

Wicklow Planning Alliance

c/o The Corner House, Newtownmountkennedy

To Wicklow County Council
planreview@wicklowcoco.ie

Friday 10th January 2020

Dear Sirs,

Re The pre-draft consultation of the next County Development Plan 2021-27

In making this submission we are guided by three Government documents:

1. The National Planning Framework
2. The National Development Plan
3. The Regional Spatial and Economic Strategy.

When referring to these documents together we shall call them the National Strategy.

We think there is much in the National Strategy that is good, for example, the aim to:

- a) Tilt the balance of future economic development away from Dublin
- b) Deliver “Compact Growth” that concentrates on urban regeneration rather than green field sprawl and the creation of walkable communities and reduced congestion on our roads
- c) Strengthen Rural Economies and Communities
- d) Deliver Sustainable Mobility, i.e. good public transport instead of car based long commutes to Dublin
- e) Deliver Sustainable Management of the waste that we generate
- f) Deliver Sustainable Management of water and other natural resources
- g) Deliver the Transition to a Low Carbon and Climate Resilient Society

If Wicklow’s new County Development complies with and delivers the objectives set out in the National Strategy then it will enable Ireland to qualify for capital funding under the Green New Deal published recently by the new President of the EU Commission.

The policies and objectives that we need to address Climate Change are exactly the same policies and objectives that are needed to strengthen rural economies and communities.

Core Strategy

We want Wicklow County Council to be like the GAA and inspire pride in the County.

We want Wicklow County Council to be creative like Norwich Council in England and issue inspirational briefs to architects for designs for social and public housing that are high density but low rise. We want you to visit Goldsmith Street in Norwich and see how important orientation is; see what happens when you insist that homes face the sun; see what happens when you get rid of the tarmac and the car and give priority to people; see what happens when you focus on making space for children; see what happens when you insist on tall windows facing south and loads of colour. Or visit the high-density low-rise charm of old Dublin with its narrow streets and small back gardens. We want our educated youngsters to come back home to live and work in County Wicklow. Instead of being stuck in long congestion on the N11 trying to get to work in Dublin. We want a concentration of jobs in the two towns identified in the National Strategy as Wicklow’s Key Towns, Wicklow town and Bray.

We agree that the National Strategy requires a radical alteration to the settlement hierarchy contained in the current Development Plan. The designation, place and hierarchy given to Bray, Wicklow, Arklow, Greystones, Newtownmountkennedy and Blessington in the current Development Plan requires amendment.

Using the criteria set out in the National Strategy the new County Development Plan must identify and list towns that are either “Self-Sustaining Growth Towns or Self-Sustaining Towns.

In our view the revised population growth target of 164,000 for county Wicklow should be reduced further if it is decided that Bray should get its figures for population growth from the metropolitan area and not from the figure of 164,000.

Compact Growth

We answer your specific questions as follows:

- Greystones- Delgany is not a large economically active town that provides employment for surrounding areas. It does not have high-quality transport links. The Dart needs expansion and we need a variety of different Bus services and a transport strategy that gets people out of their cars on the N11 and onto public transport. Greystones- Delgany is not therefore a “Key Town” as defined in the National Strategy.
Greystones- Delgany is not a “Self-Sustaining Growth Town” as defined in the National Strategy. It does not have good transport links or capacity to become more self-sustaining. Greystones- Delgany has very high levels of population growth but a weak employment base. It is reliant on other areas for employment.
- Only those towns and villages that have capacity in their existing built-up footprint and available underutilised land, brownfield sites and available infill space should be promoted for population growth.
- No, we do not think Greystones- Delgany has the capacity to sustain more housing growth because its employment base and public transport infrastructure is very weak. See the submission we made on the proposals for the N11M11 upgrade.
- No, the level of housing development in Delgany in particular has not been matched by adequate infrastructure and services. Public transport is very weak and we lack a public realm and a public green space. The traffic congestion in the village is not consistent with Healthy Placemaking or Climate Action. The recent housing development has not created any Economic Opportunities.
- The service shortfalls in Delgany include public parks, public cycle paths, public footpaths, bus services and jobs. Delgany has lost its sense of place and destination. New school places follow too slowly behind new housing; this causes great stress.
- To deliver “compact growth” development should be restricted to only those towns and villages that have capacity in their existing built-up footprint and available underutilised land, brownfield sites and available infill space.
- To make our towns more self-sustaining we must create walkable communities and stop spilling large numbers of commuters onto the N11 seeking work in Dublin. Instead, we must send our workers to the Key towns in the County as defined by the National Strategy.

