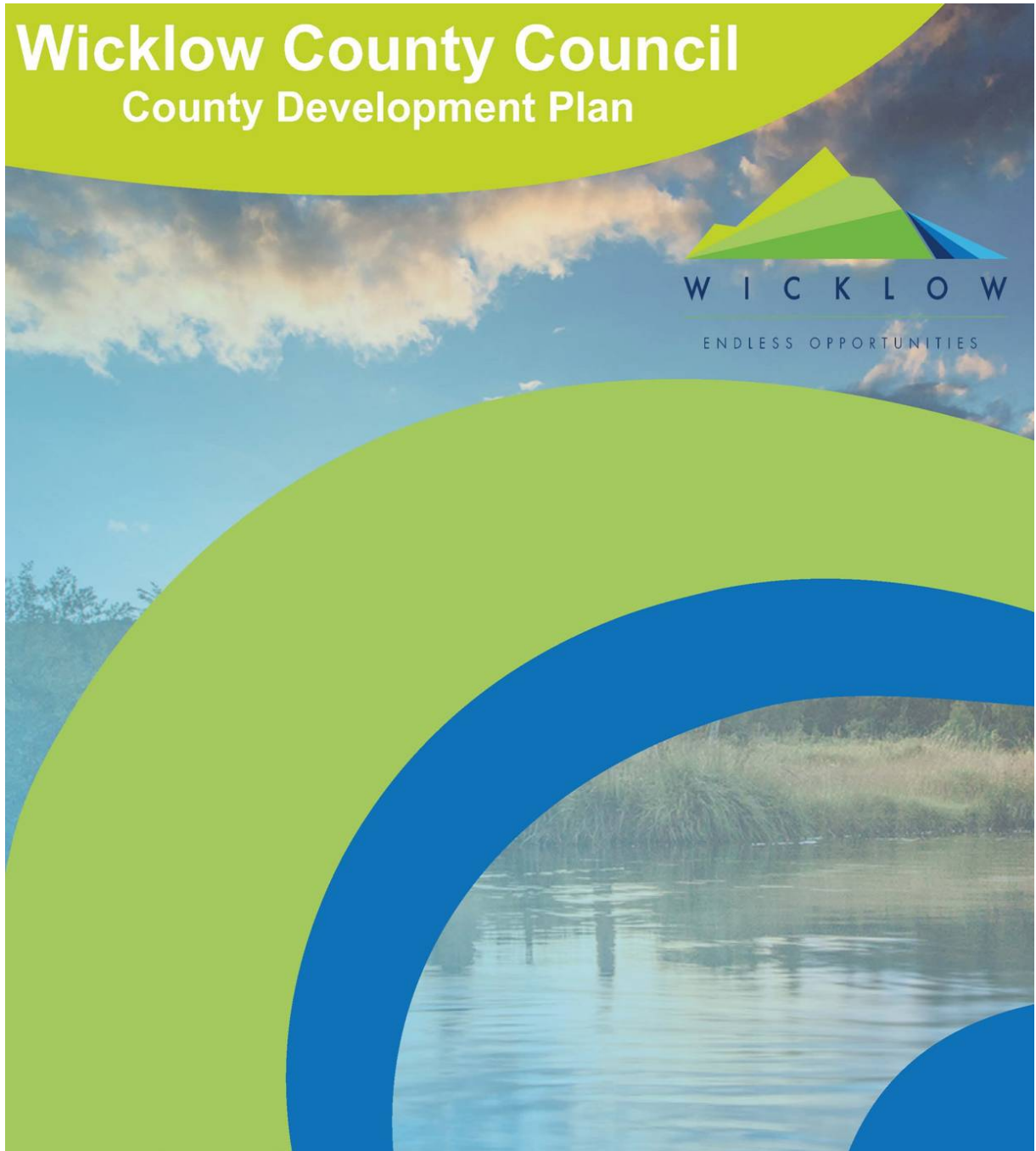


Wicklow County Council

County Development Plan



SECTION 3

ASSESSMENT OF SUBMISSIONS

Section 3.1	Prescribed bodies (Group 1)
Section 3.1.1	Office of the Planning Regulator https://consult.wicklow.ie/en/submission/ww-c2-241
General	The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable work your authority has undertaken in the preparation of the draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context. In particular, the inclusion of Strategic County Outcomes in the draft Plan which are informed by the NPF, the RSES and key issues arising in submissions from members of the public is commended and this approach assists in demonstrating consistency with the national and regional policy frameworks in a clear manner.
CE Response	Noted
General	Subsequent to the publication of the draft Plan you will also have been notified of the publication for consultation of the draft <i>Development Plans Guidelines for Planning Authorities</i> by the Department of Housing, Local Government and Planning (August 2021) which will also provide clarity and assistance to planning authorities in the completion of development plans, notwithstanding that the Guidelines are in draft form.
CE Response	Noted
General	Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions. Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation. A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.
CE Response	Noted. Detailed response in sections to follow.
Overview	The draft Plan is being prepared at a crucial time following the preparation of the National Planning Framework (NPF) and the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (RSES), which seek to promote the rebalancing of regional development in a sustainable manner. The draft Plan has proactively embraced many of the challenges and opportunities identified in the NPF and the RSES including for the Dublin Metropolitan Area Strategic Plan (MASP) by directing future housing and economic growth to the MASP, key towns and larger settlements with strong policy commitments to compact growth, regeneration and economic development. In particular the plan-led approach to the key development areas within the MASP, which includes Bray and Greystones, demonstrates the planning authority's commitment to the Regional Policy Objectives (RPOs) and guiding principles for growth of the Dublin Metropolitan Area which are set out for the MASP in the RSES. The Office further commends the planning authority for the approach to align with the key principles in the RSES which establishes Healthy Place making, Climate Change and Economic Opportunity as over-arching cross cutting themes that inform and shape all aspects of the Plan. The Office has, however, identified a number of areas which require further consideration in order to more fully align the development framework for the county within the current national and regional policy context. In particular, the population and housing targets in the draft Plan require review to ensure a greater level of consistency with the <i>Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020)</i> and a more sustainable level of growth for Newtownmountkennedy and Rathdrum consistent with National

	<p>Policy Objective (NPO 9). The settlement hierarchy requires review in relation to the number of tiers and the designation afforded to some small rural nodes or clusters which includes the approach of providing settlement boundaries around areas of ribbon development that are removed from services. In respect of economic development, the Office has concerns regarding the policy support for out-of-centre retail development in Baltinglass and Rathdrum, and a number of the employment zonings along the N11 corridor in terms of their consistency with the <i>Retail Planning Guidelines for Planning Authorities (2012)</i> and <i>Spatial Planning and National Roads Guidelines for Planning Authorities (2012)</i> respectively. The planning authority will also be aware that the Office's evaluation of the plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act in relation to climate change. The definition of appropriate settlement boundaries, the zoning of lands for specific uses (section 10(2)(a) of the Act), and the establishment of guiding policies for smaller towns and settlements are vital tools available to the planning authority in promoting effective integration of land use and transportation policies and addressing the requirements of section 10(2)(n).</p>
CE Response	Noted. Detailed response in sections to follow.
<p>Core Strategy and Settlement Strategy</p> <p>Housing and Population Targets</p>	<p>The Office considers that the total County population projections in Table 3.1 (Population Targets Co. Wicklow 2026, 2031) of the Core Strategy are generally consistent with the population prescribed for the County in the RSES and the NPF, as adjusted according to the transitional arrangements allowed for in the NPF Implementation Roadmap for headroom and NPO 68 of the NPF.</p> <p>Notwithstanding, Table 3.1 and most of the tables in Chapter 3 (Core Strategy) do not include figures for the end of the development plan period which will be 2028 rather than 2027 and these are required to demonstrate transparency and consistency.</p> <p>The planning authority is commended for preparing housing demand figures and apportioning these across the various settlements / tiers in the settlement hierarchy. The Office notes that the housing demand from 2021 up to 2026 is for 4,981 units, and thereafter it is assumed that housing demand will be delivered evenly up to 2031 to a total target of 11,126 or 14,946 units if the MASP allocation to Bray is included.</p> <p>However, the actual housing demand figure for the plan period (assumed to be Q3 2022 to Q2 2028) is unclear from tables 3.2, 3.3 and 3.4. Further, tables 3.3 and 3.4 appear to provide figures for 7 years (combined) rather than 6 years.</p> <p>As such, the planning authority is required to review its HST figures making the necessary adjustments to the figures in the core strategy tables, and clearly setting out the basis for the housing supply targets for the plan period. This is particularly important given the added complexity of the adjustments for your county under the Housing Supply Target Guidelines and the additional allocation to Bray under NPO68 (Dublin MASP).</p> <p>Recommendation 1 - Housing Supply Targets</p> <p>Having regard to the section 28 <i>Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020)</i> including Appendix 1, and <i>Circular Letter Housing 14/2021</i>, the planning authority is required to:</p> <p>(i) revise Core Strategy tables 3.3 and 3.4 to provide Housing Supply Target (HST) figures calculated in accordance with the methodology for the plan period, and review the allocations for settlements over the plan period in line with the overall HST for the county; and</p> <p>(ii) consider consolidating and reducing the number of tables with population and housing target figures in order to provide for greater clarity and transparency, including providing population projections for the end of the plan period.</p> <p><i>[Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021)]</i></p>

	<p>(Appendix A) provides a useful reference and illustrative example of a core strategy table.]</p> <p>The planning authority may also consider it necessary to review the draft Housing Strategy and Housing Needs Demand Assessment in light of the finalisation of the Housing Supply Target in accordance with the methodology as per (i) above.</p>
<p>CE Response</p>	<p>It is accepted that the Core Strategy, the Housing Strategy and associated tables should be amended to reflect the development plan period, which is to Q2 2028 (assuming the plan is adopted in Q3 2022) to more fully accord with the NPF and RSES.</p> <p>It is agreed that the number of tables set out in Chapter 3 should be streamlined, with additional tables and explanation regarding the population and housing targets to be set out in the revised Housing Strategy. This will allow for easier reading and understanding of the key elements of the Core Strategy, with additional detail and data available for those interested in the Housing Strategy.</p> <p>It is not recommended at this time that the draft development plan be amended to include a revised Core Strategy table that fully accords with the illustrative example shown in the Draft Development Plan Guidelines (Aug 2021) as these guidelines have not as yet been finalised and it is possible that revisions to this suggested table may still come about. However, revised tables that show a core strategy overview / syntheses as suggested in the guidelines is recommended.</p> <p>These proposed amendments are set out in the attached documents 'Proposed Amended Chapter 3 – Core Strategy' and 'Proposed Amended Housing Strategy' appended to this report.</p>
<p>Core Strategy and Settlement Strategy</p> <p>Settlement Strategy</p>	<p>The Office welcomes the overall approach and structure of the higher levels of the settlement hierarchy, specifically levels 1 - 4 which includes the designation of Bray and Wicklow-Rathnew as Key Towns and considers it to be generally consistent with the settlement hierarchy (table 4.2) and settlement typologies (table 4.3) in the RSES.</p> <p>However the lower tiers of the Settlement Hierarchy, which has six tiers in total, includes two Towns & Villages levels (Small Towns Type 1 and Type 2), two Villages levels (Type 1 and Type 2), Rural Clusters (level 9) and Open Countryside (level 10). The inclusion of 66 rural settlements / villages within these levels does not reflect the distinction between established village settlements and small clusters or groups of houses which, although important at a local or community level, are not consistent with the approach and guidance for development plans contained in Section 4.2 – Settlement Strategy and 4.3 – Defining a Settlement Typology of the RSES.</p> <p>By way of example, a number of unserviced settlements and very small stretches of ribbon development or clusters such as Gorteen, Kingston and Macreddin are included which are more appropriately located in the 'Open Countryside' tier. The infrastructure capacity for these settlements is extremely limited and the designation of such a large number of very small settlements undermines the objectives set out elsewhere in the draft Plan and the Core Strategy to redirect growth to the upper tier settlements to achieve compact growth (consistent with NPO 3), sustainable development of rural areas (NPO 15), and targeting the reversal of rural decline in small towns and villages (NPO 16).</p> <p>The planning authority is required to consolidate the number of lower tiers in the settlement hierarchy in particular at levels 7 – 9 with a particular focus on the inclusion of settlements based on the infrastructure capacity and deficits as highlighted in Table 8.3 of the Strategic Environmental Assessment (SEA) report.</p>

