7 Castlefield Terrace,
Killincarrig,
Greystones,
Co. Wicklow.

Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town,
Co. Wicklow.

21st December 2014

Dear Sir/Madam,

**RE: Submission to Stage 1 – Pre Draft Public Consultation
Wicklow County Development Plan 2016 – 2022**

As residents of County Wicklow we wish to make a formal submission to Stage 1 – Pre Draft Public Consultation Wicklow County Development Plan 2016 – 2022 in relation to **Chapter 15 Social & Community Infrastructure, Including Open Space** **Section 15.4 Open Space** **Objective OS3** of the Wicklow County Development Plan 2010-2016

Wording as per Wicklow County Development Plan 2010-2016

OS3 Prohibit non-community uses on areas of lands permitted or designated as public open space in existing residential developments.

It is out contention that Objective **OS3** should state that these Public Open Space lands should be assigned their own unique use zoning objective and delineation in the Local Area Plans.

The subsuming of the open spaces into the 'existing residential' use zoning objective in the recently reviewed Local Area Plans will lead to a diminishing of the status of these public open spaces and to a muddying of the waters as to the actual boundaries of these plots.

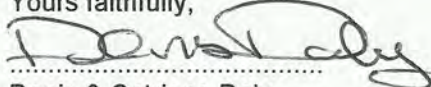
The maintenance of these residential open spaces are by and large carried out at the expense of the residents committees within each estate and to this end it demonstrates how committed and proud the people are of these amenities. It is only proper that the Local Authority should continue to recognise this and have them zoned as such in the Local Area Plans.

The unique use zoning objective and delineation of these plots is critical to their preservation in that it provides clarity of curtilage and recognises the use zoning objective into which these amenity areas are best protected. The delineation and the recognition of independent use zoning objective of these plots also provides certainty for prospective purchasers of a property bearing in mind that these green areas in fact can often be the deciding factor as to where people choose to live.

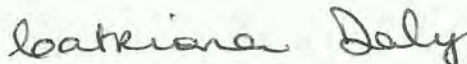
Suggested wording to be inserted into
Chapter 15 Section 15.4 Open Space
Objective OS3 of the Wicklow County Development Plan 2016-2022

OS3 Prohibit non-community uses on areas of lands permitted or designated as public open space in existing residential developments **and such lands to be assigned a unique use zoning objective and delineation in the Local Area Plans at initial preparation or at the next statutory review stage.**

Yours faithfully,



Denis & Catriona Daly.



ENERGY EFFICIENCY – submission by Frank Daly, Greystones.



Q. What objectives and standards can be included in the next CDP to promote sustainable building designs in residential and non-residential developments, as well as in older protected buildings?

Sustainable Building Design – New & Existing Buildings

We believe that on going improvements in the building regulations (Part L) standards in relation to energy performance and the use of renewable energy technologies will continue to make Wicklow homes increasingly more energy efficient. We also firmly believe however that we should not be satisfied with meeting the regulations but rather beating them. For example, we should make it mandatory that all new homes have BER ratings of A1, not A3 as is currently the requirement, and that each new home makes a net contribution to the country's renewable energy targets e.g. all new homes should be designed to accommodate solar PV capacity over and above what the regulations call for, and each one of these new homes should be installed with smart meters for the purposes of measuring any surplus electricity spilled to the grid.

Increased energy efficiency in buildings should also be noted in terms of the benefits to society. Energy efficiency reduces fuel bills and fuel poverty and has a direct benefit to the greater economy. New buildings built to high energy efficiency standards significantly reduce utility costs for the occupants effectively putting money in people's pockets. An A1 rated 100m² 3 bed semi Detached will save the occupants €1800 a year over the most common D rated houses. This allows for greater spending power in the wider economy. One way to see this is for every 1000 houses built and upgraded to an A1 standard in Wicklow €1.8 million in spending power becomes available in the region.

Social housing should be the exemplar for high energy efficiency standards in the market place and strive to exceed the minimum regulations of A3. Goals of fuel poverty elimination can be achieved at the same time as positively influencing the property market place. With high energy efficiency houses being the norm for social housing private property owners and developers will have to respond with increased efficiency levels also. This runs in line with the government's National Renovation Strategy where the public sector is to encourage uptake of energy efficiency in the private sector.

Sustainable Building Design – Older Protected Buildings

Older protected buildings are very difficult to upgrade in terms of energy efficiency without destruction of the elements which often define their value in terms of heritage. Improving insulation values on walls, floors, windows and doors mostly involve the removal of original features which is prohibited under the building's protected status. However it is often very possible to retrofit renewable energy systems to the buildings which can be used to reduce and offset the fuel that is used to run these buildings. These retrofits are usually non invasive and allow for the modernization of the energy system of the building while preserving the architecture.

Examples of possible measures to use in protected buildings are:

Heat pump heating: simple exchange of old combustion based boilers for new heat pump technology capable of utilizing the existing radiator heating systems. Provides increased comfort at lower running costs.

Solar PV: Solar panels are a very flexible technology and can be mounted on non visible roofs of protected buildings, e.g. in roof valleys. They can also be mounted on out buildings or ground mounted in suitable areas of the garden.

Solar Thermal: Where water heating is required solar thermal can be used and enjoys similar flexibility in terms of installation as Solar PV.

Micro CHP: Micro CHP (combined heat & power) produces heat & electricity from the one unit. Micro CHP can simply replace existing boilers on larger houses and eliminate any waste involved in the combustion process.

Smart Grids: Smart Grid is a concept that is being explored by Ireland's grid operator and it involves, on a micro and macro scale, balancing loads, preferably efficient beneficial loads like heat pumps, with distributed sources of renewable power like PV or wind or efficient forms of electricity generation like Combined Heat and Power. There are some small smart grid trials already being undertaken in Ireland at present, most noticeably one in Tallaght, Dublin. We believe that if Wicklow takes the proactive approach of promoting increased use of renewable and efficient electricity generation, the county could become a national test bed for smart grid technologies. It is worth noting that there are a number of companies based in Wicklow who are already very active in the renewable and energy efficient sectors, some of whom are already taking part in smart grid trials.

Funds should be sought from SEAI or other suitable organization to help finance energy mapping of each major town and district centre in the county. The energy mapping, coupled with increased penetration of locally generated power, either by renewables or CHP, are two important elements in the establishment of community owned energy cooperatives. Energy CoOps are a growing area of interest being promoted by SEAI and have been successfully implemented in smaller communities in Ireland already such as the Aran Islands CoOp.

District Heating

In relation to any new business parks proposed for the county, investigating the use of district heating to supply the park with either renewable or CHP heat, or other innovative sustainable energy production such as on site wind generation or solar PV arrays, should be made mandatory and part of the planning process. Aside from improving the carbon footprint of the county, it will attract businesses to the county with the expectation of lower energy bills for their operations.

Wicklow Energy Agency

Some of the most successful counties in Ireland with regards to renewable energy use and generation have well established energy agencies e.g. Tipperary Energy Agency, Carlow/Kilkenny Energy Agency etc. If

Wicklow is to take energy efficiency and renewable energy seriously, we believe that an energy agency should be established. If staffed with the right personnel, the Wicklow energy agency could provide advice to the Wicklow public and public and private organisations in the county on how best to reduce their energy consumption. Many of the energy agencies across the country are operated as commercial operations so this is an opportunity for Wicklow to establish a revenue generating employer that would provide a much needed service for the county.

Stephen Willoughby

52

From: Patricia Reilly
Sent: 13 November 2014 15:28
To: Planning - Development Plan Review
Subject: FW: Submission to local economic and community plan

Hi,
 This is from the lady who came to the consultation day in Blessington. Just forwarding in case she didn't send onto you too.

Regards,
 Patricia

From: Heather Darker [mailto:heatherdarker123@gmail.com]
Sent: 13 November 2014 11:02
To: Group - Local Community Development Committee
Subject: Submission to local economic and community plan

Thank you for the opportunity to put through our opinions on the Local , economic and community plan. I spoke with your colleague Patricia and she suggested that I e-mail my ideas direct to you. Some may be of specific interest to you and other comments may be for another department. I am keeping these very concise and if you need further information, please do not hesitate to contact me.

Item 1

Alter the road junction at Glendalough that people can equally consider turning left or right

Because:

This will encourage tourists to travel across the Wicklow Gap and hopefully visit places like Russborough and to spend money in West Wicklow but with Wicklows geography we have the opportunity for tourists to zig zag across our County and spend longer here and spend more money

Item 2

The Greenway in Blessington is a huge asset but we need more parking for it.

Suggestion:

You are considering developing a soccer pitch beside the Avon Ri, can we design the parking for this in such a way as it could benefit the Greenway as well - dual purpose

Item 3

Exercise machines for Blessington

We have a large number of walkers,runners and cyclists in West Wicklow, if we could offer this equipment it will give further health benefits and reduce HSE costs. Possible location beside the old library, lots of passing traffic

Item 4

Local Community Short term signage

Communities that are fundraising should be able to advertise their event, to obviously make the event more successful but also to build community spirit. If several locations were allowed on the N81 that templated signs were allowed - large but short term. It would be seen by the passing traffic and discourage illegal signing and decrease the workload of the litter warden. They could also pay a minimal charge of €20 or €30 for a two week rental of a location. This will pay for any costs. It also could be managed by a google document where fundraisers could book their space in advance. This could also be rolled out through our local enterprise office for small indigenous start up businesses. This would improve economy and show council support. (Signs could also be designed on coriboard which could be slightly adjusted for dates etc. year to year at minimal cost - encouraging less waste and recycling)

I hope these suggestions are of use

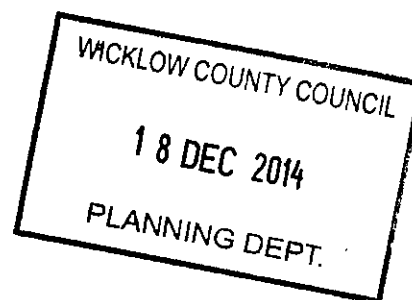
Kind regards

Heather Darker
Oldcourt House
Blessington
Co. Wicklow

087 258 9651

14/11/2014

Laillí de Buíléar
Hillside House,
Delgany.
Co. Wicklow



19th December 2014

A Chairde,

Submission to Wicklow County Council on County Development
Plan 2016 - 2022

I, Laillí de Buíléar, past, chairperson of Delgany Tidy Towns, have considered the issues in the Vision for the County document Stage 1.

I can fully subscribe to the "Vision for the County" as given in the issues booklet and endorse the goals set out except that I have serious concerns regarding some aspects of Goal 1.

Goal 1 refers to the Regional Planning Guidelines for the Greater Dublin Area. Those guidelines show Delgany / Greystones within the Dublin metropolitan Area.

I am of the firm opinion that Delgany should never have been included in the metropolitan area. We have achieved little from this over the years, except more housing, but nothing by way of transport or infrastructure to support it.

It is quite clear to us that Goals 2 to 9, especially Goal 9, are incompatible with being in the metropolitan area and linked to Greystones.

We are attempting to gain Heritage status for the village with little support from the Council. We have been campaigning for ten years to have road safety and parking problems addressed, but are told that "There is no funding".

The above points do not support a metropolitan plan.

Taking a wider county view, I consider that none of the 'Garden of Ireland' should be included in the metropolitan area for the following reasons.

1. In my opinion there should not be, a housing development south of Bray in the sensitive land area between Bray Head and the Sugarloaf mountains.

2. There is only one main road (R761) south from Bray, east of the N11.

3. There is only a single line railway, which cannot be expanded and involving a higher pro-rata fare than the rest of the DART service.

4. There are constant requests for a better public transport service to Delgany to little avail!

5. If and when the Luas extends to Bray, it is not scheduled to cross the Dublin county boundary!

6. Both Bray and Greystones have now lost their town councils! This does not warrant County Development Plan Levels 1 and 3 respectively.

For the above reasons.

The gateway to the 'Garden of Ireland', should be more clearly consolidated within the rest of the county for all its development.

I believe that Wicklow County Council should negotiate to have Bray and Greystones classed as hinterland within the Greater Dublin Area dropping to levels 3 and 4 respectively.

Delgany should be classed a Rural Town, dropping to level 6 on a par with Kilmacanogue which is nearer and more convenient to Dublin.

Delgany village is in the same class as Aughrim in the Tidy Towns competition but fails to get the same amenities or infrastructure as Aughrim.

Delgany is surrounded by narrow country roads, there are some, with only one narrow footpath and there are others, without footpaths. This actually aids the character of the village, which we would like to retain. It also encourages abundant wildlife, both flora and fauna. By being properly classed as a rural town, we could play a greater part in the heritage and tourism development in the county.

We are not, however, anti-housing or anti-industry development. Sensitive planning in accordance with the Goals already set out would be welcome.

There are already small pockets of unobtrusive business/industry in Delgany, Drummin, Willow Grove and the Downs.

Kilcoole has even attracted more industry than Greystones.

Appropriate industry aiding local employment is welcome but difficult to achieve in Delgany while being seen as a dormitory of Dublin.

After being actively involved in village life here in Delgany for thirty years, I sincerely hope that my wishes come true and as a small Rural Town and we can attain a Heritage Village status here!

Le gach dea mheain,

Laillí de Buítléar

Laillí de Buítléar

Leonora Earls

From: Wicklow County Council:[michael@indytech.ie]
Sent: 23 December 2014 12:30
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 23, 2014 - 12:30 Submitted by anonymous user:
 [89.19.94.179] Submitted values are:

Name: Francis Donnelly
 Organisation, Group, Company, etc :
 Address: Greystones
 Email: francisldonnelly@gmail.com

--Topics--

- :
- : Housing
- :
- : Tourism
- :
- : Rural_Development
- :
- : Social_Community_and_Cultural_Development
- : Built_and_Natural_Heritage_including_Landscape
- :
- : Local_Plans
- :
- :

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

My submission is with regard to Objective RH14, known colloquially as "local needs planning permission" and reflected in the current development plan at 6.3.2

The current Development Plan correctly identifies the "development pressure" experienced in rural areas of Wicklow by commuters who wish to live in a rural setting. This is an understandable desire of commuters, and Wicklow is perhaps unique in Ireland in that it is both a scenic tourism destination yet well within the "commuter belt" of a major city. Historically the impulse of the local planning authority has been to cater for perceived locals while excluding outsiders, and this has been to some extent codified in objective RH14. However, I submit that this objective does not cater for the needs of Wicklow's residents as a whole as it creates a deliberate exception to the fundamentally sound rule that no new one-off houses should be built in areas not planned for settlement.

Wicklow is blighted by one-off houses, frankly, particularly in and around the area of the National Park. Wicklow is perhaps unusual in that it would permit such development. As an outsider myself I was certainly struck by it when I arrived in the county for the first time. As an example, there are a number of houses overlooking Glendalough (that is to say, on the walls of the valley) that certainly should never have been built. While nothing can be done about existing houses (and I would not propose to do anything), we can certainly prevent the creation of new "exceptional" houses in totally unsuitable locations while still allowing for genuine local needs through the operation of the free market in existing second-hand houses.

To elaborate slightly on the theory of Local Needs Permission, I am aware that it is a common feature in County plans but firmly believe that this has emerged as a sort of

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Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 23 December 2014 17:05
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 23, 2014 - 17:05 Submitted by anonymous user:
[213.191.224.53] Submitted values are:

Name: James Doyle
Organisation, Group, Company, etc : Community Activist
Address: Bohilla lane, little sugarloaf, Co Wicklow
Email: jamesdoyl45@gmail.com

--Topics--

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

Policy SS4 says that these centres should, where possible, "be self sufficient, incorporating employment activities, sufficient retail services, and social and community facilities."

The policy stipulates that "Residential development will only be permitted if sufficient progress is made in providing employment, retail, social and community facilities within the settlement".

This reflects the "self sufficiency" ideals of overarching Settlement Strategy - in other words we don't want runaway housing developments without an increase in local employment and amenity opportunities. There needs to be balance. So to monitor this we want to see shops open, jobs created and social facilities launched side by side with house building. Not one after the other.

This makes sense - it's a intelligent policy idea. What's lacking is a plan to make it work.

Specifically HOW do we ensure (or at least encourage) the "sufficient progress" in job creation, retail services, social supports and community facilities that the current Plan says is required before residential development can be permitted?

Implement: For employment and retail progress - introduce reduced commercial rates for businesses with premises inside these Development Centres (consider raising rates elsewhere to compensate); explore ways to incentivise employment of people living locally (Local Enterprise Offices and Revenue).

Implement: For social supports and community facilities - Council administration to actively monitor, evaluate and report (to Council in advance of Budget setting process)

on which Local Growth Centres need which social/community services most in order to harness retail and employment progress and in justify residential development. This obligation to monitor, evaluate and report should be carried out objectively and with minimal room for political lobbying.

When the Budget is decided and the various investment allocations are negotiated the Council would be obliged by a) the County Development Plan Policy and b) the analysis and findings of the Council staff's report, to invest funds into services and facilities in Local Growth Centres where the 'self-sufficiency' balance between services and public demand is most out of sync.

Projects (e.g. the long identified Youth Centre for Kilcoole) would be prioritised on the basis of transparent assessment not political brinkmanship.

Existing Policy SS4: To ensure that all the Primary and Secondary Local Growth Centres, will in so far as practical, be self sufficient, incorporating employment activities, sufficient retail services, and social and community facilities. Residential development will only be permitted if sufficient progress is made in providing employment, retail, social and community facilities within the settlement.

New Policy SS4: To ensure, by means of leveraging the Council's resources (financial and administrative), that all Primary and Secondary Local Growth Centres develop in a manner that is both sustainable and self-sufficient such that residential development will only be permitted if sufficient progress is made in providing employment, retail, social and community facilities within the settlement. Responsibility for promoting sufficient progress incorporating employment activities, sufficient retail services and social and community facilities is accepted by the County Council. Execution of this responsibility will comprise the leveraging of financial (where feasible) and administration resources of the Council in SS4(A), SS4(B) and SS4(C).

New Policy SS4(A): To promote and realise the potential for sustainable living in Local Growth Centres and self-sufficiency both in terms of adequate residential development and acceptable employment, retail, social and community services by the adjustment of commercial rates throughout the County to stimulate employment and retail opportunities within Local Growth Centres.

New Policy SS4(B): To promote and realise the potential for sustainable living in Local Growth Centres and self-sufficiency both in terms of adequate residential development and acceptable employment, retail, social and community services by undertaking an analysis of economic and social realities in each Local Growth Centre in each budget cycle, targeted at realising this self-sufficiency balance and reporting to the County Council with a County-wide report in advance of budget decisions commencing with a breakdown of which Local Growth Centres need which type of investment (whether it employment, retail, social or community based) and which third parties can be incentivised/utilised to assist. All relevant state agencies will be consulted with for the production of this annual report and the formulation of potential partnership solutions (e.g Skills training facilitated by Wicklow LEO for outdoor activity centre start-up).

New Policy SS4(C): To promote and realise the potential for sustainable living in Local Growth Centres and self-sufficiency both in terms of adequate residential development and acceptable employment, retail, social and community services by means of allocating a certain fixed % portion of the investment aspect of the annual budget to be allocated to Local Growth Centres. The decision as to how and where the money will be invested will be made by Councillors on full notice of the Council staff's report setting out the priority investment areas therein and any vote of the Councillors that either introduces a new proposed investment or removes a recommended investment in the report (or significantly adjusts it (by an increase or decrease of more than 25% of the figure recommended for investment in the report) will require a special meeting of the Planning SPC and a 75% majority of its membership to be approved.

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

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

[illegible]

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

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

<http://www.wicklow.ie/node/810/submission/68>

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 23 December 2014 13:50
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 23, 2014 - 13:50 Submitted by anonymous user: [86.45.35.60]
Submitted values are:

Name: Kevin Doyle
Organisation, Group, Company, etc :
Address: Ballymanus, Aughrim, Co. Wicklow
Email: doyle.kevin@hotmail.com

--Topics--

-: Vision and Core Strategy

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

I am currently a resident of Ballymanus, Aughrim, Co. Wicklow. In the current Wicklow county development plan my area is in an orange zone (less favorable for wind turbines).

In the 2016-2022 strategy document, in relation to Goal 10 under vision core strategies I agree with and fully support this document. In my opinion I would like the current zoning to remain in place as I believe this rural area is of outstanding beauty. This is a special amenities area and I would hope it would not be used for industrial development.

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/65>

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 23 December 2014 14:25
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

From: Wicklow County Council [michael@indytech.ie]
Sent: 23 December 2014 14:25
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 23, 2014 - 14:24 Submitted by anonymous user:
[109.76.165.110] Submitted values are:

Name: Sinéad Doyle
Organisation, Group, Company, etc :
Address: Ballymanus, Aughrim, Arklow, Co. Wicklow
Email: sineaddoyle55@hotmail.com

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

Alternatively you can attach your submission (10MB limit on attached files):
<http://www.wicklow.ie/sites/default/files/webform/Sinead%20Doyle.docx>

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

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

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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/66>

Ballymanus
Aughrim
Arklow
Co. Wicklow
23rd December 2014

Re: Submission to Wicklow County Council
Development Plan 2016 – 2022

Dear Sir / Madam,

I would like to make a submission in relation to the Wind Energy Strategy in the Wicklow County Development Plan 2016 - 2022.

Currently Ballymanus is an area of special amenity in which it is a less favorable area in which industrial developments can be developed. I would like to voice my opinion that this should remain unchanged.

Ballymanus is high quality visual amenity with diverse flora and fauna in the locality. The following protected species live in the area: the buzzard, hen harrier, red kite, grouse, migrating woodcock, ravens and bats.

Kind Regards

Sinéad Doyle

Leonora Earls

From: Treacy Bentley [raymondgaffneyauct@eircom.net]
Sent: 19 December 2014 11:05
To: Planning - Development Plan Review
Subject: Fwd: SUBMISSION REGARDING WICKLOW COUNTY DEVELOPMENT PLAN 2016 TO 2022

CAN YOU PLEASE SEND A CONFIRMATION REPLY TO THIS BELOW OUTLINED EMAIL WHICH WAS SENT IN ON THE 18/12/2014.

----- Forwarded Message -----

From: <raymondgaffneyauct@eircom.net>
To: planreview@wicklowcoco.ie
Sent: Thu, 18 Dec 2014 17:07:18 -0000 (GMT)
Subject: SUBMISSION REGARDING WICKLOW COUNTY DEVELOPMENT PLAN 2016 TO 2022

Dear Sir/Madam,

I would like to make the below outlined submission with regards to the above mentioned.

I Raymond Gaffney own C. 18 Acres of land in Barndarrig, Co. Wicklow. This land is surrounded by necessary public services and infrastructure such as roadway, street lighting, Church, School, Shops, Post Office, Filling Station, Licensed Premises and Transport-Bus Stop. The sewerage plant has been upgraded and is able to cater for an increase in houses.

I own a well which has been tested by Wicklow County Council. There is ample water supply to cater for 200 houses. This had been certified and the paperwork is with Wicklow Co.Co.

The local national school has recently been increased in size and it is my understanding that the school is currently operating on a two third capacity.

Barndarrig is situated approx. 7 miles from Wicklow Town and 38 miles from Dublin. When the new road upgrade is completed the old N.11 will be free of the volume of traffic that it currently has.

With all of these factors I submit that Barndarrig Village should have a greater housing capacity, and I am now proposing that Barndarrig be increased from Large Village status to a higher status.

Yours sincerely,

RAYMOND GAFFNEY
MOBILE: 087-2583729

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 28 November 2014 14:39
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Friday, November 28, 2014 - 14:38 Submitted by anonymous user:
 [109.76.213.33] Submitted values are:

Name: Gerrard Hynes Associates
 Organisation, Group, Company, etc : Architects
 Address: Ballymacsimon, Glenealy, Co. Wicklow
 Email:

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

Under Section 6.3.2 of the CDP Objectives RH14, I would like to submit the following observation, which I believe should be part of Item 13 as follows...

A permanent native resident who has to dispose their dwelling, (or has to transfer their dwelling to their partner), following divorce or a legal separation.

This can be the case in many divorces due to partners wanting to stay at home due to work conditions, or business, schools and children.

This relieves the possibility of both partners seeking permission for a rural house in the event that they have to dispose of their home.

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/21>

60
Leonora Earls

From: Brian Dawson
Sent: 23 December 2014 10:11
To: Planning - Development Plan Review
Subject: IWEA Submission to the Wicklow CDP 2016-2022
Attachments: IWEA response to Wicklow CDP 2016-2022 Issues Paper 231214 PDF.pdf

Dear Wicklow Co Co Forward Planning Unit,

Please find attached a submission on behalf of the Irish Wind Energy Association (IWEA) to the Wicklow County Development Plan 2016 – 2022: Stage 1 – Pre-Draft Public Consultation.

Many thanks again for the opportunity to contribute to this important process and we would appreciate if a member of your team could confirm safe receipt by reply.

Best wishes to all in Wicklow Co Co for a peaceful Christmas break.

Brian

Brian Dawson
Communications and Information Manager

Irish Wind Energy Association
Sycamore House
Millennium Park
Osberstown
Naas
Co. Kildare

Tel: +353 (0)45 899341
Fax: +353 (0)45 854958

Email: .
Web: www.iwea.com

Follow us on twitter @IWEA

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Irish Wind Energy Association
Sycamore House
Millennium Park
Osberstown
Naas
Co. Kildare

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

By email: to planreview@wicklowcoco.ie

Date: 23rd December 2014

Re: Issues Booklet for County Wicklow Development Plan 2016-2022

Dear Sir/Madam,

The Irish Wind Energy Association ("IWEA") welcomes the opportunity to comment on the **Issues Booklet for the County Wicklow Development Plan 2016-2022**. As the County Development Plan will inform the vision, objectives and policies of the new plan for County Wicklow (2016-2022), including its Renewable Energy Strategy (RES), IWEA feels it is critically important to make a submission at this pre-draft stage. We very much welcome the opportunity and look forward to engaging constructively with you in the future.

IWEA would like to reiterate that we welcome Wicklow's County Council's positive support of renewables and wind energy in particular. Renewable energy development is a vital part of Ireland's strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change.

We thank you for the opportunity to contribute at this first stage consultation and we look forward to contributing further as the strategic plan progresses.

Yours sincerely,

*sent by email, no signature required

Caitríona Diviney,
Chief Operating Officer,
Irish Wind Energy Association.

1.0 Introduction

The Irish Wind Energy Association ("IWEA") is Ireland's leading renewable energy representative body and as such has an active interest in the potential for sustainable energy. IWEA is committed to promoting the use of wind energy in Ireland and beyond as an economically viable and environmentally sound alternative to thermal or nuclear generation and promotes awareness and understanding of wind power as the primary renewable energy resource.

Renewable energy development is a vital part of Ireland's strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change. IWEA supports proper planning and sustainable development and recognises that development of wind energy projects must afford clear protection to residents while enabling Ireland to develop our huge natural clean energy renewable resources and meet our EU2020 targets. IWEA members are involved in developing more than 85% of the wind farm capacity that is planned to be built from now to 2020.

1.1 EU commitments and DCENR's RES-E target

In the first instance, we wish to remind Wicklow County Council of Ireland's need to support renewable energy also stems from it's EU commitments, namely EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources which came into force in April 2009 and which establishes a binding target of 20% of overall EU energy consumption coming from renewable sources by 2020 as well as a binding 10% minimum target for energy from renewable resources in the share of transportation fuels. Ireland's target under the directive is for renewable resources to account for 16% of total energy consumption by 2020. Failure to meet these targets could result in EU sanctions. In line with these commitments, DCENR announced a revised target for electricity from renewable energy sources (RES-E) of 40% by 2020.

The European Union is also now in the process of agreeing the framework for a further series of targets for renewable energy towards 2030, and Ireland in October 2014 agreed to new EU 2030 targets which seek a 40% reduction in Green House Gas Emissions and a binding EU target for renewable energy of "at least 27%".

1.2 Benefits of wind energy development to Wicklow County Council

As the vast majority of new renewable capacity will be provided by on-shore wind, the 40% target is a significant challenge for the Irish wind industry as a whole. An approximate doubling of wind capacity will need to be installed on-shore in Ireland within the coming years if we are to meet our 2020 RES-E target. The expansion of the Irish wind industry will be an extremely positive economic development for Wicklow County Council and can result in greater grid security and stability, job creation, Local Authority rates and development contributions, and will bring about a reduction of GHG emissions.

1.3 The Promotion of Renewable Energy

IWEA welcomes Wicklow County Council's recognition that the County has the potential to develop its renewable energy potential further during the period of the County Development Plan as set out in the Issues Paper. In terms of the question regarding how can alternative forms of energy be best promoted and developed, IWEA suggests that clear and target focused objectives and policies that demonstrate the manner in which renewable forms of energy are encouraged should be included in the document. IWEA also welcome the acknowledgement of the current DoECLG Wind Energy Planning Guidelines, which should be followed in the preparation of this plan, along with any subsequent revision.

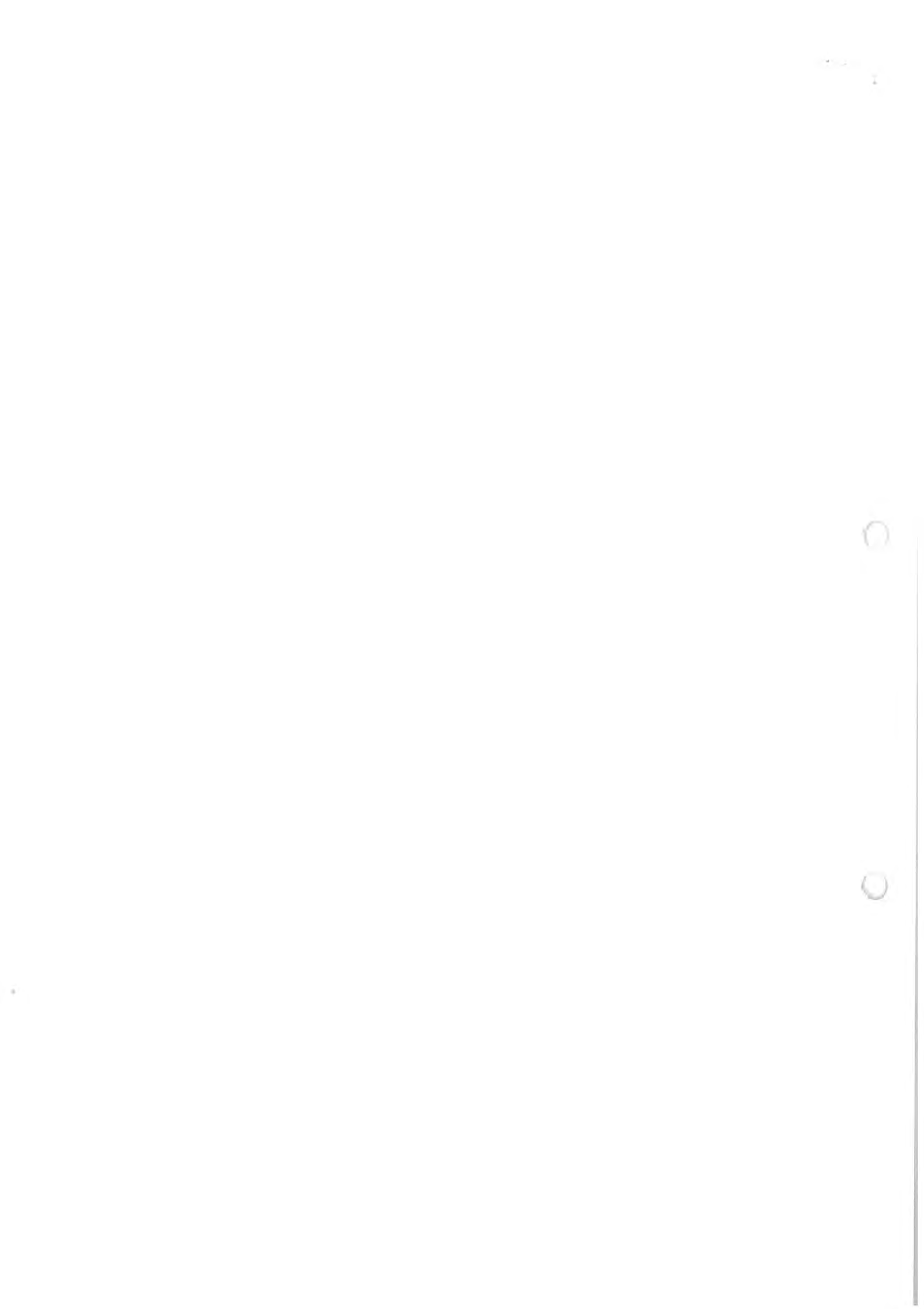
IWEA wish to reiterate that when preparing the Renewable Energy Strategy, that it should be prepared in accordance with SEAI document entitled *"A Methodology for Local Authority Renewable Energy Strategies"*.

The inclusion of specific policies and objections in the new Plan that promote the further development of renewable energy will enable Wicklow County Council to:

- Develop a sustainable, wind energy industry employing construction and professional service providers and attracting significant capital investment;
- Enhance the vibrancy of the county as a renewable energy leader;
- Support rural development in a sustainable manner;
- Deliver significant community benefit including the lowering of energy prices and the provision of land lease payments to local landowners annually;
- Contribute to the funding of the construction of an electrical grid infrastructure that would be the basis of the new renewable energy industry; and,
- Deliver significant commercial rates revenue to County Wicklow annually.

1.4 Conclusion

IWEA are hopeful that the new Plan will contribute to achieving the development of the wind and renewable energy resource in the County. There is an opportunity for Wicklow County Council to take a proactive approach in the new County Development Plan to realise the wind energy development potential of the County and to adopt policies and objectives that enhance sustainable development. We encourage the Local Authority to seize this valuable opportunity.



Ballinagore,
Ballycoogue,
Arklow,
Co. Wicklow.
19-12-2014.

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

Submission to the Co. Wicklow Development Plan 2016 -2022 under the area identified in the ISSUES booklet as; Renewable Energy.

- 1 Renewable energy technologies will be necessary in the future but caution is necessary when new technologies are being explored so that factors like safety, public health, environmental harmony, economic viability and long term sustainability are satisfied. Public acceptability is basic and will not occur where there is not sufficient public consultation and this consultation taken on board.
- 2 Factors like the effect of new technologies on flora and fauna and the balance that has developed between these and human habitation should not be disturbed.
- 3 The preservation of safe clean water resources for residents of surrounding rural areas and towns are of paramount importance.
- 4 The impact of new technologies on present and future town, rural and upland areas needs serious attention so as to preserve harmony and not create opposition and public rejection.
- 5 A wide range of renewable energy resources should be examined including wave energy, solar energy and biomass energy – presently there seems only a concentration on wind energy.
- 6 A fragile and slowly recovering tourist industry needs to be safeguarded and nourished and tourist areas need to be preserved and protected.
- 7 In the light of the above; Large scale industrial development from, for example, the sprawling wind farms with their massive steel pylons topped by incongruously large swirling blades, based on huge environmentally incompatible concrete foundations are contrary to points 1 to 6 above and measures need to be taken to strictly control developments of such wind farms in Co. Wicklow. Construction of roadways to cater for massive transport trucks to transport in the raw materials into mountain, hill and ridge areas become inevitable and lasting scars on the landscape.
- 8 Great concern is being expressed with the permission to develop a proposed windfarm at Raheenaleagh when public knowledge regarding the harmful effects of such developments was in its infancy and public consultation was considered minimal and inadequate.

- 9 Any planning application to extend this windfarm should be totally rejected under the criteria of the Planning and Development Act 2000 – Adopted Variation no.4, amended May 2014 and under the Regional Planning Guidelines, June 2010.
- 10 The Guidelines aim to protect Rural Tourism from ‘pressures of commercialisation and development that serve to undermine rural economic systems, landscapes and conservation areas thus losing what makes such destinations attractive and special places to visit’ (5.4.2. p.106) and Guidelines 6.4 state that water supply is ‘an issue of concern since the early 1990’s’ and that we should ‘protect and work to improve water quality’ (6.5.1.p.129).
- 11 As all are aware Arklow’s supply of water comes from the Goldmine river rising on the slopes of Croghan Mountain and South Wicklow is slowly beginning to see Tourism recovering.
- 12 Arklow, Woodenbridge, Avoca, Aughrim and hinterland are scenic areas and any industrial development should take cognisance of ‘visual and landscape sensitivity’ (appendix 1, section 3a of Planning and Development Act 2000).
- 13 In keeping with the above, we would view with equal concern the possible imminent application for planning permission for a windfarm at Ballymanus which would conflict with the Regional and local Planning and Development criteria. The attendance at the Information evening in Lawless’s on 13 October last would reinforce anyone’s misgivings who are concerned about proper development of a responsible wind energy policy for Co. Wicklow.
- 14 In conclusion we would wish to make some suggestions, and these are reinforced by the comments made recently by a couple who live in the shadow of revolving turbines in South Wicklow at a recent public information meeting in Aughrim on 6th October and whose life, and health, physical and psychological, has been negatively affected by this windfarm – the daily experience of people living near windfarms too closely erected to dwelling houses is more valuable and significant than detached statistics developed well away from the windfarm site. Vested interests of Developers should not influence decision making.
- 15 Suggestions: that the Planning and Development Act should be further amended to say that the distance of wind turbines from residences should be at least doubled to twenty (20) times the diameter of the rotor blade (not 10 times as at present) and shadow flicker and noise levels should be continuously monitored.
That: ‘tall’ turbines should not be erected on farm, hill or ridge areas in any cases.
That: in the light of the points made in the above submission and for any other equally cogent reasons; that Croghan Mountain and Ballymanus should be deemed unacceptable sites for windfarm and wind turbine development and be rejected by Wicklow Co. Council and by Bord Pleanala also if repealed to this Bord.

Thanking you for the opportunity to make a submission to an issue of such vital importance and of such public interest.

Yours sincerely,

Charles Kavanagh
Colette Kavanagh and Family.

Leónora Earls

From: Ian McAulay [IanM@mcaulayrice.ie]
Sent: 09 December 2014 10:56
To: Planning - Admin
Subject: Wicklow County Development Plan 2016 - 2022- stage 1 pre draft submission- submission in relation to villages and in particular Glenealy.
Attachments: glenealy conceptual plan.pdf; GLENEALY MASTERPLAN.pdf

Hi Sorcha,

could you please find attached a proposal which is conceptual only in its make up. We understand that the current process in regards to the preparation for the new development plan is at a very early stage but we do feel that this particular issue is relevant for how the council may deal with villages and in particular Glenealy Village..

Our proposal involves the re generation of Glenelay village so in that light I suppose we would be looking for you to consider the possibility of upgrading Glenealy's Status of level 7 to a higher level with the possibility of even urban sector level similar to that of Ashford. We appreciate there are many things that are relevant here but we have to start somewhere as they say...

We would be very happy to meet with you to discuss this if possible.

On behalf of Kinsella

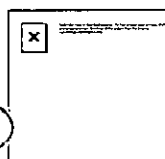
kind regards

Ian McAulay | Director

McAulay Rice Architects

Fitzwilliam Square, Green Tree House, Wicklow Town, Co Wicklow

T: +353 (404) 62178 | E:ianm@mcaulayrice.ie |



**Proposed Feasibility Report and
Conceptual Plan for the Possible Development
of a New Village Centre for Glenealy Village**

Client: Mr John Kinsella

Date: November 2014



McAulay Rice Architects, Green Tree House, Fitzwilliam Square, Wicklow Town, Co. Wicklow
T: 0404 62178

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FOREWORD

This report is to be read in conjunction with the accompanying proposed A1 Conceptual Plan Drawing. (An A3 version has been attached to the end of the report for reference)

The lands contained in the Conceptual Plan and referred to in this report are lands owned by our Client, Mr Kinsella. Additional lands outside of the proposed Village Centre study area are included to give an overall Masterplan on how the Village could develop in the long term/ distant future. These lands are also in Mr Kinsella's ownership and have been included to show further possible uses that are compatible with proposed uses for the Village Centre.