Climate Change, Flooding & Coastal Zone Management

Climate change.

We take heart from the fact that for the first time your Issues Paper now acknowledges that the County Development Plan is much more than just “a land use framework” and that it does have a serious role to play in helping Ireland to achieve its national and international obligations and targets for emissions reductions. The County Development Plan in the past has been a significant

contributor to carbon emissions because of the car-based development that it encouraged and promoted. We urge you to read the papers published on the Department of Transport's website and how they make the link between bad spatial planning, carbon emissions and traffic congestion.

We answer your specific questions as follows:

- The County Development Plan can address Climate Change by:
 - permitting only sustainable growth so that residents can live, work, study, play and socialise in the county; so that residents can walk or cycle from home to work, to school, to the shops, to the park; so that residents do not need a car because public transport options are varied and reliable, clean, comfortable and safe.
 - Permitting compact development not urban sprawl scattered across the entire county or along public roads in the county
 - promoting cycling, walking and public recreation facilities
 - promoting public transport to connect all settlements in the county with each other and to connect settlements with national public transport routes;
 - prohibiting development in areas that are at risk of flooding;
 - protecting the natural landscape
 - protecting biodiversity,
 - Explaining and encouraging re-wilding
 - Explaining how the Ecology Emergency is separate from the Climate Emergency
 - Implementing a programme to significantly increase the canopy cover of trees in urban spaces to provide locked-in carbon, calmer and cooler streets, and increased biodiversity.
 - Requiring all residential developments to have allotments so that we can reduce the carbon footprint by growing what we eat rather than importing 83% of what we buy in the supermarket. Currently, Irish farmers do not produce what Irish consumers are buying in the supermarket.
 - In adapting to climate change we need to prepare for better food security. It is necessary to zone and protect from development good quality soil suitable for horticulture close to towns and villages
 - Make all public buildings showcases to demonstrate what can be done to de-carbon our buildings and to demonstrate how zero carbon buildings are cheaper to maintain and more comfortable to live and work in.
 - Explain how and why Ireland is one of the most de-forested places in the world
 - Our ancestors were able to drink water straight from the river. We cannot do that today because of the artificial fertiliser, the animal and human waste, the industrial waste that we discharge into our rivers and sea. We need proactive planning enforcement.

Flood Management

- Please specify that Natural Flood Management Solutions (for Rivers and Streams) must always be tried as the first priority before hard engineering Flood Management solutions.
- There is significant flooding along Three Trout Stream and where Blackberry Lane crosses Three Trout Stream. There is also significant surface water run-off on Blackberry Lane and in Delgany generally. It seems wasteful. There should be a strategy to capture and save such water.
- Any planning permission granted for a new development in a flood risk area should contain a condition noting the risks associated with flooding.

The Council should embark immediately on a programme to lift the lids off all culverts and let rivers and streams flow naturally. Where rivers and streams overflow or spill out of their channels the flooded areas should be treated as public open spaces like in other European countries.

Housing Density

We want to emphasise that in order to achieve high density you do not need high rise. Again, see our comments above on Norwich City.

Only two of County Wicklow's towns are designated in the National Strategy as "Key Towns", (Bray and Wicklow). An argument could be made that future housing on greenfield sites on the edge of these two towns only could possibly secure densities of 35 plus units per hectare but with building height capped at four storeys.

The National Core Principles stipulate that the scale and nature of future housing provision should "*be tailored to the size and type of settlement where it is planned to be located*". We submit that high densities in all other towns in County Wicklow is not appropriate because the other towns are not self-sustaining.

The new County Development Plan should therefore prioritise the location of new housing in the footprint of existing settlements and in particular, prioritise re-use of existing buildings, infill-development, regeneration. Where an increase in existing building height is deemed necessary it should be to no more than four storeys. Volunteers doing the soup runs have observed that they are very aware of the huge number of vacant buildings and the general dereliction. If the council concentrate on eliminating vacancy and dereliction you could create a great number of new homes.

Recent developments in Delgany are of very poor design standards. They are not "place-making", many homes have poor orientation and lack basic privacy. We need gardens to grow vegetables. Children need safe public spaces to play.

