



# Wicklow Town - Rathnew LAP Submission - Report

<b>Who are you:</b>	Private Individual
<b>Name:</b>	Judy Osborne
<b>Email Address:</b>	[REDACTED]
<b>Reference:</b>	WRLAP-130645
<b>Submission Made</b>	September 26, 2023 1:09 PM

## Topic

Regeneration of Communities & Places - Healthy Placemaking - Urban Design - Opportunity Sites in Wicklow Town - Rathnew

## Submission

see attached document

## Topic

Economic Opportunity - Tourism - Shops & Services - Community Facilities

## Submission

see attached document

## Topic

Heritage - Biodiversity- Green infrastructure- Climate Action- Energy

## Submission

see attached document

## Topic

Infrastructure - Sustainable Movement - Transportation

## Submission

see attached document

## Topic

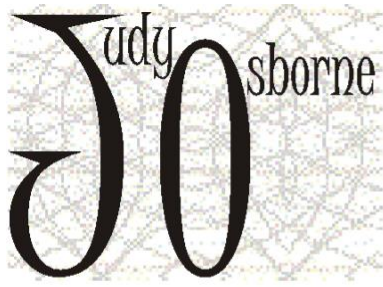
Other topics for you to have your say on! - Environmental Assessment - Plan Implementation -Plan Delivery

## Submission

see attached document

## File

Wicklow LAP pre-draft submission.pdf, 0.62MB



MSc Spatial Planning  
Proper Planning & Sustainable Development

Glasheen  
St Patrick's Valley  
Wicklow Town

tel: 0404 69698  
mobile: 086 36 99 575  
judydaleosborne@gmail.com

---

Pre-draft submission to Wicklow Planning Department regarding the Wicklow and Rathnew Local Area Plan

26<sup>th</sup> September 2023

So, we are now considering how to plan for a sense of place after two decades of housebuilding in Wicklow which has now reached the target for accommodating new residents as required in national policy. That seems to be the wrong way around but we are where we are and I have put together a list of my thoughts from living in the town for the past 30 years.

When the last Local Area Plan for Wicklow was being developed (before 2013) climate change was not top of the agenda. That's a big change and local government now has an important role in implementing policy. That's not the only issue but it does underpin all aspects from the plan.

It is over 32 years since the first major Intergovernmental Panel on Climate Change report in 1990 predicted the impacts of emissions are climate change. Annual Green House Gas (GHG) emissions have increased yearly to surpass a level that is 60% higher than in 1990. The direction of travel is along a trendline with a trajectory towards +3 °C to +4 °C warming by the end of the century.

The extent of Green House Gas emission reductions is crucial to our ability to cope with climate change, and while some impacts are now inevitable into the future, staying within certain limits is vital.

Notwithstanding the overwhelming challenges ahead, we can avoid failure, tackle the issue honestly and take different, meaningful, and relevant actions over the coming 30 years and local authorities must play a major role in implementing climate action

From deciding on small planning applications to guiding local authority development to standing up in a court of law, the development plan is the means local authorities use to require, encourage, request, and influence sustainable development and climate action in their areas.

The Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017) included a Specific Planning Policy Requirement for local authorities to:

*“Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts)” [12, p. 2].*

The research undertaken has demonstrated that development plans that tackle the climate issue are the ones that clearly, succinctly, and effectively document the local aspects of climate action facing that local authority area.

Baseline emissions profiling is a major part of the above and I trust this will now be undertaken in Wicklow and Rathnew Local Area Plan.

1. Local Authority Climate Action Plan Guidelines state that *local authorities have a key role in delivery of active travel programmes by expanding walking and cycling facilities in their functional areas and enhancing the public realm to increase safety and connectivity for pedestrians and cyclists by retrofitting existing infrastructure and providing new infrastructure.*

*Local authorities can facilitate the integration of safe and convenient alternatives to the private car into the design of local communities in line with Transport-Orientated Development principles and by prioritising walking and cycling accessibility to both existing and proposed developments.*

