

Planning Services  
Wicklow County Council  
January 4<sup>th</sup> 2020

To Forward Planning Section, Planning Services, Wicklow Co Co,  
Thank you for the publication of the Stage 1 Issues Booklet and the opportunity to contribute to the plan making process.

I wish to submit the following observations and suggestions for assessment for inclusion in the draft Wicklow County Development Plan 2021-2027. I look forward to submitting further and more detailed observations and submissions over the course of the development plan process.

### **Climate Change**

Climate Change is the greatest risk to our country, county, communities, environment and economy. Mitigating its effects and adapting to its impacts should be the core principles behind all future planning. A CDP can include objectives on transport, energy, development standards and land use to mitigate CO<sub>2</sub> emissions.

Through development standards, increase the required capacity of all surface water drainage systems in future developments and provide for attenuation tanks.

Include an objective that all new developments should include energy monitors.

Include a community objective to improve future food security by identifying lands near urban areas for allotments and community gardening (possibly lands at risk of flooding or part of green belt areas)

A portion of development contribution levies (surface water section) should be used for carbon sequestration projects e.g. forestry, bog remediation, upstream soft engineering etc based on the carbon footprint of a development and where such measures could positively impact on flooding or surface water management.

Increase buffer zones for development from water courses and coastal waters. Apply a more precautionary approach to flood risk analysis in land zoning than that provided for in OPW historical flooding maps.

Any land use, transport or development based public submissions to the Wicklow Climate Adaptation Strategy should be assessed for inclusion in the draft CDP

### **Transport**

The RSES identifies Bray and Wicklow as key growth towns. Whilst Bray is well served by public transport Wicklow is poorly served by rail and bus services leading to car dependency. This must be addressed by improving the jobs ratio in this region and by improvements to frequency and service of public transport, particularly the rail service. It is requested that this plan identifies the investment and upgrade of the Wicklow rail line as a necessary requirement to enable compliance with the RSES.

The RSES delegates the identification of Self Sustaining Growth Towns to the CDP process and states that these towns should have 'good transport links'. The assessment of 'good transport links' should emphasise public transport provision and not rely solely on car dependent transport links. The assessment should also identify if the frequency and range of public transport services in those towns is adequate to encourage modal shift from car to public transport.

All towns, whether designated Key, Self Sustaining Growth, Self Sustaining, Town or Village should

provide for improved pedestrian and cycling infrastructure to encourage active transport, road safety and an attractive alternative to car use for short journeys.

Planning applications for any multi unit development should provide a route map showing safe cycling and walking routes to school, shops and public transport.

The plan should provide a map for potential 30kph slow zones in all town centres and their approach roads for a 300 metre radius from town centre or variant depending on town layouts

Ensure through development standards that multi unit developments provide adequate on street EV charging points and that ground floor units are provided with external charge points

Include an objective to make all existing and new cycle paths raised or segregated. Investigate methods such as providing linear rumble strips (rumble bars), physical segregation barriers, raised road markings to further improve road safety and offer protection to cyclists and visual and tactile information for motorists

### **Environment**

Identify suitable public lands for native tree planting in order to support native tree cover with the aim of increasing Wicklow's forestry cover to meet national targets. Similarly, identify areas for rewilding.

The proposed Wickow to Greystones greenway has great recreational potential but this proposal must prioritise protecting and preserving the very environment to which it seeks to create access. If environmental concerns and impacts can be adequately addressed and mitigated, this green way should also be expanded northwards to Bray via the Cliff Walk and on to Dun Laoghaire local authority area via Bray Harbour

### **Tree Preservation Orders**

Trees in urban areas are afforded very little protection under current legislation. TPOs created during the CDP process provide some protection and consideration of urban trees. It is requested that during this plan process that adequate resources are provided for planning services to carry out a review of all TPOs and to carry out an assessment of previously requested TPOs

### **Protected Views**

It is requested that the current method of showing protected views by an arrow on map is improved by providing a photograph(s) of the protected view which clearly shows the scope of the protected view

### **Rural Development**

Dispersed one off housing needs to be curtailed – over the past 5 years one off housing has accounted for approx 45% of permissions granted. This type of development is not sustainable in terms of environmental, societal, service and transport costs. An objective is required to encourage rural housing to be centered around and close to rural villages and towns with the aim of revitalising these towns, improving services and reducing the decline of rural towns and villages.

### **Economy**

The CDP aims to increase the jobs ratio to 60% by 2028 and this will have positive impacts on transport and quality of life. In order to increase the attractiveness of population centres for investment and job creation there needs to be a greater emphasis on place-making and improvement

to public realm and amenity. A public realm framework is required for each large town that identifies the potential for improvements and linkage between such public open spaces within each town.

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