

[REDACTED]

Sent: 13 January 2020 09:18
To: 'Richard Mulcahy(Indigo.ie)'
Cc: Planning - Plan Review
Subject: RE: Wicklow County Development Plan 2021- 2027 Submission

A Chara,

I wish to acknowledge, with thanks, receipt of your submission regarding the County Development Plan review.

Regards

[REDACTED]
Administrative Officer
Planning Control.

From: Richard Mulcahy(Indigo.ie) [REDACTED]
Sent: 10 January 2020 16:35
To: Planning - Plan Review
Subject: Wicklow County Development Plan 2021- 2027 Submission

Dear Sir/Madam,
Attached please find our submission for your forthcoming development plan.
Regards,
Richard Mulcahy
Stephen Tracey

Administrative Officer
Forward Planning
Wicklow County Council
Station Road
Wicklow Town

Date: 07-01-20

Wicklow County Development Plan 2021-2027

A Chara,

We would like to make a submission for consideration in the preparation of the Wicklow County Development Plan 2021-2027.

We are landowners in the Park & Kilmurry townlands south of Arklow and believe that this coastal area is underutilised and that the coastal zone management plan can be improved to further promote tourism, recreation and the natural heritage of the locality.

We refer in particular to Cell 12 of the current coastal zone management chapter in the current county development plan.

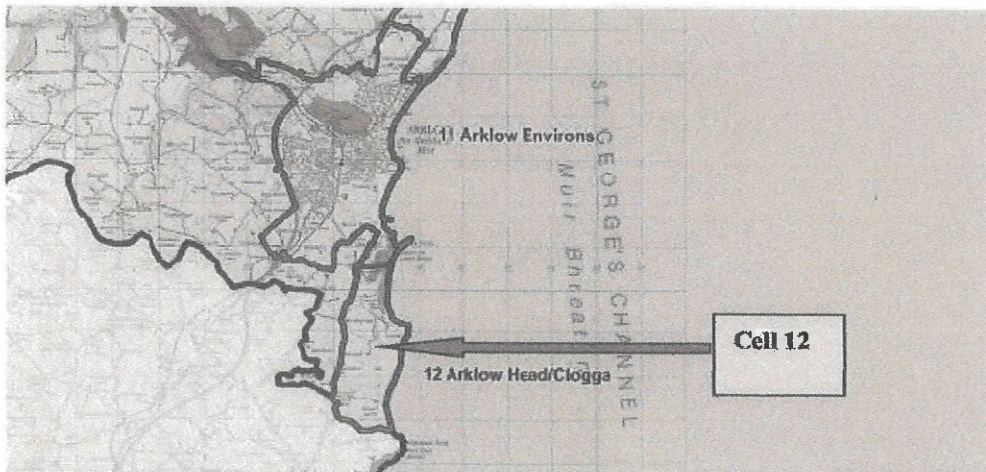
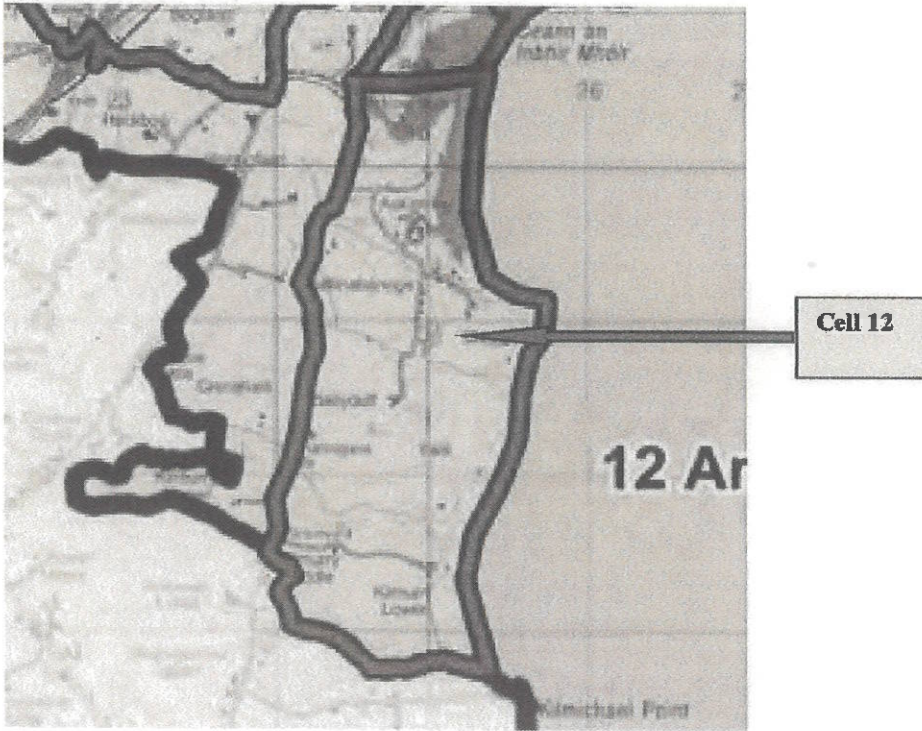
Cell12 Arklow Head / Clogga