	<p>Recommendation 2</p> <p>Having regard to National Policy Objectives NPO 3, NPO 15, NPO 16 and section 4.2 – Settlement Strategy and section 4.3 – Defining a Settlement Typology of the Regional Spatial and Economic Strategy, the scale of the settlements at levels 7 –9 and their infrastructure and service provision, the planning authority is required to:</p> <ul style="list-style-type: none"> (i) consolidate and reduce the number of settlement levels and consider combining tiers 7 – 9 into one tier which distinguishes between the larger serviced villages and smaller unserved villages / clusters, the latter of which, should be included within the Open Countryside tier; (ii) review and reduce the number of settlements within Levels 7 - 9 having regard to NPO 15 and the range of social, community and retail services, as well as capacities in service infrastructure such as footpaths, cycle lanes and public transport available to ensure that the growth targets are proportionate and will assist in sustaining and regenerating these settlements; (iii) review the settlement boundaries to reflect the extent of each established settlement to ensure compact and sequential growth and avoid ribbon development consistent with the guidance in the <i>Sustainable Rural Housing Guidelines for Planning Authorities</i> (2005); and (iv) notwithstanding the changes that may result from part (a) above, remove Ballyduff, Ballyfolan, Ballynultagh, Baltyboys, Boleynass, Barranisky, Carrigacurra, Croneynhorn, Glenmalure, Goldenhill, Gorteen, Kilcarra, Kilmurray, Macreddin, Oldcourt, Rathmoon, Redwells and Tomriland from tier 9 and include them within the Open Countryside tier. <p>There are five separate diagrammatic maps setting out the settlement hierarchy for the County. It is considered that one map should be provided to depict how the county will develop in line with the strategic roads/rail infrastructure, settlement designations and rural area types as required by Section 10 (2B) of the Act.</p> <p>Observation 1</p> <p>Having regard to Section 10 (2B) of the <i>Planning and Development Act 2000</i> (as amended), which requires the principal elements of the core strategy to be represented on a diagrammatic map or other such visual representation, the planning authority is requested to replace the five maps setting out the settlements for the County with one map to give a clear County wide representation of the spatial relationship/interaction between settlements, relevant roads, including national roads and inter-urban and commuter rail routes.</p>
<p>CE Response</p>	<p>The concern with the settlement hierarchy is noted and it is recommended that it be streamlined and simplified by</p> <ul style="list-style-type: none"> - Reducing the number of tiers by amalgamation of some - Omitting the rural clusters <p>However, it is recommended that some tiers may have to include 'sub-tiers' to reflect the real distinction between certain types of towns / settlements that exist in the County.</p> <p>These proposed amendments are set out in the attached documents 'Proposed Amended Chapter 3 – Core Strategy', 'Proposed Amended Chapter 4 – Settlement Strategy' and 'Proposed Amended Housing Strategy' appended to this report.</p> <p>A revised Core Strategy map can be produced showing all settlements in the hierarchy – the various tiers were previously shown separately to avoid visual clutter.</p>

<p>Core Strategy and Settlement Strategy</p> <p>Distribution of Population Growth</p>	<p>It is considered that the housing unit allocations at settlement and tier level (combined) are generally acceptable as the vast majority of future housing growth is directed to the larger settlements and settlements designated for significant growth in the RSES.</p> <p>It is noted, however, that the population targets for Newtownmountkennedy and Rathdrum set out in table 3.6 represent an increase on the 2016 population of 47% and 45% respectively by 2031. The potential impacts of such rapid growth on smaller towns and villages is acknowledged in the NPF. In order to ensure that growth is appropriate to the nature, scale and social and physical infrastructure in these settlements, the provisions of NPO 9 limit population growth to 30% of its 2016 population by 2040. Notwithstanding the extant permissions for Newtownmountkennedy and Rathdrum, the Office considers that the draft Plan should review the allocations to these settlements to ensure greater consistency with NPO 9 and for the reasons outlined below.</p> <p>Section 4.4.1 and Appendix A (section 1.2.3) of the draft <i>Development Plans Guidelines for Planning Authorities 2021</i> provide guidance on how extant planning permissions should be considered in respect of the core strategy and land availability.</p> <p>The housing unit allocation to Newtownmountkennedy is greater than that allocated to the Self-Sustaining Growth Town of Blessington at tier 3 and almost the same as the allocation to the remaining tier 4 settlements which are allocated 473 housing units between them. Newtownmountkennedy has experienced very significant growth over recent years, much of which is located on the periphery of the settlement outside or close to the CSO boundary and western distributor road. Furthermore, the employment base in the settlement is low, resulting in high levels of car-dependant commuting patterns along the N11, and an unsustainable settlement and transportation strategy contrary to Section 10(2)(n) of the Act. In this context, it is considered that the housing unit allocation should be reduced for the plan period.</p> <p>While Rathdrum has a lower housing unit allocation for the plan period, this is considered in the context of its 2016 census population of 1,663. Many of the above issues also arise in the context of Rathdrum, particularly the location of development and the high level of car-dependency resulting from this pattern of development.</p> <p>Recommendation 3 Future growth of Newtownmountkennedy and Rathdrum</p> <p>Having regard to National Policy Objectives NPO 3c and NPO 9 of the NPF, the requirements of section 10(2)(n) of the <i>Planning and Development Act 2000</i> (as amended), the housing unit allocations to Newtownmountkennedy and Rathdrum, and their designation as Self-Sustaining Towns which are described as having ‘...high levels of population growth and a weak employment base which are reliant on other areas for employment and / or services and which required targeted ‘catch up’ investment to become more self-sustaining’, the planning authority is required to reduce the housing unit allocation to appropriately signal that it is an objective of the planning authority to moderate the future growth of both settlements. This recommendation also needs to consider the extent of land zoned in these settlements which is addressed in Recommendation 5.</p>
<p>CE Response</p>	<p>The growth ‘targets’ for Newtownmountkennedy and Rathdrum reflect:</p> <ul style="list-style-type: none"> (a) Existing housing development already completed since 2016, and housing currently under construction and expected to be completed during the lifetime of the new plan; (b) The need to ensure that growth in the town centres and existing infill sites within the built up part of these towns can be facilitated during the lifetime of the plan. <p>To reduce population and housing growth targets for these towns would require a restriction</p>

being imposed on desirable town centre regeneration and infill as all the growth capacity would already be taken up by less desirable but already completed / under construction edge of centre / out of centre greenfield development. This is clearly illogical and would be contrary to the goals of the NPF.

In order to try to reverse this imbalance in the medium to longer term (i.e. the majority of housing being located outside of the centre rather than in or close to the centre) very limited greenfield lands are proposed for new housing development in these towns that do not comprise infill sites. However, having reviewed the proposed zoning provisions for these towns, it is considered that there are some (limited) opportunities for a further reduction in greenfield zoning on some edge of centre sites, and these proposed revisions are shown on the maps set out in this report (see '**Proposed Amendments – Level 4 Towns**').

<p>Core Strategy and Settlement Strategy</p> <p>Zoning for Residential Use and Settlement Boundaries</p>	<p>The planning authority's attention is drawn to the requirement in sections 10(2A)(c) and (d) of the Act for core strategies to include information on the area of land both already zoned, and (b) proposed to be zoned for residential use or a mix of residential and other uses.</p> <p>This is necessary to satisfy legislative requirements and to demonstrate consistency with the <i>Guidance Note on Core Strategies (2010)</i> and to avoid over-zoning of land to meet housing targets.</p> <p>Recommendation 4 – Zoning for Residential Use</p> <p>In accordance with section 10 (2A) of the <i>Planning and Development Act 2000</i> (as amended), and having regard to the <i>Guidance Note on Core Strategies (2010)</i>, the planning authority is required to amend the core strategy table(s) in Chapter 3 of the draft Plan to:</p> <ul style="list-style-type: none"> (i) include the area and potential housing yield of both residential zoned lands and other lands zoned for a mixture of residential and other uses, as required by Section 10(2A)(c) and (d) for all settlements which include residential and mixed use development land which has the potential to deliver residential development, and (ii) confirm that the density assumptions used to calculate the housing land requirements for the plan period are consistent with requirements of 10(2A)(a) and the recommended residential densities for large towns, small towns and villages in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009). <p>[<i>Development Plans, Guidelines for Planning Authorities, Consultation Draft, August 2021</i> (Appendix A) provides a useful reference and illustrative example for the presentation of this information in the core strategy table.]</p>
<p>CE Response</p>	<p>The Core Strategy table will be updated to show the information requested.</p>
<p>Core Strategy and Settlement Strategy</p> <p>Zoning for Residential Use and Settlement Boundaries</p>	<p>While the Office acknowledges the efforts by the planning authority to consolidate the future growth of settlements and deal with legacy over-zoning, concerns remain about the extent of land zoned for residential development in Newtownmountkennedy, Rathdrum and Ashford relative to their housing target allocations in the core strategy.</p> <p>As outlined above, the Office's analysis indicates that Newtownmountkennedy's 2016 population could increase by 47% by 2031 with its housing stock increasing from 1,222 to 1,854 units (or 52%) over the same period. It is further noted that the current local area plan for Newtownmountkennedy has a more expansive settlement boundary and zones a greater area for residential use such as the AA 5 lands.</p> <p>The Office considers that the planning authority should address this issue and try to moderate the future growth of the settlement over the plan period by either deleting the residential zoning objective for land without the benefit of planning permission, or reserving the land as Strategic Land Bank and restricting development within the plan period.</p> <p>In relation to Rathdrum, the Office's analysis indicates that Rathdrum's 2016 population could increase by 45% by 2031 with its housing stock increasing from 669 to 868 units (or 30%) over the same period. It is also noted that this figure could be higher if further planning permissions are approved and constructed on existing zoned land. The current local area plan for Rathdrum has a more expansive settlement boundary and larger areas zoned for residential in particular along the northern edge of the settlement. There is a need, therefore, to rezone some of the remaining New Residential land to Strategic Land Bank to moderate the growth of the settlement over the plan period.</p> <p>Ashford is a level 5 Small Town Type 1 which has a 2016 census population of 1,425 people. The</p>

