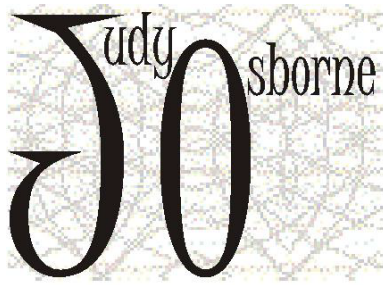


From: Judy Osborne
Sent: 10 January 2020 11:19
To: Planning - Plan Review
Subject: Judy Osborne submission pre draft WCDP
Attachments: WCDP Pre draft submission 2008.doc; WCDP Predraft submission april 03 .doc; WCDP pre draft submission 2020 cover letter.doc

Please find attached.



MSc Spatial Planning
Proper Planning & Sustainable Development



To: planreview@wicklowcoco.ie

10th January 2020

Re WCDP pre-draft submission

Dear Sirs,

As a member of the Wicklow Planning Alliance (WPA) I have contributed to many pre-draft submissions to county development plans in 1998, 2003, 2007, and 2013. The plans that were adopted following these consultations have improved each time with the vision, goals and objectives better constructed, incorporating contemporary understanding of issues and government guidelines. Despite this most of the WPA proposals have been ignored and I can see no analysis of the impact of the existing plan. The issues have not changed though the need to produce a plan that will reduce the carbon emissions and loss of biodiversity of the settlement strategy and all other goals becomes ever more urgent. Meaningful indicators which can be used to monitor the impact of the final plan become ever more important.

Please accept the attached documents, copies of two earlier submissions, as my contribution to the current process.

Judy Osborne

To the Planning Department
Wicklow County Council
County Buildings
Wicklow

Monday, December 22, 2008

A pre-draft submission regarding the new County Development Plan 2009

The need for change

This plan needs to be radically different from those we have seen before, taking into account the environmental capacity of the county in accordance with the Strategic Environmental Assessment directive and the Water Framework Directive, which will have a significant impact on development proposals in the plan period 2009-13.

The previous plans have failed to produce the sort of development we need.

Whilst recognising the best efforts of the council's Planning Department the previous Plan has failed us. Whilst there may be significantly less development in the next 5 years it is vital that we remedy previous mistakes and prevent the continuance of damaging trends. Despite warnings, the sprawl and unsustainable rural development continues, undermining the possibility of developing the strong urban centres that economic prosperity depends on. The quality of urban design is poor, the production of houses with low energy and water requirements that will be needed to service the 21st century remains rare, the natural environment is increasingly degraded and access to good quality open space in urban areas is declining rapidly. The provision of employment opportunities is weak.

Vision and leadership

The previous plans have not provided the vision and leadership required to positively promote good quality development.

The over arching need to reduce carbon emissions¹² and reduce our dependence on oil, to protect vulnerable bio diversity, particularly wetlands, and to provide some food security for residents in county Wicklow must be considered in every section.

¹ See also [adapting to climate change produced by COMHAR (www.comharsdc.ie) investigating the challenges and offering a report outlining how local authorities can adapt to climate change, through examining best practice internationally and current adaptation action gaps. The research work consisted of desk-top interrogation of the international and national adaptation literature and a review of a sample of other local authority development plans.

² A new internet-based tool called an 'adaptation scan' is designed to help policymakers factor the effects of climate change into their decision-making plans. The scan includes local climate change scenarios and effects for specific areas and provides adaptive measures to deal with both positive and negative effects.

To strengthen a sustainable economy in the county it will be essential to develop the characteristics that are unique to Wicklow and those aspects that we can excel in. Wicklow is known as the Garden of Ireland and is blessed with the Wicklow Mountains, a beautiful coastline, fertile soils, the highest level of forestry planting in the country, a strong and comparatively wealthy population base and easy access to all the amenities of Dublin. This should be a pretty good place to start!

Key proposals

The key proposals are to some extent echoes of the recent government guidelines to local authorities on the preparation of development plans

1. The more extensive use of **GIS mapping** incorporated into the development plan to illustrate search areas and constraints to inform developers and the public of the possibilities available within the county. A model of the county would be helpful to clearly illustrate the form of the land, which underlies the nature of our opportunities and constraints. These tools would also provide bases for landscape assessment regarding characterisation, sensitivity and strategies.
2. **More monitoring tools** as proposed in the guidelines, which state, “monitoring involves the collation and analysis of performance data and effectiveness measured against stated criteria. Policies should be formulated in terms that allow performance to be readily measured. This will involve the formulation of quantifiable criteria to facilitate measurement. Suitable criteria should be devised as policies and objectives are being drafted and not at the end of the policy making stage.”

The Department of the Environment have issued guidelines relating to the strategic environmental assessment that propose a series of indicators including drinking water and risks of pollution, Noise, Estimated reduction in road accidents arising from safer road design/works the number of or severity of recorded water or air pollution incidents, Recorded traffic or industrial process noise levels, Consumption of non-renewable mineral resources, Increase in reuse/recycling of construction and demolition waste, Estimated levels of water supply and waste water infrastructure required to serve new development Reduction in estimated loss of water supply by repair/renewal of old pipe networks, Traffic volumes/modal split, % of new development within public transport corridors, Amount of national/local energy generated from renewable sources, Recorded flooding episodes, Damage to or loss of protected sites or structures, Developments in sensitive landscapes etc

- 3 **More phasing of development** to take account of possible alternative scenarios of zero, low or high growth. This approach has already been adopted in the recent Regional Population Projections published by the CSO wherein alternative migration figures are offered. Had this technique been used in earlier development plans we might have seen very different results.

Source: Schneider, H.C., Bijl, K., Van Cranenburgh, S. *et al.* (2008). The Dutch Adaptation Scan for Local Authorities. ENS8/ECAC7 Abstracts. 5: EMS2008-A-00647.

Currently the County and all the main towns are massively over zoned which is resulting in a dispersed settlement pattern and failure to create compact walkable towns.

4. **The use of sustainable criteria to assess applications** for development as used in the National Spatial Strategy Asset Test for proposed residential developments in towns.
5. **Master planning or framework planning** that go beyond the two dimensional to envisage the three dimensional expectations needs to be implemented to ensure sustainable urban design reflecting the environmental carrying capacity of the area, planning for critical urban mass in designated towns and pedestrian friendly design that facilitates walking and cycling, strengthening community and the social capital that may become increasingly important in the next period.

GENERAL

The sections of the 2004 plan reviewed are high on generalities but singularly lacking in detail. The sections are full of vague aspirational objectives. These aspirations may be helpful in assessing individual planning applications. But the absence of any detail means that the plan lacks any real sense of direction or purpose. The plan fails to define a state or condition in which the county will be by the end of the plan period that is it does not provide a vision that can motivate and inspire the local authority, professionals, developers and the public. Inasmuch as it lacks this element the plan is very weak.

Because of the absence of detail it is difficult to assess to what extent the 2004 plan has achieved any of its objectives. Any subsequent plan must first of all attempt such an assessment. It should take each of the objectives included in the preceding plan and document the extent to which they have been achieved. Any plan, which aims to build on a previous one, should always begin with an assessment of the success of that preceding plan. This ensures that the subsequent plan has the right focus, learning from previous mistakes and successes and correcting imbalances.

Chapter 2 OVERALL STRATEGY

NO.	POLICY	Successful ✓ or not X	comments
Section 3 The Vision			
1.	Provide for sustainable growth.	X/✓	This has been achieved to some extent. However the level of settlement dispersal, poor design and lack of social capital is not sustainable
2.	Uphold the right of the individual to build in rural areas	✓	Yes, this has been fulfilled
3.	Develop transport systems and expand public transport, cycling and walking.	X	No. There is no evidence of this. Sample surveys may be needed to monitor the rate of cycling in County Wicklow, both for work and leisure.
4.	Develop facilities accessible to all.	X/✓	some facilities but not enough.

- A summary of existing facilities needs to be audited to identify greatest need.
5. Provision of infrastructure X/√ some
 6. Encourage good design X Look at any recent development
 7. Ensure development doesn't damage landscape X Look at Wicklow Environs.
 8. Secure employment base X No. There is now less employment in County Wicklow than before. See Census results. By allowing residential development in smaller towns it has undermined the critical mass in the Primary and Secondary Development Centres Bray Greystones, Wicklow and Arklow that is essential to attract employment-creating investment. Nothing has been done to facilitate alternative sources of employment for example in renewable energy and home working. There might be a range of sustainable employment options in the rural areas that do not include damaging businesses that would be better located in urban settings. A checklist of criteria to measure the suitability of proposals should be included

CHAPTER 3 POPULATION AND SETTLEMENT STRATEGY

Table 1: Population Change in Main Settlements.

	Total 2002	Total 2006	% Change
Bray + environs	28,002	28,814	2.9
Greystones + environs	11,913	14,569	22.3
Arklow + environs	9,993	11,806	15.4
Wicklow + environs	9,355	10,070	7.6
Kilcoole	2,826	3,252	15.1
Newtownmountkenedy	2,521	2,548	1.1
Blessington	2,509	4,018	60.1
Enniskerry	1,904	1,881	-1.2
Rathnew	1,441	1,849	28.3
Rathdrum	1,387	1,405	1.3
Ashford	1,356	1,349	-0.5
Baltinglass	1,260	1,735	37.7
Aughrim	871	1,145	31.5
Newcastle	851	837	-1.6
Kilmacanoge	834	839	0.6
Dunlavin	814	849	4.3
Carnew	809	949	17.3
Tinahely	692	965	39.5
Avoca	564	734	30.1
Roundwood	518	589	13.7
Kilpedder	517	480	- 7.2
Glenealy	377	528	40.1
Laragh	357	378	5.9
Shillelagh	278	311	11.9
Donard	201	182	- 9.5
Stratford	151	163	7.9
Redcross	-	196	-

County Wicklow	114,676	126,194	10	Summary
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analysis of population figures

	2002	2006	%increase
4 Primary and secondary growth centres (Designated in the Regional Planning Guidelines as centres for growth)	60,704	67,108	10.5%
14 Growth centres in the hinterland (Designated in the County Development Plan as additional centres for growth)	17,256	20,686	19.9%
8 small villages	4,341	4,647	7%
rural areas	32,375	33,753	4.3%

In general terms this indicates that the council have been successful in meeting its objectives and directing the population into the larger towns but

1. This is contrary to the Regional Planning Guidelines which have said growth in the hinterland of Dublin should be in the primary growth centres only and elsewhere should only be to meet local growth which would be around 10% per plan period.

In county Wicklow it is over 10% in 9 out of 14 villages and over 30% in 5 villages)

Rural development outside of villages was predicted to reduce but in fact it has increased by 4.3% in a 4-year period.

2. This only includes population up to April 2006 and could be higher by now

3. Residential land is over zoned by over 100% to allow for 'flexibility'. Whilst population figures are well below target (largely because of lack of infrastructure) this over zoning has resulted in a very scattered settlement pattern which is much more expensive to service and makes walking and cycling much more difficult.

The Plan should discuss alternative scenarios for negative, zero or gentle growth, and fast growth. In areas where it is considered appropriate to refocus growth once this returns to the economic scenery (probably consistent or parallel with the areas identified in the Rural Residential Development Guidelines) it would not be necessary to remove current zoning but very clear phasing should be introduced.

Any new plan ought to look at the volume and location of all zoned but unused land and decide what is to be done with it before any more land is zoned.

POLICY NO. POLICY STATEMENTS SUCCESS ✓ OR FAILURE X
COMMENTS

SS1 Locate on zoned land. ✓

Wicklow town should be self-sustaining. X

Wicklow town should not be dormitory. X

High-level employment and amenities X

SS2 Concentrate hinterland development in Wicklow and Arklow X

No, the County Development Plan only required 50% local buyers in towns and villages in the hinterland contrary to Regional Planning Guidelines

SS3 Develop local growth centres. ✓

SS4 Only permit residential development if sufficient progress made in providing employment, retail, social and community capital is adequate. X

No. New development are sadly lacking in access to appropriate social infrastructure. A checklist is required to assess sustainability of new proposals. As in extended version of chapter 5 of the National Spatial Strategy.

SS5 Control ribbon development unless SS9. X

This is unacceptable. Ribbon development is contrary to all proper planning yet, as predicted, it is comprehensive around all small settlements such as Ashford. Every field now has a house or a site notice and its presence is interfering with opportunities for genuine rural enterprise and shows no awareness of or vision for urban morphology.

SS6 large villages should cater for local growth only. X

No. Glenealy has grown by 40%. The 300 new house dwellers have not all got existing strong links to the village. Generally they should have been directed to Wicklow Town.

SS8 Zoned land is only applicable to this plan period and could be left out of the next plan. ✓

The next County Development Plan 2009-13 will clearly not require so much zoned land to provide for sustainable growth so it is to be expected that some land zoned in 2004, will not be zoned in the current process.

