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Please find attached a submission on the County Development Plan Issues Paper on behalf of Wicklow Upland Council

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**Submission to Wicklow County Development Plan 2021 – 2027
Stage 1 – Issues Paper Public Consultation, January 2020**

1. Introduction

Wicklow Uplands Council (WUC) welcomes the opportunity to submit its feedback on the Issues Paper developed by Wicklow County Council in preparation of the draft Wicklow County Development Plan 2021-2027. A brief submission has been prepared at this time and subsequent more in depth submissions will be developed as the consultation process progresses.

WUC is an independent voluntary organisation which represents over 40 diverse member groups and individuals with an interest in the Wicklow Uplands region. Our organisation takes a partnership approach to sustainable development and promotes projects which bring value to those who live and work in the uplands as well as those who enjoy the area for recreational purposes. Therefore the organisation is ideally placed to make well informed, grassroots contributions to this process.

Our mission is:

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

2. Strategic Priorities:

WUC represents the needs and concerns of communities within the uplands and continually seeks to provide a coordinated response to the challenges which can arise at a local level. Of particular importance is the need to involve local people in the statutory decision making processes that affect their local area in the spirit of Local Agenda 21. The strategic priorities of WUC, of which our organisation would like to see reflected within the new County Development Plan 2021-2027, include:

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

3. Specific Responses to themes in the issues paper:

3.1 Compact Growth & Housing

WUC is committed to supporting those who live, work and recreate in the Uplands areas and is concerned that there should be due recognition for particular needs away from the towns and

villages. The rural landscape is a living landscape which has supported homes, livelihoods and recreation.

WUC welcomes the emphasis on planning new housing in existing settlements and avoiding urban generated housing in Wicklow's scenic landscapes. It is reasonable too that people who would choose to live in rural areas of significant landscape quality should need to demonstrate 'a functional, economic or social' requirement (National Planning Framework policy).

Within those parameters the Uplands Council is committed to supporting those who live and work in County Wicklow. Families will continue to have the opportunity of developing new skills: at home, in the City and abroad, thus generating new ways of managing life in rural areas, to maintain and develop the County rural structure. To assist in achieving these objectives, appropriate new housing provision in rural areas should encourage a further generation to succeed and thrive, bringing new social potential to a changing economic environment.

The need for diversity of housing in rural areas is acknowledged in the Plan proposals. It suggests compact development of varied requirements, not so much through private housing provision, but also in social housing for special needs, the elderly and overcoming difficulties in accessing housing in rural areas. Social housing may need to focus on small towns and villages, but there will also be special requirements for people in the more remote areas.

3.2 Climate Change

Climate change is the greatest threat facing today's society. All efforts must be made to address this crisis, to reduce our carbon emissions and halt the loss of biodiversity. Wicklow County Council was proactive in being the first local authority in the country to declare a climate and biodiversity emergency (May 2019) and should continue to lead. A Climate Adaptation Strategy was drafted in 2019 with full public consultation and WUC suggests that the strategy and the feedback received during the public consultation are enshrined in the new County Development Plan. While the strategy was welcomed there must also be a greater focus on mitigation measures in order to support a preventive approach. The successful implementation of mitigation measures is crucial in the transition to a more low carbon and environmentally sustainable economy as set out in the Governments Climate Action Plan 2019

The Wicklow Uplands region has a significant role to play in climate mitigation and adaption strategies. Healthy upland habitats store carbon, provide clean drinking water and slow floodwaters, preventing downstream flooding. Across Ireland, 53% of all soil carbon is stored in peatlands found in the uplands; this represents just 16% of the land area¹. It is the NPWS, Coillte and upland farmers who are managing large areas of the uplands. WUC suggests that, given the significant role the uplands can play in meeting national climate targets, Wicklow County Council continues to provide all necessary supports to their management and to the communities living in these areas.