Rural Housing

We answer your specific questions on housing as follows:

- We require *affordable* houses. Too many houses are not *affordable* for working families. Huge mortgages for over-priced houses are a heavy burden on families. The Council should make its own sites available for the construction of *affordable* homes. The Council should do what Norwich Council did and draft exciting, imaginative, inspirational briefs for architects and developers and then organise competitions to achieve the best design. We also require
 - Intergenerational communities
 - High class public housing (not social housing) in the centre of town locations so that working families would be happy to rent rather than buy.
 - If you are not able to deal urgently with the issue then sell off existing vacant and boarded up council houses to families and let them restore, renew and regenerate them.
 - Homes for those on the Council's Housing List
- Yes, the groups in society that find it difficult to access housing include
 - Working families that do not earn enough to get a mortgage to buy on the open market.
 - The elderly who would like to live in town near the shops and church.
 - Those that have special needs and require assisted or sheltered housing
 - Young people leaving prison
 - Travellers

- Yes, there is a need in our area for special housing of the type listed above. The only housing currently being constructed in our area is that being provided by the market which is seeking to maximise profits.
 - Social housing should be provided in the centre of towns, within walking distance of schools, shops, church etc. and social housing should be provided by the local authority not private developers. Social housing should be in locations where there are opportunities for employment, access to public services and good social networks. To provide affordable housing for local people the council should provide some serviced sites on the edge of villages, as in county Limerick.
- Because Wicklow's towns are not self-sustaining they are entirely inappropriate locations for high rise. See our comments on density above.
- Increased densities can be achieved by prioritising re-use of existing buildings, infill-development, regeneration and an increase in existing building heights to no more than four storeys.
- We do not understand your reference to "*genuine rural housing needs*". Surely all our children who want to leave the family home and become independent have genuine housing needs. The sons and daughters in most families have a preference to live in the locality where they grew up and near their parents. We find the inference that somehow the needs of rural families are more genuine is troubling. The children that grew up in Irish town and elsewhere in inner city Dublin would love to be able to afford to live beside their parents but cannot afford to do so because these areas have become gentrified. We should not be pitching rural families against urban families or suggesting that some areas should be exempt from planning law.

Jobs, Place-Making and Rural Development

We think that the historic streetscapes and settings of most of Wicklow's towns are bleak, charmless and inhospitable. They exhibit decay and neglect or alternatively they are cluttered with shabby poor-quality shopfronts and advertising. In many cases they urgently need a good cleaning. We agree there is a critical link between the quality of urban place-making and business investment/job creation. In all the county's towns Wicklow County Council could improve the quality of urban place-making by doing the following:

- i. Provide proper regular cleaning and maintenance of the public realm.
- ii. Create lots of *pedestrian only* streets. Give priority at all times to pedestrians and cyclists. Create safe walking and cycling routes.
- iii. Create out of town or edge of town parking facilities and restrict or prohibit cars in town centres. Getting rid of motor vehicles and the associated noise and pollution will make town centres a place that is attractive to visit and linger in. When you are not distracted by traffic congestion you are more likely to notice and appreciate streetscapes and architectural heritage.
- iv. Make more proactive use of legislation on Vacant Sites.
- v. Make more proactive use of legislation on Derelict Sites.
- vi. Enforce the planning laws on advertising hoardings, sandwich boards and unauthorised developments like smoking tents. As stated before, there is a need for more active planning control on the erection of big tents for smokers and the sort of advertising that is on the seafront in Bray. This is unauthorised development and planning laws should be enforced by the Council without waiting for the public to complain.

We answer your questions as follows:

- We think County Wicklow should be ambitious and aim to be the leader in Ireland in the transition to a net zero-carbon economy. In deed this will likely be required by the new climate act currently going through parliament.
 - The transition to a net zero-carbon economy will enable a shift in the *location* of new jobs.