SS9 Numerous statuses of applicants are exempt from normal planning considerations. ✓

Too many. In order to understand the scale of this problem the new plan should include details of numbers of Section 140 resolutions that permit development contrary to the professional opinion of the County manager and his team of planners. It was anticipated that, with declining occupancy rates, the rural populations outside of urban settlements would decline. To the contrary, rural population has increased by nearly 5% in four years between 2002 and 2006

CHAPTER 4 HOUSING

The objectives set out in this chapter in the last County Development Plan do not establish any indicators to measure the success of the policy.

We need to know

- * How many houses were built under part 5 of the Planning and Development Act 2000?
- * How many housing trusts are active in the county?
- * How many units have been built that are suitable to house the elderly in supportive communities?

Policy H9 An objective to encourage mixed communities X / ✓

There has been a policy to work with Action Area Plans to encourage **mixed development** however the range of facilities is strongly focused around commercial opportunities, which are not always forthcoming - for example the original range of amenities in Blessington has been curtailed. A checklist of minimum requirements in each settlement should be included in order to assess proposals. Ticking off these requirements and itemising the community gain expected in each locality of a Local Area Plan (as in the Ashford Plan) would better ensure that social and physical infrastructure develop in tandem with pedestrian friendly residential and employment opportunities.

CHAPTER 5 DESIGN

Sustainable building methods

Policy D2 Council will advise builders to use sustainable building methods beyond building standards. X this policy is not working.

New housing is not suitable to the 21st century.

We propose that policies be rewritten along the following lines:

The Council will have regard to the following issues (some of which are expanded later):

- Desirability of conservation and re-use of buildings;
- Value of building to higher densities, for example encouraging terraced housing as opposed to semi-detached or detached forms;
- Integration of both passive and active solar technologies into buildings, such as solar and photovoltaic panels as well as of wind energy involving turbines for both domestic and non-domestic development
- Orientation of buildings to enhance solar gain and reduce overshadowing, thus for instance, not requiring houses to be parallel to adjacent roads
- Consider the energy performance of different buildings, eg. discourage the building of buildings

- Encourage opportunities for plant growth on and around buildings, recognizing the potential for wildlife support
- Encourage robust building forms which are both adaptable to different uses and are built to last
- Encourage the re-cycling of materials from non-destructive / renewable sources and the use of both local and natural, environmentally sensitive materials

Designing for efficient space and energy efficiency

Dwellings shall incorporate adequate storage facilities, in accordance with the most stringent requirements in Ireland (eg. for Dublin City) as well as facilities for drying clothes, recycling waste and composting (whether individual or communal). The Council will encourage the use of materials and technologies that contribute to environmental sustainability. Several neighbouring counties are adopting these standards and Wicklow's policies should not be inferior to these.

Wicklow County Council shall support the achievement of standards higher than the current Building Regulations. These shall include the projected 2010 standards and, for example, **A-Rated Passive House standard**, with the aim of future-proofing in terms of energy efficiency. Developers and/or their agents shall further include an indication by the developer of how proposed development can be further upgraded to carbon neutral standard using a range of commercially available technologies, including photovoltaic solar panels as well as micro wind turbines.

The national best practice guidelines on Passive Home Design were launched in Dublin Castle in July 2008. It was co-authored by the Wicklow based architectural practice, MosArt. SEI regards the Passivhaus Standard of construction as providing an excellent basis for achieving a significant reduction in carbon emissions from the residential sector in Ireland. The first certified Passive House was built in Wicklow by MosArt. A Passive House requires 60% less energy for space heating compared to the recently upgraded energy efficiency standards (which introduced a 40% reduction in carbon emissions from the 2007 standards). Achieving such standards requires careful master planning to maximise passive solar orientation as well as achieving a compact building form. It also involves exacting standards of detailing and construction in terms of insulation of the building envelope (including triple glazed windows), airtight construction, reduction of thermal bridges and the use of a highly efficient heat recovery mechanical ventilation system.

Investing in Passive House design brings a multitude of benefits to the building manager and/or homeowner. Focusing on financial issues for a dwelling, for example, the space heating costs will be dramatically reduced compared to conventional construction standards. As an example, the total combined cost of space heating, domestic hot water and operating the mechanical ventilation system in the above referred to demonstration house has been measured by UCD as being €1.00 (one Euro) per square metre per year. Passive Houses are also proven (as measured by UCD) to provide excellent air quality through the ventilation system which extracts stale or humid air from bathrooms and kitchens and supplies fresh air to all living spaces and bedrooms. High levels of whole-house comfort are guaranteed through the use of superior detailing in terms of insulation and air tightness. Occupants of Passive Houses also benefit in terms of raised awareness of sustainability issues, helping them

to become environmental ambassadors and spreading the uptake of such ground-breaking building practices.

Different house types

Recognising the importance of building form and compactness as means of conserving energy, Wicklow County Council shall give priority to two rather than single storey houses, including those located in rural areas. Similarly, the possibility of accommodating mechanical plant or water storage (regarding rain water harvesting) shall be actively encouraged by the Council. Where such a strategy necessitates higher walls than conventional construction, the Council in recognizing the critical need for energy conservation, shall be positively disposed. All of these strategies shall, however, be moderated by consideration of the character and sensitivity of the landscape context.

Alternative heat sources for large complex developments

In regard to multi-use development, the Council shall seek evidence that the opportunity of involving energy innovative means of energy production, such as combined heat and power, (CHP) as well as symbiosis between different buildings and their uses has been thoroughly investigated. This could comprise, for example the utilisation of the heat excess of one building / use (eg. offices) to the benefit of another (eg. residences, hotel, swimming pool).

Reduction in Demand for Water

Wicklow County Council shall require evidence with development proposals of an attempt at reducing the demand on potable water resources. Dual flush toilets as well as devices such as shower head 'aerators' which reduce the consumption of water (as well as primary energy for heating) are examples of what should be considered. Regarding the conservation of water, water butts as a means of collecting rainwater from roofs, which can be used for garden irrigation or car washing, should be given consideration along with other means of harvesting, processing and recycling rainwater. Included is the installation of grey-water systems whereby rainwater collected can be used for toilet flushing and other non-potable functions. Recognising that the storage of this water in the attic space obviates the use of pumps, the council accepts the possible need for higher walls.

Reduction in Demand for Waste Treatment

Given the pressure on Wicklow County Council to provide drainage services for settlements throughout the county, developers will be expected to explore the feasibility of using innovative yet tried and tested technologies which are capable of dramatically reducing the outflows of waste water that has to be treated in the local WWTP. The current practice of 'conditioning out' food macerators in kitchen sinks should be incorporated into county council development controls

Sustainable Landscape Treatment

In urban, suburban and rural areas where a landscape component is required, Wicklow county Council shall require sustainable landscape design. Depending on the extent of development in a particular context, plant material may comprise more or less **native or naturalised species** – more of these in rural areas and a greater acceptance of ornamentals in developed areas and large private estates. In general, landscaping should include **food-producing species, both fruit and nuts**. Hard landscaping shall comprise permeable paving and / or gravel where feasible (for example on private

driveways) in order to minimise the load on the surface water system and materials shall be locally sourced where feasible.

Urban Design and Expansion

Policy D5 New development will take cognisance of streetscapes in massing, rhythm, etc. X

Section 7 Urban Design Development guidelines X

These policies have failed to result in well designed development

Recently opened new estates still offer poor layouts and a total failure to consider adjoining developments

We propose **new policies for Urban Extension and Design**. A very strong statement regarding the need to provide pedestrian friendly design is essential and reference could be made to the European Charter of Pedestrian Rights

Wicklow County Council shall require for **all residential development proposals clear indication of proper provision for pedestrians and a strong sense of public realm**.

Hence, pavement heights must make due provision for prams, bikes and wheelchairs and those who have walking difficulty. There will be a clear preference for 'soft and green' fronts with continuous private landscaping, involving a minimizing or elimination of walls, as well as for generous planting in the public realm and minimizing of high estate boundary walls. Regarding the latter, connectivity between different estates must be given serious consideration, being appropriately located and designed to clearly identify and celebrate the opportunity of passing from one to the other. Public open space must be located so as to create useful but also meaningful form that is an integral part of the overall estate form. Enclosed courtyards formed by duplex and apartment developments must be inviting with ground surfaces and facades designed to encourage a sense of openness and connection that ostensibly encourages communal use and passive surveillance.

Wicklow County Council shall **have special regard to the expansion of urban areas in terms of proper integration with the existing cores and suburbs**. It recognises such problems as sprawl, poor interface of quite different land uses, the need for adequate connectivity, poorly located and configured public open space, consumption of the open space provided by the original institutional fringe around urban cores, creeping conurbation and the dominance of roads and traffic in many areas resulting in severance of residents from amenities / services, noise and a lack of a sense of place and physical harmony. It further recognises that these problems have to a fair extent been caused by a planning approach driven by a prioritisation of infrastructure and land use. This approach would be improved where informed by a form-led approach that takes into account urban design quality and that incorporates a process of creating visions of various scenarios involving the integration of parts into a harmonious whole.

We propose that much greater use be made of **master planning**, framework plans or properly constructed Action Area Plans. These tools should comprise not simply the flat two dimensional shape but the three dimensional form of development including consideration of profiles desired especially on hills, in order to avoid the banal and unarticulated.

For this **form-led approach** for the planning of urban extension as well as of change in existing areas, the Council shall have regard to the complexity of contemporary urban shape and form, involving development types that differ significantly in regard to overall requirements and site specific (location relative to main roads and/or urban core, access, road widths, site / plot size, plot sequence and building types). It recognises that the morphology (shape / form) of contemporary urban areas is frequently disjointed, unbalanced in the spatial extent of its land use components and unarticulated due to a conflict of development kinds or types. There is, therefore, a need to relate overall morphological considerations (macro morphology) of towns and their expansion to the smaller scale involved in respect of each development type (micro morphology).

This embracing of the two scales of macro and micro-morphology can be described as a typo-morphological approach. It should inform forward planning that recognises the distinctive physical character of different areas and uses, their character and place in the overall urban structure as well as the relationship between different kinds of development and their own unique physical nature and requirements.

Such development kinds include, original urban cores, institutional fringe, suburban housing estates, industrial estates, business parks, and rows of big metal box pavilion buildings along roads (eg Bollarne Road) and isolated buildings in their own grounds (eg. schools and hotels). These in isolation or in various combinations make up the urban fabric. The physical nature and requirements of each must be considered.

While this approach is primarily objected orientated, this approach also concerns process and thus accepts change as an integral part of urban life and development. Notwithstanding, its merits as a tool for conservation where warranted are appreciated. More specifically, this approach has the potential to achieve at the macro morphological scale overall integrity of urban form, special cohesion of different land uses / types, improved interface of these types and well considered urban profiles that incorporate articulation and hierarchies of form.

Each kind of development shall be identified typologically in respect of its buildings, plot, plot series, streets, blocks and tissue (identifiable morphological units) and recommendations provided regarding alteration and/or significant change. This approach permits a reasonable degree of prescription in order that the integrity of each kind of development shall not be destroyed. The Council appreciates, however, the need for flexibility in order to accommodate necessary change and innovation.

In order to illustrate the latter, four examples are cited , as follows:

1. The poorly integrated (though as yet incomplete) area around Broomhall where suburban housing interfaces with a school site and commercial / industrial blocks as well as the Wicklow Town Relief Road (Ashtown Lane). A poor understanding of the nature of these types of development in respect of their

respective sites, roads, interrelationship (function, scale, access) and inadequate concern for the public realm have resulted in spatial awkwardness and disharmony (note the visual confusion, and clash of scale of this area as viewed adjacent to Rathnew Cemetery from the Tinakilly Hotel avenue). Moreover, this area could have proved an important buffer between an expanded Wicklow Town and Rathnew, rather than continuing amorphous sprawl. An appreciation of the overall morphology of Wicklow Town and Rathnew should have informed their respective expansion in principle, prompting the use of existing boundaries (eg. hedgerows, streams, cemetery, roads) to structure expansion and the typologies involved in the different kinds of development concerned.



Broomhall: unsuccessful mix of use with abrupt interfacing.



Suburban housing backing and siding on to public roads creates a sense of hardness and denies the possibility of an enriched public realm.

2. Close to Broomhall, are the lands around the Village Mill where industrial blocks are effectively ‘dropped into’ an area otherwise zoned for suburban residential development. The success of such land use mixing clearly necessitates a different response regarding building, plots, site, block and street / road, including a sensitively designed public realm.



Inserting industrial units into a residential area, if appropriate in the first place, requires sensitivity of design especially regarding form and interface.

3. The recently completed bank building on Main Street, Wicklow, which: (a) ignores the original burgage pattern that is a legacy of Anglo-Norman towns; (b) obtrudes in profile with grossly excessive and inexpressive bulk as viewed from the Bridge and: (c) creates a strong horizontality in elevation across what was originally a few plots that is in severe contrast to the remainder of the streetscape. The inclusion of a form-based approach, including typo-morphological criteria, in the relevant development plan would have positively controlled such a proposal.



The newly completed bank building, in terms of integration, is insensitive regarding its scale, massing and façade, and does not have the municipal or public use that

might justify such difference. It ignores the burgage street structure of Wicklow Town, without any justification.