	<p>settlement strategy allocates 196 housing units to 2028 for the level 5 settlements combined. The vision for the town is, inter alia <i>'To provide a framework for the moderate growth of the town, in order to provide housing for current and future generations, to revitalise the economy of the town, and to allow improvements of social and community infrastructure'</i>. (Emphasis added)</p> <p>The Office notes the opportunities for infill development on the designated opportunity sites and sites developed at a low density in close proximity to the town centre. Having regard to the extant planning permission on the SLO 1 lands, the location of the other lands zoned for New Residential including the SLO 2 lands and the housing unit allocation for the level 5 settlements, there is a need to address the extent of land zoned for New Residential land and rezone same to Strategic Land Bank.</p> <p>Recommendation 5 – Residential Land Zoning (Newtownmountkennedy, Rathdrum and Ashford)</p> <p>The quantum of land zoned for residential development in Newtownmountkennedy and Rathdrum exceed that required to meet the projected housing supply target and would result in a population increase in the region of 47% and 45% respectively to 2031. The quantum of land zoned for residential development in Ashford similarly exceeds that required to meet the projected housing supply target. Having regard to NPO 3c and NPO 9, section 10(2)(n) of the <i>Planning and Development Act 2000</i> (as amended) and the potential for infill development in the vicinity of the Main Streets consistent with the principles of sequential approach to zoning and compact growth, the planning authority is required to:</p> <ul style="list-style-type: none"> (i) delete the residential zoning objective for land on the periphery of Newtownmountkennedy including within the Action Area Plan 1 lands that does not have the benefit of planning permission or alternatively to reserve the land as Strategic Land Bank and restrict development within the plan period; (ii) rezone further New Residential land in Rathdrum without the benefit of planning permission to Strategic Land Bank; and (iii) rezone some of the New Residential land in Ashford without the benefit of planning permission to Strategic Land Bank. In this regard, the planning authority should give preference to lands that are sequentially preferable in terms of proximity to the town centre.
<p>CE Response</p>	<p>With respect to Newtownmountkennedy, all previously zoned residential sites without planning permission have already been proposed for removal / rezoning in the published draft plan, bar one, at the far northern end of the proposed western relief road, at Season Park. This zoning was proposed to be retained to facilitate and ensure the delivery of the final part of this road.</p> <p>However, in order to address the concern raised, it is recommended that this zoning be changed to 'SLB'. All other zonings in Newtown with potential for residential development are sites located within the town centre or infill sites. These sites taken in conjunction with the edge of centre sites with permission, result in the high growth target set out in the draft plan.</p> <p>The growth strategy for Newtown, as set out in the draft plan, does not entail any further edge of centre greenfield zoning for new housing, but rather consolidation of what is under construction and regeneration of vacant land plots in the town centre.</p> <p>With respect to Rathdrum, the same strategy has been applied, and it is this combination of sites under construction with infill and town centre sites, that results in the high growth target. There is no intention to promote or facilitate further peripheral greenfield residential development in the town.</p>

The only sites that are zoned for new residential development in the draft Rathdrum plan are located within the built up part of the town and it would clearly be illogical and contrary to the goals for the NPF to de-zone / bank such sites.

Therefore no changes are recommended to the target or zoning plan for Rathdrum.

With respect to **Ashford**, three sites are zoned for new residential development. Of these sites:

- one (SLO-1) has full planning permission for the development of c. 130 units, this development having commenced in mid-2021. Therefore this would not be logical to de-zone or bank;
- one site is owned by the Local Authority and is necessary for the provision of social housing in the town, for which there is a demand. Various assessments / surveys are already underway for the lands with a view to initiating a Part 8 process within the year. Therefore this would not be logical to de-zone or bank;
- the final site (SLO-2) is located in Ballinalea. This site is an infill site, surrounded on all sides by existing housing. Notwithstanding this location, it is recommended, in order to address the OPR's concerns, that the zoning of these lands be changed from 'New Residential' to 'Strategic Land Bank'.

<p>Core Strategy and Settlement Strategy</p> <p>Zoning for Residential Use and Settlement Boundaries</p>	<p>Table 8.3 of the SEA outlines the motions advised against, subsequently agreed upon as amendments and which have potential for significant negative environmental effects.</p> <p>The Office has assessed these amendments which propose changes to the settlement boundaries of Baltinglass, Newtownmountkennedy, Aughrim, Dunlavin, Roundwood and Shillelagh and concludes that a number of the changes would be contrary to compact growth (NPO 3c) and the sequential approach to development.</p> <p>In addition to the tiered approach to zoning based on infrastructure capacity required under NPO72, both the existing section 28 <i>Development Plans, Guidelines for Planning Authorities, 2007</i> and the <i>Development Plans, Guidelines for Planning Authorities – Draft for Consultation 2021</i> (SPPR DPG 7) require that a sequential approach is followed when zoning lands, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.</p> <p>In this regard, the Office considers that specific changes are required to the zoning maps and settlement plans to ensure that the development approach is consistent with national policy objectives for compact growth and sequential development and addresses the guiding principles for the integration of land use and transport in the Regional Spatial and Economic Strategy for the Eastern and Midland Region.</p> <p><u>Recommendation 6 Residential Land Zoning (Miscellaneous)</u></p> <p>Having regard to national policy objectives NPO 3c and NPO 72 (a, b & c) which support compact growth and sequential development, the requirement under the Development Plans, Guidelines for Planning Authorities 2007 that a sequential approach to the zoning of lands is applied, the guiding principles for the integration of land use and transport in the Regional Spatial and Economic Strategy for the Eastern and Midland Region, and the Wicklow Settlement Hierarchy at table 3.5 and settlement housing targets in table 3.8 of the draft Plan, the planning authority is required to make the following changes to the settlement plans contained in the draft Plan:</p> <ul style="list-style-type: none"> (i) delete the RE – Existing Residential zoning south of Allen Dale Drive in Baltinglass referred to in table 8.3 of the Strategic Environmental Assessment (page 114) and amend the settlement boundary accordingly as this change would lead to further ribbon development contrary to the <i>Sustainable Rural Housing Guidelines for Planning Authorities 2005</i>; (ii) delete the R2.5 – New Residential (Low Density), Aug 3 and Aug 4 zoning objectives in Aughrim (referred to in table 8.3 of the SEA) and make corresponding changes to the written statement as these changes would undermine objectives to consolidate the settlement such as Specific Local Objectives SLO 1 and SLO 2 and AUG 9 (to resist significant new development on the south side of the R747); (iii) review the land use zoning strategy for Dunlavin and delete NR – New Residential lands that are not sequentially favourable and not required to satisfy its housing target. The proposed residential changes referred to in table 8.3 of the SEA (page 114) would undermine the approach to retain sequentially preferable lands as Strategic Land Bank; and (iv) delete the Tertiary Development Area zoning (RD 4) in Roundwood which encroaches on the 200 m buffer from the reservoir and adjoins a proposed Natural Heritage Area and amend the settlement boundary accordingly. The proposed change is contrary to the principles of compact growth and sequential development.
<p>CE Response</p>	<p>The CE agrees that the majority of the zonings detailed in this point do not accord with proper planning principles and should be omitted <i>other than</i> the proposed residential sites in Dunlavin.</p>

	<p>Without the inclusion of these sites, there would be no land zoned for new residential development in this town other than a single site owned by the Local Authority, identified for social housing. It is not sustainable or logical to provide for a development plan for Dunlavin up to 2028 that makes no provision for new private housing. All of the sites in question are infill sites, within the built up envelope of the town and are very close the town centre. The development of these sites would therefore not be contrary to the principles of compact and sequential development.</p>
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<p>Core Strategy and Settlement Strategy</p> <p>Zoning for Residential Use and Settlement Boundaries</p>	<p>The Office welcomes the inclusion of the Strategic Land Bank (SLB) zoning which has the objective 'To provide a land bank for future development of the settlement after the lifetime of this plan, if and when the need arises'.</p> <p>It is considered, however, that there is insufficient clarity to ensure that no residential development proposals, including single housing, will be considered by the planning authority, on lands identified as SLB until after the full lifetime period of the Development Plan 2022-2028.</p> <p>Recommendation 7 – Residential Land Zoning (Strategic Land Bank)</p> <p>To provide the clarity and transparency necessary to ensure the effective delivery of compact growth, in accordance with National Policy Objectives 3c, and a sequential approach to the zoning of lands consistent with NPO72 and the <i>Development Plan Guidelines for Planning Authorities 2007</i>, the planning authority is required to amend the Strategic Land Bank zoning objective and description to ensure that no residential development proposals, including single housing, will be considered by the planning authority, on lands identified as Strategic Land Bank (SLB) until after the full lifetime period of the Development Plan 2022-2028.</p>
<p>CE Response</p>	<p>The concern raised is accepted and therefore it is recommended that the SLB zoning wording be amended.</p> <p>Objective: To provide a land bank for future development of the settlement after the lifetime of this plan, if and when the need arises.</p> <p>Description: These are lands that are identified as being potentially suitable for new residential development having regard to proximity and accessibility to infrastructure. However, these lands are not necessary for development during the lifetime of this plan and may only be considered for detailed zoning and development after 2028. Any development proposals within the lifetime of the plan will be considered under the County Development Plan rural objectives. In order to ensure that the lands are retained for future development, no development proposals, including single housing, will be considered until after the lifetime of the plan.</p>
<p>Core Strategy and Settlement Strategy</p> <p>Development Approach for Settlements</p>	<p>While population and housing targets are provided for all 21 of the largest settlements, only 13 settlement plans are included. The Office notes the intent to prepare a local area plan (LAP) for the largest settlements of Bray (including Enniskerry and Kilmacanogue), Greystones-Delgany (including Kilcoole), Wicklow-Rathnew, Blessington and Arklow.</p> <p>It is noted from Table 3.10, that all of the settlements where it is intended to prepare a LAP have surplus land to meet their housing requirements. Therefore, it is considered that Section 3.5 of the draft Plan, which sets out the LAPs to be made between 2022-2024, should be supported by a policy objective which also states that the preparation of the LAPs will be informed by a LTP for the Key Towns and a LTP or Area Based Transport Assessment for Greystones-Delgany-Kilcoole, Arklow and Blessington. The timely preparation of these LAPs is important since the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the Eastern and Midland Region.</p> <p>Observation 2 – Local Area Plans</p> <p>Having regard to the statutory requirements for the preparation of local area plans (LAPs) for certain areas under section 19(1)(b) of the <i>Planning and Development Act 2000</i> (as amended), the Office requests the planning authority to include policy objectives which provide a greater level of clarity on the timing and priority for the preparation of the local area plans for the settlements</p>

	<p>listed in section 3.5 which takes account of the settlement hierarchy designation and expiry dates of the currently adopted dates for these settlements. Greater priority should be afforded to the preparation of local area plans for the Key Towns and there should be a clear commitment to prepare supporting Local Transport Plans where relevant consistent with Regional Policy Objective 8.6.</p> <p>The Office notes that section 3.5 (page 54) states '<i>Until such a time as new LAPs are adopted, the current plans for these towns are herewith subsumed into this County Development Plan</i>'. Given the potential for policy conflict between the core strategy figures that informed the current adopted LAPs and the revised core strategy projections and corresponding housing unit allocations that will form part of the Wicklow County Development Plan 2022 – 2028, it is recommended that this sentence be deleted.</p> <p><u>Recommendation 8 - Status of the current Local Area Plans</u></p> <p>Having regard to the need for the development plan to be consistent with the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midland Region, the revised core strategy projections and housing unit allocations for individual settlements which provide for lower population targets to 2028 than set out in table 2.4 of the Wicklow County Development Plan 2016- 2022, and the surplus of zoned land referred to in table 3.10 of the draft Plan, the planning authority is required to delete the following sentence from section 3.5 (page 54) in order to avoid policy conflict in the forthcoming plan: <i>'Until such a time as new LAPs are adopted, the current plans for these towns are herewith subsumed into this County Development Plan'</i></p>
<p>CE Response</p>	<p>The draft Development Plan already includes the following objective which is considered to address, with a small amendment, the issue raised with regard to Local Transport Plans / Area Based Transport assessments.</p> <p>Having regard to amendments already proposed in this report (such as to the settlement hierarchy) and the fact that Rathdrum and Newtownmountkennedy are not LAP towns, some further amendments to the wording will be required as set out to follow:</p> <p>Chapter 12 CPO 12.3 In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy, (namely Bray and environs, Wicklow – Rathnew, Arklow, Greystones – Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy) and any other settlement where it is deemed necessary by the Planning Authority and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plans.</p> <p>With respect to the timing and priority of future LAPs, it is intended that they will be prepared in the following order and this can be stated in the plan in Section 3.5 of Chapter 3:</p> <ol style="list-style-type: none"> 1. Wicklow Town – Rathnew 2. Greystones – Delgany – Kilcoole 3. Blessington 4. Bray MD 5. Arklow

The possible conflict identified is noted and it is recommended that the sentence in question be deleted and replaced as follows:

Until such a time as new LAPs are adopted, ~~the current plans for these towns are herewith subsumed into this County Development Plan~~. residential development proposals shall be assessed against the population and housing targets set out in the Core Strategy of this County Development Plan.