3.2.1 Renewable Energy

¹ Tomlinson, T. W. (2005). Soil carbon stocks and changes in the Republic of Ireland. In: *Journal of Environmental Management*. **76**. 77 - 93

The new County Development Plan should support the development of small scale energy production in businesses and homes throughout Wicklow. However, it is not currently possible to sell energy into the national grid from such small scale production. This is contrary to government targets to move away from non-renewables and to a greener economy. While WUC understands this is outside of the power of the County Development Plan, this is a serious national issue which all local authorities need be raising with central government. The ability to sell into the national grid would encourage the generation of energy through solar energy, photo voltaic energy and small scale wind energy production. There are many examples in Europe of community energy projects whereby the communities produce their own electricity and have developed numerous local initiatives, co-ops and innovative business models².

3.3 Economic Development and Retail

Economic Development and retail strategies should aim to support the survival of retail outlets and other services in more rural towns and villages throughout the county. The decline of services such as post offices, Garda presence, local shops, and health facilities is clearly evident in many small villages. The fabric of rural communities depends on these services. As more and more people are travelling to larger towns on the fringes of the county, outside the county or shopping online it is putting a further strain on these economies. There is no obvious solution but the County Development Plan must aim to support local business and rural enterprise by every means possible. The lack of good broadband facilities across the majority of rural Wicklow is an obvious limitation for new and existing businesses which should be addressed in the new plan.

3.4 Tourism and Recreation

The importance of outdoor recreation for our health and well-being, appreciation of our natural resources and stimulation of enterprise and tourism is widely recognised. However, as stated in the issues paper, tourism and recreation opportunities in the County must be developed carefully and sustainably to prevent compromising our valuable resources and our rich and diverse heritage. The current review of the Wicklow Outdoor Recreation Strategy will be important in this regard.

County Wicklow is already a popular visitor destination. However, the majority of these visitors are typically day-trippers either living or staying in Dublin and provide little towards the local economy. This is exacerbated by the lack of accommodation and public transport facilities in the county. Tourism must be developed which encourages independent visitors and more overnight stays. The recently launched 183 Local Link bus service between Glendalough and Wicklow Town is a very welcome development. The County Development Plan should look to further improve public transport in the County including linking east and west Wicklow.

As outdoor recreation grows in popularity and the county is easily accessible to a large population, erosion damage is now a common feature and growing problem across the majority of upland paths. As well as diminishing the outdoor experience for visitors, erosion of upland paths and peatland is a serious environmental issue due to the release of carbon and sediment runoff into water courses. As Co Wicklow can be rightly marketed as an outdoor recreation destination, there must also be future funding ear-marked and invested in repairing, maintaining and promoting upland paths and walking

² <https://www.frontiersin.org/articles/10.3389/fenrg.2019.00031/full>

trails throughout the county. Spinoff rural tourism opportunities can contribute to the local economy.

Furthermore, while Glendalough is a honeypot for tourism, visitors and local residents are reporting negative experiences due to the lack of parking. The lack of parking infrastructure is already an obvious issue in locations such as Glendalough, the Pier Gates (Luggala) and around the Vartry Loops. Traffic jams are a common feature at weekends and this is deterring return visitors and impacting on local residents. All options for new car-parking opportunities with local landowners should be investigated.

A weakness of the current upland trail network is the lack of connectivity with public transport and villages; this further exacerbates the issues with lack of parking. Strategic long distance trails for walking and cycling, which link directly with towns and villages, should be encouraged. Trails which link with public transport facilities should be prioritised as this promotes more independent visitors who are less reliant on car transport and stay for extended periods.

Cycling and mountain biking is growing in popularity throughout the county. There is an excellent mountain biking facility at Ballinastoe Woods but there is demand and potential for more. The number of cyclists taking to the public road is a clear indication for the demand for more off road long distance cycle routes in the county. The anticipated greenway developments for the county are welcome. The growing number of large organised cycle events on public roads can be a point of contention and disruptive for local residents and motorists. Such events need to be planned properly, with sufficient notice for residents in accordance with the Guidelines for Organised Events in Wicklow's Outdoor Recreation Areas³

3.5 Heritage

Co Wicklow has rich and diverse built, natural and cultural heritage and this heritage must be protected. The Wicklow uplands are widely known for its iconic landscape. It is a living landscape which has been extensively farmed for generations. Wide areas of these farmed habitats are designated under Natura 2000 and also recognised as having high likelihood for High Nature Value (HNV)⁴. HNV farmland is extensively managed farmland that has a high biodiversity. These areas are important for the conservation of semi-natural habitats and the associated flora and fauna and also for providing environmental public goods and ecosystem services e.g. upland biodiversity, water quality, soil quality and resistance to flooding. Therefore it is essential that these areas are well managed and that viable communities are maintained in these areas.