4. Rathnew Village lacks an identifiable, ie. it is relatively amorphous. A clear morphological vision is required in order to achieve integrity of urban form and fabric and allow for development and expansion at an appropriate scale and with appropriate building type / use.



This form-led approach is appreciated also as a basis for understanding the character of suburban and urban areas. In particular, it is a useful means of relating directly to the characterisation of rural areas, allowing for a seamless characterisation of the entire landscape of the county, rural, suburban and urban, as a continuum. It also provides a tool for an ecologically sensitive approach that ensures the incorporation of nature into developed areas with an appropriate response to such features as hills, outcrops and flood planes. Of particular importance in this regard is the preservation of nature where possible, especially as an integral part of urban morphology that articulates character areas, distinguishes districts /urban tissues, creates contrast with built form, incorporates nature and engenders linkages with the surrounding landscape.

Issues Pertaining to the **Design of Dwellings**

Dwellings shall incorporate adequate storage facilities, in accordance with the most stringent requirements in Ireland (eg. for Dublin City) as well as facilities for drying clothes, recycling waste and composting (whether individual or communal). The

Council will encourage the use of materials and technologies that contribute to environmental sustainability.

Several neighbouring counties are adopting these standards and Wicklow's policies should not be inferior to these.

Other current policies that are failing us are:

D8	shop front design	X No enforcement of shutters and garish lighting. In architectural conservation areas neon signs must be banned.
D10	Preservation of hedgerows	X No enforcement. Survey of hedgerows required with indicator of miles of hedgerow in county

Another issue that requires attention, either here or in the development controls relating to infrastructure is the proliferation of **unnecessary road signs** that litter the towns and countryside.

For example on the one km stretch of road forming the Rathdrum by-pass, which has almost 70 road signs (if one reads from either end), most of which are repetitive. In Germany the authorities have decided to cut back radically on road signs -in this country we are going in the opposite direction. The main objections to all of these road signs are:

Most are not necessary. They can be very ugly and destroy the landscape particularly in scenic areas. The huge signs detailing who funded the road and the engineer, county manager and a host of others that had some sort of peripheral involvement constitutes a lot of information that the motorist has neither a need nor desire to know. They are also very costly. There could be considerable budget savings in a tight financial situation and the saved money could be spent on minor repairs that are urgent. Most of all, these signs constitute a distraction and hence a traffic hazard. Sometimes they are badly placed leading to an obstructed view of the roadway.

Light and noise pollution are the two key sources of irritation to most of us and whilst these may not seem to carry the most serious impacts they certainly have the most immediate impact on our enjoyment of our environment. There are numerous ways of dealing with this including a section such as that below:.

Light pollution is caused by excessive artificial light being directed into the night sky. Outdoor lighting can cause intrusive and unnecessary pollution in both urban and rural areas, although it is in the countryside that light pollution is most noticeable. Illuminated advertisements, floodlit sports facilities, security lights and streetlights can all contribute to light pollution. Excessive light in the night sky is visually intrusive and is also a significant waste of energy. The visibility of the stars is much reduced by light pollution. Light pollution can disturb people's sleep and affect local ecology.

It is therefore important in the interests of visual amenity and energy conservation that light pollution is prevented and where possible reduced. Through good design of lighting, the reduction of light pollution should not conflict with the principles of crime prevention and safety.

The County Council will seek to minimise light pollution. Details of any lighting scheme required as part of any new development shall be submitted as part of the planning application. Where appropriate, the local authority will use conditions to limit the hours of illumination. Conditions will be attached to any floodlighting approvals given for evening usage of sports facilities such as pitches, tennis courts and golf driving ranges to control light intensity, light spillage, and hours of use.

Applicants will be expected to demonstrate to the local planning authority that:

- (a) the lighting scheme proposed is the minimum needed for security and working purposes;
- (b) that it minimises potential pollution from glare and spillage through careful siting and appropriate shielding;
- (c) in the edge of town and village locations, and in rural areas, landscaping measures will be provided to screen the lighting installation from view from the neighbouring countryside areas, and;
- (d) there will be no dazzling or distraction of drivers using nearby highways.

Noise generating sports.

Where there are development proposals for sport or recreational uses generate high levels of noise, permission will be considered where the following criteria are met;

- i) The proposal will not cause an unacceptable level of disturbance to local residents
- ii) The proposal will not cause an unacceptable level disturbance to farm life stock and wild life
- iii) The proposal will not conflict with enjoyment if areas for informal recreation

Where there are development proposals for **hotels and/or music venues** that generate high levels of noise, permission will be considered where the following criteria are met;

- i) The proposal will not cause an unacceptable level of disturbance to local residents
- ii) The proposal will not cause an unacceptable level disturbance to farm life stock and wild life
- iii) The proposal will not conflict with enjoyment if areas for informal recreation
- iv) The proposal shall demonstrate noise-containment measures
- v) The proposal will limit noise during nighttime hours

Public Open Space

This chapter 5 currently includes a brief section on public open space however this is so important that it may require its own chapter.

7.6	Public open space	X
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Access to open space is a major issue in all the main towns and most of the villages. **A Green Strategy** is required which provides much stronger controls to protect existing space in town centres and provide new space to encourage physical activity, both active sport and walking. The failure to do this has resulted in great damage to the Murrough in the Wicklow environs, which was a key amenity in the area. Also in Newtownmountkennedy and other towns.

In a report by Dr Richard Mitchell from Glasgow University, and Dr Frank Popham, from the University of St Andrews, it was said that

Across the country, there are "health inequalities" related to income and social deprivation, which generally reflect differences in lifestyle, diet, and, to some extent, access to medical care. This means that in general, people living in poorer areas are more likely to be unhealthy, and die earlier.

However, the researchers found that **living near parks, woodland or other open spaces helped reduce these inequalities**, regardless of social class.

When the records of more than 366,000 people who died in the UK between 2001 and 2005 were analysed, it revealed that **even tiny green spaces in the areas in which they lived made a big difference to their risk of fatal diseases**.

Although the effect was greatest for those living surrounded by the most greenery, with the "health gap" roughly halved compared with those with the fewest green spaces around them, there was still a noticeable difference.

The change was particularly clear in areas such as heart disease and stroke, supporting the idea that the presence of green spaces encourages people to be more active.

However, the researchers said that other studies had suggested that contact with green spaces also helped reduce blood pressure and stress levels, perhaps even promoting faster healing after surgery.

They wrote: "The implications of this study are clear - environments that promote good health might be crucial in the fight to reduce health inequalities."

They called for planning authorities to consider making more green spaces available to improve the health and wellbeing of their residents.

Professor Barbara Maher from the Lancaster Environment Centre said her research had shown that roadside trees improve health by protecting people from pollution.

"Urban and roadside trees may be an under-used resource both in terms of acting as natural 'pollution monitors' and actively screening people, especially, children and the already ill, from the damaging health effects of particle pollution," she said.

Thus Tree planting should also be strengthened. Some housing estates are required to plant a tree in every front garden. Maybe this should be standard. These matters can be considered in detail in a Green strategy. Experienced landscapers could be approached to prepare this section.

Design in rural areas

Section 8 Rural development standards Examples of best practice can be included. Other counties have already developed these and the exercise need not be repeated.

We note that whilst the previous County Development Plan refers to a set of guidelines for agricultural buildings. This is a very useful document (dated but still applicable) however it has not been used. This could be reprinted and/or incorporated into the new plan.

CHAPTER 6 EMPLOYMENT AND INDUSTRY

As with retail there is a failure to acknowledge the realities of the situation. The northern part of the county is unable to compete with the Dublin metropolitan area for industry. The IDA lands in Greystones-which have lain idle for years- are a prime example of this. It does not mean that some effort might be made to attract industry to the north of the county, but to fail to acknowledge the reality gives people unrealistic expectations.

Excessive zoning of land has taken place under this plan, again using Greystones as an example, lands were zoned for industry in Charlesland despite the proximity of industrial zoned land which had been idle. Inevitably this newly zoned land then became the target of applications for residential development which was not the original objective.

In deciding how much land to zone for industry **it was assumed that each hectare of developed land would provide 40 jobs. Has this figure been checked** against 2006 census figures?

The development control of industrial development should include polices requiring A percentage of land to be set aside for natural habitat. Hedgerows in development areas should have 6ft strips of fallow land running along them to provide wildlife corridors lake they do in some farms in England. Ecological networks need to be maintained across the County

CHAPTER 7 RETAIL

There is still **huge leakage to Dublin** and the recent decision to refuse the Marlton development in Wicklow seems to be inconsistent with the current County Development Plan The revised retail strategy for the county needs to clarify what capacity exists in each area and a hierarchy of needs.

The approach adopted is essentially reactive in that reference is constantly made to “facilitating” or “encouraging” particular types of development. In this it fails to address the Councils responsibility to “ensure” that certain types of retail facilities are provided for communities. For example during the life of the 2004 plan the Council granted permission for the conversion of the La Touche Hotel in Greystones to apartments. The granting of permission was no doubt in part a reflection of the failure of recent owners of the hotel to make it a commercial success. However the application to change the usage was dictated by the substantial profits to be made from housing development. This decision has left the community of Greystones with no hotel. If the Council were to have taken the view that Greystones needed a hotel,

the change of use would not be permitted. In that case economics would eventually dictate that the property would fall into the hands of someone who could manage it successfully. Thus the Council should include clearly in its objectives the principal of ensuring through zoning and, if necessary, refusal of planning applications that important commercial activities are provided in all communities and that these are not lost because a particular individual seeks a short term personal gain.

Reference is made to the leakage of spending out of the county and the need to address it. The plan fails to acknowledge the inevitability of this undesirable phenomenon and to that extent is impractical and encourages unrealistic expectations among the business community and public representatives. A significant proportion of the community in the North of the county works in Dublin city. This group will, inevitably, avail of retail facilities in Dublin. The strategy should recognise this and encourage alternative retail activities that do not have to compete with Dublin city

There is a lack of emphasis on attracting spend into the county. Wicklow's proximity to Dublin will lead to a leakage of spending. However that proximity offers an opportunity to attract tourist related spending. (An excellent example of this is Avoca Handweavers). Provided that tourism, residential development and other strategies are coordinated to ensure that towns do not lose their physical attractiveness, it is possible to encourage this type of spending by day trippers from Dublin and so to compensate for any losses to Dublin retailers.

CHAPTER 9 INFRASTRUCTURE

The strategy purports to provide and promote an integrated transport network and the encouragement of sustainable transport modes, to deliver high quality water supply, drainage and waste management facilities within the period of the plan...to promote the use of Green energy such as wind, and hydro-electricity...and to facilitate widespread telecommunications...

Wicklow county council has Ballynagran Dump taking mixed waste (which cannot continue) and the council has started to build a new waste water treatment for Wicklow. There are promises to bring Luas to Bray and a new waste water treatment plant in Shanganagh.

A new approach is needed to this section.

WASTE: Probably need to identify search areas for a new waste management site so as to be ready for when Ballynagran is full and for a **new site for compostable material.**

It is not beyond our wildest imaginations that many of the houses currently unoccupied could deteriorate to such an extent as to make their restoration and retrofitting for adaptation to climate change unfeasible. There will be a need to quantify and identify additional recycling facilities including **construction and demolition recycling.** Are existing sites zoned for industry and employment suitable for this use or should additional sites be identified?

Greater use of anaerobic digesters should be anticipated and planned for across the county and adjoining counties

SEWAGE AND WASTE WATER

Regulations currently under review regarding the septic tanks of one off rural housing are likely to require stringent assessment and licensed monitoring of all septic tanks. This will be expensive. The issues in county Wicklow would commonly be thin soils over bedrock resulting in the possibility of surface water pollution ending up in rivers. This risk is likely to increase with climate change and heavy bursts of rain.

The use of integrated wetland systems should be encouraged for new development.

Constructed wetlands are increasingly being used in water and land management. They address the ever more apparent need for joined-up approaches to land and water management, with this need having International, European and National support i.e. the United Nations Environmental Programme (UNEP) and its Convention on Biological Diversity (CBD) and the Ramsar 1971 Convention for the protection of wetlands and European Union Directives, particularly that of the Water Framework, Nitrates, Bathing Water, and Ground Water Directives.

There are a number of different types of constructed wetland in use in Ireland over the past 50 years or so. Notwithstanding this, it is only in the past 20 years that a wider application of this approach to water management has been integrated into the needs of natural resource management, culminating in the development of the Integrated Constructed Wetlands (ICW) concept. This more holistic approach places emphasis on the need for explicit integration of water management with landscape-fit and associated improved site values, and the facilitation of habitat and biological diversity. This purposeful integration enhances processing synergies, robustness and sustainability that are not generally available in most other single-focused constructed wetland designs. Integration benefits are primarily due to relatively larger scaling patterns and the greater biological complexity. This robust, sustainable and multi-benefit yield from ICW systems has been successfully applied throughout the country to a range of effluent types in different situations when appropriate assessment, design and construction are conducted.