<p>Core Strategy and Settlement Strategy</p> <p>Tiered Approach to Zoning</p>	<p>NPO 72a requires planning authorities to apply a standardised tiered approach to differentiate between tier 1 (serviced land) and tier 2 (lands that can be serviced during the plan period) for all land use zoning types. Lands that cannot be serviced within the plan period should not be zoned (NPO 72c). In this regard, the Office commends the planning authority for the preparation of an Infrastructural Assessment Report (IAR).</p> <p>The IAR provided in Appendix 9 of the draft Plan provides details on infrastructure constraints for the settlements but the 'Methodology for a Tiered Approach to Land Zoning', as set out in the NPF appears not to have been applied within the settlement maps and it is unclear what lands are already serviced or can connect to services, and what lands are to be provided with full services within the life of the plan. In this regard, the Office considers that further clarity is required to ensure consistency with NPO 72 (a-c) and there should be a policy commitment to prepare a more detailed IAR to inform the local area plans for the larger settlements.</p> <p>Recommendation 9 - Tiered Approach to Zoning</p> <p>Having regard to NPO 72, the planning authority is required to insert an objective in the development plan committing to the preparation of detailed infrastructure assessments, consistent with NPO 72 and the methodology for a Tiered Approach to Zoning under Appendix 3 of the NPF, to inform the development strategy for future Local Area Plans in the county.</p>
<p>CE Response</p>	<p>A new objective with regard to infrastructural assessment for LAP towns is recommended as requested.</p> <p>New text to be inserted at the end of Chapter 3, Section 3.5 'Zoning' Under 'Principle 4 Sequential Approach'</p> <p><i>Detailed 'Infrastructural Assessments' in accordance with NPO 72 and the methodology for a Tiered Approach to Zoning set out under Appendix 3 of the NPF shall be carried out for all lands proposed to be zoned in future Local Area Plans</i></p>
<p>Compact Growth and Regeneration</p> <p>Regeneration Delivery</p>	<p>The Office welcomes the inclusion of policy objective CPO 4.2 to secure compact growth through the delivery of at least 30% all new homes within the built-up footprint of existing settlements and CPO 5.6 which outlines specific regeneration projects in Bray, Wicklow-Rathnew, Greystones, Arklow, Blessington, Baltinglass, Enniskerry, Kilcoole, Newtownmountkennedy and Rathdrum consistent with NPO 3c.</p> <p>To ensure effective implementation, a clear timeline and strategic approach in carrying out the active land management approach is required and to set measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation can be monitored and measured.</p> <p>Observation 3 – Active Land Management Approach</p> <p>Having regard to NPO 6 which promotes regeneration, brownfield and infill development, the planning authority is requested to set out a clear timeline and strategic approach to carrying out the Active Land Management approach and to set measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation can be monitored and measured.</p>
<p>CE Response</p>	<p>The regeneration goals and objectives set out in the draft plan are all intended to be implemented during the lifetime of the plan. However, the delivery of the wide range of projects involved is wholly dependent on funding, particularly through the URDF and RRDF. It is not possible to predict with certainty whether and when such funding may be made available during the lifetime of the plan.</p>

With respect to monitoring the delivery of new homes and in particular the monitoring of their location vis-à-vis the objective that not less than 30% will be delivered in the built up area of each towns, this will be ensured through (a) providing a robust zoning regime for each towns that in essence would prevent more than 70% of new housing development occurring outside of the built of area of each town (other than those development in such locations already under construction or within permission that is still implementable during the lifetime of the plan), and (b) the monitoring of grants of permission, as well as commencement and completion data, utilising new improved system which it assumed will be shortly forthcoming from the Department, on foot of their signalling through the new Draft Development Plan Guidelines will be a new requirement on all Local Authorities.

In addition, the Council will utilise all tools available to it, including new measures set out in 'Housing for All' to progress optimum development sites.

<p>Compact Growth and Regeneration</p> <p>Development Management Standards and Guidelines</p>	<p>The draft Plan makes reference to a number of relevant Development Management Standards applicable to development projects and which support the overall objectives in the draft Plan, including the objective to achieve greater compact growth. The NPF signals a move away from rigidly applied, blanket planning standards in relation to building height, garden size and car parking in favour of performance based standards (NPO 13) where appropriate. There are a number of prescriptive standards promoted within Appendix 1 of the draft Plan which could militate against the principle of promoting appropriate density and compact growth in the higher order tier settlements, including:</p> <ul style="list-style-type: none"> • Site coverage and plot ratio standards for neighbourhood centres, offices, manufacturing, distribution / warehousing and retail warehousing • A separation distance of 22m will normally be required above ground level between opposing windows serving private living areas • Table 2.3 and Table 4.1 Car Parking Standards, whereby it must be clarified that the requirement is for maximum standards. <p>Observation 4 – Development Management Standards</p> <p>The planning authority is requested to:</p> <ol style="list-style-type: none"> review the car parking standards promoted in the draft Plan to ensure that appropriate maximum standards are included for both residential and commercial / industrial developments in urban areas in accordance with NPO13; and remove the site coverage and plot ratio standards and minimum separation distances between opposing windows and instead focus on assessing individual development proposals on performance based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO 13.
<p>CE Response</p>	<p>It is considered that the concern set out with respect to car parking is already addressed in the draft Development Plan; as set out in Appendix 1, Section 2.1.7:</p> <p><i>New / expanded developments shall be accompanied by appropriate car parking provision, including provision for electric vehicle charging points as set out in Table 2.3, with particular regard being taken of the potential to reduce private car use in locations where public transport and parking enforcement are available. At such locations, the car parking standards set out in Table 2.3 to follow shall be taken as maximum standards, and such a quantum of car parking will only be permitted where it can be justified.</i></p> <p>With respect to the 22m separation distance, the draft Development Plan clearly states that this standard is to be applied flexibly and other measures to protect privacy will be allowed:</p> <p><i>“A separation of 22m will normally be required above ground level between opposing windows serving private living areas (particularly bedrooms and living rooms). However, this rule shall be applied flexibly: the careful positioning and detailed design of opposing windows can prevent invasion of privacy even with short back-to-back distances. Windows serving halls and landings do not require the same degree of privacy as say balconies and living rooms”.</i></p> <p>It is not considered therefore that any amendments in this regard are necessary.</p> <p>With respect to plot ratio / site coverage standards, these are set out in the draft Development Plan for a specific range of commercial development types only, namely neighbourhood centres (mixed retail, services and community uses generally), offices, manufacturing, distribution /</p>

warehousing and retail warehousing. It is acknowledged that these standards may unduly restrict development possibilities for such uses, and therefore it is recommended that the following amendments be made to these standards:

Appendix 1, Section 3.1.1

Intensity of development (density)

- Density' will only be allowed to be generated from land that is capable of being built upon; land which is ultimately unsuitable for such purposes (e.g. due to excessive slope) will not be considered to be part of the density equation even if it forms part of the overall site. Any such areas should be clearly shown on planning applications drawings;
- The density that can be achieved on any site will ultimately depend on compliance with 'qualitative' standards such as fit with surroundings, height, open space provision, adequate privacy, car parking etc and the density ultimately proposed should be the outcome of the design process rather than the starting point;
- ~~Where a new 'neighbourhood' centre forms part of a large-scale greenfield expansion area, plot ratio in the neighbourhood hub (i.e. only that area forming an integrated part of the shopping / community facilities provided) should be in the region of 1:1.~~

Appendix 1, Section 4.1.2

4.1.2 Intensity of development

The Planning Authority will require all employment developments to be of an appropriate intensity, ~~making best use of zoned serviced land, while ensuring the highest quality of development and the protection of the residential and visual amenities of the area. measured by plot ratio and site coverage. The following standards will normally apply, except where other specified in a local plan, or where local conditions require otherwise:~~

Table 4.1— Density standards

	Site coverage		Plot ratio
	Max initial	Max final	
Offices	60%	75%	1.5
Manufacturing	40%	60%	1
Distribution/Warehousing	30%	50%	1
Retail warehousing	30%	50%	1

The Planning Authority will not permit an employment development where it is considered that there is an unacceptable over development of the site.

<p>Compact Growth and Regeneration</p> <p>Development Management Standards and Guidelines</p>	<p>Policy objective CPO 6.2 seeks to control housing occupancy within the levels 1 – 6 settlements by requiring that 25% of the units in multi-unit house developments are occupied by persons <i>“who have lived for at least 3 years duration in County Wicklow, within 15km of the proposed site”</i>. The basis for including such a measure has not been provided in the housing strategy or elsewhere within the draft Plan. Having regard to NPO 28 which aims to achieve a more inclusive society, and the size of these settlements which include substantial urban centres, the inclusion of controls to restrict occupancy of multi-unit schemes could suggest a bias towards local people which is in conflict with NPO 28. Furthermore it is not clear how the planning authority will monitor the implementation this policy approach and in this regard the planning authority is reminded of its remit under Section 15 of the Act, which states that <i>‘It shall be the duty of a planning authority to take such steps within its powers as may be necessary for securing the objectives of the development plan’</i>.</p> <p><u>Observation 5 Housing Occupancy Controls</u></p> <p>Having regard to NPO 28 which sets out to plan for a diverse and socially inclusive society that targets equality of opportunity, the planning authority is requested to review Policy CPO 6.2 and the requirements therein which set out to restrict housing occupancy to those who are from within 15km of the site and who have lived for at least 3 years in County Wicklow.</p>
<p>CE Response</p>	<p>The OPR’s concern with respect to this objective is accepted and it is recommended that it be omitted from the Plan.</p> <p>This proposed amendment is set out in the attached documents ‘Proposed Amended Chapter 6 – Housing’ appended to this report.</p>
<p>Rural Housing and Rural Regeneration</p> <p>Rural Housing Policy</p>	<p>The Office considers that the rural housing policy approach adopted by the draft Plan is generally consistent with the legislative and policy context, including NPO 19 and the <i>Sustainable Rural Housing Guidelines for Planning Authorities (2005)</i>.</p> <p>The draft Plan provides a policy framework to protect against urban generated housing in rural areas (CPO 6.31 and CPO 6.36), and to develop a programme for ‘new homes in small towns and villages’ as per NPO 18b which will support the regeneration of rural villages and small towns.</p> <p>Notwithstanding the above, CPO 6.41 which sets out the rural housing policy includes text which indicates that the needs of an applicant <i>‘shall be supreme’</i> whereby a conflict occurs with any other settlement strategy objective / landscape zones and states that <i>‘the protection of views and prospects should not give rise to the prohibition of development’</i>.</p> <p>The Office considers that the inclusion of this text is contrary to NPO 52, the advice set out in the <i>Sustainable Rural Housing Guidelines for Planning Authorities (2005)</i> and agrees with the concerns raised in the SEA which states <i>‘These changes would dilute the management of rural housing and has the potential to result in more housing in the Open Countryside with associated significant adverse effects on various environmental component</i>.</p> <p>Recommendation 10 - Rural Housing Policy</p> <p>Having regard to NPO 52, table 8.3 of the Strategic Environmental Assessment and the <i>Sustainable Rural Housing Guidelines for Planning Authorities (2005)</i>, the planning authority is required to remove the following text from CPO 6.41:</p> <p><i>“In the event of conflict of any other settlement strategy objective / Landscape Zones and categories, a person who qualifies under policy CPO 6.41 their needs shall be supreme, except</i></p>