Proposed uses, activities, services, facilities, redevelopment and gateways are followed by a reference which corresponds to the same reference on the proposed Conceptual Plan and indicates the possible location of each.

Please note that all of the images included in this report are for illustrative purposes only. These images have been obtained from the internet and are neither the property of this office or actual proposals for the Conceptual Plan. They are merely a tool to convey a certain type of development, an atmosphere or idea.

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McAulay Rice Architects, Green Tree House, Fitzwilliam Square, Wicklow Town, Co. Wicklow
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19

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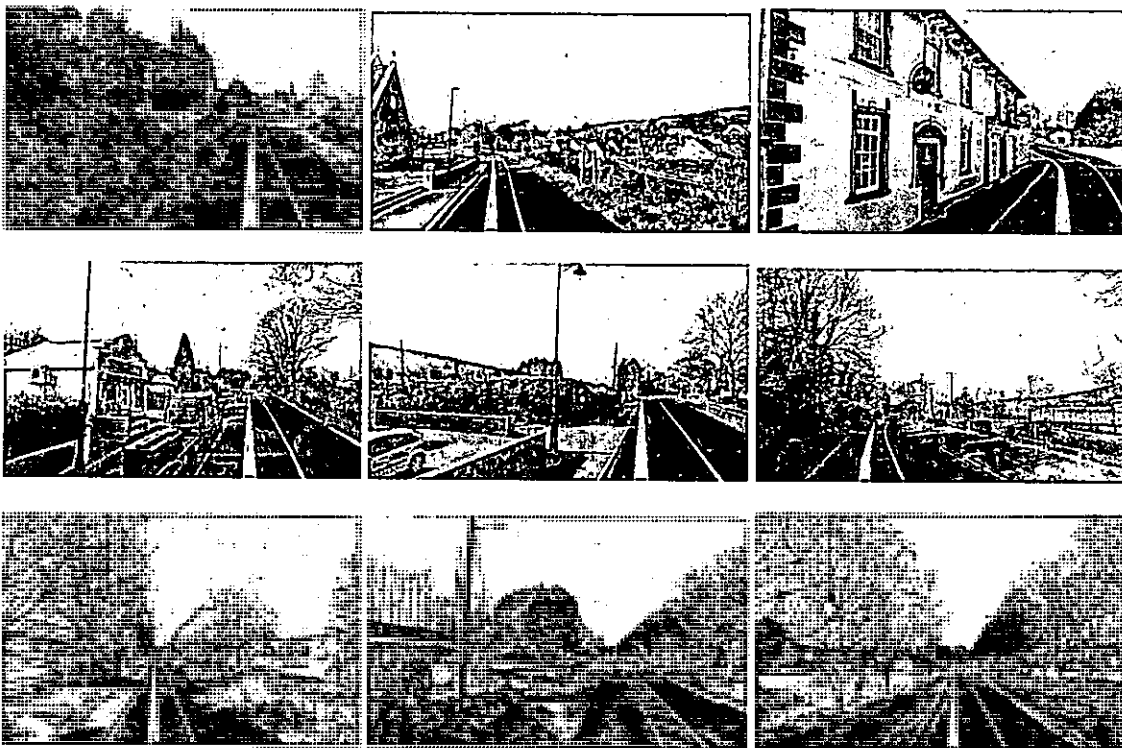
INTRODUCTION

This report had been prepared on behalf of our client, Mr Kinsella, in support of possible future proposals for the development of Glenealy Village.

Over the years Glenealy has seen the decline in commercial based facilities and this has led to the loss of a village centre or heart to the village. The village has lost a hotel, bar, several shops and the train station and little has been done to entice such commercial ventures back into the village. At present the village is sprawled in a linear line along the main Rathdrum Road. This road dissects the village and reinforces the idea that there is no apparent village centre.

As noted in the Glenealy Village Design Statement (VDS), "*Glenealy has a distinctive and diverse character which is highly valued by its local residents. Any change brought about by future growth needs to be positively managed so that the unique qualities that contribute to the village's distinctive identity can be protected and enhanced.*"

This report and subsequent Conceptual Plan strives to use this statement as the key driving force behind any proposals and various sections of the VDS will be referred to throughout.



PURPOSE OF VILLAGE CONCEPTUAL PLAN

Our client has recently acquired a substantial section of additional lands within Glenealy. Having been an employer in the village for many years Mr Kinsella is no stranger to the problems facing Glenealy due to the sprawling nature of the village and lack of basic facilities. Even before the acquisition of additional lands our client has been actively seeking ways of improving the village as a whole and now hopes that this land could be the vehicle in which to do so. By proposing to create a Village Centre, it is hoped that Glenealy will be provided with a much needed heart and sense of place.

Prior reports have discussed the sporadic nature of the Glenealy and have looked into how improvements such as landscaping and street furniture/ signage etc could be used to develop a brand for the village. The recently acquisition of land in a prime location together with lands previously owned could offer a more substantial method of developing the village for its inhabitants to allow it to thrive and hopefully ensuring its future as a viable village and growth area.

While this report discusses a concept plan for the proposal of a Village Centre for Glenealy, it is important to note that it is only at a conceptual stage and is intended for discussions purposes only, to initiate dialogue. It is not the intention to incorporate or develop existing reports or recommendations at this stage. It does however take aspects of the VDS into consideration. The purpose of the report was to investigate the possibility of pulling all the disparate sections of the village together in the form of a masterplan and provide a heart and village centre. It is hoped that this conceptual masterplan will facilitate discussions with the Wicklow Council Forward Planning Department and Wicklow Rural Partnership as well as locals, property owners, business owners, potential developers and other stakeholders to identify aspirations and development that could allow Glenealy to become a growth area in the future. While proposals have taken on board many aspects of the village it does not take into account detailed design at this stage nor has it investigated proposed usages in depth. However many of the proposed facilities and services have been listed as services requested in the VDS.

Keys areas noted in the VDS is that there is a *"good community spirit which could be strengthened with greater provision of basic facilities such as a post office, supermarket, health centre, crèche etc and improved facilities for children and teenagers as well as tackling the lack of public transport."*

GOAL OF VILLAGE CONCEPTUAL PLAN

The goal of the Conceptual Plan is to establish a core area of the community with key civic, residential, and commercial uses. It is hoped that this area will incorporate essential elements of traditional village character such as historic architectural styles, a common or village green, buildings close to the street, parking on the street and behind the buildings, an attractive streetscape, an intimate pedestrian atmosphere, and a mixed-use environment. It is also hoped that it will be a place where people can grab a bite to eat, make a variety of stops for business and pleasure, and converse and socialise with friends and acquaintances.

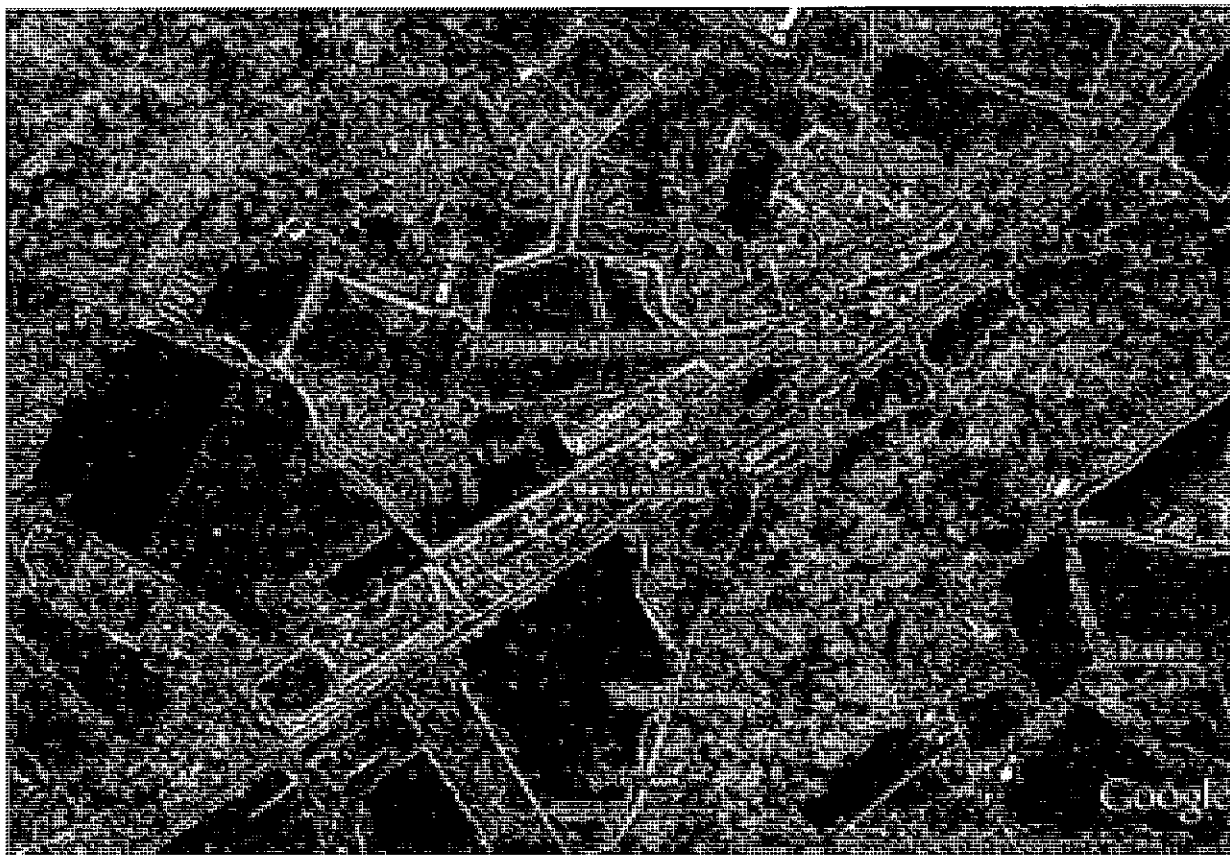
Glenealy has good potential for a variety of future development opportunities including residential (mixed-income rental and ownership), commercial, light industrial, medical and personal service, educational and civic uses. Opportunities for a farmers / artisan market and cottage industry could be created and we also believe that the village can expand and incorporate the concepts of the Ballinagran Project by integrating an ecovillage within the new village centre. This could create further business through tourism and tap into the sustainable product/ concept industry.

It is envisaged that public and private development will be required as an integral part of the Conceptual Plan to provide the needed framework to advance the following goals:

- **Develop the Village Centre as a mixed-use centre which links new and existing services and facilities, landmarks and buildings.**
- **Rehabilitate important structures and buildings and services (some of which are historic).**
- **Develop housing types for various income and age groups.**
- **Provide opportunities for new business development that support local entrepreneurship and create high-quality jobs.**
- **Provide specific commercial and retail operations desired by the community.**
- **Create tourism opportunities and establish public transport links.**

LOCATION FOR PROPOSED VILLAGE CENTRE

To facilitate the establishment and development of a new Village Centre the Conceptual Plan is based mainly on the area centrally located along the main route through Glenealy adjacent to the main residential areas, school and the former Kerry Foods factory. The area is also located close to the former Glenealy Railway Station. As our client is also in process of the land containing the station there is a possible opportunity of reopening the former station. This could bring numerous benefits for the village making it a commuter area.



Based on the location and connection to existing facilities we believe this area has much potential to serve as the civic and mixed-use centre for Glenealy. The location of the land will facilitate development within the village boundary therefore discouraging further ribbon development. Discouraging further ribbon development is a key concern within the VDS.

Mr Kinsella owns further lands to the south i.e. the lands indicated as Ballinacoola. These lands are included in this report as they represent an area for possible development that may benefit the village as a whole and compliment other proposed uses.

DESIGN STATEMENT FOR THE VILLAGE CENTRE

A reoccurring statement throughout the VDS is that the locals place upmost importance on the openness, green areas/ forest walks and rustic image of the village.

"The ribbon nature of Glenealy and the bends in the road prelude views of the whole village at once from the main road giving instead a sequential view of the village. This combined with the dramatic wooded hillsides and open lower slopes is an impressive setting to the village and creates a predominantly rural feeling when travelling through the village."

The VDS calls for the development of a Community Park in what is considered the centre of the village at present. This Conceptual Plan seeks to expand on a Community Park by not only incorporating the woodland opposite Kane's Pub but to actually place the New Village Centre within a proposed larger park.

For these reasons the concept for the future development of a Village Centre is based on a village common/ green idea with an extension of the woodlands/ forestry into and around any new proposals, therefore recreating the rural feeling that defines Glenealy.

IN ESSENCE THE CONCEPT IS FOR A VILLAGE IN A PARK.



Rural village centres are characterised by compact mixed-use settlement patterns, a community focus (such as a town common or green), traditional architectural design, and pedestrian (rather than emphasis on cars) orientation. They offer basic employment, services, and shopping for their residents as well as for those living in the surrounding lower-density rural areas. Rural village centres also provide civic facilities and activities for social interactions. At present Glenealy does not have a "main street" or Village Centre that is supported by the activities noted above.

Therefore the main design principals of the Conceptual Plan focus on the following:

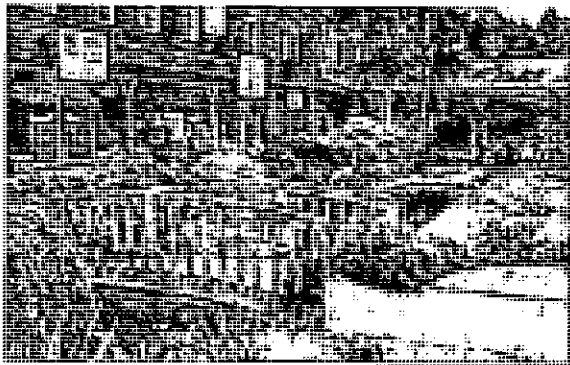
- **Village in a Park**
- **Creating Vistas and Gateways**
- **Pedestrian Orientation**
- **Outdoor Activities**
- **Mixed Uses, New Land Development and Infill**
- **Building Redevelopment and Reuse**
- **Public Transport Links, Road Network, Pathways, Trails and Cycle Routes.**

DESIGN PRINCIPALS

Village in the Park

Central to the main concept is the relationship of the proposed Village Centre to the woodlands and pockets of open space and greenery within the village and surrounding areas. It is proposed that the Village Centre will be an extension of the woodlands and that the heart of the centre will be a village green/ park with a possible pond. Proposed mixed usages will integrate into the park providing a mixture of soft and hard landscaped areas, creating character and a uniqueness and brand for the village.

Buildings should respect the existing built fabric, architectural details and characteristic features of the village to create a unified identity for Glenealy.



Creating Vistas and Gateways

Village centres should be visually distinct from surrounding landscapes. They should create a sense of arrival on approaching the centre. However traveling through Glenealy there is nothing to announce the core area or village centre. This visual issue needs to be addressed through a combination of attractive gateway treatments, infill buildings and existing building renovations with traditional village design and architecture, formal streetscape improvements such as interconnecting walkways, street trees, cycle paths, and lighting etc.

While this report has not gone into detail regarding gateways at the extensive ends of the village it does suggest locations for prominent gateways announcing the village core at particular strategic points.

- **Gateway 1 (G1)** The grounds of the Church and Old School could be developed to provide an important gateway through possible appropriate signage on new stone walls and planters. This could create a sense of arrival approaching from Glenealy.
- **Gateway 2 (G2)** The Gatelodge opposite Kane's Pub could be developed into a café/bistro and signage used to announce the entrance to the Park from this direction.
- **Gateway 3 (G3)** The area beside the existing Kerry Foods Factory area will form the main entrance to the Village Centre/ Park. This could have formal gates and possible railings.

- **Gateway 4 (G4)** The intersection of the proposed relocated GAA grounds, proposed new Village Centre and existing Railway Station will form the gateway to the Village Centre on approach from the Rathdrum side. A sculpture, for example, could announce the entrance form this section. This could be anything from a sculpture depicting an historic event such as St Kevin and the establishment of the monastery at Kilmanagh through to a modern piece depicting a sense of community etc.



Pedestrian Orientation

A key characteristic of the concept is that the village centre is pedestrian-oriented and that a reasonable number of homes (representing the primary users) are within walking distance of the centre in order for it to be successful. This is one of the many advantages of the location of the proposed Village Centre in that it will be adjacent to the main residential areas and within walking distance of the majority of all residential developments. Any proposed pedestrian heart will spill out to the surrounding areas allowing links to the existing woodlands and walks further afield and permitting the pedestrian opportunities to filter through the many suggested uses for the Village Centre. Pedestrian circulation and safety are important features of the design.

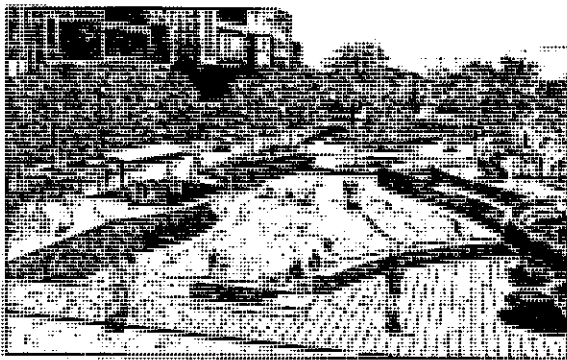
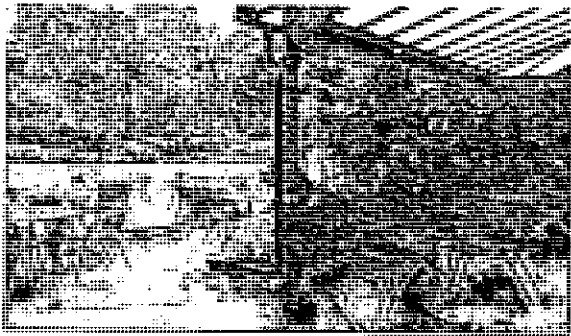


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Outdoor Activities

We believe outdoor uses are very important to attracting residents and visitors to any Village Centre. While this would include formal areas such as the village green and park, other suggested activities could be useful. Proposals for outdoor retail displays, outdoor dining, vendors, entertainment and farmers' markets are proposed along the main core of the village green. While external areas for seating for cafés/ restaurants could generate new business and encourage additional pedestrian traffic, give identity and vitality to the Village Centre, serve as a special attraction, and enhance the aesthetic value of community life.



Mixed Uses, New Land Development and Infill

The long-term viability of the village is dependent on the expansion and flexibility of commercial, professional, light industrial, and residential uses. A combination of uses including retail, food and entertainment, professional services, light manufacturing and trades, recreational, cultural, and governmental will need to be catered for if the Village Centre is to become a "place of necessity" for residents and an attraction for visitors and prospective investors.

We have suggested a variety of mixed uses and development potential for the conceptual plan. Again we would like to point out that these uses are suggested here for discussion purposes and would require further investigation into the feasibility of such uses specifically for Glenealy. Requested specific services as requested in the VDS are noted when they appear as suggested services. Each service is numbered on the Conceptual Plan prefixed with MU for Mixed Use. Suggested uses include the following:

- **Medical Arts Health and Wellness Centre (Health Centre and Chemist listed in VDS) MU1**

It is noted in the VDS that the elderly residents would particularly benefit from the provision of local health facilities. With the opening of the new Health Centre in Wicklow Town we believe that any sizable health centre would now be unfeasible. However the health and wellness industry could be a potential primary employer and service provider in plans for growth and expansion. Suggested activities could include a gymnasium, spa, yoga/ dance studio, vein and laser therapy, dentistry, alternative medicine, nutrition counseling, laboratory services, pharmacy etc.



- **Light Retail and Commercial Centre (Listed in VDS) MU2**

Units to support key services such as clothes/shoe shops, hairdresser, bakery, bookshop, charity shops, eateries etc.



- **Historic Centre, Arts and Entertainment Centre (Listed in VDS) MU3**

The Village Centre could be recognised as a high-quality district for the arts, entertainment, and history that becomes the hub for local cultural activities. The Village Centre could become the site of mixed venues and support services for art exhibits, shows and entertainment. These activities could spill out onto outdoor spaces as previously discussed. A cultural centre has been included possibly containing a gallery, dance studio, hall, drama group spaces etc.

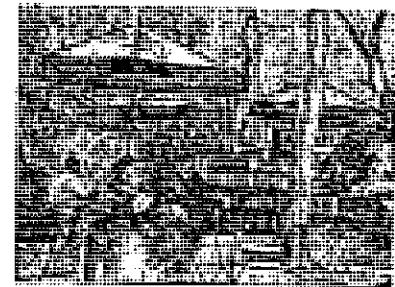
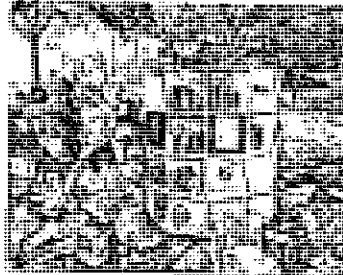


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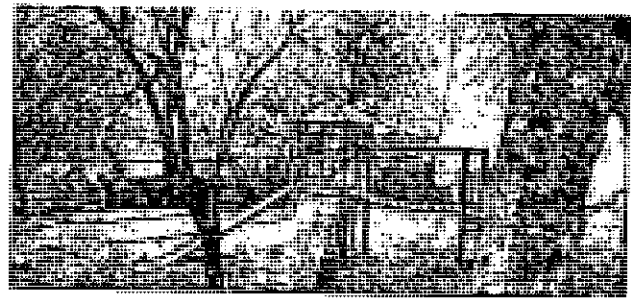
- **Civic buildings – Library MU4**

The conceptual Plan allows for a new library set in the park. This links in with the proposed playground and proposed café culture. There are other opportunities for further civic/ government buildings within the scheme.



- **Protected Playground (Listed in the VDS) MU5**

A protected playground has been located at the main entrance to the Village Centre/ Park. This will connect with the proposed library and be close to proposed shops/ café/ eateries as well as linking to a walk through the park to the existing woodlands at the existing Gatelodge and various other routes.



- **Farmer's Market/ Artisan Market MU6**

A farmers market could bring in trade to the village centre. It would allow locals and visitors the chance to purchase fresh, local fruit, vegetables, meats, dairy, breads, pastries and cheeses direct from the growers and farmers.

Artisan Markets feature gifts and handmade pieces including ceramics, jewellery, hats, handbags, cosmetics, children's toys, soft furnishings, candles, paintings, photographs, baskets, clothing and costumes, accessories, haberdashery, mirrors, pottery and antiques etc. It is a chance to experience a versatile outdoor galley showing a wide range of functional art and design items. Artists personally display and sell only their own original creations. It is a chance to purchase a unique item but also provides an opportunity to speak with the artist themselves and experience demonstrations.



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- **Cottage Industry MU7**

Both of the above mentioned markets could tie in with the cottage industry theme whereby artists, niche producers, crafts persons etc could be in permanent residence in cottage style units, producing, displaying and teaching their work. This would be centrally located within the Village Centre/Park and link in with other mixed uses.



The concept plan illustrates a series of small to moderate-sized buildings that would be used for light industrial and trades. The Enterprise Centre would primarily serve as a business incubator to create employment opportunities for local residents. The proposed site is towards the rear of the subject site would be well screened from the main route through Glenealy by trees and landscaping.

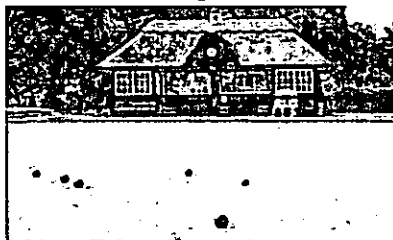
- **Sheltered/ Independent Living Units for the Elderly MU8**

Another important factor in the development of the Conceptual Plan is the inclusion and integrating of the older generation of both existing and future residents. For this reason a nursing home has been located in the heart of the Village Centre/ Park with additional individual units for independent living serviced by the nursing home. Integrating these units within the actual village centre allows residents the opportunity to experience village life without having to travel. The majority of amenities will be on their doorstep.



- **Bowling Club and Green MU9**

A bowling green and club building has also been incorporated close to the nursing home. The individual units will have small self contained gardens while the nursing home itself will be in landscaped grounds. The home and independent units will connect directly to the village core and woodlands trails allowing residents to take advantage of all the amenities on offer while feeling part of the wider community.



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- **Crèche (Listed in the VDS) MU10**

A crèche has been located towards the proposed residential section of the plan and close to the existing wooded area of the proposed park. The children could avail of woodlands walks and be brought to the library on foot.



- **Traditional Neighbourhoods MU11**

The Conceptual Plan incorporates a series of infill housing and small neighbourhoods that are laid out to connect with existing and proposed new infrastructure, the proposed Village Centre and woodland park concept. Development includes a variety of housing types to meet the income and age demands of the community today and in the future. Traditional neighbourhoods are characterised by smaller house plots with the dwellings placed closer to the pathways, tree-lined streets and links and common open space. The concept plan integrates these neighbourhoods into the core area through roadway, walkways and trails and cycle way connections. These new and existing "village neighbourhoods" will serve as the primary market for the Village Centre. As part of the Conceptual Plan additional residential development has been included in lands outside the Village Centre study area to show how these could be linked into the core area of the Centre to allow Glenealy to become a growth area in the future.

At present there is no publicly owned land for affordable or social housing in the village, the provision of which is set out under Part V of the 2000 Planning & Development Act. Social and affordable housing will form an important part of the proposed residential areas and neighbourhoods.



- **Ecovillage MU12**

Based on the present interest around sustainability and the close proximity of Glenealy and possible connections to the Ballyinagran Project an Ecovillage has been incorporated into the design. The idea is that the Ecovillage will be self sufficient and act as a working/ learning/ teaching environment.



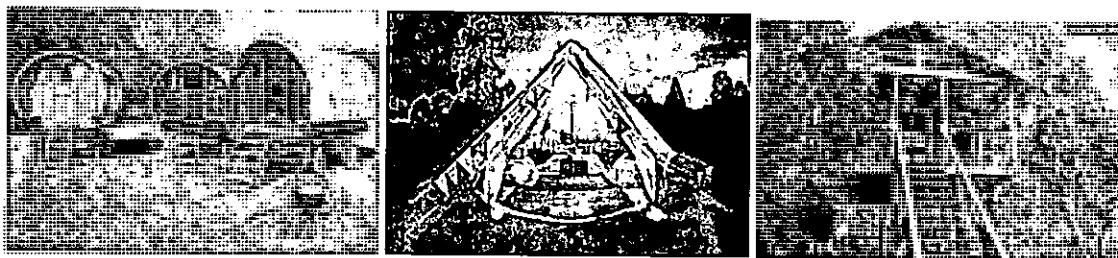
- **Garden Centre and Allotments MU 13**

As part of the self sufficient idea the Ecovillage could incorporate allotments. A possible garden centre could use products from the Ecovillage to create further retail opportunities.



- **Campsite MU14**

A campsite has been incorporated into the Ecovillage as part of the overall concept which could bring tourism into the centre. It offers another type of accommodation which will be integrated with the surrounding woodlands, lake, walks etc and a chance to try out life within an Ecovillage, if interested. Alternative camping ideas such as tree houses could set it apart and pull in tourism due to a unique/ niche market.



- **Educational Centre MU15**

An educational centre/ shop is located within the Ecovillage which could serve as an interpretative centre, educating others as to the workings of an Ecovillage.



- **Live/ Work Units MU16**

These units are based within the proposed Ecovillage and could serve as a business incubator for local tradesmen, artists, and entrepreneurs.



- **Employment/ Enterprise Centre (Listed in the VDS) MU17**

The Village Centre could serve as a primary employment centre with retail, service, medical, public, and light industrial jobs. There have been little or no developments creating employment in the village to balance the increase in residential development in the past. There are no zoned or designated lands for industrial/employment use in the village and there is a danger that the village will not develop into a self-sufficient settlement unless employment zones are created. Previous industrial developments such as the food factory and Christmas Tree Farm are no longer functional.



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- **Petrol filling Station/ Car Showroom/ Small Supermarket (Petrol Station listed in the VDS) MU18**

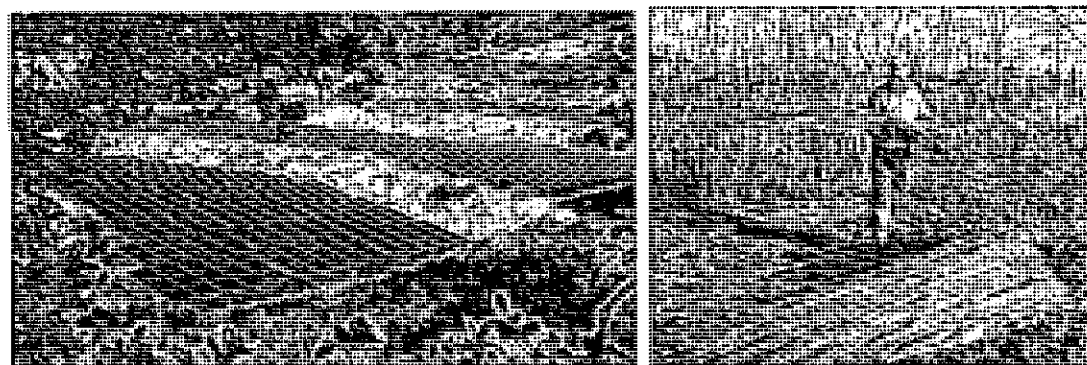
A proposal has been included to provide a petrol station/ small supermarket / car showroom on the site of the school if it ever came up for relocation and it was viable to locate it into the core of the Village Centre. These services would be located on the main route through Glenealy and could pull in passing trade.



- **Solar Farm MU19**

In keeping with the Ecovillage and possible connections to the Ballinagran Project a Solar Farm has been included on the opposite side of the railway lines. Depending on planning laws and viability this farm could possibly power the proposed new Village Centre.

(An alternative or supplementary use could be a Willow Farm. Bioenergy has the potential to make a significant contribution to Ireland's 2020 targets for renewables.)



Building Redevelopment, and Reuse

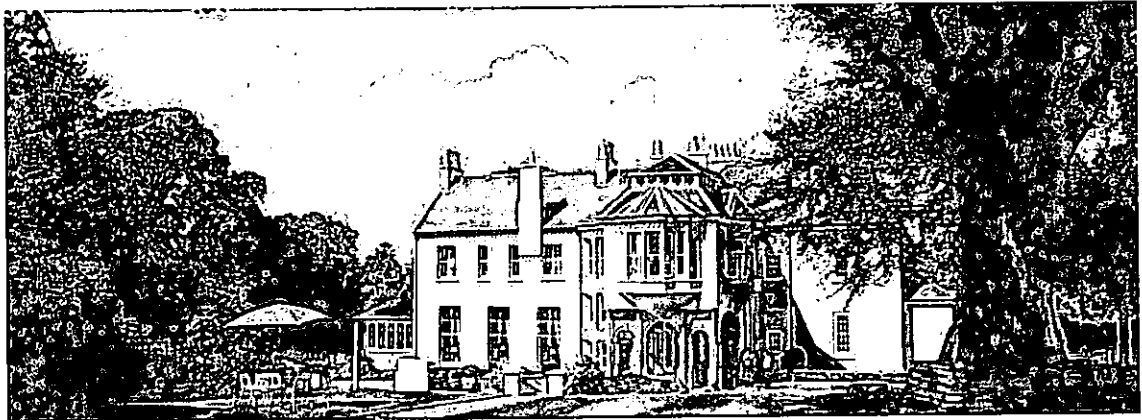
Also central to the concept is the redevelopment of a few of the village's historic buildings. Areas included in this section are marked on the Conceptual Plan as BR. Proposals include the following;

- **Reopening of Glenealy Railway Station (Better public transport facilities are noted in the VDS) BR1**

As mentioned previously, proposals could be put in place for the reopening of the Railway Station which could generate potential tourism, open up Glenealy to commuters as well as benefiting potential job creation and need for housing. Car parking will be included within this part of the scheme and a possible alternative exit route could be facilitated. Commuters proceeding on foot will be in the proposed Village Centre in minutes.

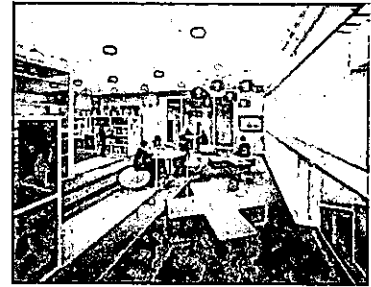
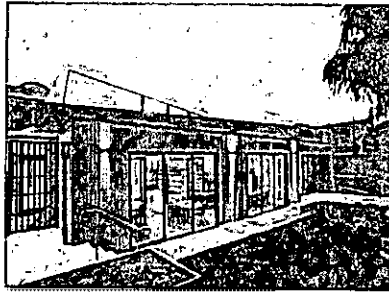
- **Glencarrig Hotel, Ballyfree BR2**

There is evidence that a hotel existed within the subject site in the 1900s. There are no places of accommodation listed for Glenealy on any tourism sites. Glenealy lacks any facility of this sort and the only existing public house has limited opening hours. Proposals include the rebuilding of a modest size hotel on the grounds of the former Glencarrig Hotel site. The hotel will connect to the Village Centre/ Park through landscaped walkways.



- **New Purpose Built School BR3**

There is also the possibility that the existing school could be relocated to the core of the Village Centre should the school come up for redevelopment. This could secure the future of the school in the long term with opportunities for growth or a possible campus incorporating a secondary school, complete with a secure environment, playing fields and parking, which the current school lacks at present.



17

- **Gatelodge BR4**

Turning the existing Gatelodge building at the entrance to the existing woodland area into a coffee shop/ bistro will create a gateway to the new development and create a sense of arrival in this location. Mr Kinsella has already looked into how this could be achieved. Proposals include extending an external seated area in and among the trees and the images below show the concept.



- **Kerry Foods Factory**

It is hoped that the former Kerry Foods factory will be re-opened as a factory, retail or further enterprise venture. We have not developed the factory site as this stage.

- **Rehabilitation of Existing Buildings**

The rehabilitation and reuse of existing buildings is also key to the Village Centre Concept Plan. It is important to include existing uses and services within the plan. The wooded area and village in the park concept purposely extends to what is considered the existing village centre or hub ie the area containing Kane's Pub and the village shop. Some of the existing buildings in this area could be expanded or rehabilitated for existing or new uses. Reconfigured parking, access, cycle paths and landscaping will serve to pull this area into the overall concept plan.

Public Transport Links, Road Network, Parking, Pathways, Trails and Cycle Routes

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To retain emphasis on the concept of the Village in the Park theme and pedestrian-orientated scheme a connector road has been proposed along the rear of the main core of the proposed Village Centre. This will keep vehicular traffic out of the main activity areas but allow for parking adjacent to these areas. Parking will be integrating into the scheme in a sympathetic manner.

This link road has been continued to show how future connections could work, allowing an alternative route into the village from any future development to the east of the proposed Village Centre.

In all cases walkways, pathways and cycle routes will link through and tie all the various areas together. Walkways and trails will also extend to the woodlands and forest walks further afield.

At present many people avail of the cycle routes in the surrounding forests. Users park opposite Kane's Pub. There could be opportunities for a cycle/ repair or hire shop if the village were to capitalise on this asset.

Glenealy could also be marketed as a stopping point along the Wicklow Way

PROGRESSIVE STAGES OF DEVELOPMENT

The overall Conceptual Plan can be broken down into various progression stages of development based on the priorities of the Wicklow County Forward Planning Department and the Glenealy Community. Before any further discussions for a possible Conceptual Masterplan takes place, many planning tools will be required to be adopted to guide new development and Village Centre design standards. Additionally, many of these development stages include public infrastructure improvements and these will need to be identified early in the process.

It is important to reiterate that this report has not taken on board the above aspects in any depth as all areas of the proposed Conceptual Plan are up for debate at this stage.

CONCLUSION

Our Client, Mr Kinsella, is a native of Glenealy and has provided employment in the area for many years. He is interested in developing his lands in a manner that would be most beneficial to the village and its inhabitants. He wishes to facilitate sustainable development that will improve the quality of life for the existing inhabitants and make provisions for the possible future development of the area as a more self-sufficient village.

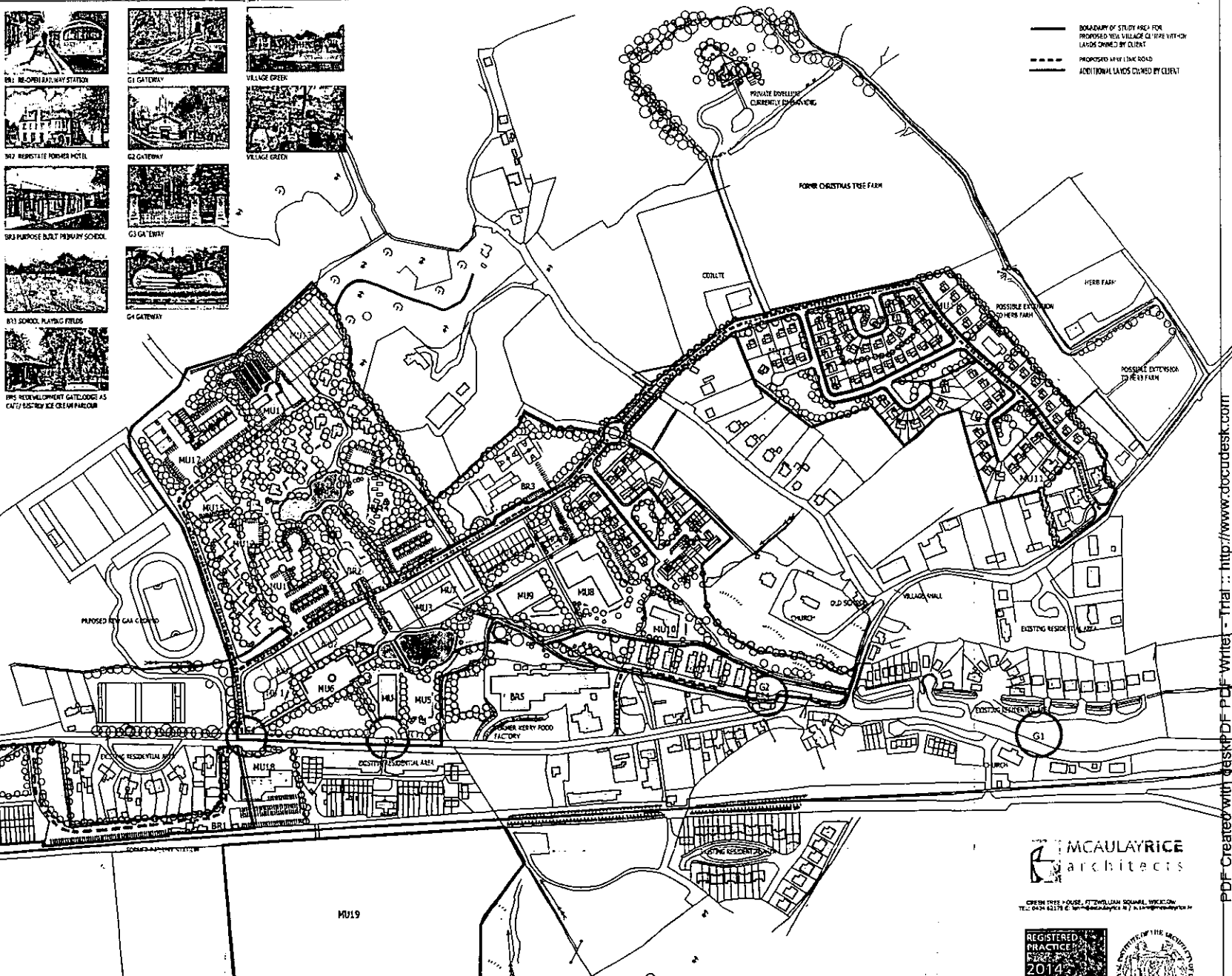
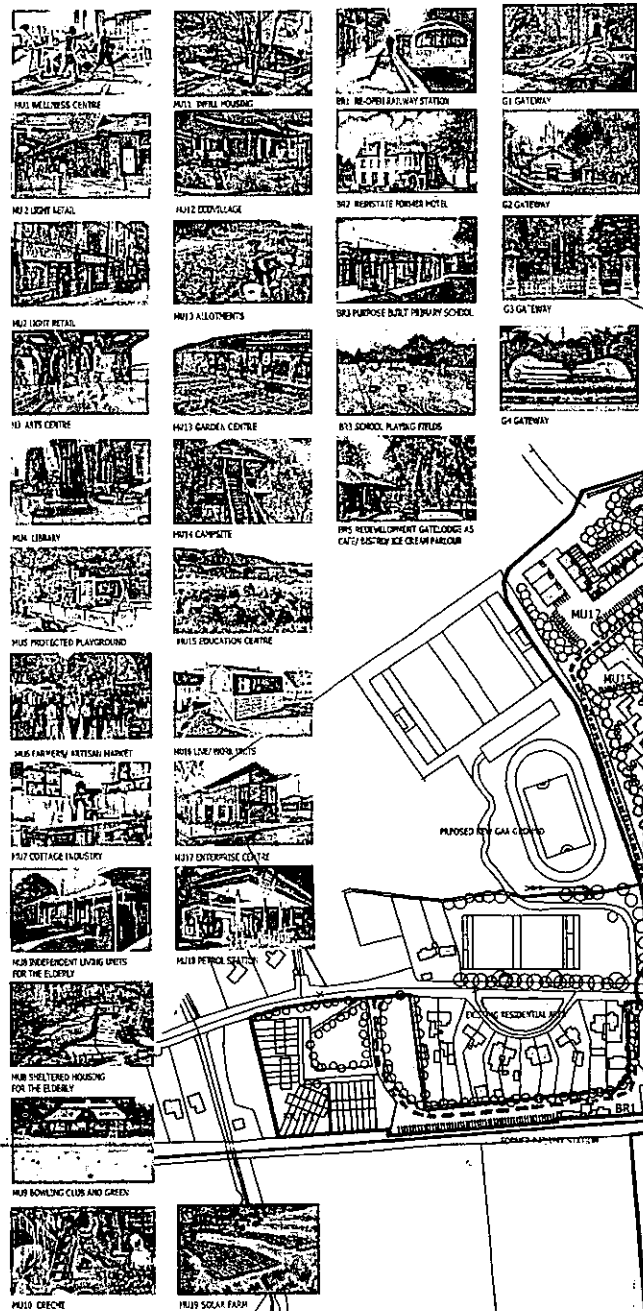
He is in ownership of a substantial section of land in a prime location within the Village, providing the unique opportunity that could allow growth while maintaining the rural setting so characteristic of Glenealy.