Wetlands should be considered as a possible solution for the following situations;

- Treatment of agricultural runoff and wash waters
- Treatment of industrial runoff and wash waters, e.g. recycling facilities, meat processing facilities etc
 - Treatment of sewage waters for single houses, hotels, guesthouses, schools, villages, towns, housing developments, industrial and commercial developments.
- Treatment of in-stream waters
- Treatment of storm water, including roads, housing developments, commercial/industrial developments, golf courses.
- Creation and enhancement of habitats and biodiversity.

A detailed site assessment and design should be undertaken by a suitable qualified person/body, examining the suitability of a site and determining the most appropriate layout and discharge type option.

WATER: The problems around the county need to be clearly identified including the lack of water in most of the east coast towns. Detailed maps need to be included to identify aquifers and areas subject to flooding. Implications of the Water Framework Directive need to be summarised in a form and language that can be understood by those developers and citizens wishing to use the plan to guide their own proposals.

Policies need to be included to ensure proper assessment of all water abstractions. The impact of lowering river flows, particularly in the warmer summer when rivers are already reduced, will have a serious impact on river fish stock and other species.

RAIL: Probably necessary to identify search corridors to keep free from one off rural housing for a new inland railway. The existing railway line is likely to be under water in 50 years or sooner. The train should stop at Glenealy and Avoca

ENERGY: The same corridor might be used to improve electricity grid to facilitate more individual use of alternatives that require access to the grid for picking up top ups or returning unused energy. The whole areas of **alternative energy supply** needs to be considered NOW. Recently announced proposals to bring a commercial electricity interconnector on land at Arklow will be assessed in a vacuum unless these matters are worked out in an integrated fashion. It would be appropriate to assess total need in the region and to propose suitable search areas for development of the necessary infrastructure.

The existing Plan is inadequate in this very serious matter. The existing policy EN6 section 5.6.2 to extend **natural gas** grid should be removed as opportunities to import gas are reported to be shrinking rapidly and be unavailable by 2030.

The previous plan promised an indicative **wind policy**. This did not happen. We now need a comprehensive plan for the county taking on board energy supply and distribution within the county and promoting the local production of energy as an element of the sustainable economy of the county. The energy agency that was discussed for the county could be asked to prepare a draft strategy for public consideration. The widespread use of **bio fuels** is now generally considered unsustainable however some production of bio-fuels for local consumption might be part of an overall strategy

TELECOMMUNICATIONS; Large areas including areas of the primary Development Centre of Wicklow still cannot access high speed broadband. This will seriously undermine the opportunities to reduce the commuting ratio, to encourage home working or small local industries. If this cannot be remedied it should be acknowledged and alternative strategies prepared.

ROADS and CYCLE TRACKS

A coastal or county cycling lane would be consistent with eco-tourism and generate local business such as cycle hire, stop over points

A bus corridor from Arklow to Dublin would help reduce commuter travel. Reopening Avoca rail station, but not to facilitate further housing development as Iarnrod have indicated they might reopen it if further housing was allowed in area

We would not accept that an outer orbital route would be sustainable development

CHAPTER 9

HABITAT PROTECTION

This section needs to make much clearer the importance of protecting biodiversity and it is suggested that this section should be separate from Heritage and Landscape

Recent EU judgments make it clear that habitat protection must include **non designated sites** as well as those designated. The development plan policies HL13 are not adequate and should be reworded to clarify the situation for prospective developers

Policy HL4 ...to ensure that the council has sufficient information to show how proposals will affect designated areas or in the vicinity of a designated area - have not been adequate and recent research by An Taisce has shown that there has been a failure to require Environmental Impact Statements.

A recent study commissioned by Monaghan County Council estimated the **wetland habitat** loss as being a loss of 1521 ha of wetland habitat throughout the county in 6 years. Do we know the situation in Wicklow?

Dumping soil as agricultural infill, supported by Teagasc, appears to be a problem that has resulted in complaints to the European Commission. The widespread loss of wetlands, caused by the disposal of spoil materials from road building and large infrastructural projects, are frequently not quantified or identified as part of an EIA. It is recommended that waste deposition generated by any construction or infrastructural project needs to be fully integrated in to the EIA evaluation process, as stated in the 2001 EC guidance on EIA.

Policy HL16. No county bio-diversity plan for Wicklow has been produced as promised

6.1.13 Protection of Hedgerows and stone walls. Without any indication of this existing resource it is impossible to know whether this section has been successful in preventing unnecessary destruction. This needs to be monitored. Several counties have undertaken Hedgerow surveys and this would be valuable in Wicklow too.

Hedgerows form an important part of any ecological networks which are vital in the protection of biodiversity, as well as contributing to carbon sequestration. In keeping with the need to reduce our carbon footprint, the Council should discourage the destruction of hedgerows and their replacement by concrete block walls.

There has been intense pressure on hedgerows in recent years. Many have been destroyed in order to provide better sightlines for development along rural roads. pressure on hedgerows will also increase rapidly in the next decade as more farms are consolidated.

Proposals to ameliorate this trend are therefore urgent in order to ensure that there are no further judgments from Europe criticizing Ireland's failure to properly assess the impact of removing hedges and walls.

Hedgerows may also form an important part of any ecological networks which are vital in the protection of biodiversity

Demesne Planting/urban trees/Forestry/Trees need to be given appropriate protection.

HERITAGE AND LANDSCAPE

We propose that **Landscape Character Assessment (LCA)** is a more appropriate and more flexible planning tool by which to assess proposals for new development. Such an analysis would take into account a range of different issues, including **tranquility zones** which will be few enough in the county but therefore all the more valuable.

All the issues raised in sections of this chapter would be organised in a more coherent way in a landscape character assessment that included recommendations.

Policy HL2 has failed to result in the identification of vulnerable landscapes and in particular The Murrough in Wicklow town has been degraded to an unacceptable degree.

The development plan failed to protect the heritage landscape of Arklow Rock

There is considerable expertise in Ireland now for the preparation of Landscape character assessment and we propose that this be undertaken in conjunction with the County Development Plan.

An Taisce propose that Wicklow County Council recognises the special role of its **landscapes** in terms of overall environmental quality, tourism, biodiversity, ecology and water quality. It also recognises inadequacies in its existing county landscape designations, including confusion of landscape character and quality / sensitivity. For this reason, it shall be a priority to carry out at appropriate scales separate assessments of the county regarding character and sensitivity in accordance with the Draft Guidelines issued by the Department of the Environment Heritage and Local Government (2001). The characterisation study will provide an important understanding of the landscape, differentiating types in order to appreciate as well as providing a sound basis for considering *in what ways* and *extent* each might undergo change by particular developments.

The assessment of sensitivity is quite distinct from this, providing an understanding of

the value of various resources and resulting in categories of sensitivity that should be adapted to different kinds of development. Thus, the sensitivity of landscape in relation to such development kinds as rural house, wind farms and forestry will be considered separately as each kind presents its own unique opportunities and challenges. However, **the foremost function of this assessment is to assist in deciding whether and to what degree certain landscape can accept the different kinds of development.** This shall be realised by the production of development specific strategies that are based on landscape character and use the sensitivity assessment categorically regarding the acceptability of development (see as examples the landscape based strategies for county Waterford and county Roscommon) We propose that Wicklow County Council further recognises that landscape characterisation should be extended into urban areas, hamlets, villages and towns and can play an important role in planning for both urban renewal and extension (see section on Urban Extension and Design).

LCA would assist in indicating suitable locations for many new developments particularly in the rural areas eg renewable energy, tourist sites, walking routes,

This will be particularly useful in the new economic period which is likely to see considerably more rural development taking advantage of the renewable energy opportunities .

Views and prospects would be covered by a Landscape Character Assessment,

Heritage parks and gardens need to be identified and protected

COASTAL REGIONS

6.1.18 and Appendix 1

We are pleased to see the designation of Bray Head with a Special Amenity Area Order however the objectives for the area of outstanding natural beauty and the coastal region in this section are very limited and have failed to provide appropriate protection to **Wicklow Bay**, one of the most stunning areas of outstanding beauty and natural habitat in the county which is now seriously degraded in the area closest to the town where its amenity is most badly needed.



We propose that the region from Kilcoole to Wicklow Head be designated with a Special Amenity Area Order

The County Development Plan should recognise the inevitability of substantial **coastal erosion and flooding along soft shores** and include maps to show the probable extent as indicated by any reports such as **THE MURROUGH, CO. WICKLOW COASTAL PROTECTION STUDY** by Wicklow County Council and RPS

The average sea level is expected rise by up to 0.59 m over the next century largely as a result of thermal expansion of the oceans. This is about 3 to 4 times the global average rate of mean sea level rise. Tied with the fact that we are experiencing more frequent and severe coastal storms the risk of coastal erosion and flooding is increasing significantly. In fact, currently about 20% of Ireland's coastline is at risk from erosion. Ireland does not have any system for forecasting sea surges or for circulating coastal flood warnings. These systems are necessary to ensure quick

emergency responses and reduce the flood damage and social disruption. To protect citizens living in coastal areas it is crucial to integrate risks associated with coastal erosion into planning and development.

In February 2002, a high-water level of 2.95m above present sea-level was experienced in Dublin. While this may have been the once-in-two-centuries event based on past experience, it is judicious to assume that this level will recur over the next century due partly to the increased sea level. Planning for this increased hazard might incorporate the following:

- No new building within 100m of 'soft' shorelines
- * No new building in land below 3 metres above spring tidal highs
- No further reclamation of estuarial flats
- No removal of sand dunes, beach sand or gravel
- Planning requirements for structures along the coastal zone should be based on the 200-year event. For much of eastern Ireland this corresponds to a level of approximately 4m O.D.

The potential of the coastal region to contribute to the economy of the county for recreation and tourism is enormous as indicated in chapter 11 section 4.2.3 which promises the more extensive use of the coastal strip but access to coast is a major problem with very few access points that are not privatised along the entire 30 length of coast line. Nothing in the development plan prevented CIE from fencing off large areas of the beach around 5 Mile Point.

strong objectives to facilitate a coastal path should be included in the plan. Measures need to be included to upgrade the path to avoid exacerbating coastal erosion.

A coastal walkway should be universally applied and include coastal strips from north to south including coastlines within Blainroe Golf Course, Ballinacarrig Caravan Park, The European Golf course etc.

The provision of a mobile beach warden who could respond to calls. This would take pressure off the Gardai and council in reduced cleanup costs. There was and may still be a very effective warden in Meath who dealt with such situations. Horses and quads should be banned from sand dune systems. Horses are allowed on the beach under by-laws at certain times, but there should be a blanket ban on them on sand dune systems. Brittas Bay is prone to blowouts caused by recreation and natural erosion. Efforts to prevent further erosion to blowouts have been relatively successful. Dune protection measures should be encouraged. Experimentation in this area should also occur

We note the 2008 EPA State of the Environment report, which states The quality of the coastal environment has been impacted by the high levels of urban development associated with the economic boom, resulting in habitat loss and impacts on the landscape. Certain coastal recreational developments, such as golf links, have resulted in ecological damage to machair and other dune systems, and conflict as a result of restrictions to foreshore access. According to the Department of the Environment and Local Government (DELG, 2001), conflicts of this nature will

continue to emerge as recreation in the coastal zone expands with the increasing availability of leisure time in society, and in the absence of a national strategy for the provision of recreation space on the coast. A proposed implementation plan for Integrated Coastal Zone Management (ICZM) in Europe was issued in 2000 (COM/00/545 of 8 September 2000). Council and Parliament adopted this Recommendation on 30 May 2002 (CEU, 2002). A formal strategy for ICZM has been under consideration for some time, and a national stocktaking is currently in preparation. This will collate information on current approaches to coastal management in Ireland.

RECREATION AND TOURISM

Presumably the council will report on the achievement of objectives included in the existing plan. For example how many picnic area facilities along tourist routes have been provide in accordance with Chapter 11 Section T&R3?

We understand that a Recreation strategy is being prepared and presumably this will form part of the County Development Plan

If it is good for local residents it will be good for tourists. children's recreation areas in tourist areas add to the tourism value.

Section 4.2.2 Walking

This section refers to miles of walks however it would appear that many walking experiences are deteriorating. This is quite marked along the Murrough but forest walks may be impacted by the siting of telecommunication masts and associated works.

*We propose that miles of walks be identified and monitored in each plan period to ensure no further deterioration.

*Other walks that should be listed are the truly excellent Sli around the Vartry reservoir and any other Slis in the county though we note there is no route from Roundwood village, which is a great pity.

*We suggest that the council also promote a walkway around Poulaphouca reservoir either partly or totally as a board walk.

We suggest that there should be an indicator monitoring how many access routes exist in the county and how many miles of walks are included.

Fencing

An indicator is also required to monitor the erection of fences around hitherto open land and ask that the council consider the following points:

It is a requirement of the Planning Regulations – 2001 - 9.(I)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure, for recreational purposes or as a means of access to any seashore, mountain, lakeshore or other place of natural beauty or recreational utility requires planning permission

There has been a large increase in the amount of new fencing in the upland areas of the County. Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. The provision of stiles or gates, while it solves the problem of access, does not in any way ameliorate the unsightly effect of wire fencing and destroys the “away from it all” ambience which makes much of the upland areas such an attraction for both local people and visitors to our countryside.

