

[REDACTED]

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**Sent:** 13 January 2020 09:05  
**To:** 'Sophia Meeres'  
**Cc:** Planning - Plan Review  
**Subject:** RE: CDP issues paper: Review

A Chara,

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

Regards

[REDACTED]  
Administrative Officer  
Planning Control.

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**From:** Sophia Meeres [REDACTED]  
**Sent:** 10 January 2020 16:02  
**To:** Planning - Plan Review  
**Subject:** CDP issues paper: Review  
**Importance:** High

Dear Wicklow County Council,

Please find attached my notes on the CDP Issues Paper, please acknowledge receipt.

Many thanks,  
Sophia Meeres

**Project Ireland 2040: National Planning Framework (Feb 2018)**  
**RSES (June 2019)**  
**Wicklow County Development Plan**

**Biodiversity and Climate Emergency**

The Irish government declared a Biodiversity and Climate Emergency in May 2019, as did County Wicklow. Wicklow County Council must ensure that the new CDP strives to adapt to climate change and strengthen biodiversity. **Climate Resilience and Strengthening of Biodiversity should be umbrella themes in this new plan. Although Climate change is named as a cross cutting theme in the CDP issues paper, the Biodiversity Crisis is ignored.**

Rather than viewing natural elements of the landscape as visual or green “heritage”, the landscape mosaic should be recognised as a network of natural infrastructures that help in the fight against climate change and its effects - by soaking up storm rainwater, preventing flooding, strengthening river banks and coastlines, cooling towns, storing carbon, purifying the air, removing pollution, strengthening soils etc. whilst providing food and shelter for wildlife.

NATURAL INFRASTRUCTURE MAPPING

If Wicklow’s development is to be planned in respect of its natural infrastructure, there must be better knowledge of it. Maps designating existing natural habitats, land cover and land use must be mandatory elements of the future CDP and all Local Area Plans. Wicklow’s Green and Blue Landscape Infrastructure (rivers, floodplains, riparian habitats, wetlands, woodlands, hedgerows etc) should be mapped, and described, along with the County’s vision for strengthening individual elements and connectivity between them.

Development should occur in respect to habitats identified on these maps. Ordinary habitats should be protected by default, and permission should be sought before removal of any mature habitat (be it hedgerow, woodland or wetland) as part of development.

**Core strategy & settlement**

The peripheral sprawl of Wicklow’s towns and villages to the detriment of their centres must be stopped. The aims of the RSES give hope that the CDP can achieve better control over future development, but the CDP should stipulate that town centres and brownfield sites are to be built before greenfield sites may be developed.

**BRAY and WICKLOW-RATHNEW are identified as KEY TOWNS in the RSES 2018.** I take this to mean that it has been decided that these two towns will grow, in population and size, whilst others are to consolidate. It makes sense that the largest towns closest to Dublin are allowed to expand. However, the definitions of a “self-sustaining growth” town and “self-sustaining” town are ambiguous and it is not clear how the plan intends to actually control the growth of any settlement. **I recommend specifying a desirable growth rate for each new type of town, such that the planned maximum 10-year increase in population can be stipulated and controlled.**

In the past, the growth “hierarchy” has not been implemented at local level, the last CDPs did not work! Actual growth of urban settlements (Level 1-5) and rural ones (Level 6-7) did not reflect the plan (**CDP 2010-2016**). **Large growth towns** Arklow and Greystones remained static (<4%), so-

called **Moderate growth towns** eg Blessington and Newtownmount and the **Rural Town** of Roundwood grew excessively (<18%).

## ARKLOW

**was consistently designated as a "large growth town" in past CDPs, despite its distance from Dublin, lack of local employment opportunity and essential infrastructure.** The plan for Arklow seems to be to make it a "sleeper town" for Dublin. But dormitory towns do NOT correspond with either the principles of the RSES, or the NPF 2040.

ARKLOW corresponds best with the description of a Self-Sustaining Town (<3% population growth) that must concentrate on improved quality of life. Located too far from Dublin, with unemployment at 20%+ (high), approx 20% commuting to Dublin for work (low), poor transport links and inadequate infrastructure (roads, waste and at risk of sea-level rise), the town could benefit from "catch-up" investment so as to boost the local economy, and in particular local tourism. **Arklow is the right size. All new housing must be built within the existing footprint, rather than on green fields. STOP the sprawl of Arklow.**

If the RSES aim to better align residential location, population growth and employment, then settlements close to Dublin and other centres of employment should grow in population size, and density.

Arklow should be designated as a self-sustaining town, and investments made to improve quality of life in the town. The public realm is badly in need of renovation, Main Street shops are failing and the town centre is partially derelict. Arklow has neither the road infrastructure or employment opportunities for large residential growth. New housing on the outskirts of town will simply consume farmland and worsen dreadful current circulation in the town.