	<p>where the proposed development would be a likely traffichazard or public health hazard.</p> <p>With regard to the preservation of views and prospects, due consideration shall be given to those listed within the area of the National Park; and with respect to all other areas, to generally regard the amenity matters, but not to the exclusion of social and economic matters. The protection and conservation of views and prospects should not give rise to the prohibition of development, but development should be designed and located to minimise impact”.</p>
CE Response	<p>The OPR’s concern with respect to this text is accepted and it is recommended that it be omitted from the Plan.</p> <p>This proposed amendment is set out in the attached documents ‘Proposed Amended Chapter 6 – Housing’ appended to this report.</p>
Rural Housing and Rural Regeneration Rural Housing Policy	<p>The Office also notes that the draft Plan does not provide a map detailing the rural area typologies set out in NPO 19 (i.e. Areas Under Urban Influence, and Rural Areas Elsewhere) as required under section 10(2A) of the Act.</p> <p>Recommendation 11– Map of Rural Area Typologies</p> <p>Having regard to section 10(2A)(f)(ix) of the <i>Planning and Development Act 2000</i> (as amended) and National Policy Objective 19, the planning authority is required to include a map which details the rural area typologies including rural areas under urban influence and rural areas elsewhere.</p>
CE Response	<p>The OPR’s concern with respect to this omission is accepted and it is recommended that the required map be included in the Development Plan.</p> <p>This proposed amendment is set out in the attached document ‘Proposed Amended Chapter 3 – Core Strategy’ appended to this report.</p>
Specialised Housing Requirements	<p>The Office welcomes the identification of existing and projected need for Traveller accommodation in Wicklow by accommodation type in the Housing Strategy, consistent with your County’s Traveller Accommodation Programme (TAP).</p> <p>The Office considers, however, that the draft Plan does not provide implementable objectives for the provision of accommodation for Travellers consistent with the estimated need, and the land use zoning maps do not appear to indicate the location of lands to provide for such accommodation, as required under section 10(2)(i) of the Act.</p> <p>Recommendation 12 - Traveller Accommodation</p> <p>Having regard to the requirements of section 10 (2)(i) of the <i>Planning and Development Act 2000</i> (as amended), the planning authority is required to include objectives in the plan for the provision of accommodation for Travellers to provide for the estimated need identified in Wicklow’s <i>Traveller Accommodation Programme 2019 - 2024</i> in accordance with the legislative requirements under section 10 (2)(i) of the <i>Planning and Development Act 2000</i> (as amended).</p> <p>This will include the identification of specific locations in the land use zoning maps for the county.</p>
CE Response	<p>To address this issue, it is proposed to include additional information with respect to the Traveller Accommodation programme in the Housing Strategy appended to the Development Plan.</p> <p>It is not proposed to amend the land use maps forming part of this Plan to zone lands</p>

specifically for Traveller Accommodation. The majority of the identified need for Traveller Accommodation is in the 'standard' housing format, and these units will be provided on residential zoned land in settlements, either within Council social housing development or as part of Part V provision in private developments.

With regard to Traveller Specific Accommodation (specially built to include group housing, halting sites and one-off single sites), the process of identifying suitable Council owned lands in each district to meet demand is ongoing and sites have not been confirmed for 14 of the 21 units of this form of accommodation required. Until such lands have been identified and consent secured it is not considered reasonable to 'zone' such lands for this use.

This proposed amendment is set out in the attached document '[Proposed Amended Housing Strategy](#)' appended to this report.

<p>Economic Development and Employment</p> <p>Employment zoned land</p>	<p>The Office notes the strong policy support for economic development and employment and welcomes the inclusion of Economic Opportunity as one of the cross cutting themes of the draft Plan as established in Chapter 2. The planning authority is commended for the evidence based analysis set out in Section 9.2 for Wicklow’s economic profile and employment trends and the aim to increase the jobs ratio target by 2031. Furthermore, the inclusion of a specific land use plan for Laragh-Glendalough is a welcome strategic approach to the sustainable management of the tourist experience to Glendalough and the promotion of Laragh as a tourist hub and enabler for the co-ordinated growth of the rural economy of this area.</p> <p>Notwithstanding, limited information has been provided in the draft Plan with respect to the extent of land proposed or available for employment purposes in any of the principle towns and this information is required to demonstrate that the extent and location of lands identified for employment purposes is consistent with the <i>Guidance Note on Core Strategies (2010)</i> and 10(2C)(b)(ii) of the Act.</p> <p>The Office is also concerned about the approach set out in the draft Plan to designate new employment areas where the zonings will conflict with the principle of compact growth and the integration of sustainable transportation objectives and compliance with policy for national roads set out the <i>Spatial Planning and National Roads Guidelines for Planning Authorities (2012)</i>. It is considered that robust justification is required for the extent and location of employment zonings at the following locations:</p> <ul style="list-style-type: none"> • Mountkennedy Demesne, Kilpedder, north of Newtownmountkennedy, with a zoning objective to provide a data centre, Map 09.01, (34ha). • Kilpedder Interchange with a zoning objective to provide for employment uses including industrial, transport, distribution and warehouse developments, Map 09.02 (27ha). • Land zoned at the Northern Gateway lands and AA-2 lands in Newtownmountkennedy. <p>Particular clarity is required on what safeguards will be put in place to protect the strategic function of the N11 national road regarding the anticipated traffic implications from development associated with these employment zonings given they are all in relatively close proximity to each other and are located at intersections to the N11 national road.</p> <p>Recommendation 13 - Employment lands adjoining the N11 national road</p> <p>Having regard to the National Strategic Outcome for Compact Growth, the principles of sequential approach to zoning (section 28 <i>Development Plan Guidelines 2007</i>, paragraph 4.19), section 6.3 of the <i>Regional Spatial and Economic Strategy</i> and section 2.7 of the <i>Spatial Planning and National Road Guidelines for Planning Authorities 2012</i> and the need to protect the strategic function of national roads, the planning authority is required to provide robust justification for the extent and location of employment zoned land and to demonstrate that the criteria of the aforementioned have been satisfied specifically in respect of the following employment zonings:</p> <ol style="list-style-type: none"> (i) Map 09.01 at Kilpedder with a zoning objective to provide for a data centre and the rationale for such a zoning in this location having regard to the need to rationalise the spatial location of such a use with energy consumption synergies; (ii) Map 09.02 at Kilpedder Interchange with a zoning objective to provide for employment uses including industrial, transport, distribution and warehouse developments; (iii) AA 2 land at Newtownmountkennedy with an objective to encourage and support the development of a major mixed use employment, a new neighbourhood centre and a new link road from the Ballyronan Interchange; and (iv) Northern Gateway, policy objective NK 1 to provide for high employment density uses, such
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as office based business and enterprise units. The Office advises the planning authority to consult with Transport Infrastructure Ireland regarding the above.

CE Response

With respect to the larger LAP towns, in the preparation of the next set of LAPs full details will be provided of all employment zoned lands (both existing and proposed) and how this relates to the employment growth strategy for each settlement.

With regard to the Level 4 town plans that form part of this County Development plan, it is recommended that the 'Introduction to Level 4 Plans' includes additional data on the amount of employment land proposed for zoning in the table already provided regarding employment growth desired (as set out below).

With respect to Level 5 town plans, data on the 'jobs ratio' is not available at this scale and therefore it is not possible to quantify the existing jobs provision, and from that develop a desired level of jobs growth.

For each of these towns therefore it is not possible to 'tally' the proposed amount of jobs growth with new employment zoning. The approach in these towns therefore has been to maintain existing zoned employment land from the previous development plan, except where that zoning comprises unserviced / unserviceable lands, or otherwise does not accord with sound planning principles, such as compact and sequential growth.

Proposed amendments to '**Introduction to Level 4 Plans**'

1.1.3 Economic Development & Employment

This table also show the amount of land proposed to be zoned in each town for new employment. While it is assumed that a proportion of jobs growth will occur in the town centre and other mixed use lands that are not specifically zoned for employment alone, or will occur on existing developed employment land through intensification, sufficient zoned employment land is zoned in each town to meet all of the jobs growth required, on the assumption of 80 employees per hectare, plus an additional 'headroom' of 100% to ensure that there will be no shortage of site choice for developers of new employment.

LEVEL 4	Jobs ratio 2016	Targeted future jobs ratio 2031	Jobs growth targeted up to 2031	Quantum of zoned employment land (ha)
Baltinglass	0.81	1.01	+500	13
Enniskerry	0.33	0.41	+100	1 ¹
Kilcoole	0.46	0.57	+100	10 ¹
Newtownmountkennedy	0.78	0.97	+1,100	28
Rathdrum	0.82	1.03	+600	15

With respect to the proposed zonings along the N11:

- (i) Map 09.01 at Mountkennedy Demesne, Kilpedder (Data Centre)

¹ To be reviewed in the next LAP to be commensurate with the employment growth objective