Traditional hill-sheep farming rarely required fencing, but since the introduction of REPS, sheep-farmers must stock-proof their land. We have been informed by REPS planners that, in many cases, such fencing is unnecessary. Traditional fencing methods: hedgerows, ditches and stone walls are now rarely used. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of REPS without impinging on access for hill walkers and other recreational users. Taking account of a) the needs of farmers and b) the desirability of maintaining access for hill walkers the Council will use the following criteria when considering applications for new fencing on hitherto open land: In the context of the fundamental change in direction of agriculture following the introduction of the Single Payments Scheme the number of sheep in upland areas has been substantially reduced and that fencing of these areas will be largely unnecessary. Much wire fencing being erected now will, therefore, be redundant. It will eventually fall down and will become a danger to recreational users who might trip over it. It would also constitute litter.

Fencing in upland or amenity areas will not normally be permitted unless such fencing is essential to the viability of the farm and conforms to best agricultural practice. The sole reason that fencing is required to comply with requirements of the Rural Environmental Protection Scheme or any other Government regulation will not constitute a sufficient reason for it being permitted.

The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account

Barbed-wire will not be used for the top line of wire.

Stiles or gates at appropriate places will be required.

All permissions will be for a maximum period of ten years. At the end of that time unless the planning permission is renewed all materials must be removed.”

*Some of the above is taken from the recently adopted Mayo Plan.

*A reference to the need for planning permission is in the Sth Tipp. Plan(8.12 last paragraph).

It should be noted that the EU is taking legal proceedings against Ireland for permitting the unnecessary erection of fencing in the uplands.

There are many **rights of way** that are not contested and these must be put back into the County Development Plan. An objective to preserve **access to the coast, river banks and to public and private forestry should be included** and the objectives of 6.1.17 should be retained to preserve the open character of commons land.

The Planning and Development Act 2000 greatly facilitates the confirmation of existing rights of way. The rights of landowners to be kept advised at each stage of

the procedures is clearly set-out and they should have nothing to fear. In fact the listing of rights of way is very much in their interest in that, if there is a clearly marked network of rights of way, it would be quite reasonable for them to refuse access to all other land. From initial enquires we have made from our members it appears that there a number access problems in the county as follows:

Castleruddery, West Wicklow – access to fort site

Glencree – Walk across upper part of valley – Collen’s land

Curtlestown – Old Coach road

Shillelagh – Graveyard at Balisland – old graveyard

Near Lough Dan – Ballinrush Estate

Hollywood – Old path south of village

Church Mtn

While we are not contending, at this stage, these are all rights of way, they merit the attention of the Council as, in virtually all cases, they are traditional walking routes which could be registered by the Council as Rights of Way. The main purpose in compiling this list is to illustrate that all is not well on the access front in the county. In the 2004 Plan you make many references to walkways, trails etc which is commendable. However, it must be realised that most of these walkways go across private land can be closed by the landowner at any time without notice and for any reason or none. The fact that most of them are open is no guarantee for the future and a change in ownership can lead to a change of attitude. Another factor that could lead to a worsening of the situation is the stand-off between the IFA and the Government over payment to farmers for access. The IFA are making bellicose statements about closing off access in pursuance to their claim.

The need for reasonable access to the countryside has been recognized as far back as 1997 by the then Dept of Sport (see appendix 1) and by the EU (see appendix 2). This denial of access has not only affected local people but is a real turn-off for visitors. The rapid suburbanisation of much of the county must inevitably result in the loss of traditional walking routes, old green roads and mass paths. Once these routes have been built-on they are lost forever.

Councils in other counties have made progress on this issue as follows:

A – Rights of Way listed

Dun Laoghaire/Rathdown – 28 rights of way (all rural) are listed and mapped in their Plan. While landowners have objected some to we are hopeful that, following a successful court case that the remaining objections can be dealt with.

Signing posting has commenced. - 9.2.14 – Table 9.4.

Clare - Rights of Way in Ennis and the Environs have been listed there is a commitment to list in the rest of the county – 3.1 – page 87.

South Tipp – Some rights of way listed – Table 4.2 – page 36.

B. Counties where listing is to be completed within two years:

Kilkenny -7.3.5.2 – Action.

Meath - 8.2.16.

Fingal - page 158 - GBO 2.

Mayo - O/TI PC 2.

Carlow Draft – Public Rights of Way - page 74 – final pt.

C – County who have provided for listing with no target date.

South Dublin – 9.5.9.iv.

The task of listing would be greatly facilitated by the appointment of an **Access Officer**. This has been done in Donegal. Pending this appointment perhaps the Heritage Officer could start the ball rolling.

Applicable to Coastal Counties – There is a particular incentive to establish a Coastal Path on a permanent and legal basis by the ensuring that the path has the full status of a public right of way. It could, in time, form part of a national coastal path. This path would generate much needed tourist revenue. The Cornwall/Devon cliff path in England brings in annual revenue of 325M pounds sterling.

Based on the provisions of the many county plans we submit that the following should be included on the Plan:

1 List existing public rights of way, paths, access points to rivers and waterways, lakes, mountains and other amenity areas, within one year of the adoption of the plan, but if examination of traditional walking routes for possible designation is not completed within this time, that an Interim Plan will be prepared. Detailed maps showing the actual routes will accompany the list and the appropriate signage will be put in place. The list will be included in the plan by way of Variation.

2 Preserve, protect, promote enhance, improve and maintain, for the common good, existing rights of way.

3 Prohibit development and keep free from obstruction existing rights of way, walking routes and amenity areas, and take legal action if necessary to prevent any attempt to close them off. South Tipp – Pol ENV 41 – page 36, Mayo O/ TI-PC 1 & Clare CDP 80 on page 85.

4 Create new rights of way as required or extend/enhance existing rights of way either by agreement or by way of compulsory powers, in the interest of ensuring access to amenities. In particular, rights of way should be created to provide linkages from built up areas to the countryside. Louth P 6.3 – 1st pt, Meath HER POL 38, Sth Dublin 9.5.9.iii & Fingal GBP 6.

5 - Look favourably upon planning applications that include proposals to improve the condition and appearance of existing rights of way. Fingal GB08.

6 - Prohibit development that would prejudice public access to existing rights of way, unless specific arrangements are made for suitable alternative linkages. Fingal GB09.

Policy T&R 10 promises to co-operate with representative groups to support the development of walking groups but no structure exists for this purpose.

Other opportunities are neglected. For example the Avoca mines are not yet opened and an objective should be included to facilitate this development

RURAL DEVELOPMENT and ENTERPRISE

Chapter 12 Section 4.3 page 149

It is agreed that rural development is likely to assume far greater prominence in the next decade and requires careful consideration at this stage. (This refers to those areas outside of existing settlements which need to be reassessed and identified and will be dealt with separately). Much greater clarity is needed in these sections. Objectives should be linked to strategies and should identify indicators to measure the success or failure of the actions.

There are numerous new international and national policy directives that will require mapping and they should be inserted into the new development plan. Eg groundwater vulnerability and other water bodies to be identified under the Water Framework Directive, Designated and special habitats to protect biodiversity, Special amenity areas such as the Wicklow Mountains (which would be identified by a landscape character assessment). It will be vital in the future to map and protect areas where good soil is suitable for agriculture

Wicklow is uncommon in that such mapping will reveal that there is limited amount of space left available for development, which is both a blessing and a curse.

There is already considerable dispersed development across the county, which hinders the development of strong urban areas, but it is not too late to draw a line under this and better regulate new proposals in the interest of sustainable development.

National policies to limit residential development in rural areas are likely to become more effective (for example a tax on second homes) The financial constraints on providing even basic amenities spread across wide areas, and the realisation that long commutes are destructive of family life and community are likely eventually to lead to fall off in demand to live in rural isolation. (This will also require that more opportunities are available to develop the sort of housing that people want in the urban areas).

Policy AG2 promises to encourage the development of sustainable alternative agricultural and non-agricultural enterprises yet there is a perception that current regulations actually hinder this.

We recognise the importance of developing opportunities to provide employment for those already living in rural Wicklow to provide employment for local people and to find alternatives to commuting

It is believed that criteria for the control of industrial and commercial development in disused buildings need to be better codified to encourage good sustainable development and strongly recommend that checklists of criteria need to be agreed by which to assess each individual proposal that comes before the Council.

While we support the principle of re-use of existing farm buildings, proper planning and environmental controls need to be in place and enforced along with such changes. Noise, smells, and increased traffic can adversely affect neighbours, and this needs to be taken into account. The potential degradation to the landscape, especially in the

proposals for breakers' yards for end-of-life vehicles, and similar enterprises, poses a threat to the overall continued potential for Wicklow to retain and grow its tourist sector, not to mention the continued quality-of-life for current residents. The storage of waste materials, especially sludge and municipal compost, needs to be carefully considered, as the impact on the locals residents is not only noxious, but threatening to health. Present regulation and enforcement regimes have not provided the basis for public confidence that the protection of the general public's interests will be secured."

We believe that this would assist rural entrepreneurs in understanding the constraints and better guide them to the development of sustainable enterprises.

We envision that these will primarily revolve around alternative energy, recreation/tourism, wood based industries and quarrying.

The criteria would include

- Ecological management of the site
- Waste, energy and resource management
- Siting and Structure of Buildings
- Vehicle use
- Impact upon the surrounding community (visual and environmental)
- Public access

There are many challenges with encouraging rural sustainable development at present. Inefficient planning and transport systems are affecting our ability to reach climate emission targets, maintain strong community, ensure social inclusion and develop commerce with rural areas. Rural Ireland (2005) calls for greater commitment to rural and regional development through establishing a Rural Policy Implementation Group, developing regional innovation and research systems and providing education and training programmes to raise the capabilities of rural businesses.

AGRICULTURE and FOOD SUPPLIES

Policy AG1 promises to support the development of agriculture but offers no strategies to achieve this aim

It simply describes how agriculture is declining as an employment opportunity in Wicklow and refers to the consolidation of farms. These figures need updating and recent European court judgments, relating the need to assess the impact on built and natural heritage of the loss of hedgerows and walls, should be included

But agriculture needs more attention in its own right. **Food security** will become a major concern in the near future and those counties which prepare for this will be providing true leadership and vision for their residents and rate payers.

As mentioned above **good soil** needs to be identified, mapped and protected in order to secure local access to food supplies which are likely to become increasingly scarce. Ireland currently has just two weeks food if the importation of food was disrupted.

Soil provides multiple services, ranging from food production, water-filtering and carbon capture, to green park areas in towns and cities, important for human well-being. However, increased urbanisation is leading to a loss of soil resources. Researchers have developed an online evaluation method that can be used as an aid to urban planning to avoid the loss of precious areas of good quality soil.

In urban areas, as in rural areas, soil provides key ecosystem services including water-filtering and carbon capture. It also shields against harmful substances and supports recreational services including public gardens, playing fields, road verges and parks. Currently, only 9 EU member states have specific legislation for soil protection, which are largely concerned with contamination. However, an EU-wide framework directive aimed at soil protection was proposed in 2006¹.

'Soil sealing' is one of the greatest threats to soil in Europe. It prevents soil from performing its multifunctional role and refers to the covering of soil as a result of urbanisation and construction. Soil quality is decreasing due to erosion, contamination and a decline in organic matter content and biodiversity. In addition, soil resources are under increasing pressure, especially as land use changes and urbanisation increases. By 2030, over 60 per cent of the world's population is expected to live in cities.

To ensure protection of soil in urban areas, planners should integrate soil quality into evaluation procedures. To this end, a study partly conducted under the EU-funded TUSEC-IP project 2 has developed a method to evaluate soil quality by combining soil quality indicators (SQIs), such as texture, pH and contamination levels, with a range of pre-developed 'pedotransfer functions' (PTFs). PTFs are models of complex soil properties, such as the ability to support plant life or capture carbon, based on combinations of SQIs that are easily measurable.

Local knowledge of soil resources can also be incorporated into the evaluation method, the output from which is a soil quality class value, which ranges from 'very low' to 'very high'. This value can provide urban planners with an indication of areas suitable for constructing new developments without sealing good quality soil. The evaluation method can also predict the impact of land use changes on soil resources, by inputting predefined SQI quality class values for different urban land uses, such as residential areas, playgrounds and shopping centres.

This new method is specifically designed for urban environments. At present, it is being further developed and tested where it will be implemented in the form of two separate tools: a desktop based tool and a web-based portal. A basic, prototype version is due to be available in an online format, useable by a wide range of end-users. Combining this method with a better understanding of the functions of soil in urban ecosystems could improve urban planning, soil conservation and sustainable environmental management of cities³.

³ See: http://ec.europa.eu/environment/soil/index_en.htm

TUSEC-IP (Technique of Urban Soil Evaluation in City Regions-Implementation in Planning Procedure) was conducted under the Interreg III B Community Initiative Alpine Space Programme supported by the European Commission. See: www.tusec-ip.org **Source:** Vrscaj, B., Poggio, L. and Ajmone Marsan, F. (2008). A method for soil environmental quality evaluation for management and planning in urban areas. *Landscape and Urban Planning*. 88: 81-94.