There will be jobs in the work required to reverse human degradation of the planet, for example, regenerative farming, rewilding and re-wetting our bogs. See the Cambridge Conservation Initiative (www.cambridgeconservation.org) and in particular the programme called Endangered Landscapes.org <https://www.youtube.com/watch?v=6jTM0-1LOGw> For example there is an opportunity to create an Eco Park in Wicklow with the Wicklow National Park at its core, spreading out to include urban areas and villages. The proposal envisages farmers being paid to manage their land in ways that benefit the environment; a 'Green Wicklow' brand under which business can trade at a premium; the Government showcasing its initiative on an international stage and being seen to take the initiative at a time when it is being fined heavily in Europe for failing to reach its emissions targets; and children and communities as well as farmers taking ownership and becoming guardians. An objective could be used such as in Fingal CDP Chapter 5 RF115 to *Support the provision of proposed long distance walking trails that provide access to scenic uplands, riverine and coastal features.*

- In the power sector, it will be easy to provide a dispersed pattern of jobs in generation, installation and maintenance of renewable energy systems.
- In transport instead of spending on infrastructure to promote long distances between cities we need spending on local transport provision between settlements in the county; good quality bus services and associated jobs. See our submission on the N11M11 upgrade
- Electrification of railways and private cars requires planned, co-ordinated action, but will provide jobs all over the county.
- The installation of electric vehicle charging points
- The retrofit of buildings will be best done through local authority-led street-by-street programmes funded by public money.
- In the Waste sector recycling, upcycling, re-use will create new jobs. You need to identify appropriate locations and facilitate access to low cost space for people who have the imagination to drive this.
- Wicklow needs to draft motivational, enthusiastic, inspiring procurement plans and invite tenders for the creation of truly Green jobs.
- Make the Claremont Campus the place to invent new batteries for our homes. Aim to make each settlement in the county energy sufficient with its own micro-grid. We know how to do all this. All that is lacking is the will.

- To make Wicklow a more attractive employment base the public realm must be improved. Get rid of the dirt, the litter, the derelict sites, the vacant sites and deliver compact growth with a concentration of workers in Wicklow's two Key Towns.
- New economic opportunities will follow if the objectives and principles in the National Strategy are implemented and if Wicklow concentrates on creating a critical mass of residents and workers in its two Key Towns. The aim should be to get people in Aughrim, Ashford, Baltinglass etc to travel to one of Wicklow's two Key Towns instead of Dublin for work and jobs.
- Economic development should be concentrated in the two key towns but as stated above many of the new jobs required to de-carbon our economy can be located all across the county.
- Brownfield sites should always be prioritised for development.
- Yes, new ways of working should be facilitated. Hubs should be located in town centres.
- The county's rural economy can be diversified by concentrating on delivery of the jobs required to de-carbon our economy. The current economic model with its emphasis on global markets is pushing our farmers out of business. We could pay them exactly the same farm assistance and other taxpayer supports but request them to stop growing cows and instead help us build a county that is entirely self-sustainable and independent of the global markets.
- No, we need more active planning enforcement to protect the countryside.
- 95% of the beef that our farmers produce is exported and 83% of the stuff Irish people buy in supermarkets is imported. Farmers should produce what Irish consumers want to buy. Instead of building fancy milking parlours Irish farmers should build glass houses and grow flowers for our florists so that when we buy a bouquet it is made with Irish flowers.
- See also submission from Richard Webb on Climate & Air Roadmap for Agriculture to Dept of Agriculture, Food and Marine

Town and Village Centres & Retail

We answer your questions as follows:

- To make our towns and villages more vibrant and attractive you need
 - to regularly clean the public realm
 - Be more pro-active in the use of Derelict Sites Legislation
 - Be more pro-active in the use of Vacant Sites Legislation
 - Be more pro-active in the use of Planning Enforcement Legislation
 - Prioritise reuse and regeneration of existing vacant and underused buildings
 - Make use of CPO powers
- Vibrancy could be improved by cleaning and improving the public realm, pedestrianizing town centres and restricting access for motor vehicles.
- Use Vacant Sites and Derelict Sites Law to address vacant units. Encourage living over the shop.
- Large shopping centres are inappropriate in Wicklow's towns and villages.
- When the new development is completed in Bray there will be no shortage of retail in the County. The centre in Arklow is not a success.
- No, previous plans have not been successful in guiding retail.
- Improving the public realm will help retain spend in the county

Tourism and Recreation

We answer your questions as follows:

- We need strict planning enforcement and control, We need to support the work of *the Pure Mile*.
- We should encourage and develop outdoor activity tourism for example walking and cycling trails with high class B&B facilities on the trails with wet rooms where visitors can hang up wet clothes to dry out over-night.
- We need more Greenways
- We can capitalise by protecting both the natural and built heritage.