Arklow was allowed to sprawl without consideration for quality of life or technical issues to do with wastewater, storm water runoff, or transport. Raw sewage flows into the river, poorly controlled housing and drainage have exacerbated flood problems along the river and the whole seafront is at risk of flooding as the sea defences fail, and sea levels rise. Roadstone lorries traverse the town centre creating danger, noise, dust and vibrations. The central roads in Arklow are narrow and serve neither existing industry nor population adequately. There are no cycle lanes and occasionally no footpaths!

Arklow's service shortfalls include poor public transport - poor bus and train connections with other towns, inexistant local bus service, lack of bicycle lanes, lack of footpaths, lack of access to the countryside and beaches.

Compact growth requires the filling in of urban gap sites, favouring of high-density residential blocks in derelict and brownfield sites over houses in green fields. Encourage residential occupation of failing the Main Streets. Create walkable towns, provide good public urban space, open space, parks, gardens and provide access to the countryside. The Urban Areas of Wicklow's larger towns must be reduced to encourage town centre densification and renewal. The ad-hoc construction of housing estates in fields on the edges of towns should no longer be possible. The CDP and LAP should lead development, not the developers!

Produce an in-depth study of each town, and inventory of local constraints and opportunities. Protect natural and historical heritage, identify green-blue infrastructures and strengthen them.

Encourage small scale local enterprise, local shops, local produce. STOP building out of town, or edge of town shopping centres.

### **Climate Change, Flooding and coastal zone management**

If the CDP is to address climate change, it must give priority to nature-led solutions and GREEN INFRASTRUCTURE that respects and promotes nature. It must at the same time prevent further sprawl of settlements, and promote public transport.

The policy concerning flooding should be the long-term withdrawal from areas at risk, from the coastline, as well as river floodplains. Short-term solutions should be complemented by natural or soft solutions (such as upstream woodland planting, habitat restoration and certain types of geoen지니어ing) to reduce the quantity of storm water runoff arriving in rivers.

- No further development in flood risk areas (flood plains) should be permitted.
- Upstream Soft Engineering techniques should be implemented to reduce river flow speed and volume. No further public money should be spent on the building of floodwalls or sea defences if they merely push the problem into the future. Combine all short term actions with long term tree planting upstream and restoration of coastal transitional zones (sand dunes, estuaries, wetlands etc)
- Owners of properties that are liable to flood should be encouraged to move.
- No new development should be allowed within 50 m the coastline, unless it is of a temporary nature and destined to fall into the sea at some point.
- Creation of a “non-aedificandi zone” along all rivers and coastline would ensure space for natural dynamics such as flooding, erosion, accretion etc.
- The planned construction of a Waste Water Treatment Plant, in a zone at risk from sea level rise, on the North shore of Arklow, seems extremely short-sighted.

The natural coastal flood zone of Arklow bay has been denaturalised, incompleted rock-armour sea defences have proven to be a short-term solution that have worsened the long-term problem. Arklow’s sandy beaches have disappeared. Defences that work with the sea, not against it, are required all along the Wicklow coastline. In Arklow Bay, breakwaters located out to sea, plus sand nourishment, the removal of jetties and piers that affect long-shore drift and a barrier at the river mouth are all solutions described in the 1991 report by the Danish Hydrological Institute.

### **HOUSING**

#### **Housing Strategy**

Complete the Inventory of Vacant and Derelict Sites and identify priorities for their future use. Identify and tax owners that allow properties to stand vacant.

Ensure that all new residential building takes place within the existing built footprint of the town, and in particular the town centres. Do not build in zones liable to flood!

### **TOWN AND VILLAGE CENTRES AND RETAIL**

#### **Town Centre renewal**

Encourage increased density of the town centres, including residential use of the Main Street, and “living over the shop”. Encourage small and local artisanal retail activities by reducing local taxes.

### **Retail Strategy**

DO NOT allow the building of any future shops (especially shopping centres) outside the town centre.

### **TOURISM AND RECREATION**

Tourist amenities (hotels, restaurants etc) in Wicklow should be based in towns and villages.

The development of Arklow as a tourist hub will require the preservation of the historical “quaint” open character of the town’s Main Street, riverfront and harbour area. Access to a natural coastline with walks and views of the sea is an asset that has been partially lost, but Arklow’s beaches could be restored by the removal of the Roadstone jetties, and completion of the sea defences. The caravan park should be removed, and the lands renaturalised as a transition zone between land and sea. The Roadstone Quarry at Arklow Rock should be closed.

Arklow lacks a good hotel, cafes and restaurants, all of which could be imagined as part of its town centre development.