Policy AG3 promises to encourage the development of environmentally sustainable agricultural activities but provides no strategies to achieve this.

International Examples could be investigated and objectives included to **assist business and farmers to comply with and understand environmental legislation**, make measurable improvements in efficiency and environmental behaviour and safeguard jobs through increased profitability.

Almost 1000 businesses were contacted in east Sussex UK, many of them micro-sized, and a total of 170 benefited from the free advice and services on offer. These included training events, waste audits, green action awards, follow-up support and a helpline. The project was successful in attracting farmers, prompted by high energy costs, water shortages and the introduction of the agricultural waste regulations in May 2006. The helpline was particularly cost-effective, taking up only 4 per cent of staff time. Actions taken by businesses included reductions in solid waste, increased energy efficiency, use of renewable energy and rainwater harvesting, reduced carbon emissions and increased awareness of legislation.

The existing **GMO Free status** of the county should be noted with pride and organic farming should be encouraged..

Cross references to the availability of space in urban areas for **community gardening and allotments** should be included. Undeveloped council owned industrial land should be made available as allotments for neighbouring Towns/Villages

A County Policy identifying the quantity of **anaerobic digesters** and other means of dealing with agricultural waste needs to be prepared with suitable search areas also identified.

Opportunities to gain added value using agroforestry systems, coppice woodlands, community woodland projects, biomass, biochar, etc. should be included

5.1.2 **Design of agricultural buildings** states that the council will have regard to the An Foras Taluntais handbook Farm buildings and the environment. X

This did not happen and hundreds of applications for cattle sheds and slurry pits in the county in the last 5 years have been permitted to be built in contravention of these guidelines and in fact to have a serious negative impact on some neighbours.

FORESTRY

We need to monitor the acres under forestry in different categories.

It could be an objective to encourage mixed forest cover suitable for sustainable local industry to monitor the success of such an objective it will be necessary to measure forestry today and at the end of the Plan period.

Whilst proposals for **ethical procurement policies** from the council may be better placed in another section it is interesting to see proposals in Cavan County

Development Plan to include the requirement to only use sustainable forests in the procurement of wood and wood products.

Forest management can be environmentally appropriate and socially beneficial but it can also be damaging. This policy recognises the responsibility of local authorities as a consumer of forest products to ensure that they have neutral if not positive effect on the world's forest. We should give preference to timber and timber products that have been independently certified by a credible globally applicable forest certification scheme and can demonstrate that the products are derived from well managed sources.

Having a timber purchasing policy is a valuable tool to help tackle the challenges of illegal logging, deforestation and climate change and helps in keeping sustainability challenges. See draft policy from www.justforests.org

End

Pre-draft scoping submission on the Wicklow County Development Plan.

This document has been prepared by a number of contributors from the Wicklow Planning Alliance. It is not entirely comprehensive but touches on a number of issues that have arisen in our experience of planning matters as they affect communities on the ground around the County.

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April 24th 2003

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Section 1. The Development Plan document

The Wicklow Planning Alliance would like to make suggestions on a number of issues relating to the actual structure of the County Development Plan document that we found problematic last time round.

1. We believe that there is **no clear line between objectives, strategies and targets**. If goals and objectives that have been established are attached to the policies to achieve these goals, and precise activities are attached to these policies, they could be seen in an integrated fashion rather than disjointed initiatives. In the Wicklow plan there is no clear link between policy, objectives and works which makes it quite difficult to see how goals are to be achieved.

It follows that the establishment of a vision statement is pivotal and more attention must be paid to the elucidation of a vision for the County, particularly in view of the National Spatial Strategy. What do we want Wicklow to be known for? What are its best assets? Is it to be primarily a dormitory county?

We have noted that Meath county Council is now embarking on a PR programme clearly positioning their County as a centre for Heritage. Where do we want to position County Wicklow?

The Wicklow Planning Alliance propose that we have already a very firm base in the well known characterisation of Wicklow as the Garden of Ireland and that this should be built on. This should permeate the entire plan and all statements should be 'proofed' against the concept of a green county. Thus in urban and village development landscaping will play an more prominent part. Similarly we need a clearly stated Tree Policy dealing with the protection and enhancement of trees and hedgerows in the County. There is something wrong with a Plan in the Garden County of Ireland that allows for hedgerows to be removed when new housing is built.

It will be seen that many of our aspirations for the next County Development Plan as outlined in this submission relate to such matters.

2. The 1999 Plan also exhibits a lack of clarity and precision that would make its legal directives uncertain. For example the Planning Alliance proposed that such words as '*discourage*' should be replaced with '*prohibit*'. '*Encourage*' should be replaced with '*promote*' and phrases such as '*will consider the making of tree preservation orders*' should be replaced with '*intend to make tree preservation orders*'. Such points could be important to prevent confusion amongst developers as to exactly what development is permissible and to prevent future side stepping of agreed policy.

3. The Planning Alliance that this is now the time to make serious changes to the way in which decisions are made in line with emerging procedures else where in Europe. It is now clear that there are problems with the technique of zoning:
 - I) The technique does not lend itself to facilitating mixed development that is commonly understood to produce more sustainable development.
 - II) Zoning is vulnerable to abuse
 - III) Zoning is too static and does not allow for a change in response to new trends.

Whilst it may be too soon to completely do away with zoning for development there now needs to be far greater reliance on the use of criteria and indicators to establish the appropriateness of applications for development. This would be in line with Government advice such as is found in the National Spatial Strategy and there are many examples to be found in planning systems in the USA, Europe and England.

4. The use of agreed criteria to assess development applications would be far more transparent but may, in the preparation period, be more demanding of staff expertise. It would be important that staff be properly prepared and management structures be efficiently organised. To successfully implement the County Plan to the standards required WCC needs to face up to and deal with a number of critical issues:

Enforcement

Although there are shortcomings in the existing planning and related legislation most of the problems related to development could have been, and can be, dealt with through existing legislation *if that legislation was rigorously enforced*.

WCC needs to review the resources dedicated to enforcing planning legislation based on a more demanding environment and implement a system of prioritizing enforcement activity based on potential impact.

Decision making

Decisions are going to have to be made in the context of increasing and conflicting demands for the services provided by Wicklow County Council. Currently, as with most areas of local and central government, there is a culture of influence through powerful lobby groups rather than making decisions based on the long term needs of the County. Wicklow County Council needs to implement a more open decision-making process where lobby group influence is exerted in a public rather than private arena.

Resource management

When Wicklow County Council completes the first draft of the County Plan it must ensure that it can be resourced and that the final draft submission must only contain proposals and services that can be implemented and run to the standards required.

This will work if Wicklow County Council can prioritize its work and publish, as part of the County Plan, what those priorities are and why.

The Council should devise and publish a service level agreement for all its activities and ensure that individual Wicklow County Council managers are accountable for them.

Working within the National Spatial Strategy and Dublin.

The County Plan must work within the context of The national Spatial Strategy and developments in Dublin as they affect Bray and Greystones.

Wicklow County Council needs to exert more influence and develop close and effective relationships with planning activities that directly and indirectly impact on Wicklow.

Section 2. Settlement Strategy.

Think globally, act locally.

1. The County Development Plan should reflect a commitment to sustainable development (in line with the European Spatial Development Perspective). The Plan should adopt the policies presented in the Strategic Planning Guidelines for the Greater Dublin Area, which seek to encourage development in the Metropolitan areas and to focus the supply of physical and social infrastructure in the Metropolitan area to meet the demands that will arise from this policy.

The present plan does not go far enough in fitting County Wicklow into the National and International picture. Ireland's economic future may depend on a strong and healthy capital city meeting global standards, which are only attainable in a compact form of settlement.

2. Outside of the Metropolitan area, development will be of a different order. Acknowledging that funds are not going to be provided to finance even basic infrastructure everywhere, it will be necessary to ensure that we get the most benefit from the little there is. This will mean a very steep hierarchy. People cannot be expected to live where infrastructure cannot be provided. Residential development should not be allowed in advance of infrastructure because it would be too damaging to the environment and to ourselves – not least the health impact.

The present plan permits residential development far in excess of available infrastructure.

The new settlement strategy should clearly show how zoned areas are linked to the availability of appropriate services. (see also following case study of Greystones)

The extremely broad definition of the word local adopted in County Wicklow has not stood the test of time. We propose that local growth should mean proportional to the existing size of that particular community and catering for the needs of the existing residents in that village or community. Zoning for a 10 -15% increase in population may be appropriate, 120% can in no way be said to be catering for local growth. We also believe that the concept of local must be applied to the community and not to individual house purchasers as to limit access to housing to locals only may not be healthy or equitable. We do however appreciate the problems of locals in housing themselves – an issue that frequently related to affordability and we would propose that further action be taken to relieve this pain. It is our belief that no amount of development will bring house prices back to affordable levels for many in Wicklow's towns and villages and it is disingenuous of would-be developers to bully communities into accepting unsustainable development on the pretext that this will bring housing within the means of many members of the community. Affordability is a far wider issue and will require government action to deal with it.

3. We don't want to end up living in degraded environments, either rural nor urban. We want decent homes in communities and neighbourhoods.

The new plan must go further in promoting community values. *One aspect of this would be the preparation of design frameworks for new areas as proposed in the National Spatial Strategy) A prime consideration of a development that will facilitate the maintenance of community is that it be pedestrian friendly. This will be expanded upon in the section on urban and village design. .*

Many of the decisions made by councillors in the last decade have undermined social networks, notably the decision to zone for enormous increases in the relative populations of certain villages e.g. Newtownmountkennedy with 750 houses, zoned for an additional 1000. The health of communities is profoundly affected by the Development Plan.

There is an onus (and possibly a statutory requirement) on Councils to consider the impact of their decisions on the health of the community they are elected to serve. A health impact assessment in other words. This requires an understanding of the modern definition of 'health'. Under the WHO definition health is much more than merely absence of disease it is a complete state of physical, psychological, economic and social well-being.

4. Some people choose to live in a dispersed rural environment and, except in clearly defined areas of limited designated sites, this should not be outlawed where people can show that they can meet agreed criteria. Development should be considered where people can show that their needs can be met within the system or by their own careful management without imposing an unmet social cost to the rest of the community, for example for responsible effluent and waste disposal or by the inefficient use of energy, water and road space.

eg

Transport. A Mobility Strategy should be devised outlining the proposed Occupier Profile of any development and as to whether or not it is intended to meet local housing need or is for a wider commuter catchment area. Information should be provided as to what measures are being taken to promote Sustainable Development by means of access to non-car based commuting modes to workplace.

Minimising Energy Consumption in Production of Building Materials and Construction. A strategy should be provided for the maximum use of the most environmentally sustainable building materials and the minimisation of the least environmentally sustainable, both in production and lifetime performance, for example, uPVC. uPVC is environmentally highly problematic in its dioxin producing manufacturing process, its short environmental and economic life as a building material and the disposal and toxic waste difficulties on redundancy.

Water Conservation. Measures should be taken to conserve use of fresh water

by means of recycling surface water run-off, that is "grey water", for uses where fully treated water is not necessary.

Energy Conservation. While amendment of Building Regulations is currently proposed to provide for increased insulation standards, this is not to prevent a Local Authority from seeking increased energy insulation standards in any development in the course of this, in order to meet greenhouse gas abatement targets at local level.

Waste. It should be a mandatory requirement of all housing developments to incorporate waste separation, reduction, and recycling, with the requirement, by means of planning permission condition, that each

householder or house owner must participate in a joint management company to minimise and manage waste, including the creation of a composting facility and for the organised separation and collection of individual elements, such as, newspapers and bottles; and toxic materials such as aluminium, plastic and batteries.

Septic Tanks and percolation areas. The provision of septic tanks and percolation areas will be required to be in accordance with the most up-to-date European and national guidelines available. Shared septic tanks will not be permitted. In cases where site conditions are unsuitable for a septic tank or other sewerage disposal system, development should not be permitted.

It is doubtful that many second homes or holiday homes would meet our criteria but a '*need to live in the area*' for example to work in a rural base industry or to contribute to family or community structures would certainly be one of the main issues.

*Notwithstanding well drafted controls in the present County Development Plan **the perception persists that permission to develop is not consistently applied.***

The new plan must be enforceable in a transparent way so that everyone understands the rules regardless of power or influence. The use of clear criteria by which all development is judged would help ensure this transparency.

Such criteria can also be applied to non residential development see section on tourism.

5 A corollary to this point is that people should not be forced to live in rural isolation just because there are no other choices. No more council land should be sold off and land banks should be acquired around villages for affordable housing. Urban design frameworks should be prepared to ensure that the fabric of our towns and villages is improved.

The present plan isn't working. *Most new houses are being sold to people who only sleep here and many people who want to contribute to the community cannot afford a home.*

The new plan must review this mismatch

6. Those people who do live in rural communities should be EXPLICITLY acknowledged and respected (in line with agreed statements in the County Development Board Plan)

Existing and indigenous business should be cherished and encouraged to participate in Environmental Management Schemes such as BS 14000.