Mr Kinsella has invested a great amount of time and energy in producing a Conceptual Plan for his lands and has put much thought into what he thinks might be lacking in the village in terms of housing, employment opportunities and community facilities. He is prepared to supply land for such community facilities, the positioning of which have been proposed within the overall Conceptual Plan for the site. The report has taken on board many aspects of the VDS.

It is important to reiterate that this is a Conceptual Plan produced to investigate the possibility of pulling all the disparate sections of the village together in the form of a masterplan and provide a heart and village centre. It is hoped that this Conceptual Plan will facilitate discussions with the Wicklow Council Forward Planning Department and Wicklow Rural Partnership as well as locals, property owners, business owners, potential developers and other stakeholders to identify aspirations and development that will allow Glenealy to become a growth area in the future.

Mr Kinsella is also prepared to facilitate the reopening of the Glenealy train station and redevelop the lands that would be left vacant should he relocate his existing business to any future Enterprise Centre or the Kerry Foods factory site.

Proposals would be required under certain phases and if the Council deems that certain facilities could, or should, be provided at certain stages then Mr Kinsella would be willing to accommodate such requests, within reason.

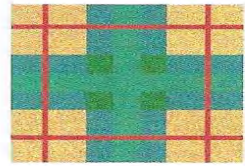


PROPOSED CONCEPTUAL PLAN FOR THE POSSIBLE DEVELOPMENT OF NEW VILLAGE CENTRE FOR GLENEALY

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Date: 22.12.2014

RE: Wicklow Co. Development Plan 2016-2022

Item: Pre-Draft Submission on behalf of Knockree Developments Ltd. in relation to the Core Strategy, Settlement Hierarchy, Population Targets and Housing Land Budgets, with particular reference to the town of Kilcoole.

1.0 INTRODUCTION

1.1 This submission concerns the town of Kilcoole, its position in the settlement hierarchy of Wicklow and appropriate population targets and residential land budgets, to the Plan horizon date of 2028.

1.2 The submission is prepared and lodged on behalf of Knockree Developments Ltd. The Co. Council will be aware that the company owns land in Kilcoole and made submissions seeking re-zoning of the land during the process of preparation of the Greystones-Delgany-Kilcoole Development Plan 2013-2019. Cognisant of the provisions of 11(2)(bc) of the Planning and Development Acts 2000-2014, this submission is confined to matters which it is appropriate to raise at this pre-draft consultation stage of the new County plan-making process. The background to Knockree Developments Ltd.'s interest in the proper planning and sustainable development of Kilcoole is indicated in the interest of transparency.

1.3 The Forward Planning Section of Wicklow Co. Council is to be complimented on the Issues Booklet which it produced to inform this Stage One Public Consultation process. The document is particularly informative, thorough and clearly expressed. It was of great assistance to the undersigned in formulating this submission. We trust that this submission constitutes a response to some of the issues which it raises.

1.4 In summary, our contentions are:

- There is a basis for review of the place of Kilcoole in the settlement hierarchy of Wicklow.

- There is a basis for allocation of a higher target population for Kilcoole for the plan horizon to 2028.
- Whether or not the above contentions are accepted, it is our contention that the housing land budget which should appear in the new Co. Plan, replacing Table 3.3 in the Core Strategy of the current Co. Plan 2010-2016, should indicate a need for additional residentially zoned land in Kilcoole. Table 3.3 of the current Plan erroneously suggests that there is a significant overprovision of zoned land for housing purposes in Kilcoole. The Planning and Development Acts 2000 – 2014 require that core strategies of development plans should demonstrate that sufficient land is zoned to accommodate housing requirements for the Plan period///ref. S.???

1.5 Addressing the above issues, the format of this submission is:

Section 2.0 sets out the relevant provisions of the Regional Planning Guidelines 2010-2016 as they affect the core strategy of the new Wicklow Co. Plan. The impact of the delayed review of these Guidelines is examined.

Section 3.0 sets out how the Core Strategy of the current Development Plan 2010-2016 affects Kilcoole.

Section 4.0 notes how certain aspects of the Greystones-Delgany-Kilcoole Local Area Plan 2013-2019 of themselves suggest alteration of the provisions of the current Co. Plan.

Section 5.0 highlights relevant population trends observable from Census 2011 and CSO population projections based on same. It examines implications for the core strategy of the new Wicklow Co. Plan.

Section 6.0 sets out our proposals as to how the town of Kilcoole should be reflected in the new Co. Plan.

Section 7.0 concludes.

1.6 The Council's stated preparedness to review the Greystones-Delgany-Kilcoole Local Area Plan on foot of the adopted new Co. Plan in 2016 is noted and welcomed (p. 28 of the Issues Paper). We are hopeful that this submission will be favourably considered in the county plan review process and will in turn inform an early review of the Local Area Plan.

2.0 RELEVANT ISSUES IN THE REGIONAL PLANNING GUIDELINES FOR THE GREATER DUBLIN AREA 2010-2016.

2.1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2016 set population targets for the constituent regions of the Greater Dublin Area – the Dublin Region and the Mid-East Region for the years 2016 and 2022. They also set targets for the constituent counties of the Mid-East Region – Wicklow, Kildare and Meath. These are as follows:

Table 1.

	2016	2022
Greater Dublin Area	1,955,500	
Dublin Region	1,361,200	1,464,200
Mid-East Region	594,600	639,700
Wicklow	164,280	176,800
Kildare	234,422	
Meath	195,898	

2.2 The Regional Planning Guidelines determine that min. 42% of the growth in Wicklow Co. population to 2016 should be allocated to the Metropolitan Area i.e. the towns of Bray and Greystones. The balance should be allocated to the Hinterland Area, concentrated in large growth towns and towns and multi-modal transport corridors.

2.3 The Regional Planning Guidelines set a generic settlement hierarchy, wherein

- Large Growth Towns I are to contain up to 50,000 population,
- Large Growth Towns II 15,000-30,000 population.
- The next level is Moderate Growth Towns, for which no population size is set.
- Small Growth Towns are envisaged as in the range of 1,500-5,000 population.

2.4 The future growth of towns is dependent on availability or provision of adequate infrastructure. Where infrastructure cannot be completed, the planning authority should encourage growth in other towns within the upper range of the hierarchy, to ensure that full provision is made for housing.

2.5 The Regional Planning Guidelines determine the settlement hierarchy for the larger towns in County Wicklow. The design of the settlement hierarchy at the smaller end of the scale is seen as the remit of the Co. Council. The allocation of population to the settlement hierarchy is considered the remit of the planning authority, within the broad structure set by the Regional Guidelines. These arrangements are reflected in the Wicklow Co. Plan 2010-2016 (see below).

2.6 With the passing into law of the Government Reform Act 2014, the 8 regional authorities (including the Regional Authority for the Greater Dublin Area) are dissolved. Co. Wicklow is subsumed in the new Eastern-Midland Regional Assembly. The new Regional Assembly will prepare a new economic and spatial strategy after its establishment in January 2015.

2.7 The Regional Planning Guidelines 2010-2016 are due for review. The current Guidelines will remain in effect until the new regional strategy referred to above is produced. The core strategy of the new Wicklow Co. Development Plan 2016 – 2022 must be “consistent as far as practicable”¹, with regional guidelines. Wicklow Co. Council’s Issues Paper acknowledges that the core strategy of the Development Plan may need to be reviewed late into the Development Plan process, or

¹ S.10(1A) of the Planning and Development Act 2000-2014

subsequent to the adoption of the Plan, to take account of any changes indicated by the new regional economic and spatial strategy.

3.0 WICKLOW CO. DEVELOPMENT PLAN 2010-2016 – CORE STRATEGY IMPLICATIONS FOR KILCOOLE

3.1 Table 3.2 of the Wicklow Co. Development Plan adopts the population targets for the county set in the Regional Planning Guidelines for the Greater Dublin Area 2010-2016 (see Table 1 above).

3.2 Table 3.1 sets out the settlement hierarchy for the county and allocates population to it in accordance with the principles set out in the Regional Planning Guidelines. Selected entries are as follows:

Table 2: Selected extracts from Table 3.1 of the Wicklow Co. Development Plan 2010-2016, with additional data.

				2006 ² Pop.	2011 ³ pop.	2022 Pop. target ⁴	Target Pop. Inc. 06-22	Surplus/ deficit Zoned land ⁵
Bray	Metropolitan	Consolidation Town	1		31,872	45,000		
Wicklow/ Rathnew	Hinterland	Large Growth 1	2		13,320	24,000		
Arklow	Hinterland	Large Growth 11	3		13,009	23,000		
Greystones/ Delgany	Metropolitan	Large Growth 11	3		17,468	24,000		
Blessington	Hinterland	Moderate Growth	4		5,010	7,500		
Newtown mountkennedy	Hinterland	Moderate Growth	4		2,410	7,500		
Kilcoole		Small Growth	5	3,252	4049	5,000	53.75%	127%
Enniskerry				1,881		3,000	59.49%	
Baltinglass		Small Growth	5	1,735		3,500	101.73%	
Rathdrum		Small Growth	5	1,528	1586	5,000	227.23%	
Ashford		Small Growth	5	1,494		3,000	100.80%	
Tinahealy		Small Growth	5	965		1,550	60.62%	
Aughrim		Small Growth	5	960		2,000	108.33%	
Newcastle		Small Growth	5	938		1,750	86.75%	

² Census 2006

³ Census 2011

⁴ Table 3.3 Wicklow Co. Development Plan 2010-2016

⁵ Table 3.3 Wicklow Co. Development Plan 2010-2016

4.0 THE GREYSTONES-DELGANY-KILCOOLE LOCAL AREA PLAN 2013-2019.

4.1 In July 2012, Wicklow Co. Council decided to include Kilcoole in its Greystones-Delgany-Kilcoole Local Area Plan 2013-2019. In respect of Kilcoole the new Local Area Plan replaced the 2008 – 2014 Kilcoole Local Area Plan. The town's local area plan review date was thus brought forward.

The 2013-2019 Local Area Plan states that it is a

“Strategy for the exclusive growth of each settlement, whilst giving due recognition to the reality of strong links between settlements and relatively large degree of cross-sharing of certain services and facilities and infrastructure...including community, recreational, retail, transport and water services. A single strategy will contribute to the success of the area as a cohesive whole.”

4.2 Section 2.1 of the Local Area Plan sees its Vision as to

“build on the dynamism between the settlements of Greystones, Delgany and Kilcoole, so that the area develops in a mutually dependent and complementary manner, as a prosperous and growing community.”

“The combined area shall maximise potential opportunities associated with strategic location on the edge of the Dublin Metropolitan Area”.

4.3 Section 2.2 states in relation to Kilcoole *“The identity of Kilcoole as a separate, stand-alone entity in the wider area is reinforced by the protection of its distinct character and encouraging growth as a small, locally important commuter town.”* CHECK QUOTE It is envisaged as accommodating moderate housing growth.

4.4 In preparing the Greystones-Delgany-Kilcoole Local Area Plan 2013-2019, the Co. Council was obliged to ensure that it was consistent with the objectives of the development plan, its core strategy and any regional planning guidelines applying to the relevant area. The Greystones-Delgany-Kilcoole Local Area Plan adopts the population targets for its constituent settlements as indicated in the Co. Development Plan 2010-2016.

4.5 In preparing the zoned land budget for Kilcoole, the Local Area Plan estimates a need for 775 additional new houses from 2011 (the census year) -2022. It concludes that, as currently zoned lands in the town are estimated to cater for 782 dwellings, sufficient land has been zoned for the Local Area Plan period.

4.6 Note that this is in stark contrast to the conclusion at Table 3.3 of the Co. Plan 2010-2016 that there was an excess of zoned land in Kilcoole of 127% (see Table 2 above).

At the pre-draft consultation phase of the Greystones-Delgany-Kilcoole Local Area Plan, the undersigned made a submission to Wicklow Co. Council which demonstrated that the methodology used in the Co. Plan to estimate the adequacy of zoned land in Kilcoole to accommodate target population in 2022 was erroneous. Our submission estimated the need by what we considered to be the correct methodology. We found that there was, in fact, a need for additional residentially zoned lands in Kilcoole.

The Draft Local Area Plan, and ultimately the adopted Local Area Plan, used a methodology similar to ours, but concluded, as mentioned above, that there is sufficient residentially zoned land in Kilcoole to cater for requirements.

At the least, it can therefore be concluded that the statement in the current Co. Plan, that there is a significant overprovision of residentially zoned land in Kilcoole, is erroneous and requires review.

At 6.0 below we will show that the new Co. Plan, where is presents the residential land budget for Kilcoole, should indicate a need for additional residentially zoned land. It should indicate that the new Greystones-Delgany-Kilcoole Local Area Plan to be prepared on foot of the new Co. Development Plan, will put into effect the additional zonings required.

5.0 RECENT POPULATION TRENDS AND PROJECTIONS

5.1 In our submission to Wicklow Co. Council on the Greystones-Delgany-Kilcoole Draft Plan 2013-2019, we presented a table similar to the following:

Table 3: 2011 Population growth compared to 2016 RPG target growth, Greater Dublin Area.

	2006	%change	2011	% change	2016 (target) ⁶	% change 06-16
Dublin	1187176	7.0%	1270603	7.1%	1361200	14.7%
Mid-East	475360	11.6%	530437	12.1%	594600	25.0%
GDA	1662536	8.3%	1801040	8.6%	1955800	17.6%
Meath	162831	13.0%	184034	6.4%	195898	20.3%
Kildare	185335	12.7%	209955	11.7%	234422	25.8%
Wicklow	126194	8.3%	136648	20.2%	164280	30.0%
Kilcoole	3252	24.5%	4049	11.1%	4500	38.4%
State	4239848	8.0%	4581269			

⁶ As set out in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, and in the case of Kilcoole, in the Wicklow Co. Development Plan 2010-2016.

The table sets out percentage growth for the 5 year period 2006-2011 in regions and counties in the Greater Dublin Area and in Kilcoole. The figure is based on actual census data for 2006 and 2011. It compares that growth with the target for the following 5 year period to 2016.

Growth in the Mid-East Region (Cos. Kildare, Meath and Wicklow) is exactly in line with target (11.6% growth recorded with 12.1% to go to reach target in 2016). Co. Wicklow is underperforming (8.3% growth achieved, with 20.2% required to make its target). Kilcoole is "over-performing" relative to target, with 24.5% growth 2006 to 2011 to reach a population figure of 4049, and a mere 11.1% to go to make its target of 4500 by 2016. The 2016 target is inclusive of 12% headroom. Kilcoole is well on its way to achieving the 2016 target population, inclusive of 12% headroom.

5.2 The CSO has issued population projections for the country's former 8 regions to 2031. They were produced in 2013. They suggest growth in the Mid-East Region of between +78,000 -+144,000 persons, depending on migration and fertility scenarios. Taking the stronger growth scenario of +144,000, this is on a 2011 base of 530,436, and projected population growth is at an average rate of 1.3% per annum.

The Regional Planning Guidelines target for the Region is +109,000 over the period 2011-2022, or a projected population growth rate of 1.9% per annum. Do the CSO population projections indicate Regional Planning Guidelines targets were overly ambitious, such that they should be reviewed? Should Wicklow Co. Council review the regional targets in the new Co. Wicklow Plan 2016-2022?

We suggest that there are difficulties in using the CSO projections to assess the RPG targets and to inform new targets for Co. Wicklow without deeper analysis .

- The CSO projections are for a significantly longer period – does the projection assume even growth over the period?
- The range of scenarios and resulting population projections examined by the CSO is wide. It was not the function of the CSO to recommend which scenario should be used for spatial planning purposes.
- The CSO population projections are at regional level and not broken down for constituent counties. Given Wicklow's slower growth than the other constituent counties to date, how should regional growth be allocated to the counties?
- The CSO figures are population projections, not plan targets.

6.0 REVIEW AND COMMENTARY

6.1 As mentioned above, this office's pre-draft submission on Greystones-Delgany-Kilcoole Local Area Plan 2013-2019 calculated the need for additional residentially zoned land to accommodate growth of the town, using a methodology which was ultimately reflected in the Draft and Adopted Local Area Plan. The Local Area Plan concluded that sufficient land was zoned. Our submission concluded that there remained a shortfall in residentially zoned land in Kilcoole.

The principal reason for the differing conclusions was that the LAP zoned just sufficient land to accommodate the target number of 775 additional houses 2011 – 2022. We contended that no allowance had been made for "market factor" viz., *"the amount of extra land that should be zoned over and above the minimum amount needed to accommodate population targets... to allow for the*

*element of zoned land that may not be released to the market for housing purposes during the plan period.”*⁷ The allowance for market factor is normally between 30% and 50%.

We further noted that the Local Area Plan assumed a 5.6% background vacancy rate in its calculations of housing need, based the actual vacancy rate in the Census 2011. However, the Regional Planning Guidelines recommend assumption of a standardised 6.5% vacancy rate, reflecting the need for the market to operate efficiently and to reflect normal turnover of housing stock.

Finally we noted that small miscalculations in the capacity of lands to accommodate housing development were made in the LAP. 2.4 ha. designated for development at 22 units per ha. were estimated to have a capacity of 74 units, whereas capacity is 53 units. 0.34 ha. zoned at 22 units per ha. are estimated to have a capacity of 31 units whereas the figure should be 7, no. Total overestimate of capacity of zoned lands was 47 units.

We summarised our conclusions in a table similar to that below:

Table 4: Review Of Need For Residentially Zoned Land In Kilcoole.

	ABA estimate	GDK LAP 2013-2019
Target population Kilcoole 2022	5000 + population	5000 population
Households at occupancy rate 2.42 per unit	2062 households	2062 households
Target no. dwellings incl. vacancy	2196 (@ 6.5 %vacancy)	2177 (@ 5.6 % vacancy)
Existing dwellings (2011 Census)	1402 dwellings	1402
New dwellings to be accommodated	794	775
Zoned land capacity required,	1032 (assuming 30% over-zoning)	775 (no over-zoning allowance)
Current cap. zoned lands	737	782
Additional res. zoned lands required GDK LAP 2013-2019	295 units	0
Additional zoned lands required at 22 / ha.	13 ha.	0

⁷ Kilcoole Local Area Plan 2008:Background Papers

In essence, we demonstrated that, with the vacancy rate recommended by the Regional Guidelines and appropriate additional zoning to allow for market factor, there was a need for additional residentially zoned land in Kilcoole.

The Manager, in his report on our submission on the Draft LAP, noted that the plan period was to 2019 and the Council had calculated that there was sufficient zoned land to cater for the target housing provision to 2022. Therefore there was a market factor of 50% built into the Plan.

The land budget for Kilcoole in the new Co. Development Plan will be for the period 2016-2022. The target population will be set for 2028, and the residentially zoned land budget will have to look at a horizon to 2025. On this basis, there is a need to zone further land for development in Kilcoole and for same to be reflected in the new Co. Plan. It should be reflected in a new Local Area Plan after the adoption of the new Co. Plan.

6.2 Under the heading “Core Strategy” the Co. Council Issues Paper advises (p.7) that population targets for the county must adhere to the Regional Planning Guidelines 2010-2016 until the new Guidelines are in place. However, it notes that

- the Development Plan will have to set targets for a horizon to 2028, where the current Regional Guidelines only span to 2022 and
- the Guidelines are based on Census 2006, whereas the Plan review has the benefit of Census 2011 results.

“In this context, the Plan team will endeavour to develop realistic targets for the county and various towns, having regard to the current Regional Planning Guidelines and more recent population change patterns and any other current population projections of the Central Statistics Office. Cognisance will be taken of the relatively modest growth experienced in Wicklow in the “boom” years (compared to other counties in the region) and the fact that major new infrastructure has been completed in the county in the last 6 years, which means that many areas in the county are prime for new development.”

Table 3 at par. 5.0 above illustrates that growth in Wicklow has not met with target. It is difficult to set new target figures in the absence of a revised National Spatial Strategy and Regional Economic and Spatial Strategy, which will review CSO regional projections, select appropriate scenario(s) and will complete the task of translating these into county targets.

Given that Co. Wicklow has experienced retarded growth compared to regional constituent counties and has overcome infrastructural bars to development, it would appear reasonable for the new Plan to pursue the historic targets.

6.3 The target population for Kilcoole to 2022, of 5,000 population, was set by Wicklow Co. Council. This was on the basis that Kilcoole was designated by the Co. Council as a small growth town and the Regional Guidelines indicate that small growth towns should be within the limits 1,500 – 5,000 population. Thus, in the case of Kilcoole, the 2022 target population can, in fact, also be regarded as a limit, which does not reference the size of the town or its propensity to grow.

We suggest that this target can and should now be reviewed, for the following reasons:

- Since the making of the 2010-2016 Co. Development Plan, Kilcoole has been subsumed into the Greystones-Delgany-Kilcoole linked settlement. P. 28 of the Issues Paper, under the heading “*Local Plans*,” advises that, after the adoption of the Co. Plan, new LAP’s will be prepared for
 - o Bray Town and Environs
 - o Arklow Town and Environs
 - o Wicklow/Rathnew and environs
 - o Greystones-Delgany-Kilcoole
 - o Blessington
 - o Newtown

It advises that “*These are all towns in Levels 1-4 of the settlement hierarchy*”. They are designated growth towns.

We suggest that there is no longer any need to constrain Kilcoole’s target population to the 5000 limit set for Level 5 Small Growth Towns.

- Greystones-Delgany-Kilcoole, as noted in the Council’s Issues Paper, is on the southern edge of the Metropolitan Area of the Greater Dublin Area. Therefore allocation of population growth to the settlement is in accordance with the principles of the Regional Planning Guidelines.
- Table 2 above shows that Kilcoole (2011 Census) is larger than Newtownmountkennedy, which is a Level 4 Moderate Growth Town in the current hierarchy, with a target population of 7,500 in 2022. Kilcoole’s confinement to Level 5 in the Co. settlement hierarchy is not tenable.
- Kilcoole is by far the largest of the Level 5 towns in the existing hierarchy. It is almost double the size of the next largest town, Enniskerry. Yet is allocated the lowest population growth.
- Table 3 above shows that, while Wicklow Co. has failed to reach target population growth to 2016, Kilcoole’s population has grown strongly and has almost reached 2016 target population levels. The town has propensity to reach an upward revision of its 2022 target growth.

7.0 CONCLUSION

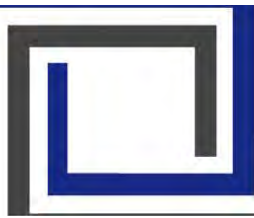
Based on the analysis presented above, we suggest that the Draft Co. Development Plan should

- Reflect the fact that Kilcoole is part of the Level 3 settlement of Greystones-Delgany-Kilcoole.
- Eliminate references to the town as a stand-alone, small growth town.
- Increase the target population of the settlement, reflecting its current size and propensity to grow and accommodate a reasonable portion of population growth of the county as a whole.
- Acknowledge that there is a shortage of zoned land to meet with existing target growth levels and additional lands will need to be zoned to accommodate revised target growth levels.
- State the intention to provide for the required additional zonings in an immediate review of the Greystones-Delgany-Kilcoole Local Area Plan.

SIGNED

A handwritten signature in black ink, appearing to read 'Auveen Byrne'. The signature is written in a cursive style with a large, stylized 'A' and 'B'.

AUVEEN BYRNE, B.A., DIP.T.P., M.I.P.I.



**REVIEW OF THE WICKLOW COUNTY COUNCIL DEVELOPMENT PLAN 2010-2016 AND
PREPARATION OF A NEW COUNTY DEVELOPMENT PLAN 2016-2022**

Administrative Officer
Wicklow County Council
Station Road
Wicklow Town

Tuesday, 23rd December 2014

[By Email: planreview@wicklowcoco.ie]

Dear Sir/Madam,

RE: SUBMISSION TO REVIEW OF WICKLOW COUNTY DEVELOPMENT PLAN BY LIDL IRELAND GMBH

Introduction & Summary

The Planning Partnership have been retained by Lidl Ireland GmbH, Great Connell Road, Newbridge, Co. Kildare to prepare a submission in relation to the review of the existing Wicklow County Development Plan.

This submission is made in the context of emphasising the importance of retailing and the need for appropriate policies and objectives regarding same in the impending Draft Plan, and does not relate to any specific land holding.

Accordingly, this submission focuses on retail policies and objectives and highlights issues arising from experience to date with the existing Development Plan and proposes modifications to same, specifically in relation to Discount Foodstores and retail policy affecting their potential development throughout the county.

In summary we consider that Discount Foodstore development is somewhat restricted by various policies / objectives of the Development Plan and furthermore the Development Plan is not fully contemporary in its consideration of Discount Foodstores having regard to the more recent *Retail Planning Guidelines, 2012*.

We also consider that the existing retail hierarchy should be refined somewhat in terms of allowing greater scope for development in the different level centres, e.g. we consider that Level 4 centres could accommodate a greater scale of development than currently provided for.

We have also reviewed the existing *Retail Strategy* and refer to same below where relevant however we highlight that on publication of the *Draft County Development Plan*, which we assume will incorporate a new draft *Retail Strategy*, more detailed comments would be provided.

We also consider that Development Plan policy should also streamline the process of application for smaller scale supermarkets / Discount Foodstores, e.g. by specifying a threshold under which detailed Retail Impact / Sequential Assessment's would not be required.

Retail Hierarchy

We note under Section 10.3 of the Development Plan that various centres are identified as being level 2, 3, 4, 5, etc. within the hierarchy. For the avoidance of doubt we do not suggest the re-designation of any centres listed in Table 10.2 rather consider that the scope of retail allowable in Level 3 and 4 centres should be expanded / elaborated on somewhat.

In relation to Level 3 centres (e.g. Greystones, Blessington, etc.) the Development Plan states: "*At least one supermarket and smaller scale department store are required to meet local needs*", however these centres are described as ranging in size from 10-25,000sqm of lettable retail space catering for a population of 10,000- 40,000.

Accordingly, we submit that the Development Plan should highlight that a number of, if not several, supermarkets are required to meet local needs, as the current reference to a single supermarket could inadvertently restrict the appropriate provision of convenience floorspace.

With regard to Level 4 centres (Neighbourhood Centres & Small Towns) we note that the Development Plan refers to provision of only a 'medium sized convenience shopping outlet (generally 500 sqm)'. We submit that Neighbourhood Centres throughout the country and Greater Dublin region in particular, often have a medium sized supermarket.

We consider that suggesting the scale to be 500 sqm is inappropriate, and for instance note the definition in the *Retail Planning Guidelines, 2012* for a "Local Centre or Neighbourhood Centre" as containing "*a small supermarket/general grocery store*". A supermarket is defined in the guidelines as a "*single level, self service store selling mainly food, with a net retail floorspace of less than 2,500 sqm*". We consider that a small supermarket would be in the mid range of same, e.g. approx. 1,250 sqm.

We submit that the Development Plan should refer to Level 4 centres as having a small supermarket rather than a medium sized convenience shopping outlet and no floor area should be specified. We also note that Table 10.3 of the Development Plan highlights that Supermarkets are acceptable in Level 4 centres, hence the current Development Plan could be considered to be conflicting in its policies.

Finally, we note in relation to Level 4 policy, specific to 'small towns', the following: "*the retail provision in small towns would be expected to be more extensive, including one supermarket / two medium sized convenience stores (up to 1,000sqm aggregate) and perhaps 10-20 smaller shops and would not generally be considered suitable for Discount Foodstores*"

We submit that the restriction / discrimination of Discount Foodstores in the above extract is entirely inappropriate and should be removed accordingly. As noted below, the *Retail Planning Guidelines, 2012*, no longer separately distinguishes Discount Foodstores, rather they fall within the 'large convenience goods stores' / supermarket categories.

Finally, we submit that all references to floor area thresholds, should explicitly state that the area refers to the net retail sales area, to avoid inappropriate reference to gross floor area. The key floor area for consideration in retail planning terms is net retail sales area.

Convenience Leakage

We note Section 10.3.3 refers to County Wicklow retaining approx. 82% of convenience spend, higher than the GDA average of 71%. We submit that 18% leakage is nonetheless considerable and the Development Plan and Retail Strategy should encourage the reduction of same to below 10% and to encourage convenience floor space expansion at all levels of the hierarchy accordingly.

Allocation of Floorspace Capacity

In the first instance, we welcome the confirmation in the Development Plan that assessments of additional floorspace need are not treated as caps or limits on the provision of additional floorspace.

We also note however that 'extant' permissions appear to be given a significant position in terms of the allocation calculations reserving all extant floorspace on the assumption it would be implemented.

We respectfully submit that the Development Plan / Retail Strategy, whilst appropriately making some provision for extant permissions, should not assume that all such permissions would be implemented as in many cases such permissions would not necessarily be constructed. We note the comments in relation to Bray, for instance:

"The GDA Retail Strategy estimates that Bray has a convenience goods floor space requirement of c. 3,500sqm and the County Strategy allows for growth in the range 5,000-7,500sqm. Since the survey date, approximately 15,000sqm of convenience floor space has been granted or constructed (assuming up to 8,000sqm (25%) of the permitted Pizarro development is devoted to convenience use). Assuming all permitted developments proceed, there will be no further need for significant convenience retail expansion in Bray up to 2016 and it would in fact appear that significant over provision has already been allowed."

We submit that otherwise acceptable development proposals should not be prevented by reason of their being 'extant' permissions in place, which could effectively 'block' development and would be analogous to land 'hoarding'. Whilst we note that the Planning Authority appears to have adopted a reasonable / practical approach to this issue, we submit that the Development Plan / Retail Strategy should be more explicit in terms of not unduly protecting 'extant' permissions.

Sequential Approach

We confirm that we are supportive of the sequential approach however we consider that in the case of developments appropriate for local / neighbourhood centres, the sequential approach can sometimes undermine same. For instance, by only referring to the 'town centre', neighbourhood centres can be undermined to a degree. We consider a relatively minor alteration to policy RT5 would address same as follows (~~proposed removal~~ | proposed addition):

RT5 The 'sequential approach' to the location of new retail development will be applied i.e. having assessed the size, availability, accessibility, and feasibility of developing both new sites and existing premises, firstly within an appropriate retail centre (e.g. town/district/neighbourhood/local, etc. depending on the scale / catchment of the development) and secondly on the edge of a ~~town~~ retail centre, alternative out of centre sites should be considered only where it can be demonstrated that there are no ~~town~~ retail centre or edge of centre sites which are suitable, viable and available.

Large Foodstores

We note Section 10.4.4 of the Development Plan discusses 'large foodstores'.

As per the *Retail Planning Guidelines, 2012*, Discount Foodstores are now included within the 'large convenience goods stores' category, therefore we consider there should be explicit reference to Discount Foodstores in this section of the Development Plan.

As with the sequential issue discussed above, we consider a minor change to policy LF1 would also be appropriate, as follows (~~proposed removal~~ | proposed addition):

LF1 Large foodstores shall be required to be located on suitably zoned lands in appropriate retail town centres or on the edge of the centre where public transport provision can be made available for shoppers.

Neighbourhood Centre

With regard to the policy on Neighbourhood Centres in Section 10.4.5 / Policy NC1, we consider that same is quite restrictive, which issues are also discussed above in relation to the retail hierarchy. We also note however that Table 10.3 of the Development Plan highlights that Supermarkets are acceptable in Level 4 centres which include Neighbourhood Centres.

Following the above, and the issues discussed in relation to the retail hierarchy, we propose the following alterations to NC1 (~~proposed removal~~ | proposed addition):

NC1 *New / expanded neighbourhood centres shall generally only be considered in areas of ~~significant~~ residential development / expansion on the edges of settlements in Levels 2 and 3 of the retail hierarchy. At such locations, the applicant will be required to show that:*

- *the scale of the existing/new residential development is such to sustain a neighbourhood centre;*
- *the retail development is located and sized to meet the needs of the ~~existing/new development~~ catchment area without impacting on the viability of the existing town centre (total retail floorspace in excess of 500sqm shall not generally be considered outside of the growth centres of Bray, Greystones, Wicklow and Arklow);*
- *the location of the development is sufficiently separated from the core retail area of the settlement as to warrant new retail facilities;*
- *the range of retail and non-retail services to be provided is appropriate to the needs of the area;*
- *all efforts have been made to integrate the neighbourhood centre with any existing / new community facilities due to be provided as part of the scheme e.g. schools, childcare facilities, sports fields etc.*

Discount Foodstores

We note Section 10.4.11 of the Development Plan discusses 'Discount Foodstores'.

As per the *Retail Planning Guidelines, 2012*, Discount Foodstores are now included within the 'large convenience goods stores' category, therefore we consider there should be explicit reference to Discount Foodstores in this section of the Development Plan.

Accordingly, we consider replacement of this Section would be necessary, as follows:

"10.4.11 Discount Foodstores

Discount Foodstore are an important, and growing component of the convenience retail market, and constitute a 'Supermarket' (as defined by the Retail Planning Guidelines, 2012) normally with a net retail sales area not exceeding (but not limited to) 1,500 sqm, selling a limited range of goods at competitive prices, with easily accessible car parking.

DF1 *Discount foodstores shall be required to locate on suitably zoned lands and shall only be considered in settlements in Levels 2, 3 and 4 in the County retail hierarchy. Where no such zoned lands are provided and a need can be shown for this form of retailing, the applicant must show through the application of the sequential approach that the site selected is suitable and optimal. To prevent any adverse impact on town centres, the proportion of comparison goods floorspace shall be limited to a maximum of 20% of retail floor area."*

We respectfully submit that the above replacement text is far more reflective of the role of Discount Foodstores, and their national classification in the *Retail Planning Guidelines*. Finally we submit that restricting Discount Foodstores from Level 4 centres (where Supermarkets are permissible) is entirely inappropriate.

Streamline Retail Impact Assessment Process

We note that the existing Development Plan provides a number of policies etc. regarding thresholds for retail impact assessment requirement, which we consider is beneficial to appropriately streamlining the planning process.

We consider a small number of relatively minor adjustments could be made to further streamline the process as follows, and as discussed below.

Regarding policies TR6 and TR7 we propose the following (~~proposed removal~~ | proposed addition):

TR6 *Where new retail development is considered 'large scale' (i.e. as per the thresholds in Section 10.5 of the Development Plan) in relation to the existing town centre, the onus is on the applicant to demonstrate compliance with the development plan and that there will not be a material adverse impact on the vitality and viability of any existing town centre. In submitting evidence in relation to retail impact the applicant shall address the following criteria and demonstrate whether or not the proposal would:*

- *support the overall strategy for town centres as set out in the development plan and not materially diminish the prospect of attracting private sector investment into one or more town centres;*

- cause an adverse impact on one or more town centres, either singly or cumulatively with recent developments or other outstanding planning permissions, sufficient to undermine the quality of the centre or its role in the economic and social life of the community;
- diminish the range of activities and services that a town centre can support;
- cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;
- ensure a high standard of access both by public transport, foot and private car so that the proposal is easily accessible by all sections of society;
- link effectively with an existing town centre so that there is likely to be commercial synergy.

TR7 *Where an application for new retail development is made within the defined core retail area of a major town or County town centre, or suitably zoned in a neighbourhood or small town centre, it will not always be necessary to demonstrate the quantitative need for retail proposals in assessing such proposed developments. In setting out the retail impact of the development the report should focus on how the scheme will add/detract from the quality of the town centre - both in relation to improving retail, urban design, integration with the built fabric and quality of life in the town/centre.*

Section 10.5 refers to a requirement for a Retail Impact Assessment over certain thresholds. Whilst we generally concur with same we request the following amendments:

1. That all references to floor area thresholds be 'net retail sales area' to avoid potential confusion with gross floor areas; and,
2. In respect of Level 4 centres as discussed above, we submit that small/medium scale supermarkets should be facilitated, hence to revise the current threshold of 1,000 sqm to 1,500 sqm net retail sales area.

In relation to Section 10.5.1, referring to a less detailed assessment, in respect of convenience floor area, we submit that the 'secondary' thresholds should be:

Level 2:	2,500 sqm net retail sales area
Level 3:	1,500 sqm net retail sales area
Level 4:	1,000 sqm net retail sales area

We consider the above proposals are in line with the *Retail Planning Guidelines, 2012* which states *inter alia*:

"Where the location of a proposed retail development submitted on a planning application has demonstrated to the satisfaction of the planning authority that it complies with the policies and objectives of a development plan and/or relevant retail strategy to support city and town centre, additional supporting background studies such as a demonstration of compliance with the sequential approach, below, or additional retail impact studies are not required."

Conclusion

We trust the above proposals will receive due consideration in the formulation of the Draft County Development Plan that may emerge and that our client looks forward to providing further input into same when published.

In particular we await the publication of any new/updated Retail Strategy, and have reserved detailed comments on same until a draft is available as much of the quantitative data in the existing strategy will have been superseded.

Finally, we submit that the emerging County Development Plan should strongly encourage appropriate retail development in the County including the expansion of the Discount Foodstore sector, particularly in the interests of economic development and employment generation.

For instance the *Retail Planning Guidelines* highlights the importance of the retail sector in employment terms where the combined retail and wholesale sector in 2010 was estimated by the Central Statistics Office at almost 270,000 people or about 14.7% of people employed in the State.

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

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Fintan Morrin', is written over a light blue horizontal line.