	<p>These lands have been zoned for employment use since 1999 and more specifically for data centre use only since 2016. There is live planning permission on the land for the development of a data centre. Notwithstanding any possible conflict with <i>Spatial Planning and National Road Guidelines for Planning Authorities 2012</i>, this zoning was not the subject of a Ministerial Direction during the making of the 2016 Development Plan. It is therefore considered appropriate to retain this zoning.</p> <p>(ii) Map 09.02 at Kilpedder Interchange These lands have been zoned since 1999; the appropriateness of this zoning was previously confirmed by the Minister (by way of a Ministerial Direction providing for the inclusion of this zoning in the Plan) as part of the making of the 2016 Development Plan, notwithstanding any possible conflict with <i>Spatial Planning and National Road Guidelines for Planning Authorities 2012</i>. Permission has already been granted and development commenced on the southern part of these lands. With respect to the northern side of the Farrankelly Road, while permission was granted in 2009 for an industrial / warehousing development on the eastern part of these lands, this permission lapsed in 2014. In the intervening years, permission has been refused on a number of occasions, for a variety of reasons, for various industrial / warehousing developments on this side of the road. In light of the concern expressed by the OPR (and others) it is recommended that the employment zoning be removed on the northern portion of these lands.</p> <p>(iii) AA 2 land at Newtownmountkennedy The rationale for this zoning was threefold (a) to provide for a mixed use development scheme that would bring with it the delivery of new community facilities for the Garden Village area, which is cut off from services in Newtownmountkennedy by the N11, (b) to provide for the delivery of a new access road between the Ballyronan interchange and the Kilcoole Road, thereby providing an alternative access route into Kilcoole which obviates the need to travel through either Kilcoole or Newtownmountkennedy Main Streets to access the southern side of Kilcoole, where the majority of employment is located and (c) to provide for new employment and Active Open Space opportunities servicing the districts of Newtown – Kilpedder – Kilcoole. With respect to the link road to the Kilcoole Road from Ballyronan, the feasibility and necessity for this link has not been assessed in detail at this time, and although the ABTA for the Greystones - Delgany – Kilcoole area (commenced in late 2021) is likely to examine the issue of access to south Kilcoole, at this time is considered appropriate to omit this objective from the plan. In these circumstances, and taking into account the development strategy and overall zoning provisions of the Draft Newtownmountkennedy Plan, a review of this AA2 zoning has been undertaken and it is recommended that it be omitted from the plan.</p> <p>(iv) Northern Gateway at Newtownmountkennedy These lands have been zoned for some time, and have been partially developed. The TII in its submission has not raised any specific issue in relation to this zoning. Therefore no change is recommended.</p>
<p>Economic Development and Employment</p> <p>Rural Economy & Tourism</p>	<p>The Office acknowledges the rural character of the county and the significance of agriculture to the economic and social viability of rural areas. In this regard, it is noted that the plan makes provision for policies to guide rural enterprise (CPO 9.31 - 9.35), agriculture (CPO 9.36 - 9.41), agri-diversification (CPO 9.37), forestry (CPO 9.42 - 9.48) and fishing (CPO 9.49 - 9.50). The Office welcomes the inclusion of policy CPO 9.34, which guides small-scale rural enterprises and requires that these locate within existing farm buildings and brownfield sites.</p>

	<p>The NPF acknowledges the key role the planning process has to play in realising the potential of the extractive industries sector and the importance of identifying and protecting important reserves of aggregates and minerals from development that might prejudice their utilisation. The draft Plan sets out the policy objectives (CPO 9.51 - 9.54) for the extractive industry. However, no map to identify the location of these resources within the County has been included and it is considered that this would be a welcome addition to the Plan and the policy objectives set out in this regard.</p> <p>Observation 6 – Extractive Industry</p> <p>Having regard to National Policy Objective 23 and the section 28 <i>Quarries and Ancillary Activities Guidelines for Planning Authorities 2004</i>, the planning authority is requested to include a map to show the location of quarries and minerals across County Wicklow.</p>
<p>CE Response</p>	<p>The map requested by the OPR can be included in the plan. Please see proposed amendments to Chapter 9.</p>
<p>Economic Development and Employment</p> <p>Retail</p>	<p>The Office welcomes the inclusion of core retail areas and the recognition of the primacy of Dublin City Centre within the regional retail hierarchy and considers that the retail hierarchy is generally consistent retail hierarchy for the region set out in table 6.1 of the RSES and with the settlement hierarchy in the draft Plan.</p> <p>Notwithstanding, it is noted that both Baltinglass and Rathdrum, which are level 3 centres, have specific lands zoned where the policy objectives consider they have the potential for an additional convenience retail / supermarket store. Having regard to the <i>Retail Planning Guidelines for Planning Authorities (2012)</i> (RPGs) and specifically section A 1.6 Types of Location and Section 4.4 Sequential Approach to the Location of Retail Development, it is considered that the zonings of the draft Plan with respect to the 'AA1' lands in Baltinglass town plan and the employment lands in Corballis Upper in the Rathdrum town plan and the references to their suitability for the provision of a retail/supermarket development needs to be reconsidered in the context of the sequential approach of the 2012 Guidelines.</p> <p>Recommendation 14 - Sequential Approach to Zoning of lands for Retail Use</p> <p>Having regard to the <i>Retail Planning Guidelines for Planning Authorities (2012)</i>, the objectives for retail development in the draft Plan and the requirements of Section A1.6 and Section 4.4 specifically, the planning authority is required to remove the land use zonings and / or policy objectives for the following lands unless it can be demonstrated that the objectives set out adhere to the guidelines in full and do not conflict with other policies of the draft Plan to support the regeneration of the town centres:</p> <ul style="list-style-type: none"> i. Lands zoned mixed use in Action Area 1 fronting the N81 in the Baltinglass Town Plan whereby Section 2.9 states that the mixed use zone lands shall be reserved for the development of a discount foodstore; and ii. Policy RT6 which states that lands zoned as employment at Corballis Upper may be considered for the development of a supermarket (Rathdrum Town Plan).
<p>CE Response</p>	<p>It is recommended that the two retail objectives in Baltinglass and Rathdrum be removed from the plan, as detailed in Section 3.2 of this report.</p>
<p>Sustainable Transport and Accessibility</p>	<p>The Office notes the proactive approach to transport and movement including a commitment to work with the NTA and TII to support the delivery of a high quality, climate resilient and sustainable transport network in the county by the inclusion of a range of policies. In particular the policy to prepare local transport plans (LTPs) for the key towns (CPO 12.3) is welcomed. However, the draft Plan does not provide baseline figures for the existing modal split for existing settlements and including baseline figures would enable the setting of achievable targets for modal change for individual settlements (e.g. Wicklow- Rathnew including as part of the Local</p>

Transport Plans) and/or by settlement type (self-sustaining growth towns, etc.). Inclusion of baseline figures and targets for modal share would also form a basis for effective monitoring in the implementation of the local authority's movement strategy and climate change strategy, highlighting where implementation needs to be stepped up or addressed in subsequent reviews of the development plan.

Recommendation 15 - Modal Share and Sustainable Transport

In order to ensure the effective planning, implementation and monitoring of the development plan requirements under section 10(2)(n) of the *Planning and Development Act 2000* (as amended), the planning authority is required, in consultation with the National Transport Authority (and Transport Infrastructure Ireland), as appropriate, to:

- (i) include existing baseline figures for modal share for the overall county and modal share targets for the plan period. It is recommended that this could best be provided at individual settlement level for the larger settlements, and at aggregate level for rural towns and villages and the open countryside; and
- provide an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular.

CE Response

The baseline figures for modal split for towns in the upper end of the settlement hierarchy are all set out in the 'Asset Based Settlement Assessment' carried out and published as part of the 1st Chief Executive's Report. Data on modal split is not available for the smaller settlements, generally those under 1,500 population. It should be noted that the data available only relates to trips to work or school and therefore is not fully reflective of all trips.

These baseline figures can be included in the Development Plan as requested, however having consulted with the NTA, the crafting of future modal split targets for each settlement is a complex exercise which entails detailed analysis of travel patterns in each location, and a general one-size-fits-all approach for setting targets is not optimal. Therefore it is considered most appropriate for modal split target to be developed as part of the Area Based Transport Assessments that are or will be carried out in the short term for the largest towns in the County (Levels 1-3 in the hierarchy) and thereafter for the medium sized towns (Level 4). It is considered sufficient for the Development Plan to state the baseline as a benchmark against which strategies and programmes set out in this plan can be assessed in the year 2 year plan implementation report in 2024, as updated data for modal split should be available at that stage from the 2022 Census.

Proposed new table:

Modal Split (trips to work and school)	Active		Public Transport		Private vehicles	
	2011	2016	2011	2016	2011	2016
Bray	21%	20%	21%	21%	58%	57%
Wicklow - Rathnew	18%	15%	8%	10%	74%	75%
Greystones- Delgany	10%	11%	22%	22%	68%	67%
Arklow	22%	24%	5%	5%	72%	71%
Blessington	19%	19%	9%	10%	72%	71%
Baltinglass	28%	34%	4%	4%	68%	62%
Enniskerry	6%	5%	18%	17%	76%	78%
Kilcoole	17%	17%	15%	16%	68%	67%
Newtown	12%	10%	17%	18%	71%	72%
Rathdrum	22%	24%	7%	6%	72%	70%

<p>Transport Infrastructure</p>	<p>The policy objectives set out in Chapter 12 to commit to a sustainable transport network, to integrate transport and land use and to facilitate sustainable travel patterns are welcomed. Nonetheless, the Office must ensure that the plan is consistent with the current strategic and statutory policy framework.</p> <p>The Office has reviewed the plan in the context of the current Greater Dublin Area Transport Strategy and National Development Plan. It is noted that a number of the public transport objectives included in the draft Plan, for example, the extension of the LUAS line to Blessington and the provision of a third interchange at Arklow, have not been identified in the RSES or the Transport Strategy for the Greater Dublin Area 2016 -2035. The inclusion of the projects listed in Chapter 12 (CPO 12.21 and CPO 12.36) needs to be reviewed to ensure consistency with the current policy context and infrastructure strategy for the region. Furthermore, as discussed previously in Section 4, a number of key policies and objectives of the draft Plan regarding employment zonings close to intersections on the national road network need to be re-examined in order to demonstrate consistency with the requirements of the <i>Spatial Planning and National Roads Guidelines (2012)</i>.</p> <p>Recommendation 16 - Transport and Land Use</p> <p>In order to ensure the effective planning, implementation and monitoring of the development plan requirements under section 10(2)(n) of the <i>Planning and Development Act 2000</i> (as amended), and consistency with the section 28 <i>Spatial Planning and National Roads Guidelines for Planning Authorities 2012</i>, the planning authority is required to:</p> <ul style="list-style-type: none"> (i) update the transport objectives and land use maps accordingly to ensure that the draft Plan and the policy objectives therein are consistent with the Transport Investment Priorities in Section 8.4 of the RSES, the <i>Transport Strategy for the Greater Dublin Areas 2016 -2035</i> and <i>Project Ireland 2040</i> including the deletion of projects which are premature including the LUAS extension from City West / Tallaght to Blessington, the provision of a third interchange at Arklow, Upgrade to the Ballyronan Interchange; and upgrade to the Glen of the Downs Interchange; and (ii) strengthen and expand on the policy objectives for national roads to ensure consistency with the Guidelines and a plan-led approach in order to safeguard the strategic capacity of national roads. <p>The planning authority is advised to consult with Transport Infrastructure Ireland and the National Transport Authority regarding the major transport infrastructure projects included in the development plan.</p>
<p>CE Response</p>	<p>The issue raised by the OPR is noted, and it is recommended that Objective CPO 12.21 be amended as follows:</p> <p>CPO 12.21 To promote the development of transport interchanges and ‘nodes’ where a number of transport types can interchange with ease. In particular:</p> <ul style="list-style-type: none"> ▪ to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and /or Regional Authority ; ▪ to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES; ▪ to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Rathdrum, Wicklow and Arklow;

- to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;
- to promote car sharing parking spaces at premium locations in car parks;
- to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;
- ~~to promote the Luas extension from City West/ Tallaght to Blessington;~~
- to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus services / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;
- to encourage the improvement of bicycle parking facilities at all transport interchanges;
- to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and
- to support the development of bus shelters, that shall incorporate disabled access and bicycle parking facilities where possible.

With respect to CPO 12.36 (Objectives for the M/N11):

- notwithstanding that a northern link into Greystones from the Glen Of the Downs interchange is only a long term concept and has not been studied in depth, it is considered prudent that the possibility of such a link should be retained in the plan in order to ensure no development / road improvements that occur during the lifetime of this plan would not prejudice this possibility in the longer term;
- the improvement of the Ballyronan interchange has long been an objective of the Council given its substandard configuration from the outset and therefore it is reasonable that this is retained in the plan. With respect to the link road to the Kilcoole Road from Ballyronan, the feasibility and necessity for this link has not been assessed in detail at this time, and although the ABTA for the Greystones - Delgany – Kilcoole area (commenced in late 2021) is likely to examine the issue of access to south Kilcoole, at this time is considered appropriate to omit this objective from the plan
- The Arklow by-pass was designed and constructed in such a manner as to facilitate the possibility of the third interchange. It is therefore illogical to omit this possibility notwithstanding the fact that this project is not listed in current spending plans.