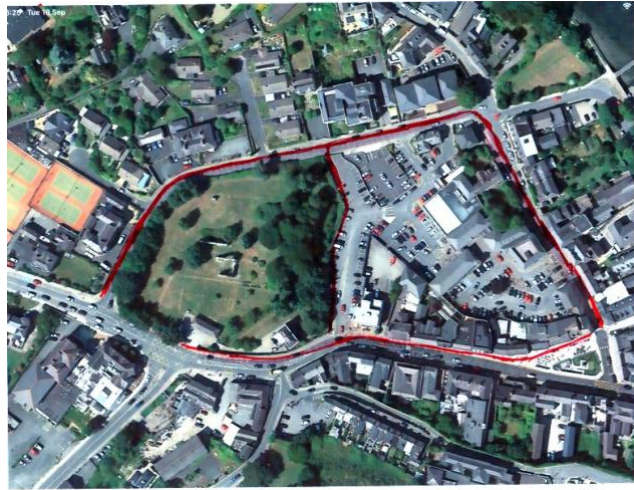
The objective to significantly improve the walkability of the area ticks all the boxes.<sup>1</sup> It encompasses the need to consider traffic plans and even speed limits. A huge opportunity was missed in the recent review. 40kph is far too fast to make walking comfortable through our main street. This has been recognised in the recent National Speed Limit Review<sup>2</sup> which recommends 30kph in all urban areas and I suggest that this should apply for around 2k on all the access roads to the town centre.

2. It is also self-evident that traffic in the town will continue to increase as, despite disingenuous transport reports in various planning applications, most commuters will continue to be car dependent and promises of more trains and bus lanes will only scratch the surface of demand. In response to this we need to find and allocate more car parks around the outskirts of the town. The car park behind the Grand Hotel is an obvious location if that could be zoned in some way to ensure the opportunity is not lost if an arrangement with the owner could be achieved. The planning permission for a 4-story car park on council land beside the AIB bank should also be reviewed. The design was appalling and not suitable for an historic town but the location is good. The whole semicircle between Wentworth Place and Abbey Street is already almost all car parking space and if the area was zoned as an Area Action Plan it might be possible to reorganise the space to maximise the parking opportunity. Did anyone ask if Supervalu were planning to redevelop their town centre store any time soon? See plan illustrated below.

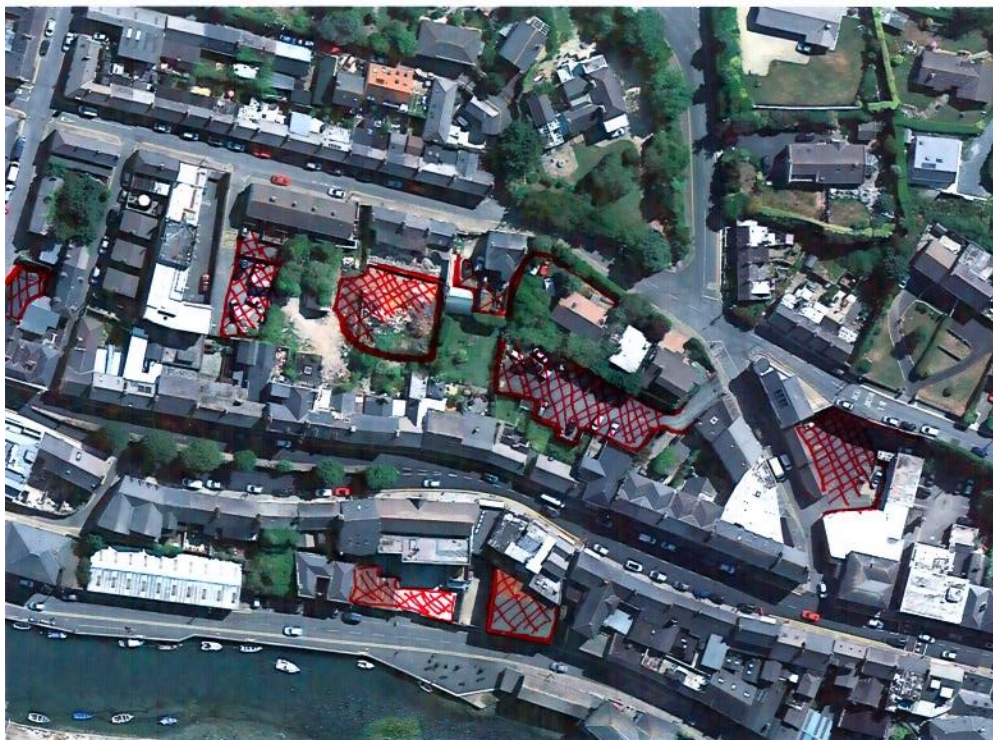
---

<sup>1</sup> see work of Kevin Leyden. Galway including 'Walkable Neighborhoods' Leyden, K.M. and Hogan, M.J. and Dâ€™Arcy, L. and Bunting, B. and Bierema, S. (2023) 'Walkable Neighborhoods'. *Journal of the American Planning Association*,

<sup>2</sup> <https://www.gov.ie/en/publication/012b3-speed-limit-review/>



I understand that the town engineers have been looking at possible opportunities around the Gaol, which would be good for that end of town but I would recommend that the planning team actually walk around (not just look at plans) and ask for access to see for yourselves the back land on the southeast side of Main Street. Having had the good fortune to have access myself I was interested to see the waste of space in the centre of town and suitable zoning might help.