Fintan Morrin
Associate
The Planning Partnership

65
Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 02 December 2014 13:33
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 2, 2014 - 13:32 Submitted by anonymous user:
[86.44.163.215] Submitted values are:

Name: Sr Miriam
Organisation, Group, Company, etc : Luisne Centre for Spirituality
Address: Darraghville, Kilcoole, Co Wicklow
Email: luisne@centreforspirituality.com

--Topics--

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- : Local_Plans
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- : Other

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

GRID REF: 294085 We request that the trees inside the boundary wall along the road, (Main Street, Kilcoole) cease being categorised as of heritage value.

REASONS:

1. The trees are only 20 years old. They were planted to replace the original trees (which they do 4 or 5 fold). when Wicklow County Council made this a condition to fell the originals when one fell across the main road.

2. The boundary wall is now in danger of collapsing (a 30m section of it) due to pressure from the present trees - those which are in 2m of the wall.

A structural engineer has told us these trees must be felled.

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

<http://www.wicklow.ie/sites/default/files/webform/Submissions%20Sheet%20for%20Wicklow%20Co%20Co.doc>

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):

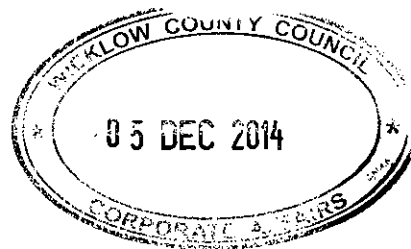
Attachment No.3 TP's (10MB limit on attached files):

The results of this submission may be viewed at:

<http://www.wicklow.ie/node/810/submission/24>

23rd Dec.

Wicklow County Development Plan 2016-2022
Pre-Draft Development Plan
Submission Sheet



Wicklow County Council intends to review the Wicklow County Development Plan 2010-2016 and to prepare a new Wicklow County Development Plan for the period 2016-2022.

Submissions or observations regarding the review of the existing plan and preparation of the new plan are invited between the period **28th October 2014 to 23rd December 2014**.

Submissions are required to be 'strategic' in nature, in that this stage of the process is for the purpose of developing the policies to deliver the overall strategy for the proper planning and sustainable development of the county and for the purpose of developing the 'core strategy' of the plan. Proposals for zoning of particular land for any purpose shall not be considered at this stage and should not be made.

—To assist this stage of the process, an 'Issues' document has been prepared, to identify the kind of planning issues that the next CDP could address. This is available on www.wicklow.ie.

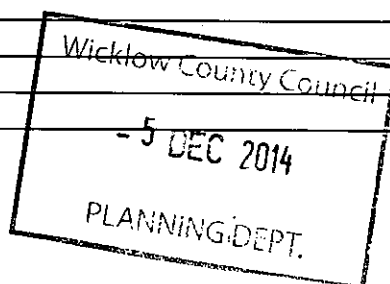
Name/ Organisation: Luisne Centre for Spirituality
Date: 19/11/14 Darraghvale, Kilcock, Co. Wicklow.

Submission: GRID REF: 294085

We request that the trees inside the boundary wall along the road (Main Street, Kilcock) cease being categorised as of heritage value.

REASONS:

1. The trees are only 20 years old. They were planted to replace (which they do four or five fold!) the original trees when the Wicklow Co Council made this a condition to fell the originals when one fell across the main road.
2. The boundary wall is now in danger of collapsing (a 30m section of it) due to pressure from the present trees - those which are within 2m of the wall. A structural engineer has told us these trees must be felled.



66

Sorcha Walsh

From: Wicklow County Council [michael@indytech.ie]
Sent: 21 December 2014 22:53
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submisson - Wicklow County Development Plan 2016-2022

Submitted on Sunday, December 21, 2014 - 22:52 Submitted by anonymous user: [176.61.74.53]
Submitted values are:

Name: Ian McGahon /
Organisation, Group, Company, etc :
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Email:

--Topics--

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-: Social_Community_and_Cultural_Development
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-: Other

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

I am calling on Wicklow County Council to plan for some 'Changing Places' toilets in the Wicklow County Development Plan. These toilets allow for a carer or family of an adult with profound or severe disabilities to attend to their toileting needs with dignity and comfort. They include a height-adjustable changing bench and a hoist for lifting a person from a wheelchair to the bench.

Today, day to day activities like shopping or going to a football match are not realistic for people with severe disabilities, because of the lack of proper toileting facilities. Some families will result to changing an adult on the floor of an existing accessible bathroom, using a shower curtain for protection. This is undignified, unsafe for the carer and unhygienic. Our most vulnerable people deserve better than lying on the floor of a bathroom.

There is a 'Changing Places' bathroom in most cities or larger towns in the UK - see <http://www.changing-places.org/>. There is only one Changing Places bathroom in Ireland, in the Lime Tree Theatre in Limerick. When built into the plans of a major new development such as a large shopping centre, or transport hub or sports arena, the additional cost of these facilities is minimal. The benefits arising for people with severe disabilities and their families are substantial. They will be able to take part in normal family and community activities, without putting their dignity or their carer's health at risk.

I am calling on Wicklow County Council to have a plan to have at least 4 of these. 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--

-:

1 2 3

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

<http://www.wicklow.ie/node/810/submission/44>



Changing Places

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Changing lives

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official manufacturers of changing places equipment



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Click on the Pamis logo below for an easy-read version of the Changing Places campaign pack.



Thousands of people need the Changing Places toilets that would help them to enjoy the day to day activities many of us take for granted.

The Changing Places Consortium has launched its campaign on behalf of those people who cannot use standard accessible toilets. This includes people with profound and multiple learning disabilities and their carers, as well as many other disabled people.

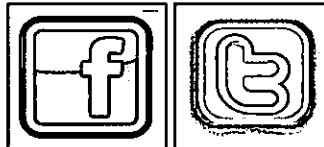
They need Changing Places toilets which are publicly accessible with enough space and the right equipment, including a height adjustable changing bench and a hoist.

Find out how the Changing Places campaign is changing lives.

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Location Map and National Register

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Find a Changing Places toilet



Click the logo above or [here](#) for the Changing Places: the practical guide



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The Changing Places website was designed and developed by Mencap on behalf of the Changing Places Consortium.

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Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 09 December 2014 22:16
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 9, 2014 - 22:15 Submitted by anonymous user:
[213.233.149.22] Submitted values are:

Name: Sean McGiollapadraig
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--Topics--

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

Having been a resident in the village and Glencree Valley at one stage, and been a frequent visitor to the village and surrounds I submit that Enniskerry is already well served with housing, particularly one-offs in all directions in the hills around, does not have the infrastructure to cater for more traffic, water supply and treatment, and sewerage treatment. It is unique in being relatively unspoilt and, having been preserved from the kind of blight and greedy housing developments that have been allowed in nearly every village and town in Ireland in the past 15 to 20 years, remains the lovely place to visit, stay in, walk from, eat and/or drink in, and photograph that it still is.

If you want to ruin it, or take away the above from it in any way, go ahead and allow more housing development in or near the village OR surrounding hills. Nobody will thank you or even appreciate any proposals to do so, particularly the next generations to come.

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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-: Enniskerry
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-: Laragh_Glendalough
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-: Roundwood

Rathdown Heritage Park Design Strategy



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1 Introduction

The subject site is strategically located between Redford Park, St. Crispin's housing estate and Greystones North Beach. It provides a great potential for creating a vibrant community and heritage park that provides safe pedestrian access to the waterfront and the Greystones-to-Bray Cliff Walk, while also protecting and promoting the site's historic significance and its natural environment. It is proposed that this park be named Rathdown Heritage Park.

Over the years the 'Friends of Historic Rathdown' have carried out research and produced a considerable amount of literature to record and celebrate the site's medieval heritage. The site gained attention in 2010 when a major clean-up was carried out by the local community, as organized by Councillor Simon Harris and supported by Wicklow County Council. 'No Dumping' signs were erected at the two entrances, with the sign at the northern entrance including a brief description of the site in an effort to educate users of its historical significance. Following the clean-up, local residents were invited to submit their ideas and opinions on the future use of the site.

Having lived in Redford Park for ten years, and with my background as an Urban Design and Planning Consultant, I prepared a first version of the present document in 2010 to express my views and opinions and to perhaps provide a basis upon which a final design strategy for the subject site could evolve.

In 2013 Greystones Tidy Towns was made aware of the document and adopted the principles of the proposed strategy. The Tidy Towns committee was particularly in favour of the strategy's promotion of community involvement and a phased implementation of works as funds become available. In early 2014, Tidy Towns in cooperation with Redford Park Residents' Association undertook another clean-up and inspection of the site and, based on their input, the strategy document has now been updated and modified to reflect the community's vision for the site.

The present document will first describe the location and history of the subject site and then discuss its planning context with regard to pertinent development plans. Subsequently, it will set out the challenges that the site faces and conclude with a list of interventions that could be implemented on a phased basis as funding is made available.

2 Site Location

The subject site is located between Greystones village and Bray Head. It is bounded by the Dublin-Wexford railway line to the east and, beyond this, Greystones north beach and the Irish Sea. The Grove road and The Grove residential area lie directly to the north of the site, and to the west the site is bounded by St. Crispin's housing estate. To the south and south west the site is bounded by Redford Park beyond which is Rathdown Park.

The location of the site is of particular importance due to the connections it provides between the surrounding housing estates and the natural amenities to the east. The Greystones to Bray Cliff Walk is a popular route that attracts several tourists and is also used by the local community. The site is also situated in close proximity to the beachfront which, despite recent erosion that led to the destruction of Gap Bridge, is frequently accessed at this point along the Cliff Walk. Furthermore, the site is located at the northern end of the Greystones Marina and SISPAR site which has been granted planning permission to be developed as a linear park and thus extend the reach of Greystones to better integrate with the housing estates to the north of the town.

Due to the strategic location of the site, it is considered that it can play a significant role in reinforcing connections and promoting permeability between the urban environment and the surrounding natural amenities, thus integrating otherwise detached and underutilised urban and rural elements in north Greystones.



3 Site Description

The subject site is owned by Wicklow County Council and managed by the Heritage Council. It is approximately 2ha and contains the protected ruins of St. Crispin's Cell and Captain Tarrant's farmhouse and outbuildings.

St. Crispin's Cell lies roughly in the middle of the southern half of the site while Captain Tarrant's farmhouse and outbuildings lie close to the northern boundary. These structures are very much in ruins with only their external walls remaining. While St. Crispin's Cell seems structurally stable and has been secured and reinforced in particular areas, the farmhouse and outbuildings may require some attention if they are to remain standing much longer.

Apart from these historical buildings, this is a green field site with collections of trees and shrubs to the north around Captain Tarrant's farmhouse and outbuildings, and to the south along a stream and the southern boundary. The western boundary is contained by a fence and by a hedge and planted trees, while the eastern boundary is contained by a security fence for the railway line.

There are two main entrances to the site, one to the north from The Grove and the other to the south west from Redford Park. The site can also be accessed from Redford Park via a passageway to the south. This entrance, however, is less frequented.

A number of informal paths have been worn into the ground. The main path leads from Redford Park to the Grove - from where walkers can continue to a level crossing at the railway, join the Bray Head Cliff Walk, or walk onwards to Greystones North Beach.



Existing Site Layout



4 Historical Context

According to 'Ancient Rathdown and Saint Crispin's Cell – A Uniquely Historic Landscape' (1993) produced by the 'Friends of Historic Rathdown', the subject site had been worked and lived on as early as 3500 BCE. Flint implements and other tools including a javelin, axes, chisels and a grinding stone were found here, and it is possible that other archaeological items have yet to be uncovered.

A number of large stones, known as the Rathdown Slabs were also found on this land. These were carved with designs unique to Scandinavian craftsmen and are thought to be from the 11th or 12th Century.

During the medieval era, the subject site was part of a larger settlement which once contained a 13th century castle on lands to the east. At one stage the medieval settlement, apart from the castle, contained 20 housing plots, a watermill and a creek whose estuary may have formed a natural harbour.



The Rathdown Hoard – the largest 16th Century coin hoard found outside Ulster – was unearthed at this site. The hoard contains Spanish Reales, indicating overseas trading during this period, and are held in the National Museum along with many other historic findings from the site. The castle and surrounding settlement fell into ruins in the 1600s and while some artefacts have been uncovered (including 13th and 14th century pottery) there is much that remains buried beneath the soil. The subject site also contained St. Crispin's Cell (built in honour of the patron saint of shoemakers) and a graveyard which is said to have been removed by Captain Tarrant when he purchased the land to be used for agriculture. There is, however, a possibility that some remains from this graveyard are still in place.

5 Planning Context

The subject site lies within the administrative areas of Wicklow County Council and Greystones Delgany Kilcoole Municipal Area. It is mentioned specifically in the Greystones Delgany and Kilcoole Local Area Plan (LAP) 2013-2019, and the Greystones Harbour and North Beach Action Area Plan (AAP). The following notes must therefore be taken into consideration:

- The site is protected under the Greystones LAP 2019 which seeks 'to protect the character of this area as a heritage and amenity area for public amenity and education'. As the site contains evidence of pre-historic, early Christian, medieval and post-medieval settlements, any proposals for the area must ensure the protection of this heritage.
- In the Greystones AAP, the site is designated 'Zone 3 – preservation of land and natural landscape for future archaeological study' and 'promotion by the Council of future development of a Heritage Park at the site of medieval Rathdown'. It is important to note that a large site to the east of the railway line is also included in Zone 3 and any future development should support the objectives for this zone.
- The site also contains the remains of Captain Tarrant's Farmhouse and the ruins of St. Crispin's Cell. These buildings are Protected Structures (registered as 08-68 and 08-67 respectively). St. Crispin's Cell is also a recorded monument/structure and must therefore be treated with even greater care. Suffice to say, these historic buildings must be protected in any future development of the site.
- The LAP shows an 'Indicative Green Route' running through the site, from the entrance at Redford Park to the entrance at The Grove. The Green Route provides local residents access to the natural amenities to the west of the site such as Bray Head, which is a designated Special Area of Conservation and proposed Natural Heritage Area. This green route should therefore be protected and promoted in a future design for the site.
- The LAP also states that 'the views (V3) seaward from Cliff Road, Rathdown Upper' are to be protected. While the vantage point indicated on the LAP's accompanying map does not lie within the subject site, the protection of this view must still be considered in any proposals within close proximity to Cliff Road (The Grove).

This design strategy seeks to work toward achieving the above objectives in accordance with the various protections afforded the subject site and its surroundings. The strategy intends to be a first step toward the development of a Heritage Park as proposed in the Greystones Harbour AAP.

6 Problems and Challenges

6.1 Overgrowing

Perhaps the most visual of the subject site's problems is its overgrown nature. An overgrown site, particularly at its entrances, is uninviting, difficult to navigate and unsightly. Due to the lack of a formal maintenance plan, the site is overgrown for the majority of the year and is almost impassable during the summer months. In the winter, the paths are particularly muddy and are difficult and unpleasant to walk on. The entrances are as good as invisible from both directions and only those who know the site will enter it.

Although some improvements have been made since the site was brought to attention in 2010, the cutting back of vegetation has mostly been undertaken by the local community who have little time, money and manpower to keep the invasive vegetation at bay. While their efforts are commendable, the local community's maintenance is simply not frequent or significant enough to keep the paths open year round. At best, the cutting back that occurs, only ever allows access through the site from one end to the other and does little to actually realise the full potential of the site. As the rest of the site often remains overgrown, people tend to just walk through it rather than being encouraged to stop and enjoy the view, the site's historical significance, and its architectural heritage.



6.2 Litter and Antisocial Behaviour

The two major clean-ups of the site in recent years uncovered massive amounts of litter (and dog waste along the paths) and highlighted the misuse of the site. One of the old farm buildings at the north of the site was found (in 2010) to be completely covered with bottles, cans, cigarette ends and broken glass. The interior walls of this protected structure were also covered with graffiti. Now this building is completely overgrown and inaccessible.

This antisocial behaviour also used to occur in St. Crispin's Cell until steel bars were constructed to prevent access. However, a stone has been removed from the rear of the structure and it is now possible to squeeze into this space once again. The interior of St. Crispin's Cell therefore continues to be misused and littered with bottles and cans.

The area along the southern border of the site appears to be the greatest challenge with the illegal dumping of building and household waste adding to the graffiti and general litter. The pollution of this watercourse and the unsightly appearance of the area will be difficult to resolve.

6.3 Management, Ownership and Pride

It is suggested that the aforementioned problems and challenges may be due to poor management of the site. There is no formal management plan and no overall vision for the site. Without anybody taking responsibility, the site wastes away and the potential of this valuable amenity is lost.

The site is owned by the Wicklow County Council and is therefore open to the public. 'The public', in this context, would mostly refer to residents of Redford Park, St. Crispin's housing estate, the Grove and to a lesser extent Rathdown Park - perhaps 2000 people in total. The site should therefore be treated as a community park. A place to be proud of, cared for and respected.

At present, however, the local community have no sense of ownership and very little sense of pride for this space. Fostering such sense of ownership and pride is a serious challenge – but not necessarily an insurmountable one.



7 Design Approach

Instead of providing a top-down once-for-all masterplan for the site, this document suggests a bottom-up phased approach that can be carried out as funding becomes available and as the site matures. Such an approach is considered more flexible and more realistic than a masterplan and therefore more likely to be undertaken and to succeed. The phases are ordered to ensure that the most needed work is undertaken first. However, they are also arranged somewhat according to cost - as the phases progress, so too does the ambition and the subsequent requirement for funding.

It should be noted that the proposals contained herein will require continuous consideration by the local community, the Heritage Council, the Municipal District Councillors and the County Council. Only through public consultation will the site be best developed to meet the needs of all interested parties. As such, the present proposals provide points for discussion and should be developed further to respond to the needs and interests of all those involved.

It is considered particularly important that the local community - the end-users - get involved in the design process. As previously indicated, a sense of ownership and pride is lacking, and by getting the local community involved, a new mindset that promotes passive care of the site can be fostered - for example by picking up one or two pieces of litter when walking the dog or visiting the beach. If locals are not involved in the process, they will not care for the site and it will quickly fall back into disrepair. To start the process of further community involvement, a leaflet summarising the present proposals and inviting comments could be distributed to all households in the area.

8 Phase One Interventions

This phase proposes interventions that are considered the absolute minimum for the subject site. While they are relatively simple and straight-forward, they should be undertaken with great care and attention to detail. For instance, the initial cutting back of vegetation should not be done haphazardly, but to a plan which is in accordance with the overall vision for the site. Similarly, the route of the proposed footpath and its construction methods and materials, should be carefully considered to ensure not only a positive visual impact on the site, but also the protection of possible archaeological burials.

8.1 Managing Vegetation

As previously stated, parts of the site are completely overgrown and require significant cutting back. The most important areas to address in this regard are around the entrances and along the main path. Recent efforts by members of the Greystones Tidy Towns and the Redford Park Residents Association have helped to improve the entrance from The Grove in particular, but there is much more that can and should be done.

The mature sycamore tree at the northern entrance to the site should be protected in accordance with the designated protected view (V3) in the Greystones-Delgany and Kilcoole Local Area Plan. However, it must also be considered that the overhang and shade of this tree at the entrance can be intimidating when coupled with the uncontrolled invasion of bramble and other fast growing vegetation. It is therefore suggested that, while protecting this tree, major cutting back of this area should be undertaken to ensure a brighter, more open, and inviting entrance.

The entrance at Redford Park is one of the most important areas to work on as the narrow path becomes overgrown more quickly than anywhere else on the site. There are several large trees here that overshadow the path and significant clumps of bramble and other vegetation, including stinging nettles, that encroach on this main thoroughfare and impede access to the site. To the right of the entrance, the ground slopes down to a ditch and this area is often used for dumping of household waste and building material. It is considered that the overgrown nature of this area helps to conceal this illegal activity - easily carried out in broad daylight without anyone knowing until it is too late. While the larger trees at this location should be kept, cutting back should be undertaken to allow better access and to improve passive surveillance – helping to deter illegal dumping.

In addition to cutting back around the entrances, the main path should be better maintained as vegetation quickly reduces its width during summer months. Between June and September, the path can be as narrow as 30cm, making it very difficult to navigate comfortably – particularly when stinging nettles are in bloom. There is also a need to cut back around the secondary entrance to Redford Park which, apart from funnelling people through a daunting passageway, is almost completely covered by dense foliage - and therefore one of the darkest and most littered and ill-respected area in the site.

As previously mentioned, this cutting back should be planned strategically and with careful consideration for the site's overall vision as well as the protection of significant wildlife habitats. Therefore, before any work is undertaken, a plan should be agreed to determine exactly which trees and shrubs should be retained, which should be removed, which should be cut back and where new ones may be planted. It may be wise to consult with an arborist and/or ecologist during this process to ensure the protection of wildlife habitats etc.

Most of the site is left in meadows, but the ground and grasses are quite uneven and not at their most attractive. Investigations should be made aiming at a richer, greener and more attractive vision being created – perhaps including a sprinkling of wild flowers and an area with higher grasses where a maze could be grown for children to explore. Also here it may be wise to consult with experts.

While another overhaul of the site would have a great positive impact and is very much advised, it is as important to develop a management plan to ensure year-round maintenance of the meadows, shrubs and trees. In the summer months, the foliage can grow back to a unsightly mass within weeks and it is therefore necessary to undertake frequent trimming during this period. Much can be done as part of a voluntary agreement with Greystones Tidy Towns and the Redford Park Residents Association, but it is considered absolutely necessary to have a plan which sets out exactly what is to be done, how frequently it is to be done, and who will do it.

8.2 Construction of Footpath

While the cutting back of vegetation will make a great difference to passing though the site with ease, it is considered that Phase One of this project should also include an upgrade to the main path. As simple as this may seem, the historic significance of the site and the potential below-surface archaeological burials and artefacts require that the footpath should not disturb the subsoil. The design and materials of the path should therefore be approved by an archaeologist. The archaeologist should also be present during construction to supervise any digging that will be necessary.

As funding is always an issue, it is proposed that the path should initially be constructed with a simple weed-barrier and a thick layer of gravel. However, this could be upgraded to a raised wooden boardwalk (or something similar) as funds become available. While the other worn paths throughout the site could also benefit from more formal surfacing, these are less important and can be left to a later stage of the project. In accordance with planning guidelines, the path should be at least 1.5m wide to allow wheelchair access and should have turning areas incorporated into the design. To reduce the visual impact on the site, this 1.5m minimum width is also suggested to be a maximum width.

The path will constitute a noticeable visual element of the site and, considering the proposed materials and construction methods, it will also be quite a permanent element. It is therefore vitally important that the chosen line for the path is visually appealing, attracting people and encouraging them to stop and enjoy the views and the site's historic heritage.

The current worn path is about the shortest and easiest route connecting the two main entrances – in design terms, this is known as a 'desire line' and is a good indicator of what end users will want from a proposed path. If there are great deviations to an existing desire line, people tend not to use it and will instead wear their own shortcut to bypass such deviation. As such, the proposed path should not deviate too far from the existing worn path. It is recommended that the path should not follow the deviation of the path to the east, this being a very new desire line that was created by ad hoc cutting back.

However, to follow the current desire line may result in laying straight lines - a motorway style path which is undesirable as it will create a cold and lifeless tunnel effect. Subtle curves on the other hand are widely accepted to be more visually appealing and will encourage exploration by drawing the eye around the bends and promote more frequent stopping – to enjoy the views and elements of the site's historic heritage. Curves are also more in keeping with the natural feel of the site and will blend in better with the surroundings. A balance between following the current desire line and providing a more interesting line must therefore be achieved.

Having established the main path at a good standard, it is recommended that the path from the south east entrance of Redford Park is upgraded. In recent years, a line of concrete was poured in an attempt to improve access over the muddy ground at this location. This is obviously unacceptable and should be removed and replaced with a more appropriate material. Where this path crosses the stream at the south east entrance to Redford Park, it is proposed that a wooden bridge or boardwalk be built to improve access and visual impact.

Primary Path Options

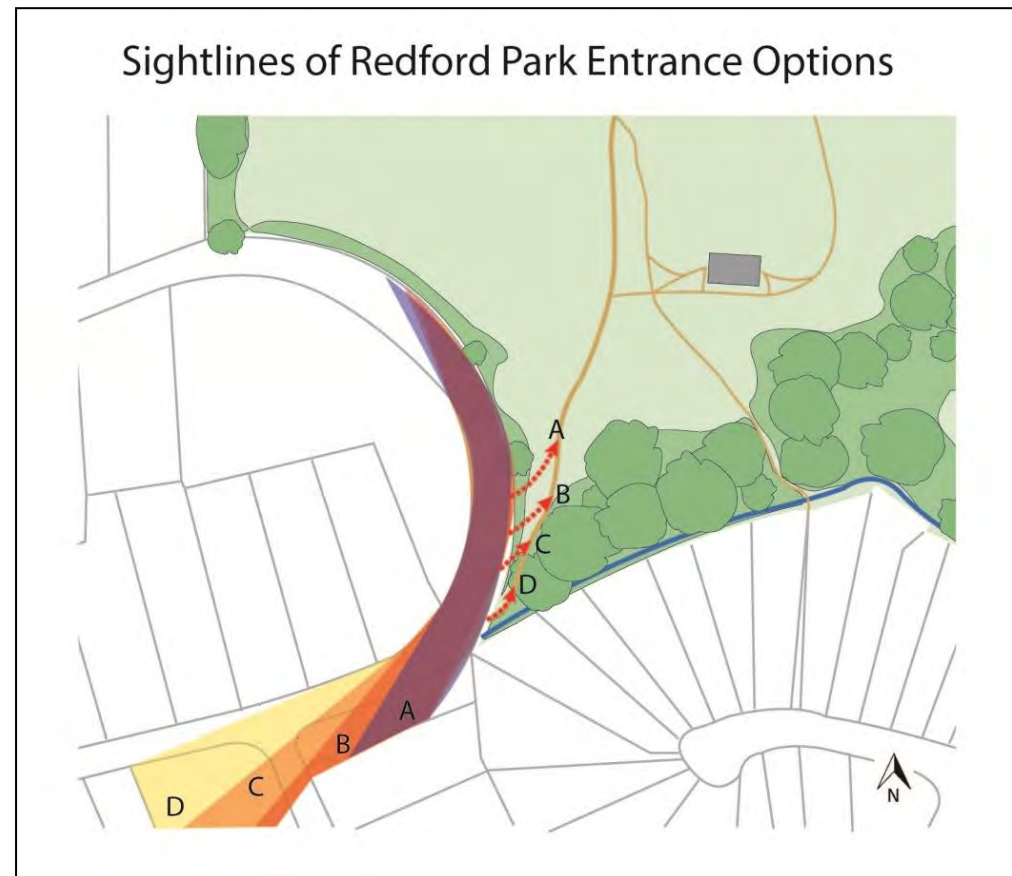


8.3 Relocation and Widening of Entrances

The third major work to be undertaken during this phase should be the development of wider and more visible entrances. It is suggested that the vegetation at the main entrance to the north should be significantly cut back and the actual entrance made to look more inviting by opening or removing the gate and erecting bollards in its place. This will improve pedestrian access while preventing cars and other large vehicles to enter. The bollards should be removable for maintenance purposes.

It is suggested that the south western entrance at Redford Park should be moved slightly to the north. By moving it away from the dense foliage around the ditch, illegal dumping into this area is made more difficult and is therefore less likely to occur.

It is important that the entrance only be moved north by a couple of meters so that it will still be visible from the junction in Redford Park and therefore continue to attract passersby. As shown in the adjacent map, the area from which the current entrance can be seen (D) extends beyond the road junction and is therefore the most visible location. The further north this entrance is moved, the smaller the area in which the entrance becomes visible (C, B and A respectively). To avoid the dense foliage in the southern corner of the site, it is proposed that Option C (approximately 2 metres north of the current location) will be the best compromise. The relocated entrance should be widened, cut back, and marked clearly to make it feel more open and inviting.



9 Phase Two Interventions

While phase one seeks to address the site's primary problems, phase two will aim to make the Heritage Park more worthy of its name and more inviting to spend time in. Additional funding for this phase will be needed and each project will require some research and involvement. However, with the cooperation of the Municipal District Councillors, the County Council and the Heritage Council, the following interventions can be achieved.

9.1 Seating Areas and Bins

The simplest of these interventions consists of a number of benches along the main pathway for walkers to sit and enjoy the view. It is suggested that the location of these benches should not only take in a view, but also blend in with the surroundings. Attention to detail is important here as the benches may stand out in the otherwise open site. If the location and design of the benches are not chosen properly, they could deter attention from St. Crispin's Cell and lead to visual cluttering.

It is suggested that the benches are integrated into the wheelchair turning areas that will be constructed as part of the upgraded main path. A timeless wooden design will be in keeping with the heritage of the site, and some light foliage behind the benches will better integrate them into their surroundings. Some suggested locations for the benches are shown on the proposed layout plan.

It is also suggested that bins are provided and that a collection service is organised as this will significantly reduce litter. Bins for dog waste in particular would be a welcome addition and the best locations for these would be at the three entrances to the site. While the placement of bins would be relatively easy to arrange and also quite



affordable, the setting up of a regular collection service may present a bigger challenge.

9.2 Erection of New Signage

For reasons unknown, the signage erected at the entrances to the site in 2010 have since been removed. It is considered that new signage should be erected at key nodes to inform passersby of the site's unique heritage. The proposed locations for new signage are shown in the following map.

At the two main entrances to the site, a brief history and relevant photographs and maps should be displayed. It is also suggested that a sign be erected on the Greystones-Bray Cliff Walk to encourage hill walkers to take a quick detour to visit the site and enjoy its historic and architectural heritage.

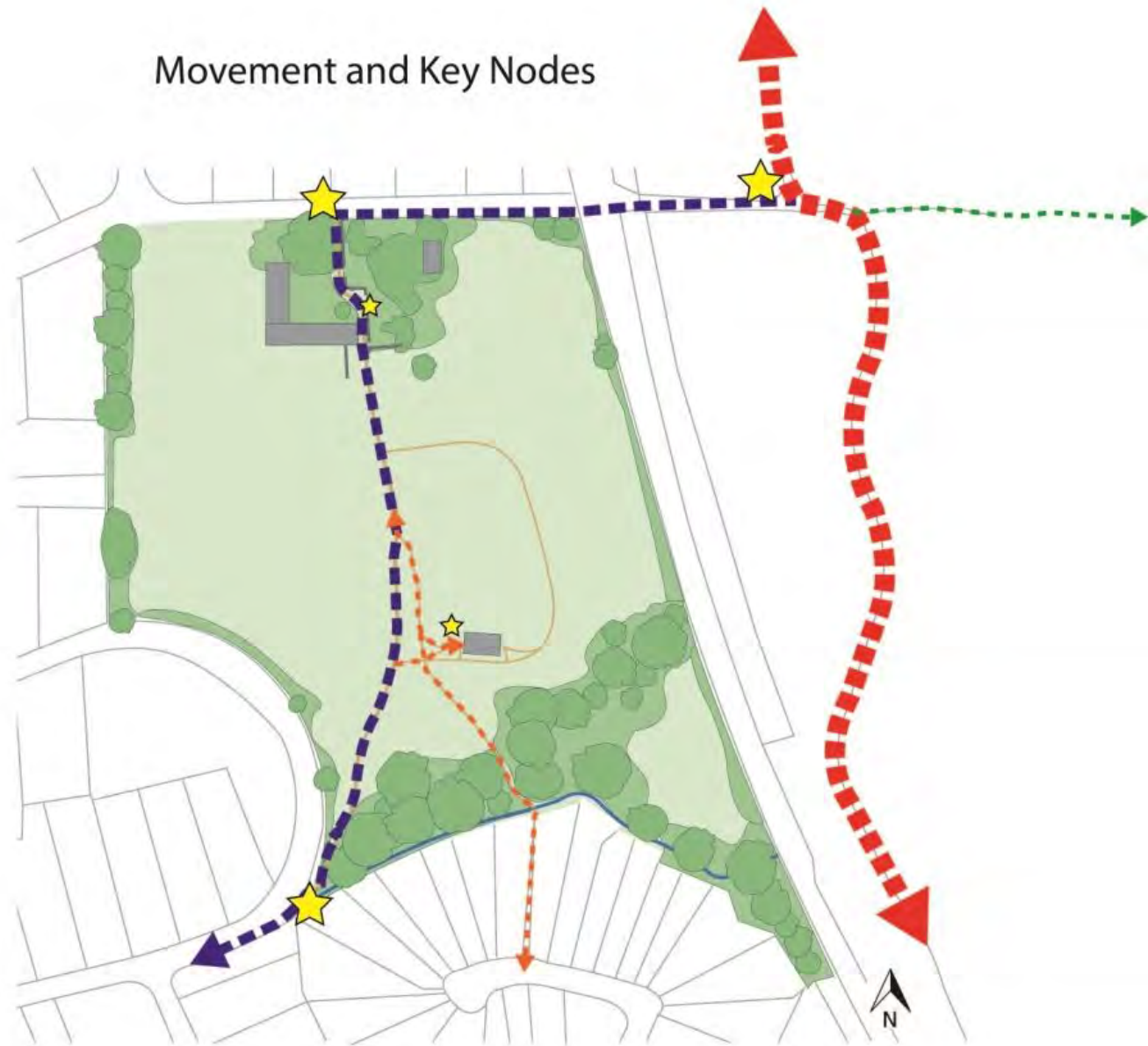
It is recommended that the weighting of information be reversed from that previously erected - i.e. the 'no dumping' sign should be smaller than that of the historical information in order to place an emphasis on 'positive education' rather than 'negative deterrent'. Better still, the 'no dumping' element could be scrapped altogether as it only serves to advertise the site as an ideal spot for illegal dumping.

If funding can be found, literature could also be made available at nearby tourist information centres. A leaflet could be distributed by local shops and further signage at the start and end of the Cliff Walk could be placed to draw attention to the site.



Movement and Key Nodes

- Greystones to Bray Cliffwalk
- Primary Path through subject site - connecting to Greystones/Bray
- Old path to beachfront
- Secondary paths on the subject site
- Minor paths on the subject site
- Key node and potential location of site heritage information
- Key node and Potential location of specific structure information



9.3 Archaeological Study

The physical interventions of Phase One and Two have been designed to minimise the impact on the site's archaeological potential. Before progressing to Phase Three (which contains interventions that may disturb the subsoil), it is suggested that an archaeological study is undertaken. If funding is available, this can be undertaken as part of a larger study of the greater medieval village site. Depending on what is found, it may be worthwhile to reassess the proposed interventions for Phase Three. For instance, if an old wall or foundations for a structure of historic significance are found, it may be interesting to unearth this as a point of interest, with further interpretive signage erected at its location.



10 Phase Three Interventions

While the first two phases are considered necessary, they are not particularly ambitious and are the types of interventions that one would expect of this site regardless. Phase three, however, consists of more ambitious interventions that require greater funding, planning and maintenance, but would really start to make the most of the site as a heritage park.

10.1 Captain Tarrant's Farmhouse

The future of Captain Tarrant's Farmhouse and its outbuildings will have to be considered. If the buildings are left as they are, they will continue to deteriorate and will soon be nothing but an eyesore. Physical interventions regarding the buildings are likely to be the last to be completed, but relevant investigations and planning should start at an early stage. The following options may be considered:

- Ideally the buildings would be restored to their former architectural glory and used as a visitors' centre for education, tourism and community uses. However, considering the cost and the present economic situation, this is not likely to happen before it is too late.
- The buildings could be made safe (which is not the case now), part-restored and maintained as the ruins they are, but continue to stand testament to their heritage. Considering the initial cost and the need for continued maintenance, this option may also be difficult to implement.



- The farmhouse could be sold to a private individual and permission given to undertake the renovations needed to turn it into a family home. Strict restrictions could be imposed in regard to the appearance and visibility of such home, the aim being to largely retain the original 18th century look. Such sale and restoration is considered the best solution as the buildings will still project their heritage and the proceeds could be used toward implementing other interventions suggested in this proposal.

While the specifics of this undertaking requires further investigation, options for the proposed site boundaries have been explored and are set out in the following map. Whatever boundary is chosen, a new site entrance will need to be constructed. The final layout plan for the subject site (p.29) illustrates how this may work with respect to the other proposed interventions.

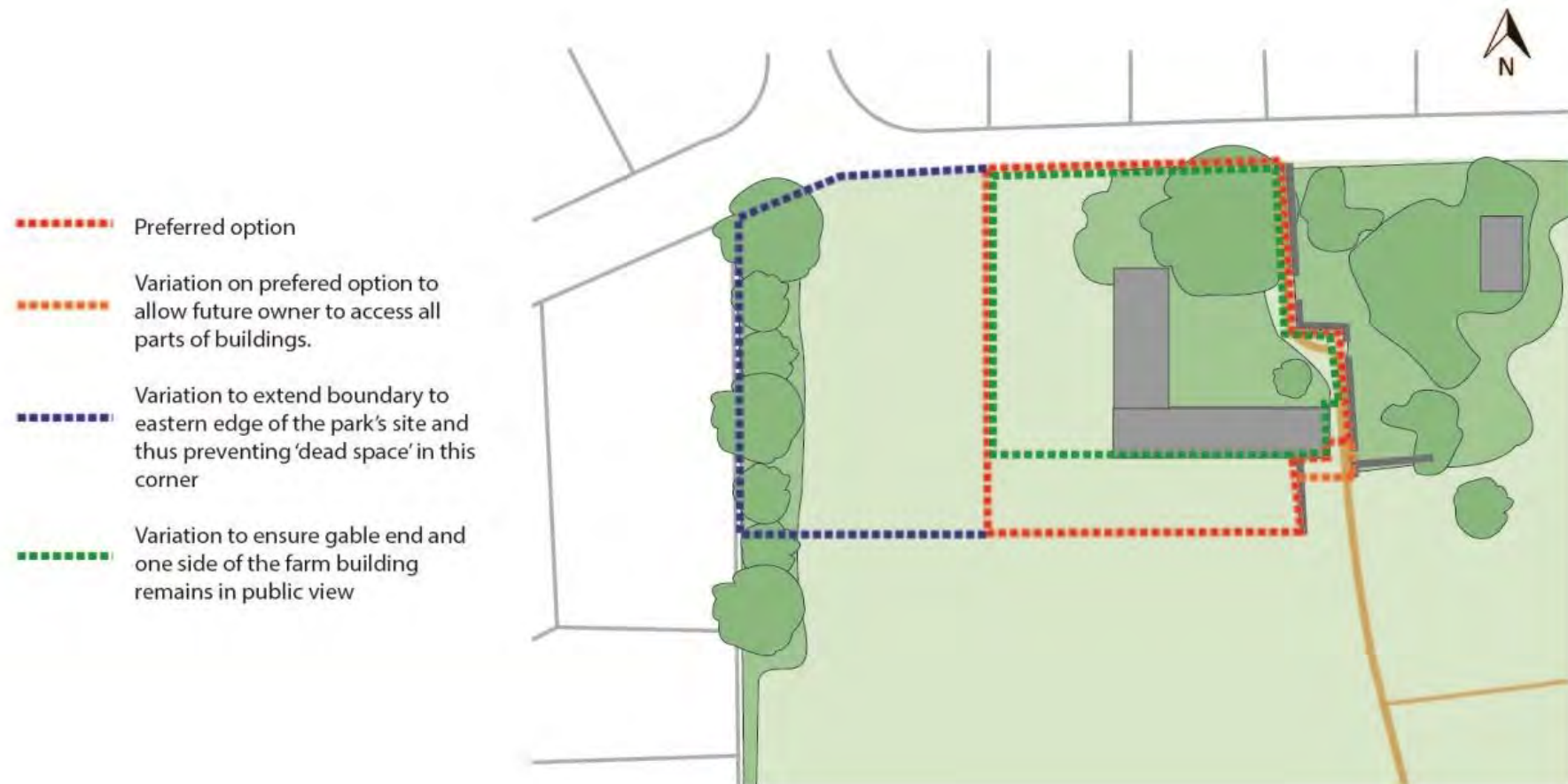
10.2 East Farmhouse Outbuilding

While Captain Tarrant's main farmhouse and outbuildings are in very poor repair, the separate outbuilding to the east (perhaps used as a shed for animals) is in an even more ruinous state. It has no roof, has suffered greatly from anti-social behaviour and is completely overgrown. Two options may be considered for this building:

- It could be cleared of vegetation and sealed off like St. Crispin's Cell. While this is an easy and cheap option, it will not exploit the full potential of the building.
- It may be restored/converted to become an open, semi-sheltered information centre with four or five large signs mounted to the walls to illustrate the history of the site. Displays of other artefacts belonging to the area may also be arranged, though naturally the possibility of vandalism would have to be considered. If the main farmhouse buildings are sold and restored as suggested previously, this option is recommended.