With regard to overall consistency with the various guidelines detailed, the CE is satisfied that the draft development plan generally accords with same, and no particular inconsistency is pointed out by the OPR. This issue is addressed in more detail in the submission from the TII.

<p>Climate Action and Renewable Energy</p> <p>Climate Action</p>	<p>The Office welcomes the inclusion of climate change as one of three cross-cutting key principles of the draft Plan. The draft Plan’s overall strategy, in terms of the focus of growth on the MASP area, key towns and villages, is consistent with the promotion of sustainable settlements, in addition to the NPF and the RSES. However, as noted above, there are elements of the transportation and movement policy objectives that require review to align with the spatial aspects of the plan. In addressing Recommendations 5, 6 and 13 above, the planning authority should consider the requirement to promote sustainable settlement and transport strategies for urban and rural areas 10(2)(n).</p> <p>In addition, the Office considers that the draft Plan should make provision to ensure that the development plan is consistent with the climate action plan to be prepared by your authority in accordance with section 14B of the Climate Action and Low Carbon Development Act 2015, in addition to any future government policy relating to climate action.</p> <p>Observation 7 – Climate Action</p> <p>In accordance with section 10(2)(n) of the <i>Planning and Development Act 2000</i> (as amended), and having regard to and the importance attributed to climate action by Government policy, as evidenced by, inter alia, the recent <i>Climate Action and Low Carbon Development Act 2021</i>, the <i>Climate Action Plan 2019</i> and the <i>Development Plans, Guidelines for Planning Authorities, Consultation Draft</i> (August 2021), the planning authority is requested to include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure that the development plan will be consistent with the local authority climate action plan, and the approach to climate action recommended in the forthcoming Development Plan Guidelines as adopted or any other relevant guidelines.</p>
<p>CE Response</p>	<p>The CE is satisfied the draft development plan addresses the issues that it should in the area of climate action, as set out in current national strategy, policy and guidelines, and the Development Plan meets the requirements of Section 10(2)(n) of the Act.</p> <p>In the event that Government or Ministerial policy / guidelines or County strategies in relation to climate action are amended / enhanced, and this necessitates an amendment to the Development Plan, this would be facilitated as a matter of course, as would any significant change in Government or County policy that has a bearing on the objectives of the Development Plan.</p> <p>In the case of new Government policy or guidelines, it is normal for the Minister and their Department to provide direction to Local Authorities in relation to what changes, if any, may be required to existing development plans to accommodate said policy changes, and therefore it is not considered necessary to include an objective in this plan that the plan may be varied if policy/ strategy on climate change, or any other aspect of Government policy or statute affecting development, is made by the Government.</p>
<p>Climate Action and Renewable Energy</p> <p>Renewable Energy</p>	<p>The Office acknowledges that the current <i>County Wicklow Wind Energy Strategy 2016</i> will be updated upon the making of any new guidelines. However, there is no specific policy objective stated to support this and there is no indication of how the implementation of the development plan will contribute to realising national targets on renewable energy and climate change mitigation and, in particular, wind energy production and the potential wind energy resource (in megawatts) as required by the Specific Planning Policy Requirement (SPPR) in the <i>Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017)</i>.</p>

	<p>It is stated within the draft Plan that the Wind Energy Strategy for the County will be reviewed and updated upon the making of the new wind energy guidelines and a clear policy commitment in this regard is considered appropriate.</p> <p>Recommendation 17- Renewable Energy Targets</p> <p>In accordance with the provisions of section 28(1C) of the <i>Planning and Development Act 2000</i> (as amended), and having regard to the government’s commitment in the <i>Climate Action Plan 2019</i> to achieve 70% of electricity from renewable sources by 2030 (adding 12GW of renewable energy capacity nationally), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and section 28 guidelines <i>Wind Energy Development Guidelines 2006</i> and the <i>Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017</i>, the planning authority is required to:</p> <ul style="list-style-type: none"> - indicate how the development plan will contribute to meeting national renewable energy targets, including specific targets in megawatts for wind energy potential in the county. In the absence of any nationally or regionally determined targets for County Wicklow specifically, you are advised to demonstrate appropriate metrics in this regard, which could include Wicklow’s share of estimates of additional national renewable electricity target as defined by the % of national land area represented by the county, linked back to the cumulative renewable energy production potential of the areas designated for renewables development. <p>Observation 8 – Wind Energy Strategy</p> <p>The planning authority is requested to include a policy objective that indicates a commitment to review the <i>2016 Wicklow Wind Energy Strategy</i> upon the publication of the new Wind Energy Guidelines.</p> <p>It is important that consistency is achieved across county boundaries when identifying areas for wind energy development potential and it is noted that lands identified in the draft Plan as ‘Most Favoured’ in County Wicklow along the Carlow county boundary do not correspond with areas identified therein as the areas of ‘viable wind speed’.</p> <p>Observation 9 – Areas Suitable for Wind Energy</p> <p>Having regard to the requirements of section 9(4) of the <i>Planning and Development Act 2000</i> (as amended), the planning authority is required to coordinate the objectives for wind energy development in the development plan, with those of the neighbouring counties, to ensure a coordinated Wind Energy Strategy across the region. Particular coordination shall be required with Carlow County Council where current conflicts arise in the identification of preferable locations in the consideration of their recently published Draft Development Plan.</p>
<p>CE Response</p>	<p>It is clearly stated in the draft development plan that ‘<i>Upon the making of any new guidelines the Wind Energy Strategy and the provisions of the CDP relating to wind energy will be updated if required</i>’ (Chapter 16, Section 16.2.1.1). Therefore no amendment or new objective is considered necessary.</p> <p>With respect to meeting the County’s share of national renewable energy targets, having regard to the national target outlined by the OPR (12GW), and of this the wind energy targets being +3.5GW of off-shore wind energy and +4.2GW of additional on-shore wind energy (source: 2019</p>

Climate Action Plan), County Wicklow should endeavour to deliver 3% of the on-shore growth requirement (Wicklow comprising 3% of the land mass of the Republic of Ireland), which equates to +255MW of renewable energy, of which +126MW would comprise on-shore wind energy. It is recommended that this be detailed in Chapter 16, Section 16.2.1

It is considered that the WES set out in the draft Development Plan makes adequate provision for the delivery of such a quantum of on-shore wind energy generation and in particular, 52,500ha are identified in the WES as 'most favoured' for the development of wind farms (where wind energy development will be considered favourably for consent), and another 59,000ha is identified as 'less favoured' where wind farm development will also be considered, but taking into account the additional sensitivities in these areas compared to the 'most favoured' areas. This accounts for c. 55% of the total area of the County, which is considered high, taking into account that considerable areas of the County are protected upland or coastal areas. It is recommended that this be detailed in Chapter 16, Section 16.2.1.1.

It should be borne in mind however much of this land may not have the capacity to be developed for wind energy if mandatory set-backs from dwellings are required by future Government policy. The prevalence of one-off rural dwellings in certain counties should be taken into account in this regard, as this may limit the ability of certain counties to provide their 'share' of the national output.

With respect to wind speed and consistency with adjoining County's wind energy strategies, the Wicklow WES does not set out wind speeds as a limiting factor influencing whether areas are suitable for wind farms or not; it may be the case that certain areas that are deemed 'suitable' in terms of capacity to absorb turbines, may not be 'viable' with respect to wind speeds having regard to current technologies and designs. It is considered that it is most conducive to the future delivery of on shore wind to not rule out areas that might become viable due to changes in technology.

<p>Flood Risk Management</p>	<p>A Strategic Flood Risk Assessment (SFRA) has been carried out by the planning authority and is appended to the draft Plan with relevant policies included in chapter. This has been reviewed by this Office and the OPW and the inclusion of the Plan-making justification test in the SFRA is welcomed. However it is considered that a number of specific sites within the settlements require a review where inconsistencies with the Guidelines have been identified.</p> <p>Recommendation 18 - Flood Risk Management</p> <p>Having regard to the detailed requirements of <i>The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DECLG and DECHLG, 2009)</i>, section 28 guidelines, the planning authority is required to update the settlement plan maps to ensure the following:</p> <ul style="list-style-type: none"> (i) the land use zoning maps are overlaid with the flood maps prepared in the SFRA in order to clearly outline the sites at risk of flooding; (ii) the inclusion of a water compatible land use zoning (open space) to the Settlement Maps for the Small Town Plans (Type 2) to ensure that there is no encroachment onto, or loss of the flood plain within the settlements; and (iii) the land use zonings at the following specific locations should be reviewed and revised where consistency with guidelines cannot be demonstrated: <ul style="list-style-type: none"> (a) Ashford - areas of Community & Educational, Employment and Public Utility lands in Flood Zones A and B; (b) Aughrim employment zoning in Flood Zone A; and area zoned mixed use to the east of the settlement at the confluence of the Aughrim and Aughrim Lower rivers; (c) Carnew - area of Existing Residential in Flood Zones A and B to the north of the settlement; and (d) Tinahely - area of Public Utility which can allow highly vulnerable uses in the centre of the settlement in Flood Zones A and B.
<p>CE Response</p>	<ol style="list-style-type: none"> 1. The SFRA of the draft plan prepared and published overlays the flood maps with the land use zoning maps for all, plans in Levels 4-6 of the hierarchy and any other locations where development zoning is proposed, as set out in Section 5 of the SFRA report. It is unclear why this has been requested by the OPR when this has already been provided. For additional clarity however additional maps can be provided for inclusion in the SFRA (see Addendum II to the SFRA appended to this report). 2. The Level 6 plans are simple 2 or 3 zone plans, which are considered appropriate for these smaller settlements. These plans do not provide the full range of zoning objectives as found in higher order plans, where it is necessary to clearly show how development zones don't conflict with flood zones unless the justification test is passed. The OPR has requested that a new zone type (open space) be added into these plans, where land is at risk of flooding. However this does not take into account that some of these lands (for example those lands located in the town cores) may pass the justification test for zoning. In order to ensure that no inappropriate development occurs in areas at risk of flooding in these simple format plans, these plans include a very clear objective to manage flood risk and this is considered to adequately address the concerns of the OPR:

Flood Risk Assessment 'Level 6 Mitigation Objective'

To restrict the types of development permitted in Flood Zone A and Flood Zone B to the uses that are 'appropriate' to each flood zone, as set out in Table 3.2 of the Guidelines for Flood Risk Management (DoEHLG, 2009). The planning authority may consider proposals for development that may be vulnerable to flooding, and that would generally be inappropriate as set out in Table 3.2 of the Guidelines, subject to all of the following criteria being satisfied:

- The planning authority is satisfied that all of the criteria set out in the justification test as it applies to development management (Box 5.1 of the Guidelines) are complied with.
- The development of lands for the particular use is required to achieve the proper planning and sustainable development of the settlement, and complies with at least one of the following:
 - (i) The development is located within the 'primary lands' and is essential for the achievement of the 'vision' or for the achievement of a specific objective for these lands.
 - (ii) The development comprises previously developed and/or under-utilised lands/sites,
 - (iii) There are no suitable alternative lands for the particular use, in areas at lower risk of flooding.

3.