(This is indicative, and does not purport to be strictly accurate. Obviously, the land highlighted is private and much of it already car parking however it could be more rationally organised.)

If this is done it would be possible to reduce the amount of parking along Main Street, saving some space for disabled or older people's parking and some loading. The paths could then be widened.

It should be possible to share road space between traffic and pedestrians if everyone understands that pedestrians have priority. It would be difficult to exclude ALL traffic from

Main Street but the walking environment must be improved if the shops are to remain attractive to shoppers.

The National Planning Framework policies are structured under National Policy Objectives which were developed as a result of extensive analysis and consultation and set a new way forward for regional and local planning and sustainable development policy in Ireland.

*NPO 27 Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.*

*NPO 64 Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.*

3. Improving cycling routes is particularly important for school children. The school bus service is completely inadequate to the need and the whole concept of cycling now much more accepted now but it just isn't safe here. I am aware of other submissions about ways that cycle lanes could be implemented and leave that to others, with my support.

Taking school traffic off the roads would make a significant difference to current congestion.

The Energy Policy and Modelling Group of the MaREI Centre, Environmental Research Institute and University College Cork has found, for example, that switching a 4 km car trip to school with walking, cycling, or scooting can save 200 kg of CO<sub>2</sub> each year; and by cycling all trips of less than 4 km rather than driving, national emissions from passenger transport could be cut by 9%

4. Reducing the through traffic would also leave more space to consider planting suitably chosen trees in Main Street to provide shelter from both sun and rain, both of which will be getting more extreme even in the near future. Policies recommending 10% tree canopy should be included.

5. Future climate change will also result in a changing coastline after erosion and rising sea levels take their toll. Very careful consideration must be given to the only area left for development...along the coast road currently zoned as a 'vibrant urban quarter'. Whilst there may be an opportunity for well-designed MIXED development, avoiding heavy/dirty industry, there is also a dearth of open space for an expanding community of 20K residents. The Murrough is becoming a degraded environment. It is barely a pleasant walk and certainly not worthy of promoting for tourism. A narrow path between rock armoury and derelict industry and industrial fencing protecting the railway is not something we can be proud of. A Greenway will not change that and if cycling increases, (as in Waterford) it may not be good for walkers.

**Much of the land in this area should be considered for a public park.**

6. It will be important to get green infrastructure adequately protected with the following aspects proposed in the Planning Regulator's guidelines<sup>3</sup>:

- *Develop a varied Green Infrastructure network to complement wider ecological systems.*
- *Identify features linked to waterways, woodland, parks, grasslands and other areas of potential.*
- *Develop buffer areas to facilitate protected species and biodiversity.*
- *Leverage the role of tree planting, woodlands, peatlands and other habitats for carbon sequestration.*

I note that several rights of way, previously proposed for the County Development Plan, were rejected by the council. In order to improve the opportunity for walking (for physical and mental health and to bring people closer to nature in the hope they may then better respect it) I propose new objectives be included in this Local Area Plan<sup>4</sup> as follows:

*To identify, in a logical and sequenced way, existing public rights of way in relevant areas of the County and to investigate the creation of new public rights of way by taking the following steps within two years of adoption of the Plan:*

- *Identify and map those areas within the County which have the potential to give access to mountain, lakeshore, riverbank or other places of natural beauty or recreational utility;*
- *Examine the identified areas for existing access routes;*
- *Investigate whether existing access routes are public rights of way and where there is an understanding that a public right of way may exist, undertake the necessary steps for consultation set out in the Planning Acts;*
- *Once verified, map and identify those public rights of way in the Development Plan;*
- *Where public rights of way do not exist and access would be appropriate, consider using public rights of way agreements available under section 206 of the Planning and Development Acts;*
- *Where public rights of way agreements are not possible, consider the use of compulsory purchase orders under section 207 of the Planning and Development Acts.*

In particular there is an opportunity to

- i) reinstate access from Rathnew/Tinakilly housing estates to the Murrough Coastline, a similar route to the former Pedestrian footbridge from Tinakilly House over part of Broadlough Lake
- ii) continue the existing PROW 4 along the rear of Seafield housing estate on an existing laneway.

---

<sup>3</sup> OPR Case Study Paper CSP05 Climate Action and the Local Authority Development Plan

<sup>4</sup> As adopted in the south county Dublin Development Plan

7. Wicklow Town is blessed with a couple of sites in the town centre which should be protected at all cost. The Abbey Grounds need to be zoned for community use and the tennis courts should be zoned for Sport to ensure future owners do not seek to develop other uses if it is zoned for mixed development. The North Quays might be suitable for development if carefully conditioned and including the renovation/reuse of the Wire Ropes building, which should remain a protected structure.