The design specifics need to be further developed, but meanwhile the above option – the information centre – together with the changed entrance and path, is shown in the proposed layout plan (p.29).

Captain Tarrant's Site Boundary Options



11 Phase Four Interventions

The first three phases have focused on the heritage aspects of the park. The interventions proposed for Phase Four aim to extend the appeal of the heritage park by installing features that will benefit the local community.

11.1 Sheltered Area and Playground

To encourage the local community to make more use of the site, a communal sheltered area should be considered. It could take the form of a pavilion or a gazebo around which smaller meetings and events could be arranged, where a family could share a picnic, where neighbours could meet for a chat, and where walkers could stop to get out of the rain.

It is recommended that this sheltered area be designed carefully so as not to distract from St. Crispin's Cell. The structure does not need to be particularly large, and should be open and constructed from durable materials. Inspiration for the design could be drawn from bronze age thatched huts that may have been built on the site years ago.

To further serve the local community a children's playground with a slide, swing-set and similar outdoor activity equipment should be considered. Again, this facility does not need to be particularly large and should be constructed from natural materials that harmonise with the



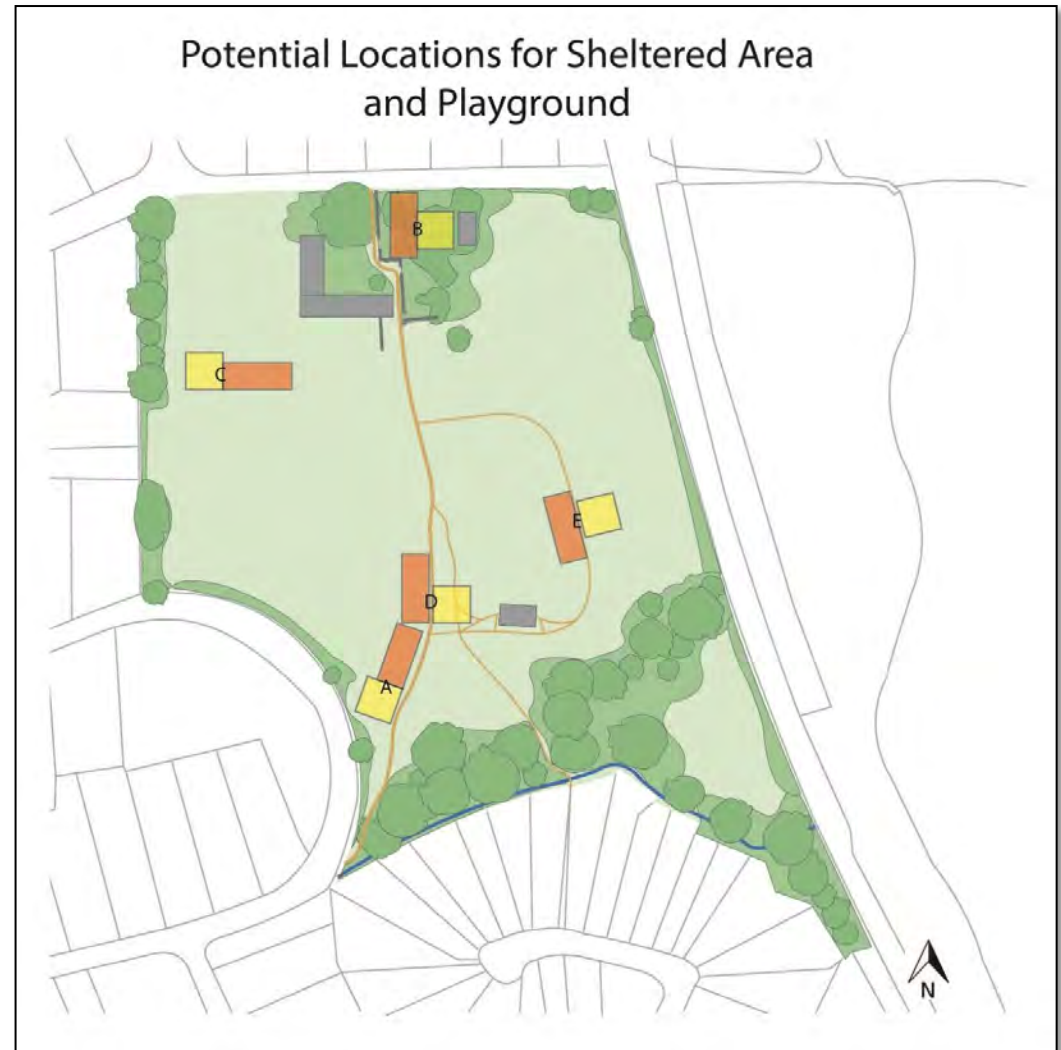
surrounding environment. A rustic wooden structure would be more fitting than a brightly coloured plastic structure. For the roughly 600 families living in surrounding housing estates, this would be the nearest place to bring their children for a healthy outdoor experience and should therefore be a welcome addition.

It is suggested that if a future playground is constructed, it should be located next to the sheltered area so that parents can supervise their children while comfortably sitting in this space. As shown in the following map, there are a number of potential locations for this family oriented area.

Option A shows the community shelter (yellow) near the Redford Park entrance and the playground (orange) to the north of this. This location does not distract from any existing views, is accessible from the main path and close to the residents of Redford Park. However, it is also possible that the sheltered area and playground can be integrated into the existing outbuilding to the east of the main farm buildings (Option B). This is the preferred option as it will utilise an already developed section of the site and provide a strong entrance from the Greystones to Bray Cliff Walk.

If a sheltered area and playground are to be constructed, it is suggested that a more detailed study be undertaken to establish the best possible location and design.





11.2 Community Garden

During the past year, a local resident has taken it upon himself to establish a flower bed on a small patch of land on the southern side of St. Crispin's Cell. While the chosen location is most unfortunate, the interest in developing a small garden is worth noting. Notwithstanding the above development, it is considered that the development of a more formal community garden with allotments for the use of local residents should be considered.

A small area of the site could be set aside for this purpose and the allotments could be rented out for a minimal annual charge which would cover the costs of necessary installations. This would further expand the use of the park and would contribute to the feeling of ownership and pride for the site.

The community garden can be constructed in raised planting beds so as not to disturb any archaeological potential. This will also help to control weeds and pests, as well as make the garden accessible without bending down to tend to the soil. A communal shed could be constructed for tools and equipment, and access restricted to plot owners only. Furthermore, a tap could be installed for water, benches could be integrated into the design and a small covered area to allow gardeners to escape any sudden downfalls of rain.

Potential locations for this community garden are illustrated on the following map. While several locations were considered, it is suggested that the garden should be located off the main path to deter vandalism, and should be positioned so as not to spoil any views or deter from St. Crispin's Cell. The location should also be close to a water mains so that a tap can easily be installed.



It is considered that Option A would best suit the site and would fill in the liminal space behind Captain Tarrant's Farmhouse. This location may also lend itself to the creation of a small entrance from the road which can be used by gardeners to drive heavier materials closer to their allotment. Such an entrance, if constructed, could be restricted for their use only.



12 Summary – Proposed Layout Plan

New entrance from The Grove

Captain Tarrant's Farm Buildings - privately owned and restored to respect architectural heritage

New community garden with communal shed, water supply and compost bin. Raised planting boxes to ensure archaeological heritage remains undisturbed

Large open areas left to grow as meadows

Main path slightly realigned and made wheelchair accessible. Seating areas to enjoy views of the sea

Realigned and widened Redford Park entrance



Restored farm buildings to be used as a communal sheltered area and information centre for Rathdown Heritage Park, with adjoining playground

Large open areas left to grow as meadows

Clearly defined paths

St. Crispin's Cell secured and made safe

Major cutting back of trees and shrubs as approved by ecologist

Wooden bridge over stream to improve access from Redford Park

69

Leonora Earls

From: Wicklow County Council [r]
Sent: 22 December 2014 18:07
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 18:06 Submitted by anonymous user: [86.45.7.198]
Submitted values are:

Name: Clodagh O'Brien
Organisation, Group, Company, etc :
Address: Clonlea, Church Hill, Enniskerry, Co. Wicklow
Email:

--Topics--

- : Vision_and_Core_Strategy
- : Housing
- :
- : Tourism
- :
- :
- :
- :
- : Built_and_Natural_Heritage_including_Landscape
- :
- : Local_Plans
- : Town_and_Settlement_Plans
- :

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

Alternatively you can attach your submission (10MB limit on attached files):
<http://www.wicklow.ie/sites/default/files/webform/VISION.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):
<http://www.wicklow.ie/sites/default/files/webform/ENNISKERRY%20LOCAL%20AREA%20PLAN.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/55>

VISION, CORE STRATEGY AND GOALS

High Level Goal

Missing from the Vision and Core Strategy is any mention of the role Wicklow, in particular the Wicklow Mountains and coastal areas, plays in meeting the leisure needs of the residents of Dublin and the Greater Dublin area, and of tourists to Ireland. The capital city has over a million residents and is very dependent on Wicklow for leisure, sport and access to wilderness on the city's doorstep -- one of its major assets as a capital city: e.g. EG Goal 6 just refers to the recreational needs of rural population.

Core Strategy

The **Settlement Hierarchy** definition is unclear. Why are different hierarchy's proposed for villages: Avoca is classified as village but Enniskerry a village also is classified as a small growth town! Enniskerry is of very limited size (core village could only have a population of less than 300) and provides only limited services to the area (no bank, post office or cash machines). Furthermore, Roundwood, much larger in size is only given County Level Development Plan 6 whereas Enniskerry is given level 5: This seems to clearly mean that planners are to be allowed to zone more land for housing in Enniskerry than Roundwood which has greater flat land for expansion than Enniskerry deep in a hillside valley between two rivers. The hierarchy also fails to mention other issues such as environmental issues, protection of outstanding areas of natural beauty and tourist considerations in setting the hierarchy.

Enniskerry should be given a lower status as a village with development level 6.

Population

It is very difficult to assess the population figures given as the basis of 2006 is unrealistic. The most recent census details should have been used. Future figures must be more realistically based. Moreover catchment area for Enniskerry village appears to include major rural zones. Which does not appear to be the case for other towns and villages e.g. Roundwood's population (790 in 2011) seems to be low compared to that of Enniskerry (1900 in 2011) given it also has housing estates.

Land Zoning

Geographical and climate change constraints must be taken into account: e.g. housing should not be built along river valleys or their banks and hillsides. Enniskerry is the victim of substantial and unacceptable water run-off and erosion and road deterioration in some areas due to the construction around it in recent years. Little account was taken in the past of the effect of insertion of new estates and houses on existing roads. All zoning must include impact statement on flood control, roads and traffic and implications for inhabitants.

Housing Policies

One-off or housing clusters in the countryside should not be allowed in sensitive scenic areas and where they 'suburbanise' a rural landscape that has up to now remained open. Large bungalows on high platforms without any planting around them remains the norm in Ireland and are a blight on the landscape. More stringent planning

requirements to site new building lower into hillside sites with strict planting regimes could alleviate some of the blight. (As is done in other countries).

Development and Design Standards

Large sprawling bungalows are inefficient and wasteful of resources. More compact housing in keeping with traditional models but modernised with regard to light and heat should be encouraged. This should be included in regulations. Protected structures in the County should be monitored for deterioration especially when left empty.

Wicklow is a zone of outstanding natural beauty and efforts continued to ensure this for future generations.

Tourism Potential

Enniskerry-Powerscourt has a major potential for development. Enniskerry with its buslink to Dublin is a major entry point to Wicklow. Unfortunately until now there has been little linked up planning between the village and Powerscourt estate to jointly manage problems generated by increased traffic and draining by the estate of tourism revenues from the village.

Enniskerry is a major destination for walkers and cyclists for whom no safe pathways or walking routes out of the village to the mountains currently exist. Instead they are forced onto narrow roads with no footpaths which is dangerous and a deterrent to development of tourism. These are currently the main groups that bring revenues to the village. Safe walking paths and cycle tracks are needed into the Glencree and Glencullen valleys. The Dargle and Glencullen river valleys could be major tourist attractions. In particular the stunning rock gorges along the Dargle should be opened up for walkers and rights- of- way brought back into more general use. The road (now closed off) that runs all the way alongside the river from the N11 to the Powerscourt Waterfall could also be a major walking and cycle access up from Bray. (It was a major Victorian tourist attraction).

Both the Dargle and Glencullen valleys should be designated Special Areas of Amenity/Conservation and protected for future generations.

Currently there are dangers posed by a major development under consideration by Wicklow County Council on a AA4 designated site along the Coookstown Road overlooking the Dargle river which poses a direct threat to the Dargle valley and views of the Sugarloaf.

Built and Natural heritage including landscapes

Green infrastructure

The Glencullen and Dargle river valleys should be officially protected. The focus should be on preserving natural areas, habitats, use for recreation and as greenways. (Currently only the Knocksink reserve provides any protection to the Glencullen river near Enniskerry).

Landscape.

Wicklow is endowed with wonderful landscape of natural beauty and interest.

Yes there must be different policies for development to protect the vulnerable areas of natural beauty which have historic resonance and recreation and tourism potential.

Areas of outstanding natural beauty and Areas of Special amenity must be subject to strict planning laws that are non-negotiable by planners. There is sufficient space for developers outside these areas so there should be no case made for development where an area is designated. For too long Ireland has been blighted by such exceptions.

Wicklow should also be seeking to develop more coastal pathways for walkers as Wales has done which has immense tourist potential.

Rights of Way.

The Coucil can facilitate the preservation of these rights by officially mapping them and defending walkers rights in court rather than leading it to individuals and walkers to try to keep them open. For too long Ireland has allowed these rights to be steadily eroded by landowners.

Leonora Earls

From: Mary O'Donnell [REDACTED]
Sent: 21 December 2014 11:23
To: Planning - Development Plan Review
Subject: Draft Plan CDP 2015 - 2022
Attachments: Wicklow Development Plan 2015.doc

Attached please find a submission for the above.

Mary O'Donnell

Submission to Development Plan 2015 – 2022

From: Mary O'Donnell, 10 Abbey Way, The Friary, Wicklow

Dog Dirt

Dog Dirt is a major problem in the town area.

It is unhygienic, unsightly, unpleasant and can lead to toxocariasis in humans which can cause serious illness and even blindness. It is toxic to the soil and is classified as a dangerous substance. It spreads parasites, Ecoli and other harmful parasites which do not die in the soil. There are 23 million fecal coliform bacteria in one gram of dog poo.

(i) Dog owners should be educated on the danger of their dog's poo. More dog poo bins are needed. For instance, there is only one near the car park on the Murrough. People are now leaving plastic bags with the poo in it thrown on the ground especially on the Murrough.

(ii) Areas with a dog run could be created.

(iii) Enforcement is necessary preferably by an outside enforcer to eliminate the possibility of local intimidation.

The Murrough and South Quay areas need to be cleaned up and made more attractive for locals and visitors. They are areas of natural beauty.

The Murrough

This area could be made into a lovely recreational area for everybody. As well as a playground and the present skate park, there should be a nice peaceful park area for adults to sit and chill out. Be it to have a rest, a picnic or just to contemplate. An outdoor bowling area could be created.

The pile of earth that was excavated for the skate park is just left there. Surely, something can be done with that. Maybe a landscaped area for children. The job was just not finished off properly.

A clean-up of the buildings would improve the area. Unsightly heaps of scrap can be seen from the road and should be screened from public view. There is a constant smell from the sewer treatment plant and occasionally from the factory further out.

The Quays

Most of the warehouses on Bond Street are dirty and dilapidated. They should be painted and cleaned up.

I applaud The Tidy Towns efforts but feel that they are up against it.



I

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Wicklow Development Plan 2014 - 2020

My concern would be development of Wicklow Town Rathnew, Glenealy and Ashford.

1 Transport at Present we depend on Taxi cars and Bus Eireann. This needs top Priority taxi are not regulated and are totally dependent on competition to keep fares low. This industry is profit based which can lead to monopolizing. We are moving towards an aged society leaving the older generation still being forced to keep their cars on the Road. Ageism also put pressure on siblings to provide this service. Bus Eireann provide a national service with little regard for local trade. One Example; if you want to travel Wicklow - Glenealy you must get the 10:00 o'clock and you arrive at 4:00 pm in the afternoon. A local bus service would not be an instant success this is where Wicklow County Council could promote and subsidize with grants to aid the set up stages. Recent laws regarding 'Permit learner and novice drivers places undue pressure on these drivers to provide shopping duties for the elderly, this jeopardizes their insurance position.

2 The four areas I mention are going to experience a boom in housing development within the lifetime of this Development and beyond. These areas are experiencing an influx of new families. Dublin City Council a long time ago planned for Dublin to develop westward with 'Finglas Ballyfermot and Ballymun' being the most famous. Wicklow County Council need to examine what happened here so as to prevent similar social problems. The overall picture should see Wicklow Town head north towards Miltown South - Rathnew should join in this and head west to Miltown - Ashford should be directed South-West towards Glenealy. The road and rail are already in place and could be upgraded if the

Council could show this expansion to government. Dublin City Council seen Wicklow as commuter town to feed City Industries (Source leader Program 1988) Wicklow County Council cannot allow itself to be in such a situation

3 Industry; government policy was set up to promote small to medium Enterprise parks. This has worked to some extent with enterprising champions giving good employment. My concern is should these parks need to expand they find themselves land locked Wicklow County Council need with urgency look at an area where industry can develop and expand. I refer to Miltown where the towns should develop to. Industry would develop westward to meet Glenealy. We have the road and rail with such a development we could see our power of straight be strong when we go to Central government for funding. Example, The last Urban Council there rushed in to giving "Molte Metals" a right on the inner morrough. This has proved to be a continuous problem for residents and organisations who have the interest of the morrough to heart. The port of Wicklow has become a rubbish distribution center. The tourist industry is most important to many a town in Ireland. We as a town have the wonderful visitors center "Wicklow Gaol". This service industry is under used, how many tourists do we here in Wicklow - Ashford do we miss out on when "St Kevens" bus service does not call into Mount "Usher Gardens and Wicklow Gaol". The upgrade of the M11 Ballinacorney north to Arklow bypass has been long overdue how many lives have been lost on this road. By-passes can destroy towns and villages but the Ballybamey - Behave has always bypassed Wicklow town. Wicklow County Council can use these years of experience to regenerate the east side of the M11.

4 Conclusion; With the abolition of the Urban Councils the people have been left without the local man. The influx of new residents will mean Councilors will hear new ideas and arguments. Wicklow County Council has to work with their elected peoples representatives to produce a concrete vision for the development of Wicklow Town, Ashford, Glenealy and Rathnew. We as a people are much more aware of our Environment and it is this area that Wicklow County Council can act as providers and guiders. We have a great opportunity let's not get lost in red tape and self interests.

Muel G. Mean

73A Cnoc Na Manach
Cill Manthair
Co. Cill Manthair
19-12-2014

Padraic O'Duill



72

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 12 November 2014 21:40
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Wednesday, November 12, 2014 - 21:40 Submitted by anonymous user:
[86.40.136.193] Submitted values are:

Name: Michael O'Keeffe
Organisation, Group, Company, etc :
Address: Ballymanus< Tinahely, Co. Wicklow
Email:

--Topics--

- :
- :
- :
- : Tourism
- :
- :
- :
- : Built_and Natural_Heritage_including_Landscape
- :
- : Local_Plans
- :
- : Other



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

The zoning of areas deemed favoured or less favoured for windfarm development needs to be changed from the present plan. The scenic beauty of the Aughrim, Annacurra and Croghan valley areas is threatened by the "less favoured" designation in the current plan. This area needs to be protected for locals and tourists alike.

Allowing winfarms in the areas of counties close to other county boundaries may cut down on the number of available objectors but will lead to an over concentration of tubines in one area, as can be seen in the Bunclody/Ferns area of Wexford. I contend that there are already enough permissions granted in this area albeit by An Bord Pleannala.

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/17>

To whom it concerns.

Housing: Ch 9.

I would like to submit the following points to be included when considering and drawing up the Strategic Policy of the CDP 2016.

As in your issues document.

Q. Those groups affected by affordability issues in our area.

Please give serious consideration to those who have been most affected during the last ten years of Housing costs ie Celtic Tiger and those now with negative equity consequences. Example; a couple who could only afford in 2005 to buy a high density small apartment and now have children and are 'stuck' in negative equity with that property and cannot move on to meet proper house requirements for a young family.

Special consideration should be given within Planning guidelines to assist in every way possible this trapped group who range age 35 to 45 years.

Local/rural residents wishing to build own home:

Please consider the following when applicants apply to build a house in a rural area. Where an applicant is wishing to build on his/her family owned land and has a need to live in the area, having lived a substantial part of their lives in the area.

Prior to 2010 planning applicants in Wicklow would qualify to build within a 8 Km radius of the family home. Currently in Wicklow the qualification is 'Immediate Vicinity of family home' with no definable distance explained in clear terms and the definition of what is considered Local.

We would draw your attention to the existing case in Kildare CDP in particular Table 4.3 Schedule of Local Needs where the norm is, Local defined as 5Km. Please reinstate a reasonable distance for clarification.

Meath CDP Table 10.4. Whereby persons who are an intrinsic part of the rural community are given special consideration if involved in part time or full time agriculture. Where they have proven they have a housing need and existing ties to the rural community.

For Example currently a person born and raised at the southern end of Newtownmountkenny in a rural setting is apparently not considered Local to qualify to build on family land on the northern part of the town less than 3 Km away in distance. This is less restrictive in both of these Counties.

Example: Where there is an objection by others to An Bord Pleanála local people in Wicklow should not be disadvantaged or treated differently to their neighbouring counties because of the variation or vagueness of rules and misinterpretations.

Rural to Urban in LAPs.

As we have been re designated from Rural to Urban in the Newtownmountkennedy LAP and changed from Newcastle to Newtownmountkennedy we would like this to be reversed as it is of no benefit to us or our children. We do not understand why this was done without consultation with us directly.

Organic Food Farm Production.

Please look at the growing Interest in Local Organic Food Production in particular to assist in every way possible and allow those trying to set up business in small enterprises such as in small organic high labour farms.

I hope you give our submission due consideration and would like to discuss further some anomalies and lack of consistency from one Plan to the next and how that affects people and residents of this County. Please remember that families in general are trying to do our best to provide a home for their families while costs associated with the planning process are growing and becoming prohibitive.

Kind regards,

Sean and Ann Owens

Leonora Earls

From: Wicklow County Council [mailto:michael@pindytech.ie]
Sent: 23 December 2014 12:16
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Tuesday, December 23, 2014 - 12:15 Submitted by anonymous user:
 [86.47.11.226] Submitted values are:

Name: Alun Owens
 Organisation, Group, Company, etc : Easthill Farm
 Address: Newtownmountkennedy, Co. Wicklow
 Email:

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

Wicklow has a large active community of organic producers and particular reference should be made to support this industry with clearly identified potential in the county.

Agri-food, fisheries and forestry represent Ireland's largest indigenous industry with notable economic, social and environmental interdependencies that pervade the island of Ireland. Collectively, the industry employs some 150,000 people and has an annual output of over €24 billion, including a multi-billion export industry.

The annual value of the domestic organic market is approximately €100 million with some 1,500 operators engaged in organic production. Unlike many sectors of horticulture, and indeed the industry as a whole, where the trend is towards consolidation, organic production is particularly suited to small-scale production.

The targets set out in the Programme for Government i.e. an increase in organic land use to 5% from the current level of just over 1% is ambitious and will require actions in a number of areas including promotion, marketing, innovation, research and product development.

1 Ref. pg 1, Context

<http://www.agriculture.gov.ie/media/migration/farmingsectors/organicfarming/OrganicFarmingActionPlan20132015230414.pdf>

2 Ref pg 4, Introduction ,

<http://www.agriculture.gov.ie/media/migration/farmingsectors/organicfarming/OrganicFarmingActionPlan20132015230414.pdf>

3 Ref. pg 47, 4.5 Organic Production

<http://www.agriculture.gov.ie/media/migration/agri-foodindustry/foodharvest2020/2020FoodHarvestEng240810.pdf>

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<http://www.wicklow.ie/node/810/submission/63>

Town Planning Submission

Statutory Review Wicklow Development Plan 2010-2016

18th December 2014



PegasusLife



Hughes Planning & Development Consultants

The Mash House, Distillery Road, Dublin 3
www.hpdc.ie

1.0 Introduction

Hughes Planning and Development Consultants, The Mash House, Distillery Road, Dublin 3 on behalf of PegasusLife, 27 Merrion square, Dublin 2 make this submission to the Wicklow County Council review of the County Development Plan 2010-2016 and to its preparation of a new County Development Plan for its functional area for the period 2016-2022. We request that the recommendations of this submission be given full consideration in preparation of the forthcoming County Development Plan 2016-2022 in accordance with Part II Section 11 of the Planning and Development Act 2000 (as amended). This submission has regard to the Housing Strategy section raised in the Issues Booklet (Stage 1 public consultation) in proposing policy initiatives to promote the provision of purpose built accommodation for those in later life ("empty nesters") to downsize from large homes to free up housing stock in established areas.

There has been sharp decline in housing availability both in new homes for families and properties to allow downsizing to occur since early 2012. It is submitted for the consideration of the planning authority that an expanded policy approach to address this issue is required. The issues paper identifies a strong demand for new housing to be delivered over the plan period (sufficient to accommodate an increase in population of 40,160 people) and we contend that a portion of this demand can be effectively met in a socially advantageous and sustainable manner by the provision of specialist residential accommodation for the older cohort of the population of the county. This would allow downsizing and freeing up of residential stock in central urban areas well served by public transport, schools and other services in part as an alternative to greenfield development.

Settlement	1996	2002	2006	2011	2022
Bray	25,760	28,002	28,814	29,339	45,000
Wicklow / Rathnew	8,727	10,776	11,919	13,468	24,000
Arklow	8,557	9,993	11,759	13,066	23,000
Greystones/ Delgany	11,296	11,913	14,569	17,208	24,000
Blessington	1,860	2,509	4,018	4,780	7,500
Newtown	2,528	2,521	2,548	3,073	7,500
Ashford	1,215	1,356	1,494	1,484	3,000
Aughrim	745	871	960	1,315	2,000
Baltinglass	1,127	1,260	1,735	1,786	3,500
Carnew	795	809	892	1,145	2,000
Enniskerry	1,275	1,904	1,881	1,940	3,000
Kilcoole	2,694	2,826	3,252	4,063	5,000
Rathdrum	1,234	1,387	1,528	1,638	5,000
Tinahely	630	692	965	956	1,550
Avoca	490	564	622	717	900
Donard	162	201	182	179	400
Dunlavin	693	914	897	793	2,500
Kilmacanogue	818	834	839	799	1,100
Newcastle	763	851	938	817	1,750
Roundwood	446	518	571	780	1,300
Shillelagh	324	278	311	426	750
Total town population	72,139	80,979	90,694	99,772	164,750
Large villages			3,135	3,438	4,635
Small villages			1,059	1,087	1,809
Rural clusters			980	1,009	1,280
Open countryside			30,328	31,334	35,278
Total rural	30,544	33,697	35,502	36,868	43,002
County total	102,683	114,676	126,196	136,640	176,800

Figure 1.0 Extract from Wicklow County Pre-Draft Public Consultation Issues Booklet showing past population growth patterns and in the county and current 2022 population targets.

This submission has regard to the provisions of Chapter 4 'Population, Housing and Settlement' of the current Wicklow Development Plan 2010-2016, with particular reference to provision of residential accommodation to meet the needs of older people. In particular we note the provisions of Policy HS11, which appears to place the onus for the provision of this type of specialist accommodation on Part V agreements:

'Policy HS11 To encourage proposals from developers to satisfy Part V obligations which are directed toward special need categories – namely, elderly accommodation, travellers accommodation, specialised accommodation for the homeless and specially adapted accommodation for persons with disabilities – where the proposal is related to an identified local need and is consistent with other policies of the Development Plan.'

This submission also has regard to p9 of the Pre-Draft Public Consultation Booklet which addresses housing supply and notes that:

'1. The plan must put in place make provisions to ensure there is enough zoned, serviced housing land, in the right locations, to meet the needs of the planned population of the county...'

The issues paper goes on to pose to the following questions at p9 (Housing) p10 (Housing Strategy):

'What types of houses/apartments are required and what kinds of densities are appropriate?'

'Is there a need for special types of housing in your area to meet particular groups needs e.g. the 'elderly, those with special needs?'

This submission will propose that the forthcoming development plan include a specific policy framework for the private delivery of specialised accommodation for older people having regard to the changing population structure of the county.

In April 2011 Wicklow had a population of 136,640 persons. There were 15,001 persons aged 65 years and over (11% of the population), however the percentage of persons within the over 65 cohort will clearly increase towards 20% of the population over the life of the next development plan.

The changing demographics and the ageing of the County's population profile pose challenges to be addressed in the draft plan. There has also been a sharp decline in housing availability both new homes for families and properties in appropriate areas to allow downsizing by the older cohort of the population to occur. It is submitted for the consideration of the planning authority that an expanded policy approach to this issue is required.

It is submitted that the draft plan should include specific policy initiatives to promote the provision of purpose built accommodation for those in later life ("empty nesters") to downsize from large homes to free up housing stock in established areas as an alternative to meeting the demand for housing through widespread rezoning of greenfield lands.

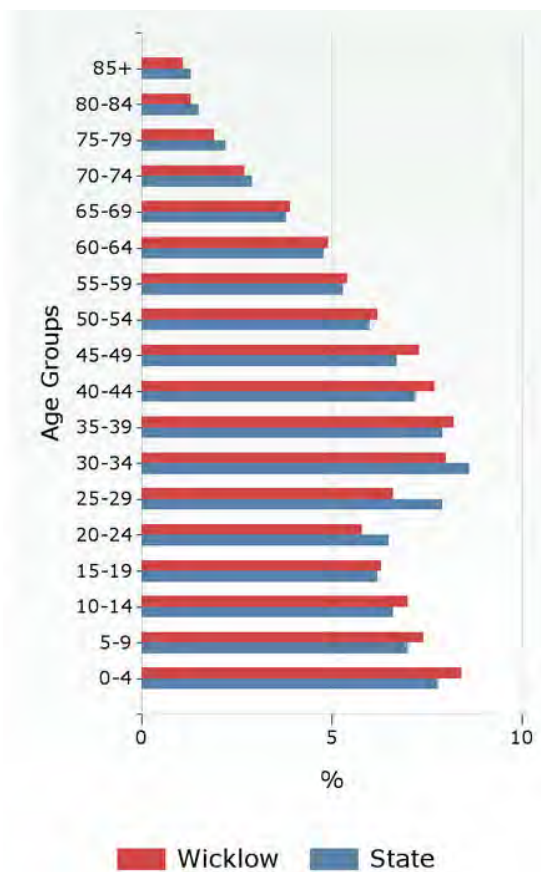


Figure 2.0 (opposite) Wicklow Population Structure (Census 2011)

2.0 Pegasus Life Profile

PegasusLife is a business on a mission to fundamentally change the way retirement housing is understood and delivered in Ireland. The company which began life 30 years ago has evolved to become an industry leader in the provision of retirement housing in the United Kingdom and intends to do the same here in Ireland. To date two sites have been acquired in Dublin. The company's central idea is that everyone, irrespective of age, shares the aspiration to live in a beautifully designed, socially inclusive environment - supported by first class services and maintenance regimes- which specifically responds to their needs as older people.

PegasusLife's focus is on the highest quality of design in landscape, architecture, accommodation and management to create accommodation to which people can aspire and which enhances its location, with each design bespoke to the site and community in which it is located. Following this submission PegasusLife will seek to expand on these themes in discussion with Wicklow County Council and through a more detail submission following the publication of the draft development plan.

3.0 Population and Housing

It is widely acknowledged that the population is ageing. Older people make up an increasing proportion of the population, the number of older people is rising in absolute terms and a high proportion of population growth is amongst older people. The Irish Longitudinal Study on Ageing (TILDA)¹ shows that Ireland's population is projected to grow significantly over coming decades and the growth in the population of older people is particularly pronounced. The population aged 65 years and over is projected to increase very significantly from its 2011 level of 532,000 to around 1.4 million by 2046. The very old population (those aged 80 years of age and over) is set to rise even more dramatically, increasing from 128,000 in 2011 to between 484,000 and 470,000 in 2046.

Having moved up the housing ladder over the course of their lives, typically bringing up a family in a 3+ bedroom house, many older people find themselves living in their family homes long after their children have left home. Whilst people often have an emotional connection with their home and are used to being active members of the community in which they live, the reality of living alone or as a couple in a large home in a suburban area can be quite different from the aspiration.

Many older people suffer from issues of isolation and loneliness which contribute significantly to issues of poor health. Older houses are not suitable for later life and are difficult and expensive to adapt and they struggle to maintain both property and garden. Access to services, facilities and care can be limited as people's mobility decreases.

For most older people the only alternative to remaining in unsuitable homes is to move to a care home. However, for a generation of people who are mainly owner-occupiers (most older people own their homes, many with little or no mortgage) sacrificing independence and moving to a care home is an unattractive prospect. Moves are generally put-off as long as possible and eventually triggered by a fall or other significant health event, or by the death of a life-partner. An already falling quality of life is further reduced as people move for the last short years or months of their lives to a form of accommodation few would choose as a positive step.

Whilst some of the issues faced by older people can be addressed by downsizing into smaller homes available on the market, such a move does little to address the quality of life or access to services and only puts-off the inevitable move to a care home. The sad reality is that most family homes released to the market by older people are released as a result not of downsizing but of the death of the owner.

In addition to failing to provide the quality of life people deserve in their old age, maintaining this pattern of home ownership ties-up large family homes occupied by couples or single older people, restricting the supply of homes for new and growing families, which in turn impacts on the supply of smaller homes. Intervening by introducing an alternative form of housing, 'housing with care' for older people looking to downsize would result significant movement throughout the housing market.

¹ *TILDA is a large-scale, ongoing, nationally representative, longitudinal study on ageing in Ireland, the overarching aim of which is to make Ireland the best place in the world to grow old. Based in Trinity College, Dublin, it is funded by the Department of Health, The Atlantic Philanthropies and Irish Life plc.*

Providing housing with care in which older people can live in supported independence enhances people's wellbeing and longevity. It reduces the need for medical and social care and provides savings to the public purse. It allows people to maintain their social connections and stay engaged in their communities. Finally, developing housing with care has significant direct and indirect benefits for the supply of housing by bringing forward higher density homes in sustainable locations and freeing up under-occupied existing housing stock.

4.0 Housing with Care Concept

It is proposed that a solution for many older people is the introduction of a new model of housing in later life, which provides high quality accommodation which supports people to live as independently as possible in a home of their own specifically designed to meet their needs. Such models are a very significant feature of housing markets in the US, Australia, New Zealand and elsewhere and is increasingly popular in the UK yet barely exists in Ireland at present.

In order to allow flexibility of design to reflect the nature of different locations and market demands, the intention is not to describe a fixed and inflexible model but to establish the common characteristics of a housing with care concept. These might include the following:

- Age restriction – minimum age limit for residents;
- Age-specific design – development layout and housing design providing a sophisticated approach to enabling older people to live independently in a barrier-free environment;
- Supported independence – individual homes fully self-contained and owned (leasehold) or rented to occupiers;
- Management – freehold retained by developer-operator or the residents themselves and the development managed in perpetuity as specialist accommodation for older people;
- Supported – a range of services and facilities provided to residents depending on the scale of the development, many paid for through service and management charges others (for example food) provided on a pay-as-you-go basis. Services and facilities (beyond normal estate management) may include some/all of the following:
 - Shared lounge areas, café/restaurant, hot/cold food service;
 - Library, hobby rooms, IT suite, cinema;
 - Health and wellbeing suite, gym, spa, swimming pool, hydrotherapy, treatment rooms;
 - Domiciliary care service – accommodation for and contract with partner service provider on larger sites or where such services not readily available in the market; and,
 - Housekeeping, laundry, concierge.

5.0 Benefits of Housing with Care

Providing older people with high quality housing with care would bring significant benefit to older people themselves and to the wider community:

- Improved quality of life through specific design, enabling independence in older age;
- Sociability and response to loneliness – specialist housing with people of the same age group designed to provide opportunities for social engagement addresses some of the main issues facing older people;
- Savings to the healthcare economy – specialist housing for older people, particularly with support provided, can result in efficiencies and reduced service usage benefitting the healthcare economy. A reduction in trips and falls and general improvements in health and wellbeing reduce hospital admissions whilst on-site support means people can recuperate in their own homes after an illness or medical incident, shortening hospital stays;
- Improving the housing market – enabling older people to downsize to appropriate accommodation frees-up housing for families which in turn creates further movement in the market; and,

- Continuity of community – allowing older people to remain active members of the communities in which they live rather than being isolated within them or moving further afield maintains community coherence

It is submitted that the above factors are broadly in line with current Wicklow development plan policy but there is currently no specific acknowledgement of the housing with care concept with the relevant residential uses classes being restricted to either residential or residential institution. We submit that it would be appropriate to consider an additional use class within the forthcoming 2016-2022 development plan to assist in bringing forward suitable accommodation for older people who would benefit from downsizing into accommodation providing supported independence, addressing current underprovision.

6.0 Proposed Use Classification

We request that the provisions of Chapter 4 'Population, Housing and Settlement' of the current Wicklow Development Plan 2010-2016 be updated as part the review process to make specific reference to the desirability of the supported living model with care model and the provision of a policy framework and associated development standards to facilitate the delivery of this form of social housing. In addition, we would request that specific proposals be incorporated into the draft Wicklow Housing Strategy 2016-2022 to clarify and provide clear guidance on Part V Social and Affordable Housing Requirements as they pertain to 'housing with care' residential developments.

We further request that the planning authority give consideration to the inclusion of a new use class within the Draft Wicklow Development Plan 2016-2022 to differentiate specialist accommodation to be provided for older people from typical open market housing, as follows:

- *'Residential (Housing with Care) - Provision of specialist housing for older people providing independent living accommodation in a supported and managed environment with services and facilities provided on-site.'*

7.0 Conclusion

We request that this submission be considered in the preparation of the County Development Plan 2016-2022 with the inclusion of a specific use class and supporting policy related to the 'housing with care' concept.

Pegasus Life would like to indicate their availability to discuss the 'housing with care' concept as applied to the Irish setting with officers of the planning authority if required. We look forward to the publication of the draft development plan in due course. Should you require any further information please do not hesitate to contact us.



Kevin Hughes MIPI MRTPI
Director
for HPDC

Glen Heste
Manor Kilbride
Co Wicklow

Administrative Officer,
Wicklow County Council,
Station Road, Wicklow Town

22/12/14

To whom it may concern,

I enclose a submission regarding a) the current review of the existing Wicklow County Development Plan and b) the preparation of the new County Development Plan for the Stage 1 – Pre-Draft Public Consultation.