The potential of the river, the Marsh and riverside walks into the countryside has yet to be realized as part of a green and blue infrastructural plan. The Avoca River Park (industrial zone) located on the floodplain of the river, and within the site of the historical Shelton Abbey, should be dismantled and restored - as part of a natural flood defense project. Shelton Abbey itself could be converted into a 5-star hotel! The Tailing Ponds on the riverside should be removed, and the flood plain restored. The sites of the Avoca mines should be rehabilitated so as to prevent the discharge of acid drainage into the Avoca. Riverside walks should be created between Avoca and the sea, as well as along the coastline from Wicklow to Arklow.

### **Amenity Rights**

New public rights of way need to be created, along the seashore, shores and banks of major waterbodies. Riverside walks should be created between Avoca and the sea, as well as along the coastline from Wicklow to Arklow.

All public land should be accessible via PROW.

### **Greenways**

The creation of greenways should be a priority, realized through the compulsory purchase of land if necessary.

### **HERITAGE**

#### **Built Heritage**

Unless listed on the RPS, buildings of local, architectural and historical interest are unprotected, even if recorded in the Buildings of Ireland Inventory. The architectural interest and character of small Irish towns (such as Arklow) is embodied in an ensemble of buildings that may be modest but nevertheless constitute a valuable record that is gradually being lost. The removal / conversion of such traditional buildings should be more carefully controlled.

#### **Natural Heritage**

The pNHAs provide NO legal status for these valuable habitats. The pNHA at Arklow Rock is being removed by quarrying activities; the pNHA designation seems completely useless as a protection.

These habitats should be mapped and described as part of the GREEN AND BLUE INFRASTRUCTURE (GBI) survey.

Ordinary habitats noted on the GBI maps should be protected by default, and permission should be sought before removal of any mature habitat (be it hedgerow, woodland or wetland etc) as part of development.

### **TPO's**

All mature trees, native and other woodland areas and hedgerows should be mapped as part of the survey of NATURAL INFRASTRUCTURE. Exceptional protection orders should be made for every habitat of significance.

### **GREEN INFRASTRUCTURE**

Is NOT simply part of heritage! The CDP issues paper recognises the potential of green infrastructure, and must in addition define it, identify it, describe it and map it.

If Wicklow's development is to be planned in respect of its natural infrastructure, there must be better knowledge of it. Maps designating existing natural habitats, land cover and land use must be mandatory elements of the future CDP and all Local Area Plans. Wicklow's Green and Blue Landscape Infrastructure (rivers, floodplains, riparian habitats, wetlands, woodlands, hedgerows etc) should be mapped, and described, along with the County's vision for strengthening individual elements and connectivity between them.

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### **COMMUNITY DEVELOPMENT**

#### **Open Space/ recreation**

The entire shore of Wicklow MUST remain accessible, and must not be blocked off by private land or sea defences. Open space facilities should include public rights of way (walks) along the entire coast, along rivers, around lakes, into forests, across fields.

The CDP should include a bold new vision for PROW along water bodies in particular.

### **TRANSPORTATION AND INFRASTRUCTURE**

#### **Waste and wastewater**

Construction of an oversized technically suboptimal combined WWTPs in sites threatened by sea level rise is shortsighted and positively foolhardy. Future WWTPs should require tertiary treatment. Multiple small plants that cater to current capacity should be favoured over single oversized plants. No further combined systems should be built, Storm water and waste water should be treated separately.

#### **Sustainable drainage**

SUDS MUST become a vital part of every settlement's planning strategy, it's not enough to note "potential". Funds must be put into place to realize plans, and future development should be conditional on SUDS status of a settlement.

#### **Sustainable transport**

Wicklow should lead the way by favouring rail and other public travel over private cars.

- More frequent, faster trains to Dublin
- More frequent, more reliable intercity buses

Efforts must be made to remove boundary walls that prevent movement of people between housing estates. The CDP should include plans to improve local pedestrian greenways and cycleways enabling locals to travel to work/ school by foot/by bike.

### **TOWN AND VILLAGE PLANS**

The CDP should stipulate figures for desirable growth of each settlement. Currently, the designations seem to have no effect on the rate of growth. Even the titles are ambiguous – is a “**small growth town**” a small town that is to grow? Or a town that is to grow slowly?

In ALL cases, the CDP should recommend that 60% of new building take place within the existing built footprint (ie twice the recommendation of the RSES). Wicklow must lead the way in the creation of compact settlements.

### **ENVIRONMENTAL ASSESSMENTS**

Most habitat protections (Natura 200, SACS etc) are designed to protect the particular habitats of certain threatened species. The protection of ordinary habitats works in the favour of many species, including rarer ones, and in a biodiversity crisis, such an approach should be considered.

Sophia MEERES  
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