The existing plan is not working. *We are still getting development that damages existing settlements with poor quality and inappropriate estates tacked on to towns and villages They contribute nothing and neither bring children to the local schools nor business to the local shops.*

The new County Development Plan should include assessment of applications for development against an agreed set of indicators as proposed in the National Spatial Strategy

7. Where an application for development is successful development controls and conditions should promote sustainable building practices such as wetland treatment beds and conservation of energy and water.

The present plan has no control over the quality of development beyond safety measures or meeting the needs of cars. Many needs of people are not met. In particular the use of holiday homes as places of permanent residents puts people into untenable buildings.

The new plan must review the development controls with this objective in mind.

References:

National Spatial Strategy. Department of Environment 2002

www.irishnationalspatialstrategy.ie

European Spatial Development Perspective (easily found on web)

Defining rural sustainability. www.thelandisours

We have stated on many occasions that the present plan is not working in the interest of the community or the environment. We here include four case studies from the County including one Metropolitan Area, one group of villages in north Dublin, under the shadow of Dublin and two rural villages

Case Study 1. Greystones

Strategic Planning Guidelines for the Greater Dublin Area

The next development plan must try to address the conflict which appears to exist between the County Plan and the Strategic Planning Guidelines for the Greater Dublin Area. By granting permission for developments in small rural villages the Council appears to be in direct conflict with the Guidelines, which have identified specific growth centres where the need for housing should be met. As a result An Bord Pleanála are applying the Strategic Planning Guidelines and overturning the council's granting of permission where such permission is appealed. This situation is unfair on both the communities involved and on the developers of the housing. The next plan should attempt to conform more closely with the Strategic Planning Guidelines in relation to where housing is to be located. In this regard it should be noted that the housing requirements of the County and of the Greater Dublin area can be met without diverging from the Strategic Planning Guidelines.

Overdevelopment

As a result of changes in the permitted density of housing and thanks to the desire of an Bord Pleanála to enforce the Strategic Planning Guidelines for

the Greater Dublin Area the town of Greystones is set to experience a doubling of its population size in a very short period of time. The scale of growth which will take place was never envisaged by the public representatives of the town when approving the 1999 plan which talked of a modest growth of 4000-5000 people. In addition much of this growth will take place without the improvements to infrastructure outlined in the County plan. This situation requires two responses in the next County Plan.

- To rectify the situation in Greystones there is a need for substantial Green belt and designated recreation areas around the town to ensure that it does not eventually merge with Kilcoole and Bray.
- A measured approach to rezoning in other Growth Centres to ensure that the level of development which ultimately takes place is in line with the Plan's objectives and that the Greystones experience is not repeated.

Development of Recreational Resources

With the likely significant increase in the population of Dublin in coming decades the demand for recreational space close to the city is likely to increase dramatically. This issue should be addressed in the County Plan in a number of ways.

- The designation of specific areas as having a scenic or recreational value (In this regard the long standing issue of the SAAO for Bray head should be made a priority in the new Plan)
- The development of existing resources to make them accessible to the public and to reduce the impact of recreational use on the natural environment
- Strict limitation of residential or industrial development where it might interfere with recreational development
- A clear acknowledgement (in line with the Strategic Planning Guidelines statement of Wicklow's role as an essentially rural county with its own Growth Centres and not as a dormitory for Dublin

Transport

Wicklow faces a number of major concerns with regard to transport.

- The rail link through the county is poor both in quality of service and in capacity to carry significant numbers of passengers.
- The principal road in the county (N11) is intended as a major link route for the country as a whole and is not intended as a commuter road to Dublin.
- Many minor roads in the county are in poor condition and their maintenance puts a great strain on the Councils resources.
- The principles of sustainable development demand that the county moves more and more towards public transport.

The Plan needs to have regard to these factors and respond in a number of ways.

- Development in the county, which does or *could* encourage commuting to Dublin, must not be permitted.
- There must be a realistic assessment of the capacity of the road and rail network and development must be restricted accordingly.

- Only as much housing development as is required by the regional guidelines (the Strategic Planning Guidelines) should be permitted. Housing development outside growth centres well served with public transport must be severely restricted.

Case Study 2 . Redcross

Every day our little villages in Ireland are becoming over developed. Instead of becoming too big too soon and consequently making huge mistakes would it not be better to begin small and overcome the obstacles as the development grows.

Infrastructure should be top of the list:- consideration for Social Amenities, widening and surfacing of roads, adequate water supplies and proper Sewerage Systems.

Take Redcross as an example

Redcross Village is a prime example. There are now two large Developments on each side of Redcross. One on the North side as you approach the Village from the R754 and the other on the West (a total of approx. 46 houses). These houses do not blend in with the village neither by shape or size. The ones on the north side are towering in between two long established residential cottages and are totally out of contrast. There are no trees, shrubs, not even a blade of grass to be seen, (only big stone walls and piers). Where are our road hedgerows gone?? “ Is this good Planning”?

The occupants of these houses have neither socially nor economically contributed to the village in any way. Taking into consideration the size of these developments very few support the local shops, Post Office or Primary School. Those who have families take their children back to their original School in Dublin or elsewhere, with few attending the Village N.S. In reality they only use their house in Redcross to sleep in and relax on the week - ends. Generally this is the case in most rural villages in Ireland.

Development of any size generates on average two extra cars per household, therefore Redcross would now have up to 100 more cars. This has a big effect on local community, whether you are a Grand - Parent, young man or woman, teenager or child your way of life has been affected. You no longer can take your daily or Sunday afternoon walk or cycle because of the danger of excessive traffic on our inadequate country roads that was never designed for such heavy traffic.

REDCROSS is a very Historical Village. In early 1900 it was almost self-sufficient. It had its own resident Doctor and Garda Barracks, two Bakeries,

Blacksmith, Farrier, Cobbler, two General Grocery and Hardware Stores, Pub, Post Office and two Schools.

Some of these sites are now derelict, could these not be developed instead of big clusters of houses on the outskirts of the Village?

Issues to be respected if small villages are to be zoned for further development:

1. DO NOT OVER DEVELOP.
2. Keep a periodical check on the Builders to ascertain that the conditions of the development are adhered to. (Conditions are too often broken with large developers.)
3. There should be a stipulation as to the size and cost of all houses.
4. N.B. There are local people some of whom have emigrated and would like to return home but they cannot afford to buy a house where they were born.
5. Priorities should be given to facilities before Development.
6. Keep the landscape green leaving more space for hedges, trees, shrubs and grass.
7. If development of Rural Villages were planned on a **SMALLER** scale it would help to maintain the lifestyle of Rural Living.

Case Study 3. Tinahely

The recent Local Area Plan for Tinahely assumes that the towns and villages in rural Wicklow should increase significantly in size. We do not necessarily share in this assumption. New housing is advertised on the basis of its being an easy commute to Dublin. This isn't true, and is contrary to good regional planning. Furthermore, there is in many villages, particularly in the south of the county, no viable public transport option. The nearest emergency medical care is in Loughlinstown, and the nearest ambulance is in Arklow. Garda services are part-time. We seriously question the wisdom, or even sustainability, of granting planning permission for significant increases in housing unless and until adequate infrastructure is in place.

A number of goals and aspirations are included in the various county-wide and area plans, with no apparent regulatory mechanism to make them happen. This is seen to be the case with sections dealing with the phasing of population increase in order to facilitate social integration of new-comers, guidelines which link new development with the provision of public open space (public parks with play areas for families), and sections protecting the physical heritage, such as hedgerow and landscape contour retention. Linkages must be made between aspirations and reality.

Enforcement action is weak, haphazard or missing, the worst example being protection of the public against illegal dumping (which is occurring in the all parts of the county). Variations and retentions granted in planning make a mockery of local government, with consequent alienation of trust on the part of the residents of the county.

Hedgerows and landscape features to be retained and included in planning provisions.

Mature or significant trees should be listed for protection.

A compulsory tree inventory should be lodged with the Council prior to any site development.

Lighting within the village should be of the least light-polluting type to minimise effect of light pollution on the surrounding rural landscape. Railway bridges should be included in the list of protected structures.

Strong active enforcement action against illegal dumping

Environmental impact study to accompany all relief road options, coupled with mitigation against noise and safety effects.

Hedgerow and mature-tree protection would significantly buffer the effects on the landscape resulting from increased building activity. This is not what is happening with developments today. Hedgerows are ripped out as a matter of course, and this should be stopped as a condition of planning permission being granted. Landscape features should be retained to the greatest extent possible. Access openings into existing hedgerows should be the minimum width for safe ingress/egress.

Street lighting and other lighting associated with new homes and businesses should be of the least light-polluting type. The effects of village lighting are seen in the rural hinterlands, and constitute a decrease in the scenic landscape at night. There are types of shielding available that limit the upward “spill” of light, as well as spacing, height, and wattage considerations. Technical advice can be obtained through consultation with the Irish Light Pollution Awareness Campaign (ILPAC) and other bodies.

The issues in Tinahely around the need for recreation reflect the need in many Wicklow villages today and one of the greatest concerns for the community at large is the provision of public open space and the development of a public park with a play area for families. This has reinforced our views that the County needs a Parks Department.

Case Study 4 The Federation of villages in North Wicklow

The 1999 County Development Plan has also failed villages such as Newtownmountkennedy and Kilcoole, which have to face huge demand for commuter housing. The current way of zoning has produced an unworkable plan that has zoned for 1000 houses in a completely unsustainable fashion yet attaches conditions to the development that either cannot be upheld in An Bord Pleanála or make development economically unviable and the Plan meaningless in terms of direction.

The community have their own ideas, as do many other communities in County Wicklow. There needs to be more attention to the ideas that evolve from local participation. A group in Newtownmountkennedy proposed a scheme linking local villages, again much lauded in the National Spatial

The restated commitment of Wicklow County Council to the principles of sustainable development and local community involvement is to be welcomed. If this commitment is to mean anything in reality, then Wicklow County Council must put in place the material and human resources necessary to implement this policy. Planning and development must also be based on innovative theoretical constructs that are capable of delivering these principles in the real world of people's lived experience. To date there has been a manifest deficit in this regard.

If development under this, or any other plan, is to be a success and not a disaster, it must be integrated and proportionate.

- Integrated in that permitted population growth must be controlled in parallel with the provision or expansion of the key infrastructural elements, social as well as physical, without which such growth will be distortion, not development, as will be a source of ongoing serious social problems.
- Proportionate in that account must be taken of the capacity of the existing community and social fabric to cope with the increase proposed. This obviously must be individually weighed in the case of each proposed development. Thus, for example, the impact of an additional 1000 houses in Greystones cannot be compared to the impact of an additional 1000 houses in Newtownmountkennedy or Kilcoole.

There is a distinctively new conundrum confronting contemporary planners and the success or failure of future development will depend on their ability to solve it. It is this: as our society becomes increasingly complex and sophisticated, people expect and demand a greater level of infrastructural facilities and services, and yet, such facilities and services require a minimum critical mass of population to justify and sustain them. How then to achieve this without in the process obliterating the very uniqueness and character of

the communities which they are intended to support? It is a new problem and requires a new solution. Old approaches and planning ideas will not work. New wine needs new skins.

We believe that the way forward is through the concept of a Federation of Villages. Instead of viewing each village in isolation and requiring it to be developed to destruction in order to be capable of attracting essential services, a number of villages would be considered within the matrix of a unified, integrated development plan, in an approach which would be not macro, not micro but medial. The villages in this model – for example, Newcastle, Kilcoole, Newtownmountkennedy and Kilpedder – would co-exist in an atomic structure and would *together* form a significant social and economic unit, a critical mass sharing the desired amenities. Together they would have a library, cinema, business parks, health centre etc which would simply not be viable in any one village and which would be distributed between the member villages of the Federation. This would enable each village to have a limited amount of development so as to retain its own individual character, which benefiting from the cumulative advantage of the sum of the various localized developments. Like cogs in a wheel, they would be independent but would function together for the common good of all.

Other key elements of planning, will now fall naturally into place around this model.

Transport.

A quality transport corridor between the constituent villages will be essential. This could be achieved by a closed loop system served by min/midi bus and involving private enterprise. It would also integrate with the schools service, which would at one and the same time address the very real impending problem for parents in the district whose children will attend the new school in Kilcoole (many do not have cars and those who do should be discouraged from using them) and provide an economic backbone for the service. Employers/employees could avail of the Dept. of Finance tax rebate scheme for tickets purchased. A regular (every 15 minutes) reliable service is perfectly achievable and would win ready support, reducing the already dangerous level of traffic on minor roads. Some of the major supermarkets could be approached to help fund the service in return for stops allocated adjacent to them. Cycle ways and footpaths should be an obligatory feature of all road developments in the Federation area, gradually extending the network. Congestion resulting from movements to and from work can be reduced by the operation of flexitime in businesses and intelligent cooperation between companies. Requirement for cooperation in these and other issues can be written into leases and freehold agreements as a condition of occupancy, along the lines of what is already standard practice in many housing developments.