Yours sincerely,

Anthony Quinn

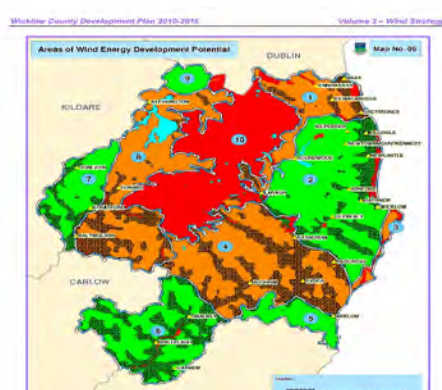
Q. What Natura 2000 sites are under particular threat in Wicklow?

(p26 *County Wicklow Development Plan 2016 - 2022 Issues Booklet*)

“Evidence to date shows that, whereas, in general, wind energy does not represent a serious threat to wildlife, poorly sited or designed wind farms can pose a potential threat to vulnerable species and habitats, including those protected under the Habitats and Birds Directives”, according to the European Commission guidance on the development of wind farms.¹

The “integrity”² of both Poulaphouca Reservoir SPA [000731] and Wicklow Mountains SPA [004040] are under particular threat from potential wind farm development in areas currently designated as “favoured” in the “Areas of Wind Energy Development Potential” map in the *Wicklow County Wind Energy Strategy* in the current Development Plan 2010 – 2016. This submission uses scientific data to demonstrate the adverse effects of potential wind farm development on the integrity of Poulaphouca Reservoir SPA and Wicklow Mountains SPA, and the also focusses on the imperative to use current scientific species distribution data to draft forthcoming strategy in Development Plan 2016 – 2022.

The effects of wind farm development on the Natura sites' conservation objectives must be “identified in the light of the best scientific knowledge in the field”, and “no reasonable scientific doubt” can remain, as per the relevant EU Court of Justice rulings in cases C-127/02 1 C-239/045 and C-6/04.2. The DoEHLG states that “implicit” in Article 6(3) of the Habitats Directive “is an obligation to put concern for potential effects on Natura 2000 sites at the forefront of every decision made in relation to plans and projects at all stages”.³



Current wind farm strategy: presents a particular threat to the site integrity of two Natura 2000 sites.

¹ European Commission Guidance On Wind Energy Development in Accordance with the EU Nature Legislation. Available at http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

² “Integrity” is defined throughout this submission as “the coherence of the site’s ecological structure and function, across its whole area or the habitats, complex of habitats and/or populations of species for which the site is or will be classified”. Definition of “integrity” from *Managing Natura 2000 Sites* at http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf

³ DoEHLG Circular NPW 1/10 & PSSP 2/10. *Appropriate Assessment under Article 6 of the Habitats Directive: guidance for Planning Authorities* <http://www.npws.ie/media/npws/publications/circulars/Circular%20NPW1-10%20&%20PSSP2-10%20Final.pdf>

A “proposed development does not have to be located within the Natura 2000 site in order to trigger the need for an AA as plans and projects outwith the site may also carry the likelihood of adverse effects”, according to European Commission [EC] guidance on wind farms.⁴ “The lack of information or data cannot be used as a reason for approving a [windfarm] plan or project”, as is stated by the European Commission in wind farm guidance.⁵ “If the adverse effects cannot be ruled out or if there is too much scientific doubt, the adverse effects have to be assumed”, states EC guidance.⁶ The key to understanding the adverse effects of wind farm development strategy in “most favoured” areas as per the would have on the “integrity”⁷ of two Natura sites is to now discuss the fauna in question in the context of wind farm strategy. The “area of distribution” of three named species from the two Natura sites takes areas currently defined as “favoured”.

Severe effects of Wind Farms on Raptors

Some relevant facts from scientific literature highlight the severe and disproportionate effects that wind turbines have on Wicklow SPA-protected raptors such as Merlin and Peregrine Falcon. “Raptor species are relatively less abundant and produce fewer young, compared with many other groups of birds, human-caused fatalities could have a more noticeable effect on populations”, according to David Sterner, in a report for the California Energy Commission.⁸ “Because wind farms tend to be built on uplands, where there are good thermals, they kill a disproportionate number of raptors”, according to Clive Hambler of Oxford University.⁹ The European Commission highlights “significant levels of mortality” among raptor species at wind farms, and state that

“there has been a particular concern over the potential effects of collisions between various species of raptors and inappropriately sited wind farms. Primarily, appropriate siting of wind farms is an issue of location and avoiding key areas for raptors”¹⁰

⁴ Quote from Page 64 of *European Commission Guidance On Wind Energy Development in Accordance with the EU Nature Legislation*. Available at http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

⁵ Quote from Page 67 of *European Commission Guidance On Wind Energy Development in Accordance with the EU Nature Legislation*. Available at http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

⁶ Quote from Page 82 of *European Commission Guidance On Wind Energy Development in Accordance with the EU Nature Legislation*. Available at http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

⁷ “Integrity” is defined throughout this submission as “the coherence of the site’s ecological structure and function, across its whole area or the habitats, complex of habitats and/or populations of species for which the site is or will be classified”.

⁸ Page 12-13 *A Roadmap for PIER Research on Avian Collisions with Wind Turbines in California* by Dave Sterner. Available at http://www.iberica2000.org/documents/EOLICA/REPORTS/Dave_Sterner_2002.pdf

⁹ *Wind farms vs wildlife: The shocking environmental cost of renewable energy*, Clive Hambler in *The Spectator* on 5 January 2013. Available at <http://www.spectator.co.uk/features/8807761/wind-farms-vs-wildlife/>

¹⁰ Page 34 of *European Commission: Wind Energy Developments and Natura 2000*. Available at

In a legal precedent, US energy company Duke was recently fined \$1 million over the deaths of 14 raptors at two windfarms, according to the BBC.¹¹

This BBC article also reports that the scientists found that “eagles often fail to look up as they search for prey until it is too late, slamming into the turbines. They can also be sucked in by the tornado-like vortex created by the fast-moving blades”.¹²

There has already been at least one documented fatality of a protected raptor species by a wind turbine in Ireland. “The eagle, a 3 year old female released in Killarney National Park in 2008, was found below a wind turbine at the Silahertane Wind Farm on the Kerry-Cork border south-east of Kilgarvan on 9 March 2011”, states the Golden Eagle Trust.¹³

An important fact is that wind turbines attract insects, which in turn attract passerine birds, which in turn attract merlins, peregrine falcons and other raptors which occur in areas marked as favoured in the current wind farm strategy. The European Commission guidance states:

A widely accepted explanation is that insects may concentrate around wind turbines, both at onshore and offshore locations, attracted by the heat radiation from the wind turbine. In certain weather conditions bats, as well as several species of insectivorous passerine birds, may be attracted to these concentrations of insects.¹⁴

http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

¹¹ US firm Duke Energy pays out over wind farm eagle deaths <http://www.bbc.co.uk/news/world-us-canada-25058346>

¹² US firm Duke Energy pays out over wind farm eagle deaths <http://www.bbc.co.uk/news/world-us-canada-25058346>

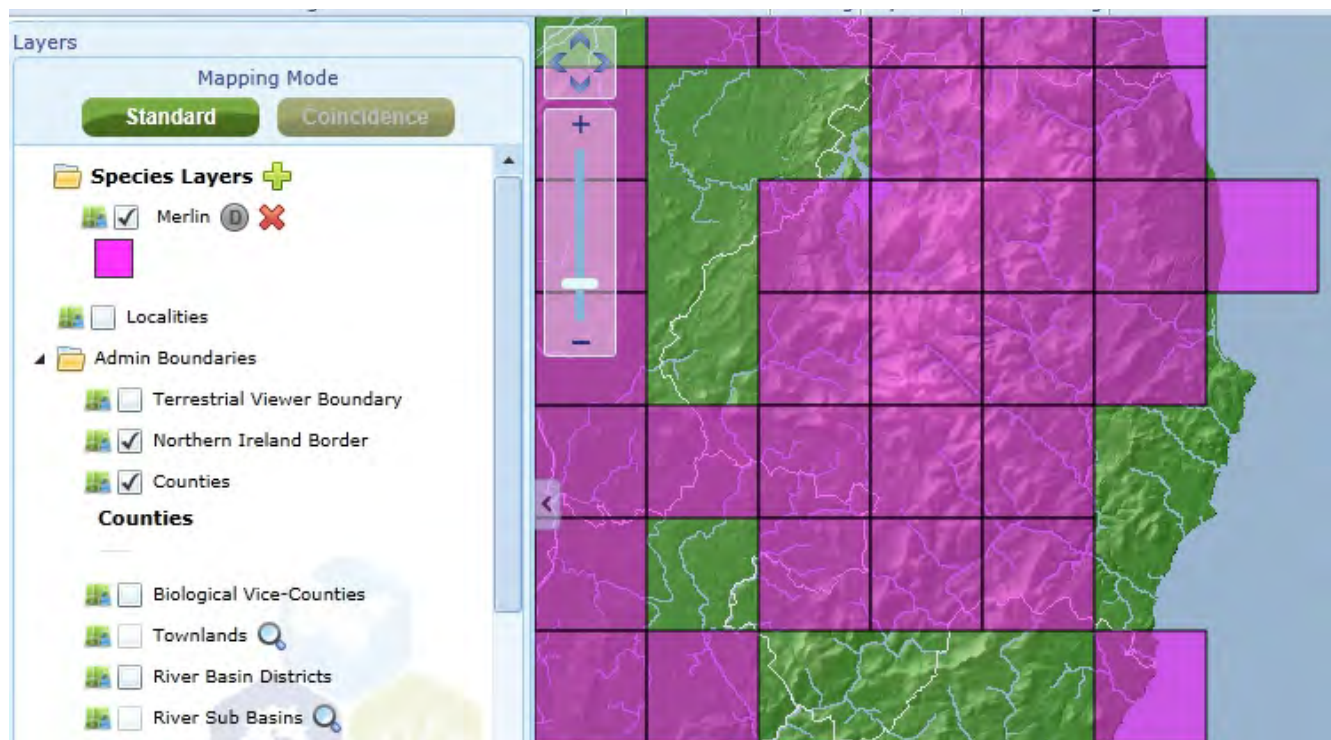
¹³ White-tailed Eagle killed in collision in Co Kerry. Available at http://www.goldeneagle.ie/index.php?option=com_k2&view=item&id=554:white-tailed-eagle-killed-in-collision-in-co-kerry&Itemid=132

¹⁴ Page 38 of *European Commission: Wind Energy Developments and Natura 2000*. Available at http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

Merlin ~ *Falco columbarius* ~ Meirliún

Merlin are recorded as present on the National Biodiversity Centre Species Map ¹⁵ in Areas 2, 5, 6, 7, 8 and 9 of the current wind farm strategy map. The fact that there were just nine breeding pairs recorded within the SPA ¹⁶ highlights how vulnerable the Wicklow Uplands' population is.

According to Birdwatch Ireland, the Merlin is a “rare breeding bird in Ireland” and is “amber listed due to a small breeding population”.¹⁷ The merlin is a bird of “special conservation interest” in the Wicklow Mountains SPA (004040): it is one of two raptor species for which the SPA was created.¹⁸ The Merlins that occur in “favoured” wind farm strategy Areas 2, 5, 6, 7 and 9 are part of this “population”, defined here as “group of individuals of the same species living in a geographic area at the same time that are (potentially) interbreeding (i.e. sharing a common gene pool)”.¹⁹



The distribution of Merlin, of “special conservation interest” to the Wicklow Mountains SPA. There is a significant overlap with Areas 2, 5, 6, 7, 8 and 9 of the current wind farm strategy.

¹⁵ <http://maps.biodiversityireland.ie/#/Map>

¹⁶ See site synopsis for Wicklow Mountains SPA 004040, available at <http://www.npws.ie/media/npwsie/content/images/protectedsites/sitesynopsis/sy004040.pdf>

¹⁷ Birdwatch Ireland website <http://www.birdwatchireland.ie/IrelandsBirds/Raptors/Merlin/tabid/398/Default.aspx>

¹⁸ See site synopsis for Wicklow Mountains SPA 004040, available at <http://www.npws.ie/media/npwsie/content/images/protectedsites/sitesynopsis/sy004040.pdf>

¹⁹ The Wicklow Uplands' “population” is as per the European Commission definition: a “group of individuals of the same species living in a geographic area at the same time that are (potentially) interbreeding (i.e. sharing a common gene pool)”. See footnote on page 10 *Guidance Document on the Strict Protection of Animal Species of Community Interest under the Habitats Directive 92/43/EEC*. Available at http://ec.europa.eu/environment/nature/conservation/species/guidance/pdf/guidance_en.pdf

The Merlin is an Annex I species under the Birds Directive: it “shall be the subject of special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution”.²⁰ The “population”²¹ in the Wicklow Uplands have to therefore be protected from injury, or from disturbance / damage to their breeding or resting places wherever they occur, even if they are not within the bounds of a designated nature conservation site. Turbines kill raptors, as discussed above.

Any wind farm plans or projects in the areas of distribution of Merlin inside of current wind farm strategy Areas 2, 5, 6, 7, 8 and 9:

- would not comply with Development Plan Objective BD3: “To maintain the favourable conservation status of existing and future Natura 2000 sites (SACs and SPA’s) and Annex I- Habitats and Annex II-Animal and Plant species in the County”;
- would adversely affect the integrity of Natura 2000 sites Wicklow Mountains SPA and Wicklow Mountains SAC in regards to the breeding population of Merlins that is listed in the Natura 2000 data forms for both the SAC and the SPA [e.g. displacement, breeding success, collision risk]
- must be subject to an Appropriate Assessment process in light of the Wicklow Mountains SPA's conservation objective: “To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: *Falco columbarius* [breeding] and *Falco peregrinus* [breeding]”.
- would not comply with the Habitats Directive (92/43/EEC). For example, Article 12 regarding “deliberate disturbance” and the “deterioration or destruction of breeding sites or resting places”;
- would not comply with the Birds Directive (2009/147/EC). Merlins are an Annex I species. For example, Article 5 regarding “deliberate disturbance” that would have a “significant negative effect on the birds” and Article 4.1 requiring “special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution”,²²

²⁰ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:01:EN:HTML>

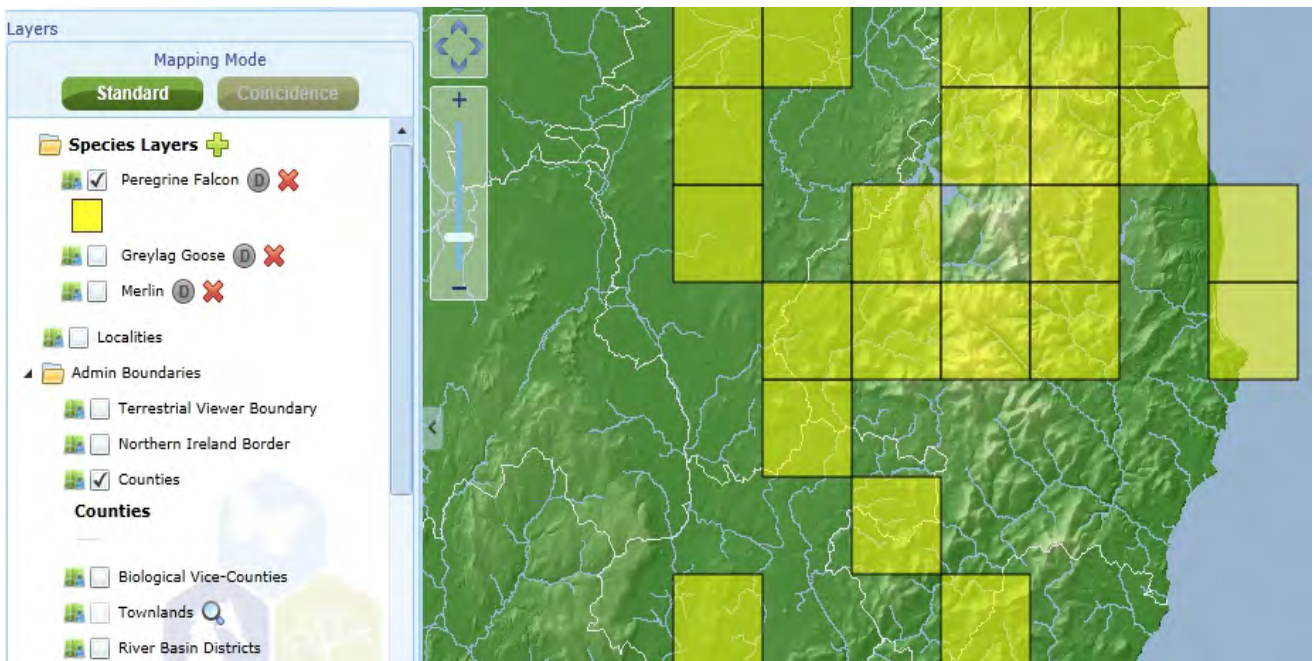
²¹ The Wicklow “population” is as per the European Commission definition: a “group of individuals of the same species living in a geographic area at the same time that are (potentially) interbreeding (i.e. sharing a common gene pool)”. See footnote on page 10 *Guidance Document on the Strict Protection of Animal Species of Community Interest under the Habitats Directive 92/43/EEC*. Available at http://ec.europa.eu/environment/nature/conservation/species/guidance/pdf/guidance_en.pdf

²² Directive 2009/147/EC of the European Parliament and of the Council of 2009 on the conservation of wild birds. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:01:EN:HTML>

Peregrine Falcons ~ *Falco peregrinus* ~ Seabhac gorm

The Wicklow mountains is a “main breeding area” for Peregrine Falcons in Ireland, as Ratcliffe states in his book *The Peregrine Falcon*, (p57). The species is of “special conservation interest”, for the Wicklow Mountains SPA (004040), where the peregrine falcon is a bird of “special conservation interest”, with 20 pairs documented in 2002, and the second raptor for which the SPA was created.²³

The Peregrine Falcon is an Annex I species under the Birds Directive: it “shall be the subject of special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution”.²⁴ The “population”²⁵ in the Wicklow mountains should be protected from injury, or from disturbance / damage to their breeding or resting places wherever they occur, even if they are not within the bounds of a designated nature conservation site. Turbines kill raptors, as discussed above.



The distribution of Peregrine Falcon, of “special conservation interest” to the Wicklow Mountains SPA. There is a significant overlap with Areas 2, 6, 7, 8 and 9 of the current wind farm strategy. From National National Biodiversity Data Centre Mapping System. At <http://maps.biodiversityireland.ie/>

²³ See site synopsis for Wicklow Mountains SPA 004040, available at <http://www.npws.ie/media/npwsie/content/images/protectedsites/sitesynopsis/sy004040.pdf>

²⁴ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:01:EN:HTML>

²⁵ The Wicklow mountains “population” is as per the European Commission definition: a “group of individuals of the same species living in a geographic area at the same time that are (potentially) interbreeding (i.e. sharing a common gene pool)”. See footnote on page 10 *Guidance Document on the Strict Protection of Animal Species of Community Interest under the Habitats Directive 92/43/EEC*. Available at http://ec.europa.eu/environment/nature/conservation/species/guidance/pdf/guidance_en.pdf

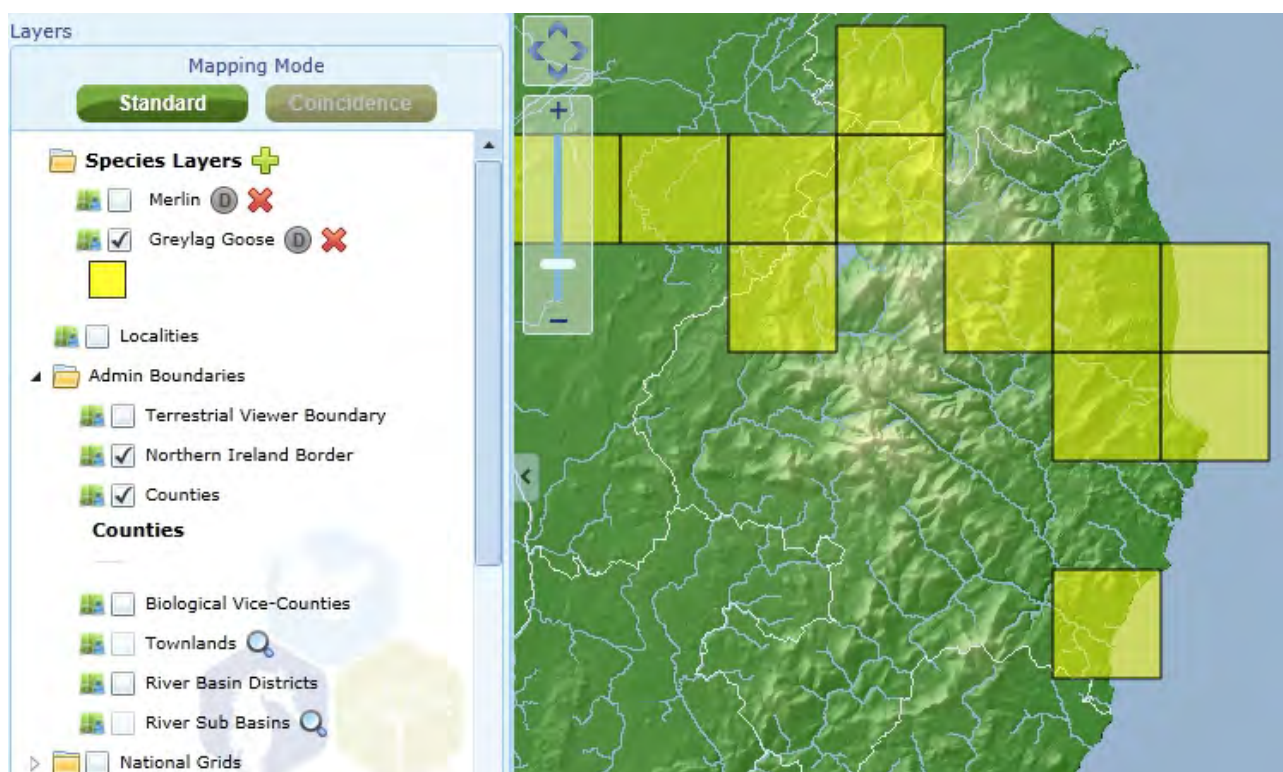
Any wind farm plans or projects, including strategic “favoured” designations, in the areas of distribution of Peregrine Falcons inside of current wind farm strategy Areas 2, 6, 7, 8, 9 of the current wind farm strategy

- would be contrary to Development Plan Objective BD3: “To maintain the favourable conservation status of existing and future Natura 2000 sites (SACs and SPA’s) and Annex I- Habitats and Annex II-Animal and Plant species in the County”;
- would adversely affect the integrity of Natura 2000 sites Wicklow Mountains SPA and Wicklow Mountains SAC in regards to the breeding population of peregrine falcons that is listed in the Natura 2000 data forms for both the SAC and the SPA [e.g. displacement, breeding success, possible collision risk]
- must be subject to an Appropriate Assessment process in light of the SPA's conservation objective: “To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: *Falco columbarius* [breeding] and *Falco peregrinus* [breeding]”.
- would not comply with the Habitats Directive (92/43/EEC) as regards Peregrine Falcons. For example, Article 12 regarding “deliberate disturbance” and the “deterioration or destruction of breeding sites or resting places”
- would not comply with the Birds Directive (2009/147/EC) as regards Peregrine Falcons, an Annex I species. For example, Article 5 regarding “deliberate disturbance” that would have a “significant negative effect on the birds” and Article 4.1 requiring “special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution”.²⁶

²⁶ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:01:EN:HTML>

Greylag Geese (*Anser anser*)

The local population of Greylag Geese (*Anser anser*) is a “feature of interest” and is of “international importance”, according to the Natura 2000 site synopsis for Poulaphouca Reservoir (000731).²⁷ The Greylag Goose is recorded as present in the National Biodiversity Centre Database in current wind farm strategically “favoured” Areas 2, 7 and 9.²⁸ “Area 9” is on the flight path corridor between Poulaphouca SPA and the documented feeding site: these Greylag Geese are commonly seen during wintertime in “Area 9”.



The distribution of Greylag Geese , of “special conservation interest” to the Poulaphouca SPA. There is a significant overlap with Areas 2, 7, 8 and 9 of the current wind farm strategy. From National National Biodiversity Data Centre Mapping System. At <http://maps.biodiversityireland.ie/>

²⁷ Poulaphouca Reservoir SPA 004063 site synopsis. Available at <http://www.npws.ie/media/npwsie/content/images/protectedsites/sitesynopsis/SY004063.pdf>

²⁸ See <http://maps.biodiversityireland.ie/>

Whooper Swans are also to be seen in “Area 9”. They are listed as present in throughout “Area 9” on the National Biodiversity Centre Database.²⁹ Whooper Swans are an Annex I species under the Birds Directive: they “shall be the subject of special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution”.³⁰ The “population”³¹ in Wicklow, which are documented in “Area 9”, have to therefore be protected from injury, or from disturbance / damage to their breeding or resting places wherever they occur, even if they are not within the bounds of a designated nature conservation site.

A recent review of scientific research on the effects of wind farms on geese and swans notes three adverse effects of wind farms on these species:

- 1) *displacement/habitat loss* (e.g. reduced use of prime feeding areas following construction of the turbines), 2) *barrier effects* (requiring a change in migration routes or local flight-lines to avoid wind farms, potentially increasing energy expenditure and disrupting links between sites), and 3) *collision mortality*.³²

Given that “Area 9” lies between the SPA and the feeding area, displacement/habitat loss, barrier effects and collision mortality would be all be adverse effects on Greylag Geese, and therefore on the integrity of Poulaphouca SPA: caused on an ongoing and cumulative basis by any wind turbine development within “Area 9”. Dr. E. Rees concludes that:

“The potential for wind farm development to cause large-scale displacement of geese and swans from internationally important wintering sites through habitat fragmentation and displacement from preferred feeding areas therefore should be analysed more rigorously and addressed more carefully in the planning process.”³³

“Birds making regular foraging flights between nesting and feeding areas may face enhanced risks” from turbines, as the European Commission states in guidance on wind farms.³⁴

An additional issue here is the collision risk for the geese and swans presented by the extra power lines that would be necessary to connect any turbines within wind farm strategy Areas 2, 7, 8 and 9 to the national grid. As noted in a recent EIS for Eirgrid, “collision impacts between Whooper

²⁹ See <http://maps.biodiversityireland.ie/>

³⁰ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:01:EN:HTML>

³¹ The Wicklow “population” is as per the European Commission definition: a “group of individuals of the same species living in a geographic area at the same time that are (potentially) interbreeding (i.e. sharing a common gene pool)”. See footnote on page 10 *Guidance Document on the Strict Protection of Animal Species of Community Interest under the Habitats Directive 92/43/EEC*. Available at http://ec.europa.eu/environment/nature/conservation/species/guidance/pdf/guidance_en.pdf

³² *Impacts of wind farms on swans and geese: a review* by Dr Eileen C. Rees of Wildfowl & Wetlands Trust, UK published in *Wildfowl*, 62. Available at http://www.wwt.org.uk/uploads/documents/1354572544_Wildfowl62.pdf

³³ *Impacts of wind farms on swans and geese: a review* by Dr Eileen C. Rees of Wildfowl & Wetlands Trust, UK published in *Wildfowl*, 62. Available at http://www.wwt.org.uk/uploads/documents/1354572544_Wildfowl62.pdf

³⁴ Page 102 of the European Commission's *Wind Energy Developments and Natura 2000*. Available at http://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

Swan and all levels of powerline have been cited in many reports as being a significant localized hazard for Whooper Swans commuting daily between roosting and foraging areas”³⁵ In a related legal case, the European Commission is currently bringing Bulgaria to the EU Court of Justice over the effects that wind turbines are having on populations of Red-breasted Geese.

Any wind farm plans or projects, including strategic “favoured” designations, in the areas of distribution of Greylag Geese inside of current wind farm strategy Areas 2, 7, 8, 9 of the current wind farm strategy:

- would not comply with Development Plan Objective BD3: “To maintain the favourable conservation status of existing and future Natura 2000 sites (SACs and SPA’s) and Annex I- Habitats and Annex II-Animal and Plant species in the County”;
- would adversely affect the integrity of Natura 2000 site Poulaphouca SPA, in regards to the population of Greylag Geese and their feeding grounds (e.g. displacement from foraging areas areas and collision risk).
- would need to be subject to an “Appropriate Assessment” process in light of Poulaphouca SPA's conservation objective: “To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: *Anser anser* [wintering]”.
- would not comply with the Habitats Directive (92/43/EEC). For example, Article 12 regarding “deliberate disturbance” and the “deterioration or destruction of breeding sites or resting places”;³⁶
- would not comply with the Birds Directive (2009/147/EC) as regards Greylag Geese and Whooper Swans. For example, Article 5: “deliberate disturbance” that would have a “significant negative effect on the birds”, Article 4.2: the “need for protection in the geographical sea and land area where this Directive applies, as regards their breeding, moulting and wintering areas and staging posts along their migration routes” and Article 4.4: “Outside these protection areas [SPAs], Member States shall also strive to avoid pollution or deterioration of habitats’.³⁷

³⁵ See 7.2 *Whooper Swan Report*. Available at <http://www.eirgridnortheastprojects.com/media/7.4%20Whooper%20Swan%20Report.pdf>

³⁶ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora Available at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:01992L0043-20070101:EN:NOT>

³⁷ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:01:EN:HTML>

Conclusion

It has been demonstrated in this submission that the site integrity of Wicklow Mountains SPA and Poulaphouca SPA is under particular threat from current county wind farm strategy. The EC guidance states:

“The Court has already held, in case C-127/02 *Waddenvereniging and Vogelbeschermingsvereniging* and confirmed in C-6/04 *Commission v United Kingdom of Great Britain and Northern Ireland* that Article 6(3) of the Habitats Directive makes the requirement for an appropriate assessment of the implications of a plan or project conditional upon there being a probability, or a risk, that it will have a significant effect on the site concerned. In the light, in particular, of the precautionary principle, such a risk is considered to exist if it cannot be excluded, on the basis of objective information, that the plan or project will have a significant effect on the site concerned.”³⁸

This “precautionary principle” which is present in European Court of Justice case law precedent, and which is inherent in both the Habitats and Birds Directives, needs to be proactively applied as regards wind turbines and associated powerlines in the next Wicklow county development plan and associated wind farm strategy.

There is a clear need to use the opportunity of the creation of the County Wicklow Development Plan 2016 - 2022 to reconsider the geographical areas marked as “most favoured” and “less favoured” in the light of all of the objective information available in the National Biodiversity Centre's scientific distributions of SPA “special conservation interest” species Merlin, Peregrine Falcon and Greylag Geese. This is so as to rule out adverse effects from wind farm development on Greylag Geese, Whooper Swans and Merlin, and therefore adverse effects on the integrity of the Natura 2000 sites Poulaphouca Reservoir [000731] and Wicklow Mountains SPA [004040].

With thanks.

³⁸ Page 4 of *European Commission Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC*. Available at http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf

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Ms. Leonora Earls,
Wicklow County Council
County Buildings,
Wicklow.

Courtown Road,
Gorey,
12th. Dec. 2014.

Submission on Draft Wicklow County Council Development Plan 2016 – 2022.

Concerning c. 12.75 acres at Newcastle Middle, Newcastle, Co. Wicklow.

A chara,

I am writing to make a submission for consideration in the drafting of the above development plan. I am part owner with others of the above lands, and I attach map of same.

This land is opposite the community centre, and adjacent to the school, and within a short walking distance of the village centre. There is road frontage on the Greystones / Wicklow road. There is a cluster of private houses to the Northern boundary of our lands, and Greenwood lane investments ltd, partly developed lands directly adjacent to our land. We believe that our lands are suitably close to the village centre to provide a good quality integrated development which would be compatible with any general objectives for development in Newcastle.

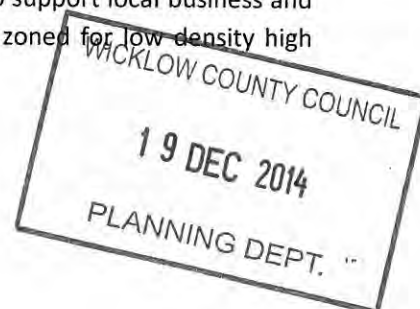
There is an old cottage on part of our land which we feel should be zoned existing residential, it adjoins the town boundary, and is not zoned on the current Newcastle plan, see map attached. I also note that the town boundary extends substantially beyond our land towards Rathnew, on the opposite side of the public road. I feel the town boundary should be extended in the proposed new plan on our side of the road as far as the 2 neighbouring residential properties, ie. More or less in line with the town boundary on the opposite side of the public road.

Under the current development plan 2010 – 2016 Newcastle is designated a Level 6 "Rural Town". "Rural Towns" are strong Rural Towns with a good range of infrastructural services that are suited to accommodating a significant element of urban generated housing demand. In the current issues booklet, stage1 public consultation, on the proposed new development plan the population targets for Newcastle are set out as follows:-

Population Growth to 1,500 by 2016 (from 817 in 2011), and further population growth to 1,750 by 2022. This is a reasonable growth target, however it is possibly conservative, and we would like to see a higher population growth target built into the new plan in order to support local business and community activities. We would also suggest that our land should be zoned for low density high quality residential development.

Yours sincerely,


Tom Redmond.



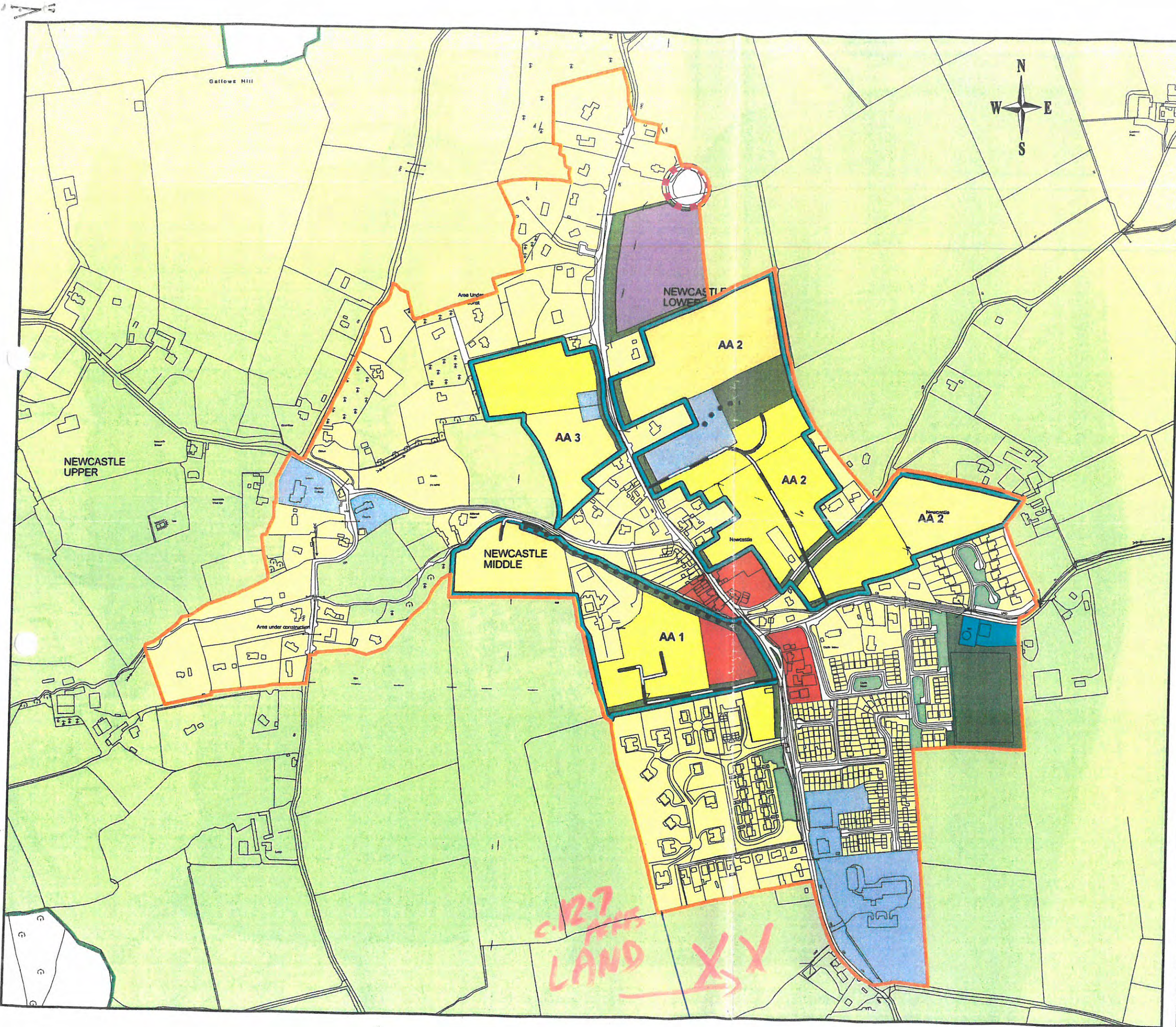
Land which is
the subject of
this submission

Existing Residential

New Residential Development

Ex'ing Cottage on $\frac{1}{2}$ acre

LAND REGISTRY
WICKLOW
County
Folio 7458 OS 19/25
This map should be read in conjunction with the folio
[plan No. on 1st page]
This map does not show opportunity or servient right
to the benefit of the benefactor or alien



NEWCASTLE TOWN PLAN
LAND USE ZONING OBJECTIVES

MAP 1

Legend

-  Existing Residential
-  Low Density Residential
-  Medium Density Residential
-  Town Centre
-  Employment
-  Public Open Space
-  Private Open Space
-  Agriculture/Greenbelt
-  Community/Education/Institutional
-  Public Utility
-  Town Boundary
-  Action Areas
-  Road Objective
-  Pedestrian/Cycling
-  Monument - Hillfort

Director of Services: **Desmond O' Brien**
Senior Planner: **Patrick B. Hooper**

Scale: **1:6000** Date: **26/7/07**

Drawn By: **POF** Checked By: **PH**

Response to County Wicklow Development Plan 2016 – 2022 Stage 1

Gerard Roe
5 Garden Village Drive
Kilpedder
Co. Wicklow



Responses to questions posed in the Issues Booklet :

Vision :

Q - Is this vision still relevant.

A- The vision is still very relevant., due in no small part to the failure to date to provide many of the vision aspects listed.

Goals :

Q - What do you think of these goals? Are they meaningful to you?

A - These goals cover areas appropriate to improving the quality of life for residents of the Wicklow county area. They are meaningful in terms of being appropriately aspirational, however one would have to question the benefit of seriously considering these goals in the absence of any commitments regarding funding provision. Is this entire consultation process a futile exercise intended to give the impression that Wicklow residents can influence community development, while lack of funding and commitment will determine otherwise?

Q - Are there any other high level goals that would be appropriate for Wicklow?

A - The current goal list is very appropriate and it would be a welcome surprise if any of the goals listed could actually be delivered (see previous funding and commitment comment). I would be reluctant to add any more to what already seems to be a very worthy, but ultimately unattainable goal list.

Core Strategy :

Q – Do you think this settlement hierarchy is appropriate for county Wicklow?

A i While the current approach may be appropriate for towns as they exist at present, there must be some recognition of the fact that smaller towns may be listed further down the development scale as a direct result of previous lack of investment and planning priority. The council must be careful to ensure that the current system does not turn out to be a self fulfilling prophesy where the towns that have historically benefited from investment and planning input continue to do so, to the detriment of smaller towns that have been starved of investment and planning priority.

Q - Are there some towns that should be given higher or lower status?

A - On the basis of the previous answer i yes. Newtownmountkenedy has suffered badly from lack of investment in waste water treatment provision in particular. It should therefore be given a higher status.

This has therefore resulted in lack of investment, development and an associated lack of services. The placement of Newtown in the level 4 category must be considered with some recognition of the lack of planning focus and development for the area in previous plans, over many years.