The current County Development Plan (CDP) defines this location as,

"This cell stretches from Rock Big in the north to the Wicklow County boundary at Kilmichael point in the south. The coast road forms the eastern boundary of the cell, for the most part, but the cell does extend inland as far as the railway line at Boglands and Money Little."



The CDP further describes this location as having:

"Tourism development, mainly in the form of holiday homes and mobile home parks has taken place around Clogga. Clogga beach itself is an attractive, medium sized sandy beach with limited tourist facilities and a very small car park. The Arklow Rock-Askinnity pNHA extends into this cell"



South Coastal Cells

WICKLOW COUNTY
DEVELOPMENT PLAN 2016-2022

-  Coastal Cell
-  SPA, SAC and pNHA



Wicklow County Council
Planning Department

Scale Not To Scale

© Ordnance Survey Ireland
All rights reserved
2016/2022 Wicklow County Council

We would like to reference the current objective CZ12 which relates to this location and outline how we believe improvements to these objectives should be considered in the future CDP. While we believe strongly that this beautiful and valuable part of the county should be protected from unsustainable development, we also believe that the promotion of sustainable tourism should be encouraged as part of the plan.

According to the World Tourism Organization, sustainable tourism is *"Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment, and host communities"*

It should also be noted that 72% of tourism's CO₂ emissions comes from transportation and encouraging Irish residents to holiday at home will help reduce air travel, its reliance on fossil fuel and hence reduce our carbon footprint.

Objective CZ12

1. *To facilitate the enhancement of recreational amenities and facilities in the cell to cater for day visitors and long stay holiday makers to the extent that it is consistent with maintaining the capacity of the cell (including its beach and bathing water quality, sand dunes, car parks and road network) and in a manner that does not diminish its unique rural, scenic and recreational amenities.*

- As noted in the current CDP, the area has limited tourist facilities. The promotion of new recreational activities should be encouraged and promoted as part of the new CDP. Water based activities such as angling, sea kayaking & surfing are high value, low impact activities that make the most of the coastal setting and can cater for the day visitors to the locality.
- The decline of the traditional farm due to slowing agricultural output should be off-set by encouraging farmers to diversify and use their lands for other activities. Promoting a new greenway along with a coastal walkway from Arklow Rock to Kilmichael Point should be explored and landowners encouraged to allow access to their lands in exchange for other tourist development infrastructure on their land subject to proper planning.