Despite EU designations and the high likelihood of large areas of the Wicklow uplands as areas of HNV, traditional extensive hill farming is in decline. Farming sustains the biodiversity of the upland landscape and it vital in maintaining its HNV. Traditional hill sheep farming is also recognised as an important aspect of our cultural heritage⁵. The decline in upland farming activities has seen an associated decline in the quality and condition of these valuable habitats. Coupled with this has been the rise in the extent and frequency of unregulated burning. This is in part due the current

³ <http://visitwicklow.ie/wp-content/uploads/2019/04/Guidelines-for-Organised-Events-in-Wicklow-Outdoor-Recreation-Areas.pdf>

⁴ <http://www.high-nature-value-farmland.ie/hnv-distribution/>

⁵ <https://nationalinventory.chg.gov.ie/traditional-sheep-farming-and-sheepdog-training/>

permissive season for burning of upland vegetation which is unduly restrictive and out of line with the UK season. Uncontrolled wildfires threaten the conservation status of Natura 2000 sites and pose a serious threat to forestry and public safety. The cost of tackling these wildfires is substantial. WUC promotes the use of controlled burning⁶⁷ on a rotational basis as means to support agricultural productivity, to support biodiversity and as a pre-emptive measure to prevent wildfires taking hold in areas of heavy vegetation in drier summer months. The use of fire can create an emotive response but when carried correctly, it is an effective land management tool which supports upland biodiversity and agricultural productivity by creating a mosaic of vegetation type and structure.

3.5.1 The Sustainable Uplands Agri-environment Scheme (SUAS) Project

The Sustainable Uplands Agri-environment Scheme (SUAS) is a pilot project funded by The Department of Agriculture, Food and the Marine (DAFM) through the European Innovation Partnerships initiative (EIP) under the Rural Development programme 2014 – 2020. The objective is to develop innovative and sustainable solutions to the economic and environmental challenges facing farmers in the Wicklow/Dublin Uplands. WUC is leading the project which commenced in 2018 and will run until December 2022. Farmers participating in the project are remunerated for activities carried out which go towards improving the condition of their farmed upland habitats. Activities include; vegetation management through controlled burning & cutting, increased shepherding activities, reintroducing mixed grazing, gully planting and drain blocking on blanket bog areas. The progress and outcomes of the project and other EIP projects are being monitored closely by the DAFM as a potential model for future upland agri-environment schemes.

3.5.2 Protecting Uplands and Rural Environments (PURE) Project

The PURE Project and Pure Mile competition is a model for active engagement with local communities. Ongoing support of the PURE Project will ensure that Wicklow continues to present a pristine clean and green image. PURE allows the project partners to take a zero tolerance policy to illegal dumping and fly-tipping and keep the cherished upland and rural landscape in pristine condition. The project represents excellent value for money and is the most cost effective way to address these issues. The Pure Mile competition continues to grow from strength to strength and is now a household name in Co Wicklow. In addition to keeping roadsides litter free, a wealth of information has been collated by the community groups regarding the built, natural and cultural heritage associated with their PURE Mile. This information is all shared to the Co Wicklow Community Heritage Archive⁸

3.5.3 Deer Management

WUC and the Wicklow Deer Management Partnership are currently working on a three year project to establish three new Deer Management Units (DMUs) throughout the county. A DMU is an area of land where landowners, hunters and other interested parties come together to manage deer with agreed objectives. The adverse impacts of deer in each DMU are being assessed and recommendations made towards reducing those impacts in a sustainable manner.

⁶<https://www.agriculture.gov.ie/media/migration/forestry/firemanagement/CofPPrescribedBurningFinal90212.pdf>

⁷<https://www.agriculture.gov.ie/media/migration/forestry/firemanagement/FSSynopsisfinal090212.pdf>

⁸<http://www.countywicklowheritage.org/category.aspx?id=14>