Population :

Q - What would be an appropriate target for your town/area?

A - It is difficult to answer that question without having a qualification in social science and some insight into the development plan and funding secured for a particular area. Population growth potential has a direct relationship with service provision i without services being planned for and provided population growth can not be predicted or managed to any great extent.

Q - Do you think certain areas are growing too quickly / not quick enough?

A - In the case of Newtown, I believe that development in the area (and associated provision of services) has stalled considerably because of lack of investment and planning focus. In order to address that issue, it would be prudent to provide appropriate services for the current population first and then look to see what future development could/should be undertaken. This argument could well also apply to other small towns in the county wicklow area.

Q - Should all growth be concentrated in towns / settlements?

A- For fiscal reasons and to ensure efficient use of infrastructural resources and services, it would appear to make most sense to ensure that growth is concentrated in the towns and settlements where these limited resources currently exist and where they are capable of being upgraded to service planned and controlled development (based on secured funding for any necessary upgrades).

Q - What factors should be taken into account when deciding how big a place should be allowed to grow?

A - Infrastructural resources and services - What resources and services currently exist and what additional investment and resources will be required?
Commercial V Residential and Social i What benefit will be delivered to existing residents? eg Employment potential, additional housing, additional social resources (parklands, roads, playgrounds, shops and community services).

Land Zoning :

Q - What factors should be taken into account in determining how much land should zoned for development in towns / settlements?

A - As answered previously (infrastructure, resources etc) with added consideration of natural environmental factors on a location by location basis (natural habitats, areas of specific environmental interests etc)

Housing :

Q - Where is there a high demand for new housing?

A- I do not have the qualification or experience to answer that question. WCC would be better advised to consult with local estate agents if it wishes to gauge housing demands in specific areas.

Q - Where is the ideal location for new housing – town centres, edge of centre, Greenfield etc.

A - The ideal location would be determined by the amount and type of housing required. Eg additional existing town centre development would be best suited to townhouse or apartment type developments (high density, low footprint). Greenfield sites would be best suited for larger estate type developments. All

categories of housing and location can only be considered with regard to current infrastructure and social services available and scope for upgrade as required.

Q - What type of houses / apartments are required and what kind of densities are appropriate.

A - House type requirements would be best answered by people currently in the market for new housing i get on to estate agents and arrange to speak with their clients.

The density question is difficult to answer without expert knowledge and experience i does anyone in the council have that experience i what is current considered best practice in the field? Could you not have outlined some current practice or theories and asked general public respondents to comment on them and express preferences?.

Q - Is there too much / too little land zoned in your area?

A - I believe that there is too little land zoned in the Newtown area due to lack of planning and provision of required infrastructure, particularly waste water treatment. Lack of investment and focus over many years has hindered local housing and the development of commercial / employment activities.

Q - Should Bray, Greystones-Delgany, Wicklow, Arklow, Blessington and Newtown, be designated for significant new housing growth.

A - Yes, but only in conjunction within planned objectives and with appropriate infrastructure and social resources provided to improve quality of life for all residents.

Q - Are there any other towns that would be suitable for major new housing development?

A - Sort out Bray, Greystones-Delgany, Wicklow, Arklow, Blessington, and Newtown first. I am sure that the objectives for these towns alone will not be met in the lifetime of this plan, or maybe even in the lifetime of the people responding to this process i why complicate the issue further by adding more unattainable targets?

Q - Should there be controls on who can build or buy houses in smaller towns?

A - In areas where there is limited scope for additional development, either through lack of space or lack of infrastructure, priority should be given to young people from the area trying to build or purchase in their own neighbourhoods

Q - Should there be restrictions on the development of houses in the open countryside?.

A - Yes ĩ house type and quantity restrictions should be considered in order to control development in areas where infrastructure is scarce. Increased demand for the provision of infrastructure and social facilities for remote areas will take finance and resources away from the many current town areas in the county that are already suffering from lack of planning focus and investment. Fix current problems under realistic timeframes before attempting to add more.

Q - Do you think new houses in Wicklow are well designed, if not why not?

I think houses nationally are not being designed to make maximum use of scarce natural resources. There should be mandatory use of renewable energy resources incorporated into housing design ĩ solar panels, thermal exchange systems, communal power and heating systems, increased use of wind power, rainwater recovery systems etc ĩ Does Wicklow County Council have the foresight to plan as a model county for sustainable housing design?

Q - What type of houses would you like to see in the future in county Wicklow /In your area?

A - As above ĩ Developments planned with use of modern sustainable resource technologies.

Q. - Is it necessary to include design standards in the CDP or should the plan just refer designers to national design documents?

A - Yes ĩ Wicklow is ‘The Garden County’ it should go further than the currently inadequate national design requirements in order to protect the environment and scarce natural resources. Don’t simply exploit our environment and natural resources for simplistic and short term tourism benefits, work to protect them.

Q - Are there imbalances in housing demand and supply in your area?

A - I believe so. Because of the lack of infrastructure available to support development in the Newtown area (waste water treatment in particular), housing developments planned over 30 years ago have not yet been undertaken and new development has stalled.

Q - What types of new houses are needed to meet demands?

A - WCC should engage in some direct market research by surveying currently active home buyers and estate agents i what types of new houses are they looking for, or what can they afford?

Q. - Are there certain groups in society that find it difficult to access housing?

A - Obviously YES. Young people looking to enter the property market, families on low i middle incomes or social welfare, people who may already be homeless (ref current homelessness crisis) people in rented accommodation trying to deal with rising rental charges etc.

Q - Is there a need for special types of housing in your area to meet particular groups needs e.g. the elderly, those with special needs etc

A - Yes

Q - Are there affordability issues in your area?

A - Yes

Q - Do you think there is still a need for developers to provide social and affordable housing, given the recent drop in houses prices across the country?

A - Yes i House prices dropped during the past 4 i 5 years, but so did average earnings while living costs increased (food, fuel, energy, insurance etc). House prices are now increasing again but wage payments are not.

Enterprise and Employment :

Q - What measures can be put in place to ensure Wicklow is viewed as a more attractive employment base?

A - Better infrastructure and facilities. Eg roads, transport links (bus & rail), waste water treatment provision, broadband, social facilities for employees (shops, entertainment etc) Provision of national and local enterprise focused incentives, reasonable and pro-active approach to rates charges. Ensure additional housing is available to provide for local workforce options.

Q - What factors would stimulate existing business to expand?

A - See answer to previous question.

Q - What key areas should Wicklow focus on in order to stimulate employment and enterprise within the county?

A - Clean industries ï Service sector provision, technology development, alternative energy. Reduce the over dependency on tourism sector activities. This is a lazy option prone to fickle market forces that are largely beyond local control. Invest in industries that can stimulate consumer demand in Wicklow and beyond. Don't spend so much money on trying to make revenue obtained from tourists solve our current problems ï work to solve the issues ourselves through investment in sustainable industrial development.

Q - Are there new ways of working that should be encouraged / facilitated in the plan e.g. working from home, live-work units etc?

A - Yes. All modern options for work practices should be facilitated ï Investment in infrastructure, transport, broadband etc is critical to supporting these modern options.

Q - Is it realistic or desirable to zone greenfield land in all towns for new industrial estates / business parks or should such employment development be reserved for only larger towns?

A - Given the investment required to bring required infrastructure and facilities up to standard that encourages industrial development, it would seem to make most sense to concentrate resources and efforts only in larger towns for the time being.

Q - What should the employment strategy be in small towns and villages?

A - Smaller enterprises targeting a direct sustainable market within the located town and village.

Tourism :

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

A - As outlined above, I believe that the current focus of developing the tourist industry as a priority sector, is a mistake. It is a lazy and costly option that is prone to being adversely affected by market forces that are beyond local control. The various areas of concern and decline illustrated in this section of the document, highlight that fact. I strongly suggest that the primary focus should be switched from tourism to sustainable industrial activities in larger town areas that would have a greater potential for generating employment opportunities. Invest in local infrastructure rather than wasting additional funding and resources on the declining tourism market. The tourism industry is in decline despite best efforts and funding over many years ĩ time to focus on something new and more sustainable with a more direct benefit to a larger section of the county population ĩ plan to create jobs in industries that satisfy consumer demands in the county and beyond.

Conclusion

At this stage of the process, I have exhausted my time and interest in the development plan issue and would strongly recommend that the council reviews the process by which it attempts to elicit responses from the public. I do have relevant opinions on other aspects of the plan, but I am beginning to question the relevance of the consultation process.

From my attendance at the process meeting held in the Greystones office and from reports I have received of attendance at some of the other meeting opportunities held in the county, it is very obvious that the level of response to the process currently being undertaken is going to be poor. This is despite the fact that most people living in the county would have strong and valid opinions on how their local area should be managed and developed.

In my considered opinion, there has never been a more defined disconnect between elected officials on a local and national level and the general public and this has resulted in a lack of confidence in the authorities they represent. In short the general public does not trust local or national authorities to look after their interests and as a result is very reluctant to engage with them generally. When this induced apathy is combined with a very technical and time consuming process, detailed through a document as long and tedious as the current Development Plan Consultation Booklet, then it is not at all surprising to me that the public do not feel inclined to engage ĩ despite my previously stated belief that people do have very strong opinions on how their local environments should be developed.

The fault clearly lies with the mechanics of the consultation process being pursued by the council. This fault is not exclusive to the council however i the recent consultation process undertaken by the Commission for Energy Regulation received less that 160 responses to one of itô critical process stages, despite the fact that at the same time, over 100,000 people took part in street demonstrations around the country to highlight issues with specific areas that were directly relevant to the consultation being undertaken. People chose to march rather than to participate in a process that did not engage with them.

I would urge the council to consider other methods to engage with the public such as commissioning qualified market research sample interviews or undertaking online surveys where the technobabble of the consultation document is summarized into easily understandable and pertinent questions that can then be further evaluated by the council technical staff.

To embark upon important policy changes introduced as a result of consideration of a very poor level of response to a system that does not engage with the public sufficiently, is an unfair practice that can not hope to reflect the opinions of the general public sufficiently and will only result in a further disconnect with the local political and developmental process.

The council needs to try harder to communicate with the public on such important matters. It is not good enough to conduct a tediously complex process and then base new policy on a handful of submissions received. There are many more people out there who would like to have their say, but they donô have the time or technical knowledge to respond to the process as it is currently presented. They will however answer simply formatted, direct questions, posed to them, either through face to face meeting, or if presented in a survey format. The effectiveness of the current process must be evaluated by the level of response received and itô effectiveness must be questioned accordingly.

Go back to the drawing board and try designing a process that will engage with people more and will give them the encouragement needed to participate.

Gerard Roe
5 Garden Village Drive
Kilpedder
Co. Wicklow



Sun 21/12/14

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

28 October 2014



Senan Sexton
St. Anne's
Bray Road
Shankill
Co. Dublin

Wicklow County Council

30 OCT 2014

PLANNING DEPT.

Re: County Development Plan 2016 – 2022 - Submission under Stage 1 – Pre Draft
Public Consultation.

Dear Sir / Madam

I refer to the above; this submission concerns itself with two matters.

1 Review of Little Sugar Loaf Area of Outstanding Natural Beauty to exclude the Glen of the Downs Garden Centre site

The Glen of the Downs garden centre lands are situated just within the Little Sugar Loaf Area of Outstanding Natural Beauty.

We propose that the boundaries of the Little Sugar Loaf Area of Outstanding Natural Beauty be slightly rolled back so as to place our lands within a Corridor Zone.

We contend that both the site and the area surrounding the site have very significantly altered since the completion of the N11 Kilmacanogue/Glen of the Downs Dual carriageway, the Foxborough Lane Realignment road and the N11 grade separated interchange/overpass which now overlooks the site.

The Glen of the Downs garden centre lands are surrounded on all four sides by medium to national scale roads. Furthermore, these road works, the N11 concrete separation and the road signs have significantly altered the appearance of the Glen of the Downs garden centre lands.

Finally, the construction of the following culverts have substantially altered the site:

1. A very large culvert at the northern end of the site to accommodate the N11.
2. A substantial culvert at the southern end of the site to accommodate the overpass.
3. A further culvert at the southern eastern of the site to accommodate the "Foxborough Lane Realignment" road.

The Glen of the Downs garden centre lands are now essentially an "island" site distinct from the local countryside surroundings.

As such, the Little Sugar Loaf Area of Outstanding Natural Beauty needs to be reviewed to exclude the Glen of the Downs garden centre lands and the lands revert to a Corridor Zone.

2 Note the Glen of the Downs Garden Centre lands as a potential area to be developed as a key tourism attraction in a sustainable manner

I outline the reasoning and concept behind why the Glen of the Downs garden centre lands should be noted as a "potential area to be developed as a key tourism attraction in a sustainable manner" as outlined within the Tourism section of the Consultation document.

INTERPRETATIVE CENTRE

The Glen of the Downs garden centre lands are currently zoned Arts, Tourism & Interpretative Centre.

The Glen of the Downs garden centre lands need to be linked to the adjacent Glen of the Downs Nature Reserve Special Area of Conservation (SAC) which is operated and owned by The National Park and Wildlife Service (NPWS).

However, it is the responsibility of the Education & Visitor Service Unit of the Office of Public Works (OPW) to create visitor facilities on NPWS lands and as such create this pedestrian link. Please see attached correspondence from the OPW.

Wicklow County Council and the OPW must work together to build a new pedestrian entrance to the Nature Reserve at the northern end of the Nature Reserve beside the N11 using the adjacent small public road there. This small public road gives access to a small number of homesteads and it is perfect for the proposed use. Users of the Nature Reserve could then park in the Glen of the Downs garden centre lands and walk into the Nature Reserve.

We have consulted with The NPWS who were very enthusiastic about the project but were only able to give verbal confirmation that they back the proposal.

It would be a great opportunity to celebrate the Reserve and Ireland's Ancient Woodlands through an Interpretative Centre which could also double as an Information and Tourism Gateway Centre for Wicklow.

The Interpretative Centre will be based on a "Woodlands of Ireland / Environmental Awareness" theme with demonstrations of how to recycle and reduce carbon usage.

We can provide gardening education and distribute free seeds and trays to schools.

School children and special needs groups can be educated on the value of recycling and environmental awareness.

Please see correspondence from National Learning Network, Sunbeam House Services, and the Health Service Executive. These bodies recognise the important part recreational and nature activities play in therapeutic rehabilitation.

Positioning interpretative centres with their parking requirements adjacent to, rather than within, sites of national interest is preferable so as not to affect the protected site.

It would also facilitate the closing of the existing dangerous car park and car park entrance at the Nature Reserve.

Such a Centre could be built and long leased at a peppercorn rent to State bodies or NGO's associated with nature conservation and/or tourism. We are very happy to facilitate and fund the provision of this facility on our lands.

Therefore, this Interpretative Centre will enable the amenities and history of the internationally famous Glen of the Downs Nature Reserve Special Area of Conservation (SAC) to be enjoyed and celebrated.

TOURISM ELEMENT

Wicklow desperately needs a centralised focal point to dispense ticketing and information services for all of Wicklow's amenities to include historic attractions, activities, sightseeing and hill walking.

The Glen of the Downs garden centre lands are an ideal location for same; existing tourism offices at Bray and Wicklow Town are difficult to access due to traffic congestion.

The Glen is ideally located on the N11 at the gateway to all of Wicklow's tourist attractions and could not be more perfect in its setting, ease of access and location.

The site can act as a tourist orientation point for onward sight-seeing and hill-walking into the NPWS sites in Knocksink and Enniskerry and other heritage sites such as Glendalough, Glenmalur, Powerscourt and all of Wicklow's amenities including the nearby Sugarloaf.

I refer to attached correspondence from Failte Ireland, Wicklow Tourism and Wicklow County Enterprise Board.

ARTS & CRAFT CENTRE UNDER THE CRAFT COUNCIL OF IRELAND - REGIONAL OUTLETS PROGRAMME

A central focal point is required for indigenous arts and craft trades to display and manufacture their wares and the Glen of the Downs garden centre lands would be an ideal location.

Please see attached correspondence from The Craft Council of Ireland identifying the need for such a facility, how it falls under the Centres of Excellence Programme and that the Glen of the Downs garden centre lands are ideally suited and located for same.

The Craft Council of Ireland:

1. Agrees with the need for such a communal focal point.
2. Agrees that garden, craft and tourism uses are linked.
3. Identifies the pivotal concept that these uses complement each other whilst remaining sensitive and suitable to their surroundings.

4. Identifies the appeal of the project to the growing market of Cultural & Eco Tourism. (This is especially popular with the Scandinavians and Dutch).

We propose an ancillary retail area selling ecologically friendly and recycled products and a food offering.

BENEFITS

- Uniqueness, setting, innovation, educational focus and high eco standards.
- Opportunity for Wicklow to promote itself nationally and internationally.
- Educational, heritage and tourism benefits.
- A commercially viable approach that is at the same time pro community, heritage, environment, employment and tourism.
- Sensitive, low impact approach based on synergetic uses.
- Innovative, educational, environmentally and family friendly concept.
- Creation of sustainable local trade and employment.
- Provision of local community amenities.
- Competitive platform to achieve the aims of each respective body involved.
- The site is extremely well signposted both northbound and southbound.

We have had discussions with the Department of Arts Sports & Tourism who also wish the project the best.

The garden centre lands are within close proximity of Bray, Greystones and are within one mile of Kilmacanogue.

We have reached an agreement with the Glenview hotel to connect to their sewage system if the plans proceed.

3 Summary

Wicklow County Council should include the above proposals within the Development Plan and work with the OPW to provide the required new pedestrian entrance to the Nature Reserve this providing the necessary framework to bring this highly innovative and beneficial project to planning and fruition. Please see below logo.

If you have any queries, please contact the undersigned at or

Yours sincerely



Paul Sexton



Senan Sexton BCL ACA





OPW

The Office of Public Works
Oifig na nOibreacha Poiblí



Visitor Services
Unit 20
Lakeside Retail Park
Claremorris
Co. Mayo
Ireland.

Seirbhís Cuairteora
Aonad 20
Páirc Miondiola Cois Locha
Clár Chlainne Mhuiris
Contae Mhaigh Eo.
Éire

Tel/ Teil: 00 353 1 647 6000
Fax/ Faics: 00 353 1 661 6764
Web: www.opw.ie
www.heritageireland.ie

Mr. Senan Sexton, BCL ACA,
Paul P Sexton & Co. Garden Centres,
Glen of the Downs,
Co. Wicklow.

Dear Mr. Sexton,

I acknowledge your letter of December 12th and regret that I didn't get in touch sooner. Having considered the matter, I don't feel that it would be appropriate to involve this Office in the planning process.

However, I wish you well with the project and trust that it will enhance the tourist activity in Co Wicklow.

Yours Faithfully,

Tom Prendergast.
Visitor Services.

18 December, 2008.

National Learning Network

Investing in People, Changing Perspectives

8th January 2009

To whom it may concern

National Learning Network is Ireland's largest non-government training organisation with more than 50 purpose built training and employment facilities catering for around 4,500 students each year. Our client group are those who are marginalized from the work place and who need support to gain paid employment.

National Learning Network Bray and Paul Sexton & Co have enjoyed a good working and business relationship over the last 5 years. We have been fortunate that Paul and colleagues have accommodated many of our students on work experience placements, as part of their overall rehabilitation programmes.

Work experience is an essential part of the careers education of our students. For them it offers important insights into the world of work and also helps clarify career options for the future. The Centre depends on the generous response of employers and Paul's involvement in this regard has been and is currently very much appreciated.

We fully support Paul's new endeavour of an Interpretative Centre, on our doorstep! I look forward to bringing groups of students from our Centre here on community visits or educational outings to the new facility. Feel free to contact me for further information on 087 - 1222012.

Yours sincerely



Colette O'Loan
Employment Co-ordinator

National Learning Network | Bray
Reechwood Close, Bnghall Road, Bray, Co. Wicklow, Ireland.

T +353 1 286 6751 F +353 1 286 6753
E standards@nlw.ie W www.nln.ie

National Learning Network Limited

Directors: Chairman, D. O'Connell, Managing Director, P. Sexton, Finance Director, J. O'Connell, Secretary, J. O'Connell, & Paul Sexton & Co.

Registered Office: 100, The Corporation, Dublin 1, Ireland. Registered in Ireland.

Approved Training Provider | Inclusive Education | Employment Access

Ref: 0140801-09

8th January 2009

TO WHOM IT MAY CONCERN

**Re: Development by Paul Sexton at Glen of the Downs, Delgany,
Co. Wicklow**

Sunbeam House Services provides a range of supports to individuals with intellectual disabilities in Co. Wicklow. Currently we have 317 people who benefit from our services.

Developments such as those envisaged by Mr. Sexton at the Glen of the Downs would be most beneficial to the vast majority of our people. Many of those in our care enjoy activities in the great outdoors, and interpretative centres where they can interact with nature are most beneficial in their overall care programmes.

From a psychological support viewpoint, arts and crafts and lectures on planning and gardening activities are most beneficial to those diagnosed with handicaps. It assists them to reflect less on their own disability and focus to a greater extent on nature and art-associated activities which can bring high levels of satisfaction to their lives.

Sunbeam House operates 30 centres throughout Co. Wicklow, from Arklow to Rathdrum to Bray and Greystones, and the location of the Sexton development at the Glen of the Downs is ideally located so all of our Clients could benefit from and enjoy the various activities which are being planned for this centre. We wholeheartedly support this development.

Yours sincerely,



Michael Noone
Managing Director

Sunbeam House Services

SHS
Cedar Estate,
Killarney Road,
Bray,
Co. Wicklow,
Ireland.
Tel: +353 (01) 2868451
Fax: +353 (01) 2760367
Email: info@sunbeam.ie

Website: www.sunbeam.ie

Managing Director:
Michael Noone

Directors:
V. Scallan (Chairman)
A.R. Giles (U.K.)
G. Knaggs
R. Smith
M. Cronin
M. de Paor
F. Rountree
C. Lambert
S. Stafford Johnson

Training & Employment Services

- Wicklow ATEC
- Training Services
- Dargle Community Base
- Arklap Fencing
- Ballyraine Rural Industries
- Ballyraine Garden Centre
- Connect Employment

Care & Residential Facilities
Day Care Units, Residential
Care Units and Community
Homes are provided in Bray,
Greystones, Shankill, Arklow,
Rathdrum and Ashford.

Company Secretary: A.R. Giles

Sunbeam House Services Ltd.
Registered in Ireland
Registered No. 76504
CHY No. 6559

Accredited by
CQL
The Council on Quality
and Leadership



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Lincara Day Centre
Boghall Road
Bray
Co. Wicklow

Tel: (01) 286 2345
Fax: (01) 286 3902

6th January 2009

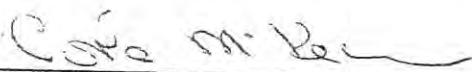
To Whom It May Concern;

**Re: MR. PAUL SEXTON,
SEXTON'S GARDEN CENTRE,
GLEN O'THE DOWNES,
CO WICKLOW.**

The above named person has provided industrial contracts for service users of the Bray Mental Health Service for the past number of years. This has provided supported employment for many individuals and has been of huge benefit to the overall wellbeing and lifestyle of those concerned.

Mr. Sexton has also supported the fundraising activities of the friends of Newcastle Hospital.

Yours sincerely


CÓRA MCKENNA
Assistant Director of Nursing



Fáilte Ireland

National Tourism Development Authority

27th January 2009

Mr. Paul Sexton
Glen of The Downs Garden Centre
Kilmacanogue
Co. Wicklow

**Re: Glen of the Downs Garden Arts & Craft, Tourism & Interpretative
Centre, Co. Wicklow**

Dear Mr. Sexton,

Further to contact and discussions with Mr. Senan Sexton on your behalf, I enclose a copy of the Tourism Factsheet 2007 for the East and Midlands Regions which includes statistics on tourist numbers for Co. Wicklow. This factsheet provides information on the number of overseas tourist visits from the main tourist markets, purpose of trip, type of accommodation used as well as revenue generated for Co. Wicklow. As you will see from these statistics, Co. Wicklow received 254,000 overseas visitors in 2007, which was the highest of the eight counties in the Midlands East region.

The Glen of the Downs is an important gateway to Co. Wicklow from the north and is itself a popular area with tourists. It is considered that the proposed development would complement and enhance the overall tourist offering of the area. In addition, the integrated nature of the proposal, bringing together a number of separate strands of activity and interest, would ensure that the proposal appeals to a wide spectrum of visitors.

Yours sincerely,

Paddy Mathews
Manager, Environment and Planning

Wicklow County Tourism



St. Manntan's House
Kilmartin Hill
Wicklow, Ireland
Tel: +353 (0) 404 20070
Fax: +353 (0) 404 20072
E-mail: info@wicklowct.ie
Website: www.visitwicklow.ie

Paul Sexton / Senan Sexton
Glen of the Downs Garden Centre
Kilmacanogue
Co. Wicklow

9th January 2009

**Re: Planning Ref. No. 08/1137 - The Glen of the Downs Tourism, Arts/Craft,
Garden & Interpretative Centre.**

Dear Paul and Senan,

Wicklow County Tourism is delighted to see this long discussed project come to fruition; it must be five years in the pipeline now! We would see what you are proposing is a quality project and we fully support you in this project.

As you are aware, we believe the concept is both innovative and pro community. We particularly like how you have linked in the Glen of the Downs Nature Reserve. The Reserve is somewhat difficult to access now since the road works and the provision of an Interpretative Centre on near adjacent land with associated car parking is truly innovative. It in no way affects the Reserve but will do wonders to promote its use and enjoyment.

Wicklow County Tourism is very interested in the provision of the Interpretative and Tourist Centres free of charge as we see this as a fantastic opportunity to promote county Wicklow, we also understand that this would be in line with the thinking of Fáilte Ireland. The location for this proposed project is ideal and would provide an excellent shop window to showcase the county for tourists driving down the M50/N11 from Dublin Airport or coming from the Ferry Port north on the N11. This road is one of busiest roads in the country.

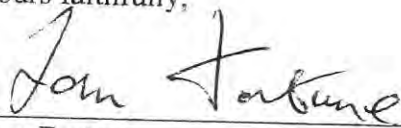
We would see the Arts & Craft Centre as an ideal opportunity to encourage local craft and much needed employment. We see that you hope to develop this in conjunction with the Craft Council of Ireland under their Regional Centres of Excellence Programme.

Wicklow County Tourism feels that the various proposed uses contained in this project complement each other and would be perfect in these wonderful surroundings.

In summary, we would see this as an excellent proposal, and one that we would see as a benefit for tourism in county Wicklow, and, has the full backing of Wicklow County Tourism. We would strongly recommend that Wicklow County Council grant approval for this project.

If you have any queries, please contact me at 086-2488195.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tom Fortune', written over a horizontal line.

Tom Fortune
Chairman Wicklow County Tourism Ltd.

**Cc Leonora Earls, Senior Executive Officer, Planning & Economic Development,
Wicklow County Council, County Buildings, Wicklow**



Wicklow County
Enterprise Board

Bord Fiontar Chontae Chill Mhantáin

Wicklow County Enterprise Board,
Wicklow County Campus,
Clermont House,
Rathnew,
Co. Wicklow.

Tel. 0404 67100

Fax. 0404 67601

E-mail. enterprise@wicklowceb.ie

www.wicklowceb.ie

Ms. Leonora Earls
Senior Executive Officer
Planning & Economic Development
Wicklow County Council
County Buildings
Wicklow Town
Co. Wicklow

6th January 2008

Re: Planning application 08/1137 - Paul P. Sexton & Co. Garden Centres, Glen o'the Downs Arts & Craft Interpretative & Tourism Centre

Dear Ms. Earls,

I refer to the above planning application and I can confirm that Wicklow County Enterprise Board supports development that is likely to increase tourist activity and job creation in County Wicklow. On this basis, Wicklow County Enterprise Board is supportive of this innovative proposal.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,

Sheelagh Daly
Chief Executive Officer

c.c. - Paul & Senan Sexton, Paul P. Sexton & Co. Garden Centres



Directors: E. Sheehy (Chairperson), J.O'Brien, H. Alexander, B. Bermingham-Roberts, V.Blake MCC, P. Casey MCC, P. Doran MCC, T.Gregan, C. Kavanagh MCC, M.Lynham, A. McLoughlin, G. McMahon, B.T.Newsome, M. Savage, Chief Executive. S. Daly. Companies Registration Number 234401. Registered office as above.

Investing in your Future



Senan Sexton,
'St Anne's'
Bray Road
Shankill
Co. Dublin

26th January, 2009



**Re. Glen of the Downs Arts/Craft, Tourism and Interpretative Centre – Planning
Ref. No i.e. 08/1137**

Dear Senan.

Further to our various discussions regarding your planned development in the Glen of the Downs Garden Centre, Co. Wicklow – the Crafts Council of Ireland are delighted to hear that you plan to dedicate a craft area within the development. We believe there is a very real and tangible link between garden, craft and tourism – and many of our current and developing projects are focused on linking these areas.

Your project, as planned, would fit with many of the objectives under the Crafts Council's Regional Outlets programme – and we would certainly encourage you to contact us when your plans are finalised to see how we could work with you to promote craft sales and increase awareness.

As you are aware, consumer research conducted by the Crafts Council over the past 24 months has indicated that there is a lack of access to craft in Ireland. While consumers, in particular women between the ages of 25 and 50, identified an interest in contemporary Irish crafts, they found it difficult to find craft products in key retail locations.

As a result, the Crafts Council of Ireland's current strategic plan (2007 – 2009) focuses on improving and increasing access to craft, increasing awareness of craft and supporting /training and developing craftspeople to reach these consumers.

Our database shows that there are currently 67 Crafts Council registered craft enterprises located in the Wicklow area – and over 418 in the combined Dublin, Wicklow, Kildare and Wexford region – providing a solid supply base for your proposed outlet. This, coupled with the visitor numbers you anticipate and the afore-mentioned lack of craft access to contemporary Irish crafts, is a positive indicator for your proposed project.

The Crafts Council's Retail Programme is focused on three key objectives:

1. Increasing the volume and variety of Irish craft sales
2. Increasing the variety and market suitability of craft products on sale



Crafts
Council
of
Ireland

3. Increasing and expanding the number and type of outlets selling Irish craft – and facilitating new types of craft retail

Under the Retail Programme we run a variety of projects that may be relevant to you as your development progresses. The Regional Outlets Programme facilitates the development of retail outlets in areas where craft is under-represented at retail – while the current model is currently in its pilot phase, and plans phase 2 have yet to be finalised, there is already a wealth of knowledge gathered through this programme that we could share with you. We plan to publish a guideline / toolkit booklet in the coming weeks that may provide you with some important information and insights.

We have also just completed the pilot of the Garden Centres project with the Arboretum Lifestyle and Garden Centre in County Carlow – where we worked with the Arboretum team to introduce a designated Irish craft retail space into the existing retail area. The initial results from this pilot are positive – and again we would envisage that this project may provide you with critical learnings.

The Garden Centre project, coupled with the Crafts Council's presence at Bloom 2008 (Bord Bia's consumer garden show in the Phoenix Park, Dublin), has proven that there is a very real link between craft and garden. A similar ethos permeates both – skill, knowledge, design ability, awareness of the environment etc. Consumers interested in the home and garden tend to have an interest in, and appreciation of, design – and a very real passion for unique and creative products.

Developing a link with tourism will also strengthen your craft offering to consumers. The Crafts Council are currently working with Failte Ireland on a variety of levels to increase links between craft and tourism. Failte Ireland recently launched a dedicated craft retail information page on their Discover Ireland web site. We are also working with Failte Ireland to train tour guides on craft trails and destinations, so that tourists can visit craft studio's, meet craftspeople and purchase craft products – to experience 'stories in the making'.

The pilot retail outlet, *Core – Offaly Westmeath Crafted Design*, the first to be launched under the Crafts Council's Regional Outlets Programme (mentioned above) tapped into this natural connection with tourism marketing – and Ballinahown (the village the shop is located in) has since been designated a Craft Village and, thanks to the support of Tourism Ireland, is a key tourist stop for visitors to Clonmacnoise.

At a time when the economic outlook is uncertain, there is a very real opportunity to capitalise on a key shift in consumer behaviour – a move away from the belief in the disposable nature of goods, where products were seen to have a limited fashion life-span, towards an attitude where goods should be made to last, and should reflect the ethics of the purchaser (have minimal impact on the environment and be sourced and produced ethically).

Developing an Interpretative Centre celebrating Ireland's ancient woodlands provides visitors with a link not only with nature but with culture and heritage – the synergies with craft are strong. And research shows us that cultural tourism is growing at a rate 3 times faster than any other type of tourism at present and is worth an estimated 5.1 billion euro to the economy. Your proposed development seems to tap into all of these elements strongly – and we wish you every success.

Please keep in touch as your project evolves - as we roll out our plans for the next phase in the various retail projects we will hopefully be in a position to talk in more detail about how we may be able to work together in the future.

Kind regards,

Nicola Doran
Retail Programme Manager
Crafts Council of Ireland

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 22 December 2014 22:19
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 22:19 Submitted by anonymous user: [93.107.32.5]
 Submitted values are:

Name: Emma Sibley
 Organisation, Group, Company, etc :
 Address: 16 Djouce Meadow, Roundwood
 Email:

--Topics--
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 -: Infrastructure
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Submission - If you wish to make comments on a topic, please fill in the box below: Re: Development and population growth in Roundwood. Lack of public transport in Roundwood is a major concern for a growing population. 2 private buses a day is not a sufficient service for the area.

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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 -: Roundwood
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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):

23/12/2014

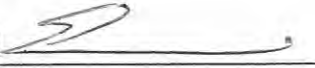
Rossana
Ashford
Co. Wicklow

Wicklow County Development Plan 2016-2022
Pre-Draft Development Plan
County Buildings
Wicklow Town

Submission:

Proposed amendment to lands previously zoned for recreational grounds.

Having had consultations with local club, and to enable a proper and full sized all weather jogging, walking, running track to be constructed in harmony with nature, this land parcel is necessary to ensure a proper landscaped quality development, I would officially request to include the land plot already within this folio ownership as outlined and marked on the attached map, colour which will be made available for the purposes as proposed to include new football pitches and all weather jogging, running and walking tracks.

Signed 

Patrick Stephens
Registered owner of the subject lands.