Heritage

Built Heritage

- * We need to better protect our heritage and use all the tools available. The La Touche Hotel is just one example of a protected structure that was wilfully neglected and there are many others in Wicklow Town and around the county which are deteriorating rapidly. The council has the power to intervene and this should be done.
- * Bray Town has a number of fine examples of Victorian buildings and streets. While a number of these are listed in the register of Protected Structures, it is necessary that the areas where they are located are viewed in a holistic approach. Currently Bray, unlike eight other towns in Wicklow, does not have any ACA's in place. As such it is our opinion that the Quinsboro Road, Florence Road and Eglinton Road, Galtrim Road, Wyndham Park, Adelaide Road, Novara Avenue, Sidmonton and Meath Road and Bray Seafront should all receive an ACA designation.
- * Bray needs urgent attention. Bray has much built heritage that has simply been ignored in previous plans and neglect when it comes to planning enforcement. If it was appreciated and minded Bray would be a major tourist centre..

Natural Heritage

- Not only should rights of ways be listed but also waymarked ways, looped walks, mass paths and routes to holy wells, mass rocks and penal mass stations, which should be identified, mapped, kept free of obstruction and protected. .
- Amongst other potential Rights of Way please list the route through the Luggala Estate from "Pier Gates" to Lough Dan on the Sally Gap to Roundwood Road and the route from the main road in Glenealy to the woodland on Carrick Mountain along Ballymanus Lane..
- Please strengthen the awareness and protection of the Glen O'the Downs [SAC] Nature Reserve, the jewel in the crown of Wicklow nature. An objective should be included to monitor and manage the largely-forgotten Western section of the Glen nature reserve and re-connect it to the Eastern section via a number of wildlife bridges over the N11 / M11 and underpass tunnels where suitable. Prioritise the Glen for awareness, protection, environmental monitoring, and restoration. Re-wild as a native riparian wooded (oak) wildlife corridor to the maximum extent possible.
- Waterways, river systems and wetlands everywhere need urgent protection in order to address the Ecology Emergency.
- Please identify, map & zone all Wicklow river corridors & wetlands for protection (Waterford County council's last two County Development Plans provide a good example). Please state Wicklow policy to facilitate restoration of the natural connectivity, flow and condition of the

rivers wherever reasonably possibly, to include completing the removal of unnecessary obstacles / weirs and encouraging fencing / drinking solutions to keep livestock physically back from poaching the river bank, while also preventing overgrazing by livestock and wild animals and allowing re-wilding / native re-forestation.

- Please state Wicklow policy to work closely with LAWPro, EPA, NPWS and IFI to support local communities, land-owners, River Trusts and Tidy Towns groups to protect rivers and re-connect the community to their local lifelines.
- Please study the creation of a new zone type "Land reserved for Nature including Climate & Biodiversity Natural Solutions" and the zoning of Wicklow Rivers and a corridor 50m each side of each river. This could be piloted on selected rivers such as the Three Trouts Stream and The Swan river in Bray. If successful it could be applied to the zoning of other Uplands as well as the Rivers/Wetlands.
- What's left of our trees and woodlands everywhere need urgent protection in order to address the Ecology Emergency. For example strengthen the awareness and protection of the ridge of Scotts Pine trees known as Harmon's Brow / The Dancing Trees on the brow of Drummin Hill just South of Delgany Village
- Make more use of dark sky zones and quiet zones

Transport

Our answers to your questions are set out in the submission that we made on the proposals for upgrade of the N11M11.

You must prioritise compact urban growth that concentrates on urban regeneration rather than green field sprawl and the creation of walkable communities and reduced congestion on our roads

Environmental Assessment

Throughout this submission we have addressed environmental, ecological and Climate issues that must be addressed in the new County Development Plan

Please also see the report and study done by Verde Environmental Consultants as part of their assessment of the proposed N11M11 upgrade Route Options. We ask you to give careful attention to Verde's study.

Indicators and monitoring

The Plan should include a commitment to monitor the efficacy of the plan and its outcomes and include the indicators that will be relied upon to deliver that monitoring. We suggest you adopt the Guidelines on SEA's published by the Department of the Environment.

END

Dr. Craig Bishop
For Wicklow Planning Alliance