IT Network

In the context of general development, a high speed IT link should be provided between the Federation villages. Linked to this would be a Citizens Information Centre with IT access facilities. This system could be managed

from the Federation library, wherever located. This basic element of infrastructure will be a sine qua non for developing the employment potential of the Federation.

Employment.

Primary Employment Types. Increasingly, the industry which will survive in Ireland is not the massive, materials heavy variety but information/intelligence based activities whose products are contained in small bulk and may even be exported by data transfer. The need is for modern, self-contained factory units on a human scale. The buildings would be located within a berm 6/8 ft high and surrounded with a belt of deciduous trees (and example can be seen in Shillelagh) which will create an attractive environment within the area and act as a visual barrier and sound absorber from outside. A business estate of this kind would be developed in each of the Federation villages. Examples of the sort of industries which should be targeted include Internationally Traded Service activities, data processing, technical and consulting, healthcare, media recording, publishing. The quality IT link would also attract back into active presence in the community, significant numbers of people who currently commute to Dublin daily but who could work from a home or local base, given data links of sufficient quality. This would both have a positive quality impact on the local areas and would help to alleviate the chronic traffic conditions on the N11.

Secondary Employment Types. These would be in the form of cells of small enterprises housed in various types of workshop, office, studio, gymnasium, laboratory etc. A series of individually designed structures melting into the landscape of the villages. The regional headquarters of Coillte serve as a good example.

A key principle of sustainability underpinning employment development is that work should be brought to the people and that this is by far more efficient and effective than bringing people to the work. Every job created which requires a person to travel outside of the Federation transport loop e.g. more than one mile on the N11, should be considered a failure.

Professional, Retail and Business.

These enterprises follow centres of population. A Federation of Villages will have the capacity to attract what one village could not attract. Main Street businesses will combine into business courtyards with coffee shops, boutiques and special interest enterprises.

As all these enterprises are within and amongst the people, they will become an integral part of the fabric of the villages. The human scale will promote loyalties both for and from the enterprises. The village unit, in retaining its human scale, will sustain an atmosphere of community which will militate against vandalism, absenteeism and demoralization which are feature of

larger depersonalised settlements and which are major negative factors for business.

Political/Administrative.

To fully realize delivery of Wicklow County Council's commitment to Agenda 21, consideration must be given to a structure within the Federation to promote ownership and active participation in the living concept by the members of the constituent villages. This could take the form of a Federation "Council" which would coordinate activities in relation to matters of mutual interest and concern and have an overview and advisory function vis-à-vis WCC in relation to Federation issues. Nominees to the Council would be determined by a democratic selection process within each village and would serve a fixed term, in accordance with the "Council's" constitution and terms of reference.

New wine, new skins. The problems and dilemmas confronting today's planners and administrators are new, complex and urgent. They will not be solved by old thinking or historically workable approaches, which are increasingly proving inadequate and leading to a dangerous alienation between governors and the governed. If Wicklow County Council is to have any hope of succeeding in this area, it must think and act outside the box. This document is offered in a spirit of positive cooperation to facilitate WCC in its task. Wherever each of us is coming from in terms of interests, expertise and responsibilities, we all meet at one irreducible fact – whatever solutions are adduced for the key problems referred to above, it is vital to the interests of all of us that they succeed.

3. Urban Design

3.1 Wicklow Planning Alliance reiterates its position that the Council should be using an Architect with urban design experience to review applications for residential and commercial developments. It is suggested that there may be some benefit in appointing a panel of suitably qualified people from the County to assist in the critique of development applications as regards urban design.

As is stated in previous sections of this submission it has been established that the best means of control is by the use of agreed criteria to evaluate development proposals.

Thus any application should consider urban and village design under a number of headings including

Character

Continuity and enclosure

Quality of the public realm

Legibility

Adaptability

Diversity
Permeability

The parameters are well rehearsed in such documents of the Urban Design Compendium that also elucidate the economic value of good design. However there are also social and environmental benefits to good design. The aim is to facilitate the development of communities, fostering a sense of identity and trust that may lead to a greater sense of citizenship essential to the well being of any democratic political system.. This requires that developments are pedestrian friendly, safe and attractive, This has not been the experience to date in the design of developments in towns and villages in County Wicklow.

We note that the latest Plan for the Wicklow Environs uses the design approach as in the UK department of the environment document Places, Streets and Movement 1998 , abandoning the formula referred to in the last County Development Plan from the An Foras Forbarthais Residential Site Development Works for Housing Areas and Geometric Design Guidelines. This is of course a pre requisite as the existing development controls are more suited to building estates fit for a car but not fit for humans however clearly stated objectives for design would also need to be stated.

3.2 This section will also need to deal with the issue of **dark skies**. Again there are many examples of how these objectives can be included in a County Development Plan .The following is one example of suitable wording for the Plan:

Light pollution is caused by excessive artificial light being directed into the night sky. Outdoor lighting can cause intrusive and unnecessary pollution in both urban and rural areas, although it is in the countryside that light pollution is most noticeable. Illuminated advertisements, floodlit sports facilities, security lights and streetlights can all contribute to light pollution. Excessive light in the night sky is visually intrusive and is also a significant waste of energy. The visibility of the stars is much reduced by light pollution. Light pollution can disturb people's sleep and affect local ecology.

It is therefore important in the interests of visual amenity and energy conservation that light pollution is prevented and where possible reduced. Through good design of lighting, the reduction of light pollution should not conflict with the principles of crime prevention and safety.

The County Council will seek to minimise light pollution. Details of any lighting scheme required as part of any new development shall be submitted as part of the planning application. Where appropriate, the local authority will use conditions to limit the hours of illumination. Conditions will be attached to any floodlighting approvals given for evening usage of sports facilities such as pitches, tennis courts and golf driving ranges to control light intensity, light spillage, and hours of use.

Applicants will be expected to demonstrate to the local planning authority that:

- (a) *the lighting scheme proposed is the minimum needed for security and working purposes;*
- (b) *that it minimises potential pollution from glare and spillage through careful siting and appropriate shielding;*
- (c) *in the edge of town and village locations, and in rural areas, landscaping measures will be provided to screen the lighting installation from view from the neighbouring countryside areas, and;*
- (d) *there will be no dazzling or distraction of drivers using nearby highways.*

This will apply particularly to:

- (1) *residential and commercial areas;*
- (2) *areas of nature conservation interest;*
- (3) *areas whose open and rural landscape qualities would be affected.*

3.3 The hierarchy of space within an area is also important and the designation of space for active and passive recreation. The Wicklow Planning Alliance seek the instatement of a **Parks Department** within the Council with dedicated funds to co-ordinate and promote the establishment of parks in towns and villages.

Rural villages no longer provide adequate opportunities for children to play safely, with increased volumes of traffic on country roads making them unsafe for walking or cycling and poor urban design with unsupervised land away from passive surveillance making parents reluctant to leave children alone. Play parks will become an essential part of healthy urban living as villages expand with residential development.

Other aspects of recreation that need to be addressed in the County Development Plan are

1. The need to establish links between the Wicklow National Park, Bray Head, the Coastal Walk.
2. The need to pursue the establishment of an SAAO for Bray Head
3. The need to incorporate **rights of way** (as other Counties have done such as Dun Loaghaire) We understand that the Council have already prepared a document on existing rights of way which the public have not seen. We would support the policies of Keep Ireland Open in this regard.
4. The establishment of comprehensive **cycle routes** throughout the County would be a valuable development in County Wicklow and should be pursued.
5. **Speed limits** on rural roads are likely to become a big issue in the next while. On investigation it appears this is something that could be taken on board at County level and work should be initiated to assess the needs on roads within the County. In general speed limits on rural roads should be significantly reduced.

6. Along with the above, the Wicklow Planning Alliance propose that the County should introduce the concept of ‘**quiet roads**’ as is practiced in Jersey and other regions. Some roads could be sensibly be designated as quiet roads, wherein the speed limit is set at 20mph thus facilitating a safe environment for walking and cycling without actually banning traffic.
7. **Control of advertising in rural areas** is not adequately addressed in the current plan. In particular criteria should be included that would prohibit large plastic advertising structures related to petrol filling stations as these contrast poorly with a rural environment.

Section 4. Heritage

As proposed in the introductory sections of this submission it is vital that the new Wicklow Development Plan should set out a Vision Statement.”

In relation to ‘Heritage’, this should specify the meaning and ‘value’ of ‘heritage’ so that specific objectives and future actions can be measured against this understanding. Such specification requires the following questions to be addressed:

1. What is ‘heritage’?
2. Why is it of value?
3. What relationship do we require between our ‘heritage’ and the creation of our current and future environments?

‘Heritage’ can be understood as our ‘collective inheritance’ as a community in a particular place. This involves both tangible and intangible dimensions. ‘Heritage’ both shapes and is embedded in the culture of the people. It plays a significant role in enabling the development of shared identity among people, a sense of belonging, of shared history and experience stretching back in time. It is expressed through and in the natural and built environments, and through all forms of human expression.

Those elements of ‘heritage’ which have been preserved have a particular significance in recording the story of the community and is therefore of value in helping us to define who we are and what we want to be. The existence and valuing of our ‘heritage’ allows us to respect ourselves and therefore to have the capacity to respect others. Our heritage represents our ‘uniqueness’ as a people and a place. It is our link to each other, our bridge between our past, present and future – our sense of continuity. As such it is fundamental to the development of healthy community life and the generation of constructive social capital enabling us to contend effectively with the challenges with which we are presented.

Our 'heritage' is therefore irreplaceable and non-renewable. It requires preservation, conservation and active support through the adoption of appropriate, integrated public policies, strategies and resourcing in order to maximise the value of our 'heritage' both for today's generation and tomorrow's. Because our 'heritage' reflects our uniqueness, it has economic significance and value. Co. Wicklow's 'heritage' has been a significant feature in attracting tourists since the nineteenth century, and has contributed to the development of the film industry within the county. It is not a 'dead' thing, but a living and developing dimension to life in Wicklow. We need to build on the past and on our heritage as a community. We need to consider our heritage with a future perspective, as a valuable partner, rather than an enemy of development.

We commend the establishment of the Heritage Forum and trust that this may be developed as an effective and efficient medium to establish clear objectives for heritage.

Section 5 Tourism

In our group discussions it became clear that it is our belief that tourism should not be isolated from the needs of the resident population. If we stay faithful to the green, garden image of County Wicklow and provide appropriate recreational facilities for residents, then tourism potential will follow in a more sustainable and economically viable way. Recreation has been dealt with elsewhere and we would commend the Planning Department to the submission by Bob Galvin in Bray however we would also like to contribute a view on tourism as part of the rural economy.

The economic climate has become more difficult for small business particularly in rural areas and for those in the tourism enterprises. The last five years has seen most businesses invest heavily in modernising and upgrading their product. Established rural businesses are an asset and a resource that must be acknowledged and supported by the council.

The capital investment required to establish a viable business, particularly in the tourism trade, is now so high, that it will be very difficult for new, indigenous rural businesses to establish.

It would be impossible to re-establish those already in existence. They are for the most part, family run often in their second generation. They have developed specialised expertise, and have unique character, which is the lifeblood of Irish tourism.

In order to compete with the global market, these businesses will have to be allowed to develop and consolidate. The single most important assistance and facilitation that rural businesses require from the county council is planning permission to upgrade and consolidate. As with all develop proposals, the best and most transparent means of decision taking will be where clear criteria have been established for rural development by which proposals can be evaluated. 15 criteria have been established by the English Group 'The

land is ours' as referred to earlier in this submission and we would recommend that work be undertaken by the Planning Department to establish the suitability of such a system in the Wicklow context.

Section 6 Waste

The Wicklow Planning Alliance submit that it is beholden on the Council to designate a suitable site or sites for landfill in the County, other than Ballynagran which has been rejected by the community, the Councillors and the Courts as a suitable site.

Separation of the waste streams is essential to the proper management of this resource.

Whilst the Waste Management Plan may deal with many issues, this must be properly integrated into the County Development Plan in order that there is no conflict of interest here. For example all new housing should be designed to include facilities for the storage of recyclables and for composting. Similarly, the reduction of waste must be seriously considered in those development controls that deal with construction methods,

There would also be a need to refer to waste management in the retail section with regards to their ability to manage the extra waste streams created through their business.

Section 7. Water

Management of water has always been is one of the core responsibilities of the Sanitary authorities. The legislation for water management is very wide ranging. This has been consolidated under the EU Water Framework Directive.

The purpose of the directive is to establish a framework for the protection of inland surface waters transitional waters, coastal waters and ground water which:

1. Prevent deterioration and protect ecosystems.
2. Promotes sustainable water use
3. Aims at enhanced protection and improvement.
4. Ensures the progressive reduction of pollution of groundwater and prevents its further pollution.
5. Contributes to mitigating the effects of floods and droughts.

The directive entered into force in 2000. It will be transposed into the legislation this year. The timeframe for its implementation is from Dec2000 – Dec 2015.

Wicklow Co. Council will inevitably be part of one of the Competent Authorities.

The Timeframe for the directive straddles this Co. Development plan.

This Development plan should begin the incorporation of the framework directive into the management of the county.