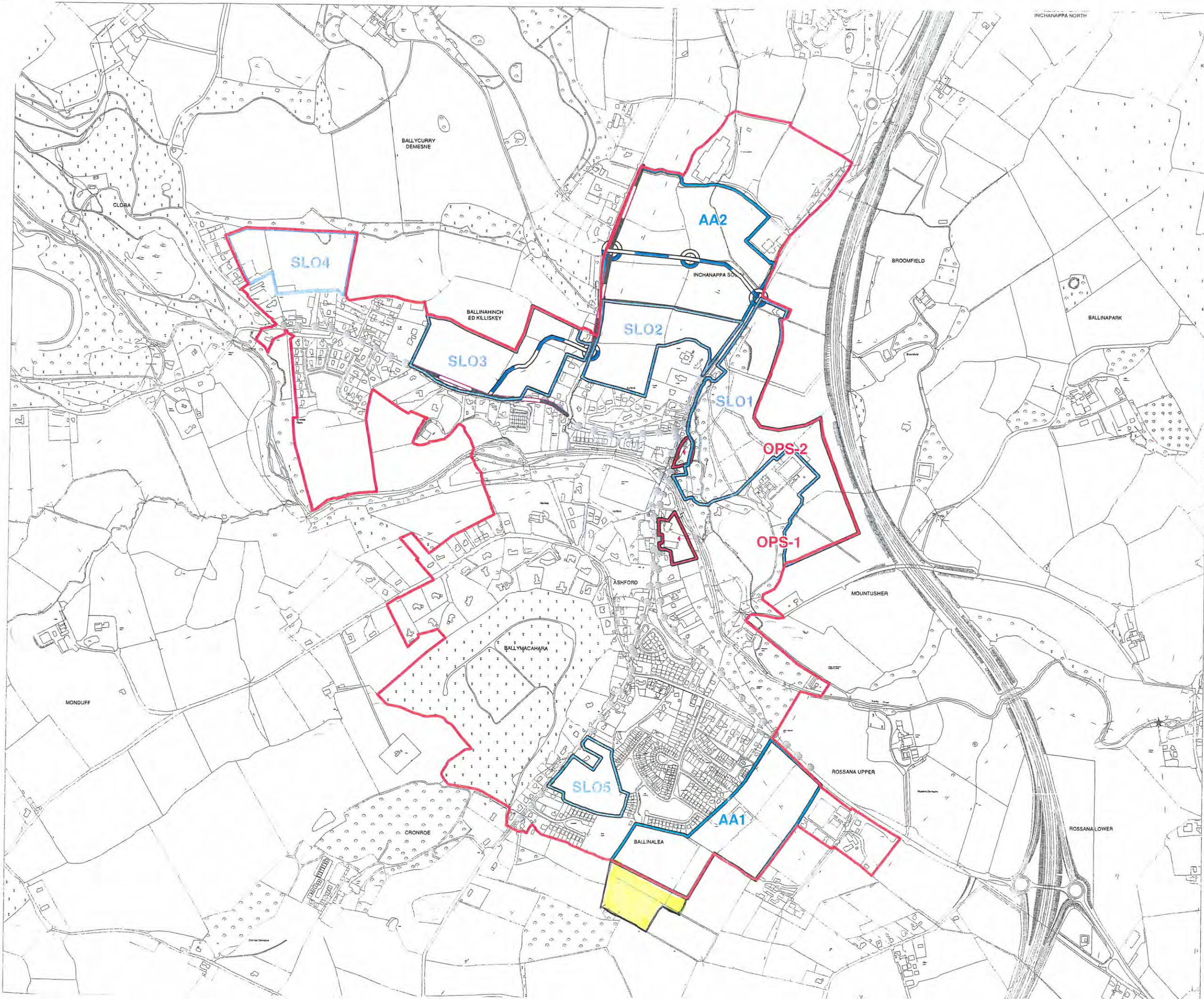
Map attached

ASHFORD TOWN PLAN

MAP 3: KEY TRANSPORTATION OBJECTIVES

LEGEND

-  Existing Footpaths
-  Proposed New Roads/Footpaths
-  Road Improvement Objectives
-  Opportunity Site Outline
-  Action Area Plan Boundary
-  Specific Local Objective Boundary
-  Plan Boundary



Director of Services:	Desmond O' Brien
Scale: 1: 7,000 @ A3	Date: 10/10/14
Drawn By: SW	Checked By: SW

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**WICKLOW
COUNTY
COUNCIL**



Wicklow County Council Planning Department
County Buildings, Station Road, Wicklow
Tel: (0404) 20100 Email: planreview@wicklowcoco.ie

Leonora Earls

From: Wicklow County Council [michael@indytech.ie]
Sent: 18 December 2014 21:11
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submisson - Wicklow County Development Plan 2016-2022

Submitted on Thursday, December 18, 2014 - 21:10 Submitted by anonymous user:
 [213.233.148.32] Submitted values are:

Name: Niall Stephenson
 Organisation, Group, Company, etc :
 Address: Cappagh, Aughrim, Arklow Co.Wicklow
 Email:

```
--Topics--
-: Vision_and_Core_Strategy
-:
-:
-:
-:
-: Rural_Development
-:
-:
-: Built_and_Natural_Heritage_including_Landscape
-:
-: Local_Plans
-:
-:
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Submission - If you wish to make comments on a topic, please fill in the box below:

Please do not allow the development off wind turbines in orange zoned areas such as the one in Ballymanus. Please do not grant planning permission to Abbo Wind Ireland. I fear that this could open the door to further development in orange zoned and possible red oned areas. I would like the area to be kept as is now a beautiful quiet scenic area. Thank you

Niall Stephenson
 a very very concerned member of the public.

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

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--Town / Settlement Plans--
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-: Aughrim
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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/39>

From: Wicklow County Council [michael@indytech.ie]
Sent: 22 December 2014 13:11
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Monday, December 22, 2014 - 13:11 Submitted by anonymous user: [213.79.48.22]
Submitted values are:

Name: June Stephenson & Seán Doyle
Organisation, Group, Company, etc : N/A
Address: Ballymanus, Aughrim, Arklow, Co. Wicklow
Email: [REDACTED]

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

Ballymanus
Aughrim
Arklow
Co. Wicklow
22nd December 2014

Re: Submission to Wicklow County Council Development Plan 2016 - 2022

Dear Sir / Madam,

We would like to compliment you on the excellent development plan 2016 - 2022 strategy document and in addition make a submission in relation to Goal 10 under the vision and core strategies. We refer to the current Wind Energy Strategy - Volume 2 with regards to the designation of various areas within the county being zoned as favourable (green zones), less favourable (orange zones) and not favourable (red zones). The development plan 2016 - 2022 should not upgrade any of these zones. The current red zones should not be upgraded to orange zones and the current orange zones should not be upgraded to green zones.

Thank you for the opportunity to voice our observations with regard to Wicklow County Councils Development Plan.

Yours sincerely,

June Stephenson & Seán Doyle

June's Mobile:
Seán's Mobile:

Alternatively you can attach your submission (10MB limit on attached files):
<http://www.wicklow.ie/sites/default/files/webform/dev%20plan%202016%20to%202022.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/48>

"The West Wing"

33, Kindlestown Park,

Greystones,

Co. Wicklow



19th December 2014

The following is a submission for Wicklow County on behalf of Bernadette Stokes and the Campaign for Greystones Dog Park.

As a large beautiful and green county, unfortunately Wicklow is without a dog park anywhere in the county. Dog parks are badly needed in order to exercise dogs correctly and without causing interference to the public. People who bring their dogs to dog parks are responsible citizens and in my experience pick up after their animals. However, Wicklow residents have no option but to travel to another county in order to correctly exercise their dogs.

We would like to make the point that it is not very difficult to put a dog park together. Firstly, it is waste ground of approximately 2 acres converted to grass, fenced, double gated and a separate double gate for lawnmower access, some seating benches and a water tap if possible. Fencing of about 2 acres would cost approximately €8,000.00 which can be easily raised by responsible dog park users.

Having observed the 5 different dog parks that the Dun Laoighaire Rathdown Council have in place, we would like to make the point that a small area fenced off for small dogs within the dog park would be an improvement on their dog parks.

We hope that as our County Council you will give this matter serious and urgent consideration and that it be prioritised as there are no dog parks in Wicklow whatsoever!

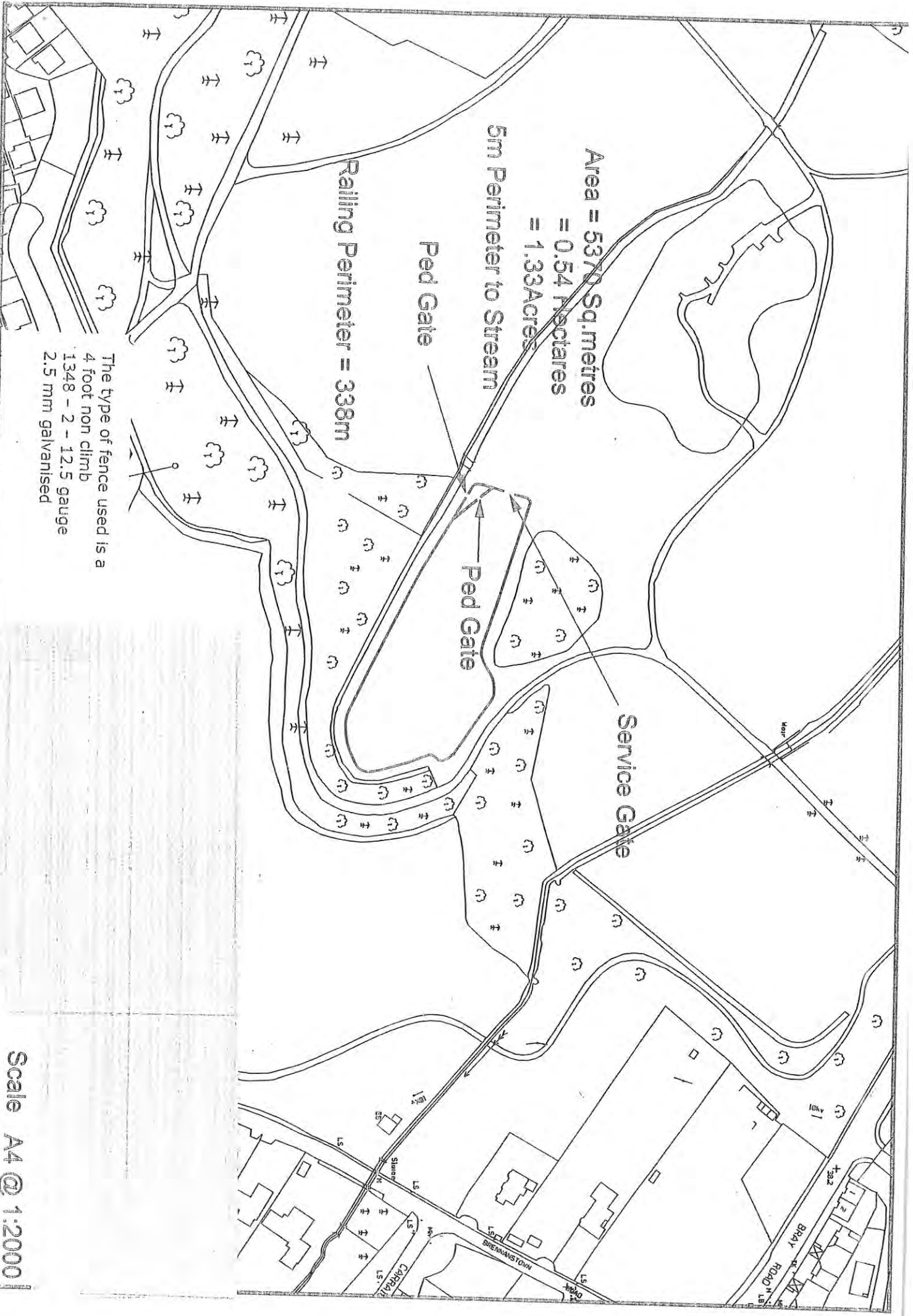
Enclosed with our submission is a active small dog park plan which may be of assistance to you.

Yours sincerely,

Bernadette Stokes

Bernadette Stokes





Scale A4 @ 1:2000

22nd December 2014

Administrative Officer
Wicklow County Council
Station Road
Wicklow Town

**Re: County Development Plan 2016 – 2022
PRE-DRAFT SUBMISSION**

Dear Sir or Madam,

This is a pre-draft plan submission on behalf of **Brian Stokes, Inchanappa House, Ashford, Co. Wicklow**. We have studied the Council's "Development Plan 2016 - 2022: Issues Paper" and we invite the Council Members to have regard to the following submission when preparing the draft development plan. In particular, this submission relates to Ashford and its future population target as identified by the strategic questions set out in the Ashford section of the Issues Paper (see pages 31 and 32). The purpose of this submission is to invite the Council to set the future population target (2028) for Ashford at 4,000.

As acknowledged by the Council in the Issues Paper, the current Regional Planning Guidelines don't provide any projected population targets for 2028, which is the year that the new County Development Plan will set targets for. In April 2014, the Central Statistics Office (CSO) estimated the State's population at 4.61m¹ with 546,900 within the Mid-East region that includes County Wicklow. The Mid-East population represents an increase of 12,900 on the population recorded in the 2011 Census and it confirms the continued attractiveness of the Mid-East region including Wicklow as a place to live and work.

In December 2013, the CSO produced Regional Population Projections 2016 – 2031² that estimate that the Greater Dublin Area will see its population increase by just over 400,000 by 2031 if internal migration patterns return to the traditional pattern. For the Mid-East region, the population is projected to increase by between 78,000 and 144,000 - the variation is due to migration, fertility rates, and natural increases. The projected population in 2031 for the Mid-East region is between 612,000 and 678,000 persons. The higher of these figures equates to an annual increase of 1.2%, the highest growth rate in any region of the State.

From the growth patterns table on page 7 of the Issues Paper, the projected population for County Wicklow in 2022 should be 207,752³. Applying the 1.2% growth rate for the Mid-East region from the CSO December 2013 projections, the population target for County Wicklow in 2028 would be 227,710 [= 207,752 x (1.2% x

¹ <http://www.cso.ie/en/releasesandpublications/er/pme/populationandmigrationestimatesapril2014/#.VJKdhdpXIU>

² <http://www.cso.ie/en/releasesandpublications/er/rpp/regionalpopulationprojections2016-2031/#.VJBYzNgpXIU>

³ The Council will note that there is an error in the County Total figure as 164,750 + 43,002 = 207,752 and not 176,800 as stated in the table. The error is repeated from an error in the current County Development Plan.

6)] – an overall increase of 14,958. The County Plan has always split the overall population target between the urban and rural parts of the county. Since 2002, this split has been increasing in favour of the urban areas, which is consistent with the National Spatial Strategy, the Regional Planning Guidelines and the proper planning and sustainable development of Wicklow to direct development into urban settlements where there are services, amenities, and the necessary infrastructure.

In 2011, the percentage urban-rural split was 73%/27% whereas for 2022, it is projected to be 79%/21%. For 2028, we recommend that the projected split is 82%/18%, which would be consistent with the change between 2011 and 2022. Using the 1.2% growth rate and the 82%/18% split, the urban population target in County Wicklow would increase from 164,750 to 186,722 persons between 2022 and 2028 – an increase of 21,972 $[(227,710 \times 0.82) - 164,750]$. For the corresponding period, there would be a reduction in the rural target from 43,002 to 40,988.

Population growth in Ashford was previously constrained due in the most part to a lack of water and waste water infrastructure. Those deficiencies have been addressed including an upgraded pumping station at Ashford that pumps waste water to Wicklow. However, since that facility has been commissioned, residential and other developments subsequently stalled due to problems accessing credit. All development infrastructure without any capacity constraints is now available at Ashford including excellent transport links, road infrastructure (two grade separated interchanges to the M11), all public service utilities, and social amenities to facilitate the coordinated and sustainable development of Ashford.

Ashford is a highly desirable residential location and has become a significant employment base with over 60 business located in the village including the internationally renowned Ashford Studios. The recently adopted variation 5.1 to the County Plan identifies clear objectives to further increase the employment provision within Ashford including within the town centre with solicitor/architect/accountant type practices and also larger industrial facilities to maximise the village's superb transport links.

The village also has excellent social and recreational amenities such as the new community centre and a 1 acre state of the art playground, which has been provided on our client's land. Furthermore, the Community Park of which the playground forms part of will be circa. 10 acres and constructed as part of the Inchanappa residential development (SLO1). The community park will be an idyllic town centre amenity that can be enjoyed by more residents that present forecasts plan for Ashford. Upon completion, it will be one of the biggest urban parks in the county and it will distinguish Ashford from other towns and villages in Wicklow.

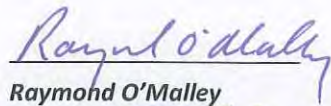
With regard to future residential development and a population target for Ashford in the next County Plan, there remains substantial untapped demand for residential accommodation in the village. To this end, our client understands that a planning application is being prepared in respect of the SLO3 lands at the northern end of the village and also possibly at the AA1 lands at the southern end. In addition, our client has been progressing plans in respect of his residential zoned land at Inchanappa House. Combined, it is anticipated that planning applications for several hundred dwellings in Ashford are expected to be made to Wicklow County Council in 2015, which if approved would provide a significant impetus to development in Ashford and begin to address the latent demand for residential development in the village.

The current population targets for Ashford are 2,500 and 3,000 for 2016 and 2022 respectively thus as an absolute minimum, the 2028 target should be increased to 3,500. However, the impact of the anticipated 'front-loading' of much needed residential development at Ashford is that the population targets would likely be reached sooner than the dates in the development plan. It follows and the Council is invited to agree that it would be prudent to factor in this accelerated level of development from 2015 by identifying a higher population target than 3,500. Accordingly, the Council is invited to assign a target population of 4,000 for Ashford in 2028.

In summary, the Council is requested to adopt **a target population of 227,710 for county Wicklow in 2028** of which there would be a projected increase of 21,972 in the urban population amongst the various urban settlements in County Wicklow. Of this c. 22,000 increase, the Council is requested to direct at least 1,000 of this projected increase to Ashford and thus set **a target population of 4,000 for Ashford in 2028**. Ashford is a highly desirable location to live and work. The town is fully serviced with excellent physical, social and recreational infrastructure, so it is primed and ready for development. In due course, it is anticipated that Ashford would be elevated to a Hinterland Area Moderate Growth Town in future county development plans.

Please acknowledge receipt of this submission and direct all future correspondence to this office.

Yours,



Raymond O'Malley

Kieran O'Malley & Co. Ltd.

ROM: rom

87

Leonora Earls

From: Julia Strickland
Sent: 20 December 2014 10:09
To: Planning - Development Plan Review
Subject: Planning submission for Wicklow County development Plan

Submission for draft Wicklow development plan planreview@wicklowcoco.ie

From: Julia Strickland

Winterberry, Kilmolin, Enniskerry, County Wicklow

acknowledged
f

Ideal location for development: is at lower altitude in valleys so that views to and from higher ground are not lost or blighted. It allows people to 'look up' to nature from the town. High level walks and views provide somewhere people can 'escape' to from suburbia. I have noticed this works well in England. I also notice how the Eagle Valley houses built on the skyline looming over Enniskerry badly affected the approach into the village.

For the benefit of existing residents and passers by : People using public roads should be able to see 'distance' rather than having land completely 'blocked off' for estate development. Houses should not be built too close to the existing public roads leaving room for nature strips, cycle paths and safe footpaths. There should be occasional sight lines from the main roads through the new estates ideally across green areas. This will prevent a feeling of exclusion to the public, preventing 'stealing' of views for the few living in the estate from the public at large and a feeling of being hemmed in by developments and suburbia.

Public Footpaths (not on roads) - for fitness, for tourists, for amenity: Although Ireland is behind other countries in this regard it is essential we provide for attractive new routes as part of new development permissions granted. Even if the footpath doesn't join up immediately we should plan for the future when the adjoining private land becomes available. For example if a path was planned for from Kilmolin (on the Glencree Rd from Enniskerry across farm land zoned AA1 for development) to Knocksink wood, then we would have the makings of a spectacular circular walking route (from Enniskerry village up to Kilmolin and back down through Knocksink to the village) and perhaps even join up with the Wicklow way.

Views and Prospects for Enniskerry: The current views in the county plan are 1) from the Summerhill House Hotel, 2) from the lands at Monastery House, 3) from Cookstown Rd to Sugarloaf. These benefit a few people. The view from Kilmolin/Parknasilloge north east towards the sea and Carrickgollogan should be included as a view to be protected as it benefits many more of the public including tour buses and cyclists. The County plan should consider what is of maximum value to everyone, not just a few lobbyists.

Enniskerry population: Current plans show Enniskerry is to increase by one third in size by 2022. That is too much. It will destroy what is currently an asset to the county. It will ruin the attractiveness of the village and approach roads and will overload the village with traffic. It will be to the detriment of tourism. There is too little regard to maintaining the character and personality of villages.

Not enough 'green space' planned for. I see it is planned to incorporate 210 residential units plus school and businesses and pitches/courts/playgrounds on 16.25 hectares in Enniskerry but the only required green space will be the 'existing' GAA pitch on this land. This means **all amenity space planned is for use by children and is largely concrete/asphalt** (no doubt dogs will be excluded) there is no public park / natural area required. Wicklow County Councils amenity plans are not encompassing the general public. Many people who live here moved here for the countryside and now due to planning laws can't move

further out into the countryside. Please plan your amenity space to be more inclusive and to provide quality of life for all sections of society, not just children.

Who should be allowed to build new houses: I disagree with the assumption that a resident's offspring should have the right to live near their parents and build new houses where others cannot. This is not realistic or fair.

Thank you for reading my submission,

Julia Strickland



Submission

GVA

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Segrave House,
19-20 Earlsfort Terrace,
Dublin 2

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Fax: (01) 661 8568
Web: www.gva.ie
E-mail: admin@gva.ie

Submission at Pre-Draft Stage of the County Wicklow Development Plan, 2016-2022

December 2014

1.0 Introduction

This submission has been prepared by GVA on behalf of Tesco Ireland Ltd., Gresham House, Marine Road, Dun Laoghaire, Co. Dublin in response to the Issues Booklet published for pre-draft submissions on the Wicklow County Development Plan, 2016-2022. Tesco, being a recognised part of the retail environment in County Wicklow, welcomes the opportunity to comment on the Draft Plan.

The submission responds to the strategic issues raised within the Issues Booklet with a particular focus on matters relating to the retail sector. The retail sector makes a major contribution to the urban structure of towns within Wicklow by increasing vitality and viability and acting as an economic anchor.

This submission assesses the impact of key Development Plan policies on the retail sector and provides recommendations where it is considered that they would contribute to further investment and employment within the sector. The planning for and provision of an appropriate level of retail development to meet the needs of the county towns and their catchments, is necessary to ensure that expenditure is kept within the County and leakage to Dublin in particular is minimised.

Tesco Ireland Ltd. is committed to the enhancement of its offer in its existing stores in Wicklow, particularly the main stores in Bray, Wicklow and Greystones where these stores have extant permissions for their redevelopment¹. While it is the intention that overall redevelopments of the stores may progress in the future, flexibility is required to ensure the delivery of refurbishments and floorspace reorganisation in the short term to improve the existing retail offer at these locations.

Issues Addressed- Summary

Retailers each have their own distinct business models and floorspace requirements and it is within this context that this submission is made.

In answering some of the selected questions posed in the Issues Booklet, the following key points are made and should be noted:

- 1) Support retail provision in the County to avoid trade leakage to Dublin in particular through flexibility for existing/planned Centres e.g. Tesco Shopping Centre Redevelopments at Bray, Wicklow and Greystones.
- 2) Policies which encourage the appropriate locating of convenience retailers should have regard to their operational requirements. This will ensure that only suitable forms of retail locate within the Town Centre thereby protecting its vitality and viability.
- 3) It is important that large convenience goods stores are located at an accessible location and have sufficient car parking provision (i.e. 1:14)
- 4) The existing cap on comparison goods in supermarkets which is contrary to the Retail Planning Guidelines, should not be brought forward as a retail policy in the new County Development Plan

¹ Reg. Ref. Nos. 08/1057, 12/6147, 11630020, 12630008, 10623409

2.0 Questions and Answers

Of the questions posed in the Issues Paper, we have chosen a select few which are of relevance to the issues addressed in this submission.

Question

What should be the core aims of the retail strategy? Can the strategy adequately respond to the current challenges facing the sector?

Answer

The priority of the Planning Authority should be to secure the long-term future of centres at Wicklow and Bray as the primary shopping destinations within the County by promoting retailer representation and an improvement in the quality of the existing retail offer. This will retain expenditure within the County to the benefit of all businesses and defend against leakage to Dublin.

The provision of modern retail facilities must be encouraged under the Retail Strategy and the Development Plan through flexibility for existing Centres in terms of unit sizes, signage, parking and end user types. Going forward, such flexibility is important if designated centres and the Towns which they serve are to react to consumer demand which will be necessary to ensure their sustained vitality and viability in light of ever increasing competition and challenges facing the retail sector.

Question

What planning measures can improve the competitiveness and attractiveness of centres across the county?

Answer

It is our view that the existing cap on comparison goods in foodstores should not be brought forward as a retail policy in the new County Development Plan. It is considered that the application of this policy is contrary to the Retail Planning Guidelines (RPGs) which have been updated in the intervening period since the adoption of this policy in the last Development Plan. In this regard, there is no specific policy within the RPGs to support the implementation of a floorspace cap or restriction on comparison space within foodstores. Indeed, it is submitted that the RPGs recognise that foodstores play a vital role in maintaining the quality and range of shopping and as such they are *“an accepted element of retailing in cities and large towns. They provide primarily for the weekly convenience goods shopping of households².”* In this regard, the comparison element generally contains essential household products which are purchased while a weekly food shop is being carried out. The comparison element is therefore complementary to the convenience element as they both are a similar household goods shopping experience for the consumer.

The only convenience floorspace caps referred to within the Guidelines are those relating to the large **convenience** floorspace cap that is set at 4,000m² for the four Dublin local authority areas; 3,500m² for the four other main cities and 3,000m² for the remainder of the State. As stipulated by the Guidelines, *“These floorspace caps apply to new retail stores or extensions to existing stores which will result in an aggregate increase in the net retail floorspace of the convenience*

² Guidelines for Planning Authorities, Retail Planning, 2012, Section 4.11.1, pg.35

*element of such retail stores. In this regard, while some stores may retail convenience goods only, in other cases, stores may retail convenience and comparison goods. In these mixed comparison/convenience retailing stores described above, there is therefore **no cap on the amount of non-grocery or comparison space** delineated for the relevant store, for example on the planning application drawings.³*

Furthermore, the Guidelines note that these caps supersede those identified in existing retail strategies such as the retail strategy for the Greater Dublin Area. As such, it is submitted that the policy to cap comparison floorspace within large foodstores is unsupported by the National Retail Planning Guidelines, 2012 and the Retail Planning Strategy for the Greater Dublin Area.

Having regard to the important retail role foodstores and large supermarkets play, it is considered that the Wicklow County Development Plan, 2016-2022 should provide flexibility for larger foodstores, and it is therefore, inappropriate to apply a 20% cap on the level of comparison floorspace. It should also be borne in mind that the comparison offer within supermarkets is generally lower/middle order and not higher order goods that are encouraged to locate in the Town Centre.

Question

Is there a role for traditional 'Main Street' shopping, in the context of changing shopping patterns?

Answer

The role of the Main Street is very important in protecting the vitality and viability of Town Centres. Given the finer grain nature of the majority of Town Centres, it is considered that the most appropriate form of retail development along the 'Main Street', is small to medium size units e.g. Tesco Express Quinsborough Road, Bray, supported by ancillary retail services. Where the prospect does exist within a Town Centre to deliver larger floor plates the opportunity to provide a destination comparison store(s) which would reinforce the role of the Town Centre and improve its vitality and viability can be exploited.

In this regard, it is our view that, Town Centres are more suitable for higher order comparison retailers, and smaller, specialised retailers. Locations at the edge of the core retail area are generally considered to be more appropriate for higher scale convenience retailing where modern floor plates are achievable. With specific reference to convenience shopping, the requirements for a large floor plate, car parking and good access means that to locate such a development within a traditional fine grain urban centre can have a dramatic impact on the streetscape and in turn the character of the Main Street.

In addition, utilising large areas of Town Centre lands for convenience retail can inhibit the consolidation of comparison shops along a Main Street. Historic and confined retail cores can also struggle to provide the car parking necessary for convenience shopping which can have a negative impact on the Town Centre and the existing retailers therein.

³ Guidelines for Planning Authorities, Retail Planning, 2012, Section 2.4.1, pg.13

Question

How can modern retailing needs be accommodated in existing town centres?

Answer

It is widely accepted that convenience operators are often best accommodated when located on the periphery of the Town Centre/at Edge of Centre sites. Such sites have to be accessible, of an appropriate size and have the correct topography in order to provide for the operational requirements of retailers.

Development Management policies need to provide sufficient flexibility and recognise the important characteristics and requirements of retail operators. Many retailers will operate an established business model, capable of delivering competitive goods to customers at accessible locations. Such models have some flexibility with regard to the overall scale of the store (which will be dependent on market demand) and the physical layout of the building. However, with regard to car parking, accessibility, and retailer profile, there is little potential for flexibility as they are critical requirements.

An array of factors will determine the attractiveness of a town for new retail development and these should be considered in reviewing the Development Management policies. These factors include:

- Quality of the public realm
- Level of support from economic and town development agencies
- Retail Layout achievable
- Traffic Management & Movement Strategy
- Servicing / Deliveries & accessibility
- Height / Mix of Uses
- Car Parking
- Health and Safety
- Development Plan restrictions

In order to encourage the appropriate location of convenience retailers, Development Management policies must have regard to the operational requirements of modern retailers. In this regard, policies must acknowledge that modern stores need to be designed to be efficient, spacious and provide a pleasant environment for both employees and consumers alike.

The standard back of house requirements of retailers to ensure the efficient operation of a supermarket include *inter alia*, a cage marshalling area, bulk storage, staff facilities, offices and administration areas. In addition to these requirements, the design of any building has to have regard to the current Building Regulations, Disability Access and Fire Safety Requirements, underpinned by the principles of Universal Design.

Back of house areas are now designed to minimise the need for multiple deliveries per day by providing adequate chilled and ambient storage areas for holding stock before it reaches the store shelves. In addition, central delivery systems remove the need for individual suppliers to visit stores thereby reducing the number of deliveries to any store. This system is environmentally sustainable as it allows for a single truck to provide a store with a range of products, which in the absence of this system would require several separate truck deliveries.

The Planning Authority is referred to Table 1 below which sets out the necessary back of house areas often required to ensure the efficient operation of modern supermarkets. For example, while it is not strictly required to have an enclosed cage marshalling area within the footprint of a building, it is often enclosed within residential areas to ensure that there is no visual or noise impact associated with the movement of roll cages within the service yard.

As stated above, a supermarket must also be designed to comply with current Building Regulations. Building Regulations apply to all works involving the construction of new buildings, the primary purpose of which is to provide for the health, safety and welfare of people, conservation of fuel and energy, and access for people with disabilities in and around buildings. Therefore, it is inevitable that buildings designed today will have greater requirements than in the past.

Table 1: Modern Retailer's Requirements

Description	Reason for Requirement
Cage Marshalling Area	- To facilitate the safe unloading of a full HGV directly undercover. - To avoid stock being exposed to the elements. - To reduce noise levels normally associated with this activity. - To provide Health & Safety benefits for staff. - To provide an area for sorting and recycling waste and packaging. - To facilitate speedy off loading and HGV turn-around.
Back-up Chiller	- To ensure continuity of chill chain - To ensure that chilled products are maintained at the correct temperature after delivery and before packing out on the sales floor. - The size is designed to meet seasonal peaks.
Fresh Meat Chiller	- Required by trading law. - A back-up freezer is provided for frozen food products. - The size must meet the requirements of seasonal peaks.
Alcohol Storage Area	To ensure that alcohol is stored in a secure area with limited access to specific staff.
Ambient Food and Non-Food Storage Area	- To provide sufficient space to facilitate sorting of deliveries and storage per category. - This is essential to prevent cross contamination. - A separate clothing storage area is provided. - A separate secure storage area is provided to protect high value goods.
Cleaner's Room	- Provided in line with Environmental Health requirements. - To accommodate all cleaning machines, equipment and chemicals. - To avoid any potential cross contamination
Staff Kitchen, Restaurant, Lockers, Changing Areas	In the interest of staff amenity
Ladies & Gents WC, Accessible WCs	All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design
Store Manager's Office	In the interest of staff amenity
Staff Training Room	To facilitate on-site training and up-skilling.
General Office	General office to facilitate IT, stock and ordering and general administration.
Lifts and Access Stairs	All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design
Circulation Areas	All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design
Fresh Food Counter	- To comply with various Environmental Health requirements. - This includes physical separation between cooked and uncooked and direct - This includes direct access to back-up chiller.
Bakery	An in store bakery is provided complete with ovens, storage and manufacturing area in compliance with various Environmental Health requirements

Having regard to the aforementioned, Development Plan policies must recognise that the design of modern retail formats are dictated by retailer's requirements, current Building Regulations, Fire Safety and Disability Access requirements. Each of these regulations necessitates extra space requirements (circulation space, staff facilities, car park layout requirements etc.) which traditionally would not have been required in similar type retail stores.

Policies which provide for the appropriate locating of convenience retailers as above will not only ensure that suitable sites are identified which can accommodate a modern format retailer but such policies will also support the Town Centre by removing traffic associated with convenience retailing to more accessible locations.

Question

How are current car parking standards working?

Answer

The current car parking standard for supermarket retailing which falls within the category "other retail (town/village, district/neighbourhood centre, large/discount foodstore) is 4 no. car parking spaces per 100sq.m floor area. While it is acknowledged that the demand for the private car can be reduced in relation to certain types of land uses, large convenience stores are not such a use. As recognised in the Retail Planning Guidelines (Section 4.11.1) such stores provide for the weekly convenience goods shopping of households and thus the majority of customers undertake the trip by car.

In terms of public transport the County is served by both bus and rail, however, these tend to be concentrated on the main centres. In land use planning terms locating uses such as comparison retail within the Town Centre, which can take advantage of the public transport available, is in accordance with proper planning and sustainable development. However, given the essential nature of the weekly convenience shop and its substantial weight/volume it makes public transport unsuitable for the vast majority of convenience shopping customers.

Given the rural nature of a large part of County Wicklow and the viability issues associated with serving such an area with public transport, the private car is a necessity for those living in the catchment areas of the main settlements. In this regard, for a large proportion of the County population the private car is the only way a weekly shop can be undertaken and therefore, it is not only important that the convenience retail unit is located at an accessible location, sufficient car parking provision must also be provided.

In terms of car parking requirements, a convenience retail store has different characteristics to other retail developments including higher order comparison and retail service outlets. The Draft NTA 2030 Vision document (Section 8.5, 'Parking Supply') specifically separates food and non-food land uses with a maximum standard of 1:14 being applied to 'food retail' and 1:20 being applied to 'non-food retail', thereby recognising the different trip generation rates of these two forms of retail.

The parking characteristics and customer-shopping needs in respect of convenience shopping vary little throughout the Country and therefore, the NTA recommended standards are relevant to County Wicklow. On foot of the Draft 2030 Vision document a number of Development Plans, including Dún Laoghaire Rathdown (2010), Fingal (2011) and Meath (2013) identify a specific food retail category while others including Kildare (2011) and Dublin City (2011) identify

standards for supermarkets and large convenience goods stores. The provision of an appropriate level of car parking to serve a convenience led store is a necessity and must be provided for in the Development Plan.

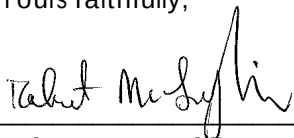
3.0 Conclusion

We trust that the above comments and recommendations will be taken into account as part of the preparation of the Development Plan for County Wicklow. This submission asks that the Development Plan:

- Historic and fine grain Town Centres are more suitable for higher order comparison retailers, and smaller, more specialised retailers.
- The existing 20% cap on comparison goods within large foodstores should be omitted from the new County Development Plan as it is contrary to national retail policies.
- Retail policies must have regard to the operational requirements of modern retailers.
- Development Plan policies must recognise that the design of modern retail formats are dictated by retailer's requirements, current Building Regulations, Fire Safety and Disability Access requirements.
- A convenience retail store has different characteristics to other retail developments including higher order comparison and retail service outlets and we would ask that the Development Plan include a specific food retail car parking standard.

We are available for discussion on any of the matters referred to above. We would also appreciate if you could confirm receipt of this submission by return.

Yours faithfully,



Robert McLoughlin BAgSC (Land Hort), MRUP, MIPI
Director
For and on behalf of GVA

From: Mike Walker [r]
Sent: 22 December 2014 19:54
To: Planning - Development Plan Review
Cc: minister; Edward Sheehy; Deputy Billy Timmins T.D.; Deputy Stephen Donnelly T.D.; Deputy Andrew Doyle T.D.; Deputy Simon Harris T.D.; Deputy Anne Ferris T.D.; Cllr. Joe Behan; Cllr. John Brady MCC; Cllr. Christopher Fox MCC; Cllr. Oliver O'Brien; jryan@greatplacetowork.ie; Cllr. Brendan Thornhill; Cllr. Pat Vance MCC
Subject: ACCESSIBILITY

Dear Sir/Madam,

Concerning your invitation for submissions to the Wicklow County Development Plan 2016 - 2022 [<http://www.wicklow.ie/pre-draft-submission>]: the issues booklet contains many questions, but the document is only available as a downloadable pdf i.e. contributing would be made easier if the booklet itself were available as a webpage with the facility to answer the questions. Furthermore, the instructions for contributing are unhelpful:

"Submissions are required to be 'strategic' in nature, in that this stage of the process is for the purpose of developing the policies to deliver the overall strategy for the proper planning and sustainable development of the county and for the purpose of developing the 'core strategy' of the plan."

There is no definition of "strategic" given, in addition to which the above sentence is convoluted and unclear. This, and the unclear language used in the issues booklet can only serve as a barrier to a resident of Wicklow eager to participate but unfamiliar with government/local authority consultations. The Putting People First Action Programme for Local Government seeks to, "put a strong emphasis on accountability as the bedrock of a properly functioning system of local democracy, providing for better engagement with citizens ..." It is regrettable that that standard was not applied to this consultation which is of such importance to Wicklow residents.

Kind regards,
Mike



Leonora Earls

From: Colin Walker [c]
Sent: 23 December 2014 15:22
To: Planning - Development Plan Review
Subject: Fwd: SUBMISSION
Attachments: Submission on Wicklow .doc; ATT612490.htm

Begin forwarded message:

Submission on Wicklow Development Plan 2016-2022

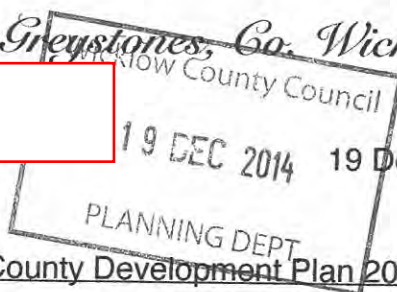
From Patricia Walker, Glentor, Enniskerry, Co. Wicklow

In general the Development Plan issues booklet is written with a lack of conciseness, clarity and simplicity in use of language, and there is no supporting explanation of some of the planning and development terms used. The concern is that this language will have served as a barrier to understanding and participation in the consultation and disproportionately favours those with experience of such processes, which does not include the majority of Wicklow residents.

Comments on Enniskerry, pages 45-46:

1. What is meant by growth? And where is it explained that it will contribute to the well-being and quality of life for, "a cohesive community of people".
2. Q. Is the 'vision' for Enniskerry still appropriate for the period 2016 to 2022 and beyond?
 - A. No, not if it based simply on an assumption:
"Given Enniskerry's proximity to Bray and the Dublin metropolitan area coupled with ease of access to the N11, it is considered to fall into the second category and the development policies for the town must be framed in that context."
Why is it considered to fall into the second category, and so why "must" development policies be framed in this context?
3. Q. Is the role and function of Enniskerry, as a Level 5 'small growth town', in line with future aspirations for the town for the period 2016-2022 and beyond?
 - A. No. It should be categorised as category 6, a "key village", and exploited for its tourist, heritage and quality of life potential, especially given its proximity to Dublin city and surrounding urban areas.
4. Q. How big should Enniskerry be allowed to grow? Are the current growth targets appropriate and reasonable? Would it be appropriate to slow the pace of growth allowed in the existing plan? What should the target for 2028 be?
 - A. Enniskerry's population should not be bound by a population number but rather a quality indicator for the resident population and visitors. The number of visitors attracted to the town will be determined by the extent to which it is an attractive destination. As a gateway to the Wicklow uplands, National Park, Glencree Valley and Powerscourt Estate, Enniskerry's potential is as tourist and day visitor hub, where local residents benefit from retail facilities mixed with those that support local employment (e.g. crafts & outdoor pursuits) catering for visitors.
5. Q. What type of employment should the Enniskerry plan facilitate?
 - A. Enniskerry has the potential to support mixed employment from local craft and outdoor pursuit to highly skilled small scale web-based enterprises. These types of employment are mutually attractive in that many individuals involved in web-based business are attracted to outdoor pursuits e.g. golf, mountain biking, climbing etc. Maintaining Enniskerry character as a gateway village with easy access to the airport (via the M50) is key to this.
6. Q. What shops, services, facilities and infrastructure is needed to provide for existing and future populations, e.g. shops, community, sports, recreational, roads etc?
 - A. See above – if it assumed that exploiting Enniskerry's potential lies in developing its tourist and web-based industry capacity, then any land development must be pursued very cautiously in order not to jeopardise the town's character i.e. potential. The criteria for planning must be such that any development adds to the draw and attraction of the town, and not undermines it.
7. Q. What can be done to attract more tourists to the village?
 - A. The role of the town, as opposed to feeder town for Dublin, can be emphasised. It can be marketed as unique upland location a short way from Dublin, accessible by public transport. All planning applications could be rigorously examined and tested against this benchmark of adding to the attraction of the town i.e. architectural concerns, materials used, aspect etc.
8. Q. What objectives are required to safeguard the heritage of the town?
 - A. See above – identify agree the potential of the town as a tourist and web-based industry hub, and ensure all planning and development is complimentary to that.

51 Convent Court, Delgany, Greystones, Co. Wicklow



19 DEC 2014 19 December 2014

Dear Sirs,

Submission to Wicklow County Council on County Development Plan 2016 - 2022

I, a long-time resident of Delgany, have considered the Issues in the consultative document, Stage 1.

I can fully subscribe to the Vision for the county as given in the Issues Booklet and endorse the Goals set out except that I have serious concerns regarding some aspects of Goal 1. This goal refers to the Regional Planning Guidelines for the Greater Dublin Area and shows Delgany/Greystones within the Dublin Metropolitan Area.

I am of the firm opinion that Delgany should never have been included in the metropolitan area. We have gained nothing from this over the years except more housing but nothing by way of transport or infrastructure to support it. It is quite clear to me that Goals 2 to 9, especially Goal 9, are incompatible with being in the metropolitan area and linked to Greystones. We are attempting to gain Heritage status for the village with little support from the Council. We have been campaigning for ten years to have road safety and parking problems addressed, but are told that there is no funding. "Metropolitan – how are ye?"

Taking a wider county view, I consider that the whole of the 'Garden of Ireland' should be excluded from the metropolitan area for the following reasons.

- 1 There cannot, rightly so, be housing development south of Bray in the sensitive land between Bray Head and the Sugarloaf mountains.
- 2 Greystones/Delgany is not on transport corridor and is unlikely to be so in the foreseeable future.
 - There is only a single-line railway which cannot be expanded and involving a higher fare pro-rata than the rest of the DART service.
 - There is only one road south from Bray, east of the N11.
 - The extended Luas line and the proposed orbital route will be of no advantage to Delgany. If and when the Luas extends to Bray, it is not scheduled to cross the Dublin county boundary.
 - There are constant requests for a better public transport service to little avail and recent indications that it is being curtailed even more by Dublin Bus.
- 3 Both Bray and Greystones have now lost their town councils; hardly warranting County Development Plan Levels 1 and 3 respectively.

For the above reasons, this, the gateway to the 'Garden of Ireland', should be more clearly consolidated as a hinterland, with the rest of the county for all its development.

I am not, however, anti-housing or anti-industry development. Sensitive planning in accordance with the Goals already set out would be welcome. There are already small pockets of unobtrusive business/industry in Delgany, Drummin, Willow Grove and Downs. Kilcoole has attracted more industry than Greystones. Appropriate industry aiding local employment is welcome but difficult to achieve while being seen as a dormitory of



Dublin. We could further advance our tourism potential and thus create more local employment by having a clearer heritage status.

I strongly believe that the Regional Planning Guidelines should be amended. This can be done when the NSS is updated in 2015-2016 in time to feed into the Wicklow County Development plan 2016-2022. In that review, Bray and Greystones should be classed as hinterland within the Greater Dublin Area dropping to levels 3 and 4 respectively. Delgany should be classed a Rural Town, dropping to level 6, the same as Kilmacanogue which is nearer and more convenient to Dublin.

I would gladly make observations on the on other matters in the Issues Booklet if I could see them as relevant to my perceived status of Delgany as a rural village rather than as part of a large growth town in the Dublin Metropolitan Region.

Yours faithfully,



David J Walsh