8 The need for dedicating land use for the community would be better recognised if suitable mapping identified public open space. Such mapping is also needed to identify current green infrastructure such as trees, hedgerows, quality soil that should be reserved for farming or community gardens. Generally, there is insufficient baseline data currently available, particular for the public to see. Promises of monitoring are meaningless without base line data to compare progress or lack of it. It is imperative that resources are directed to producing this data.

This also ties in to the need to produce 3D models to aid appreciation of what currently exists and what can be protected or developed. This is now quite possible for a modest sum.

Rob Kitchen, Prof. at Maynooth University [REDACTED] has developed a printed 3D model of Dublin. when asked about the costs he replied:

it depends on the size of the model. Ours is 3.5m by 2m, which is quite large. It took a couple of months for it to be printed. Our Cork model took longer as the hills mean many more layers and thus time. It cost c.€15K (might be cheaper now - ours was printed in 2020), which is a half to a third cheaper than the quotes we got for a model made using wood or other material. You could scale it for cost. It certainly gets people talking. It's relatively straightforward to project LAP kinds of layers onto it (though you do need a projector with high lumens and a wide-angled lens). If you're ever in Maynooth and want to look at it led us know and we can arrange.

9. There are other matters of urban design in the new draft Sustainable and Compact Urban Design Guidelines.<sup>5</sup> Mixed use within housing estates is strongly recommended. All estates should include digital hubs and other work spaces along with a few shops and services such as doctors surgeries and dentist etc.

With higher densities and smaller gardens, it is increasingly important to include public open space, either active or passive use. Pocket parks etc. designed for all ages. This will be particularly important if society moves to more working from home, which would be

---

<sup>5</sup> <https://www.gov.ie/pdf/?file=https://assets.gov.ie/268831/c529966a-6a97-482c-a12c-b31c4ec7b371.pdf#page=null>

isolating and very bad for society unless there are parallel opportunities for community activities.

With smaller gardens we also need to reserve space for allotments and community gardens as food security will, without doubt, become an issue within the period of the next plan.

Various matters of urban design are covered in the OPRs Case Study including expanding district heating and I would like to see an objective to work towards a community energy grid for the town as currently in place in Tallaght<sup>6</sup>. This award-winning project aims to produce energy from low carbon sources within the community for use locally. I would also continue to ask for washing lines to be provided in each garden to be required as a planning condition to reduce the use of dryers and unnecessary energy demand/carbon emissions.

10 We need objectives to include housing suitable for older people. This should be included in all residential developments in the same way that creches are included. In particular I expect there will be pressure to rezone the land opposite Lidl for residential development. The land is currently zone for Education and Community Use. Changing this zoning should be resisted at all cost. It is eminently suited to the development of a small-scale nursing home with independent living accommodation in the grounds for older people.

11. It is necessary to pay far more attention to SUDS with increasingly intense rainfall patterns. Our may streams and rivers running through the area cannot be used as drains as they are now. Suitable objective can be included to ensure better enforcement.



Outfall for surface water into the Marlton Stream on a rainy day

12. Of course all this is academic as the town will reach its target population (once planning permissions are built out) and there's little or no space left. However, population targets may increase with the next National Planning framework so we'd better be prepared.

---

<sup>6</sup> <https://www.seai.ie/case-studies/tallaght-community-energy/>



13. I note that the previous Local area Plan for Wicklow had an objective 14.2.3 for a statutory 2-year review. Section 15(2) of the Planning and Development Act 2000 (as amended) states that the manager shall, not later than two years after the making of a development plan, give a report to the members of the authority on the progress achieved in securing the objectives of the plan.

It appears that has not occurred but in order to ensure compliance in the following years it will be important to adopt appropriate base line data so as to assess progress in line with indicators. The purpose of KPIs is to provide for accountability at operational (local authority) and sectoral (local government) levels and national level (national government).

The Local Government Climate Action Key Performance Indicators report includes a list of potential climate action key performance indicators (KPIs) for the local government sector, which local authorities should consider using in key thematic areas, including transport e.g., kilometres of permanent segregated cycling network, percentage of local authority vehicle fleet which are zero emissions.

Other indicators might be

- i) how many parks have been taken in charge?
- ii) How much fertiliser is used in public areas,
- iii) How much is recycled, are civic amenity sites productive.
- iv) How many of us can access green space?
- v) Are the Broadlough, river and beaches in good condition
- vi) How many houses are built in flood zones?
- vii) What is the % of tree canopy?

END