2. *Development that is detrimental to the quality or amenity of heritage features will not be permitted, including views and prospects, archaeological features, protected trees/structures.*

- The World Tourism Organisation outlined the following goals for sustainable tourism:
 - *Physical Integrity: To maintain and enhance the quality of landscapes, both urban and rural, and avoid the physical and visual degradation of the environment*
 - *Biological Diversity: To support the conservation of natural areas, habitats and wildlife, and minimize damage to them*

- **Resource Efficiency: To minimize the use of scarce and non-renewable resources in the development and operation of tourism facilities and services**

The promotion of sustainable tourism will ensure that any proposed developments will not have a detriment impact on the quality or amenity features of the area.

3. To strictly control the further proliferation of sea outfalls for effluent discharge and in particular to prohibit short sea outfalls. All effluent discharges should be in compliance with the EU Bathing Water Directive. Any development that compromises the Blue Flag status of the beach will not be permitted.

- Any new development in the locality should minimize the pollution of air, water and land and the generation of waste by tourism enterprises and visitors.

4. To facilitate the development of appropriate outdoor and indoor recreation in the cell by permitting the use of its rural hinterland for environmentally sensitive and sustainable recreational purposes, where buildings and structures have only a minor impact on the landscape and where the completion of landscaping schemes would assimilate such developments into the countryside (e.g. golf, pitch and putt, amenity forestry, paint ball games, adventure fun parks).

- While the above activities are welcomed, we believe that landowners should be encouraged to open their farms and lands to educational courses covering farming, birdwatching, marine life, forestry, etc. As noted above, water based activities such as angling, sea kayaking & surfing make the most of the coastal setting and can cater for day visitors to the locality. All the above recreational activities are high value, low impact activities.

5. To facilitate the development of new tourist accommodation subject to the following controls:

a) New tourist accommodation shall be restricted to the existing developed cluster at Clogga or to existing developed sites;

b) permission will only be considered for new accommodation where the development forms part of a well-developed, integrated tourism and recreation development, which would add to the public amenity and enjoyment of the area and provides a significant public element (e.g. public car parking, playground / indoor playzone, swimming pool open to paying public etc);

c) the development of any further holiday homes shall be prohibited, other than a small scale element of which may be allowable in an integrated development that provides a range of accommodation types;

d) the development of any further static or touring caravan parks shall be prohibited;

e) automated gates will not be permitted on any development; and

f) new development shall have or be provided with high quality direct access to the main traffic routes;

g) development shall be of an exceptionally high quality design.

- The above proposals should be commended and due to the coastal location, innovative and sustainable tourist accommodation should be encouraged with a focus on renewable energy, water management, biodiversity and reducing and recycling waste. The rural design guidelines with a focus on vernacular architecture should be employed with farmyard style courtyard tourist accommodation promoted allowing for new accommodation in a clustered development.

6. To preserve existing access routes to the beach and to support and facilitate the development of additional car parking, proximate to existing access ways to the beach.

- Landowners should be encouraged to provide the above facilities in exchange for being allowed to develop other tourist related activities once they meet all proper planning and sustainable development standards.

7. To control and limit the development of permanent rural housing to that shown to be strictly necessary (in accordance with the County settlement and rural development strategies) and to require the highest standards of siting and design for any new dwelling and regard to environmental designations.

- This objective does not form part of our proposals for sustainable tourism development and so we have no comment on this matter.

Conclusion

Our proposals focus on tourism development centred around the local environment and physical resources in the locality ensuring sensitive development of this coastal area. We are asking that landowners be given the opportunity and encouragement to provide sustainable tourism development and activities subject to proper planning and sustainable development.

It should be noted that the lands outlined in cell 12 are unique in that its east coast location has a catchment area of 1.9 million people within 100km of the area. Along with an excellent transport infrastructure from motorway to rail between Dublin and Wexford, the proposals are economically viable, socially responsible and environmentally friendly to both visitors and the existing community. It provides an opportunity to provide a sustainable tourism location of excellence in County Wicklow.

We request that our views are considered in the preparation of the new county development plan.

Yours sincerely

Stephen Treacy
Stephen Treacy

10th January 2020