Ashford

It is accepted that the justification for these zonings is not sufficiently clear in the SFRA. To address this, it is proposed to amend the SFRA as set out in the attachment document '[Addendum II to SFRA](#)'

Aughrim

It is accepted that the justification for these zonings is not sufficiently clear in the SFRA. To address this, it is proposed to amend the SFRA as set out in the attachment document '[Addendum II to SFRA](#)'

Carnew

It is accepted that the justification for this zoning is not sufficiently clear in the SFRA. To address this, it is proposed to amend the SFRA as set out in the attachment document '[Addendum II to SFRA](#)'

Tinahely

It is accepted that the justification for this zoning is not sufficiently clear in the SFRA. To address this, it is proposed to amend the SFRA as set out in the attachment document '[Addendum II to SFRA](#)'

<p>Environment, Heritage and Amenities</p>	<p>Chapter 8 of the draft Plan addresses mandatory objectives in relation to protected structures and architectural conservation areas (ACA's) for the county and archaeological heritage and it is noted that the inclusion of ACAs within the land use zoning maps for the settlements sets a strong precedent to conserving and enhancing those settlements.</p> <p>Chapter 17 includes objectives for natural heritage, including protected habitats and species designated for nature conservation, and green infrastructure. The proactive approach to peatlands in the context of the transition away from commercial peat production is also to be commended.</p> <p>Chapter 18 includes objectives for public rights of way including an objective to bring forward proposals for the creation of further public rights of way, and that the public rights of way are indicated on maps 18.09 and listed in Table 18.3A.</p> <p>Advisory Note The Office also welcomes the promotion of sustainable recreational use in the draft Plan. Having regard to the particular environmental characteristics and sensitivities of County Wicklow, the planning authority is requested to satisfy themselves that there are no policy conflicts within the draft Plan between commitments given to the protection of European Sites and any policy objectives which aim to facilitate sustainable recreational use of the outdoors in County Wicklow.</p>
<p>CE Response</p>	<p>The points raised are noted.</p> <p>The CE is satisfied that none of the objectives with regard to the sustainable recreational use of the outdoors conflict with the protection of European sites, the draft plan having undergone an Appropriate Assessment and including strong objectives with regard to the protection of European Sites (CPO 17.4, 17.5, 17.6, 17.14, 18.17, 18.18, 11.47, 11.48).</p>
<p>Environmental Reports</p>	<p>The Office considers that there has been strong integration between the environmental reporting and the draft Plan preparation process. The inclusion of an analysis of the Member's amendments in the Environmental Report is welcome and is consistent with the strategic environmental assessment process in accordance with the SEA Directive and the Section 28 ministerial Guidelines. Notwithstanding, in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities, the findings of the Strategic Flood Risk Assessment should be better integrated with the SEA process, including comprehensively addressing land use zoning and the justification test undertaken therein.</p> <p>The Office notes that diverse terminology is used in Section 3.0 Screening for Appropriate Assessment which sometimes correctly references the 'likelihood of significant effects' but also sometimes incorrectly states that the draft Plan will have 'an adverse impact on the integrity of European sites'. The planning authority is advised that the terminology used should be amended to ensure that the correct legal test is being applied.</p>
<p>CE Response</p>	<p>The SEA and AA will be enhanced / updated in light of the issues raised if necessary.</p>
<p>General and Procedural Matters</p>	<p>While the Written Statement of the draft Plan is presented in a standardised format, the Office is concerned about the overall size of the document which includes three volumes and 10 appendices. Whilst there is an extensive range of national and regional policy, legislation and guidelines which the planning authority must have regard to and comply with in preparation of the draft Plan, consideration should be given to reviewing the final document and reducing the significant explanatory text regarding national and regional policy and objectives. The Office considers that there may be an opportunity to rationalise elements of the draft Plan and references to other policy documents, in an attempt to streamline and make the Plan a more</p>

	<p>concise and user friendly document and to remove duplication. This would result in a plan that is easier to follow and provides greater focus on the key objectives for the plan period.</p> <p>Notwithstanding the above, the Office acknowledges that the chapters are presented in a standardised format that is easily followed and understood. The accessibility of the individual chapters in the online version also make it easier for the public to access the relevant information. The Office advises that the planning authority satisfy themselves that the references to section 28 Ministerial Guidelines and legislation are up to date e.g. DMURS in the plan.</p> <p>Furthermore, the Office welcomes the inclusion of Chapter 20 Implementation and Monitoring, which indicates the planning authority's intention to securing and monitoring the implementation of Strategic County Outcomes and the Core Strategy of the Plan. The Office commends the approach applied to set out, in as far as is possible, objectives which are specific, measurable, achievable, and realistic which is advocated for within the recently published <i>Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021)</i>.</p> <p>In this regard consideration could be given the inclusion of provisions for monitoring residential development permitted in rural villages and in the open countryside over the plan period to assist in the monitoring of development patterns occurring under the settlement strategy and tracking progress of the Core Strategy to meet with the requirements of NPO 15 and NPO 16.</p>
CE Response	<p>The CE notes the concerns of the OPR with regard to the size / length of the documents but in light of the obligations with respect to the content of Development Plan, it is not evident how it could have been made any shorter.</p> <p>With respect to monitoring, the CE looks forward to new resources and mechanisms being provided by the Department to carry out the detail monitoring required by the new guidelines.</p>
Summary	<p>The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.</p> <p>At the end of the process, your authority is required to notify this Office within five working days of the decision of the planning authority in relation to the draft Plan. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the chief executive shall inform the Office and give reasons for this decision.</p>
CE Response	Noted
CE Recommendations	
Proposed Amendments to Volume 1	
Amend the draft plan as set out appended document ' Proposed Amended Chapter 3 – Core Strategy '	
Amend the draft plan as set out appended document ' Proposed Amended Chapter 4 – Settlement Strategy '	
Amend the draft plan as set out appended document ' Proposed Amended Chapter 6 – Housing '	
Amend Chapter 9 (Employment) as follows:	

Insert new table:

	Active		Public Transport		Private vehicles	
	2011	2016	2011	2016	2011	2016
Bray	21%	20%	21%	21%	58%	58%
Wicklow - Rathnew	18%	15%	8%	10%	74%	75%
Greystones- Delgany	10%	11%	22%	22%	68%	67%
Arklow	22%	24%	5%	5%	72%	71%
Blessington	19%	19%	9%	10%	72%	71%
Baltinglass	28%	34%	4%	4%	68%	62%
Enniskerry	6%	5%	18%	17%	76%	78%
Kilcoole	17%	17%	15%	16%	68%	67%
Newtown	12%	10%	17%	18%	71%	72%
Rathdrum	22%	24%	7%	6%	72%	70%

Amend CPO 9.15 and Map 09.02 to remove 'Employment Zoning' form northern side of Farrankelly Road at Kilpedder Interchange.

Amend Chapter 12 (Sustainable Transportation) as follows:

CPO 12.3 In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy, (namely Bray and environs, Wicklow – Rathnew, Arklow, Greystones – Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy) and any other settlement where it is deemed necessary by the Planning Authority and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plans.

CPO 12.21 To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular:

- to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and /or Regional Authority ;
- to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;
- to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Rathdrum, Wicklow and Arklow;
- to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;
- to promote car sharing parking spaces at premium locations in car parks;
- to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;
- ~~to promote the Luas extension from City West/ Tallaght to Blessington;~~
- to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus services / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;
- to encourage the improvement of bicycle parking facilities at all transport interchanges;
- to improve existing and provide new footpath / footway linkages to existing / future transport

interchange locations; and

- to support the development of bus shelters, that shall incorporate disabled access and bicycle parking facilities where possible.

Amend Chapter 16 (Energy Infrastructure & Communications) as follows:

16.2.1 Electricity Generation

In accordance with the provisions of section 28(1C) of the *Planning and Development Act 2000* (as amended), and having regard to the Government's commitment in the *Climate Action Plan 2019* to achieve 70% of electricity from renewable sources by 2030 (adding 12GW of renewable energy capacity nationally), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and section 28 guidelines *Wind Energy Development Guidelines 2006* and the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017*, the development plan aims to put in place the appropriate supports that will allow County Wicklow to contribute its share of the additional national renewable electricity target (excluding off shore wind energy generation), which estimated to be **255MW**.

16.2.1.1 Wind Energy

Having regard the County target for renewable energy generation set out above (255MW), and national targets of 4.2GW to be sourced from on-shore wind, the on-shore wind generation target for County Wicklow is **126MW** (unless other sources of renewable energy generation allow the overall target of 255MW to be met).

It is considered that the WES set out in the Development Plan makes adequate provision for the delivery of such a quantum of on-shore wind energy generation and in particular, 52,500ha are identified in the WES as 'most favoured' for the development of wind farms (where wind energy development will be considered favourably for consent), and another 59,000ha is identified as 'less favoured' where wind farm development will also be considered, but taking into account the additional sensitivities in these areas compared to the 'most favoured' areas. This accounts for c. 55% of the total area of the County, which is considered high, taking into account that considerable areas of the County are protected upland or coastal areas.

Amend Volume 1 maps as set out in Part 2 of this report.

Proposed Amendments to Volume 2

Amend 'Strategic Land Bank' (SLB) zoning objective as follows:

Objective: To provide a land bank for future development of the settlement after the lifetime of this plan, if and when the need arises.

Description: These are lands that are identified as being potentially suitable for new residential development having regard to proximity and accessibility to infrastructure. However, these lands are not necessary for development during the lifetime of this plan and may only be considered for detailed zoning and development after 2028. ~~Any development proposals within the lifetime of the plan will be considered under the County Development Plan rural objectives.~~ In order to ensure that the lands are retained for future development, no development proposals, including single housing, will be considered until after the lifetime of the plan.

Amend 'Introduction to Level 4 Plans' as follows

1.1.3 Economic Development & Employment

This table also show the amount of land proposed to be zoned in each town for new employment. While it is assumed that a proportion of jobs growth will occur in the town centre and other mixed use lands that are not specifically zoned for employment alone, or will occur on existing developed employment land through intensification, sufficient zoned employment land is zoned in each town to meet all of the jobs growth required, on the assumption of 80 employees per hectare, plus an additional 'headroom' of 100% to ensure that there will be no shortage of site choice for developers of new employment.

LEVEL 4	Jobs ratio 2016	Targeted future jobs ratio 2031	Jobs growth targeted up to 2031	Quantum of zoned employment land (ha)
Baltinglass	0.81	1.01	+500	13
Enniskerry	0.33	0.41	+100	1 ²
Kilcoole	0.46	0.57	+100	10 ¹
Newtownmountkennedy	0.78	0.97	+1,100	28
Rathdrum	0.82	1.03	+600	15

Amend Level 4 Plan – Baltinglass

Amend 'Action Area 1' as set out in Part 2 of this report.

Amend Level 4 Plan - Newtownmountkennedy

Omit 'Action Area 1' as set out in Part 2 of this report.

Amend Level 4 Plan - Rathdrum

Section 4.4 Economic Development & Employment Objectives

~~RT6 — Subject to compliance with the Retail Planning Guidelines and the sequential test, lands zoned for new employment (E – Employment) at Corballis Upper may be considered for the development of a supermarket.~~

Amend Volume 2 maps as set out in Part 2 of this report.

Proposed Amendments to Volume 3

Amend Appendix 1 as follows:

Section 3.1.1

Intensity of development (density)

- Density' will only be allowed to be generated from land that is capable of being built upon; land which is ultimately unsuitable for such purposes (e.g. due to excessive slope) will not be considered to be part of the density equation even if it forms part of the overall site. Any such areas should be clearly shown on planning

² To be reviewed in the next Kilcoole LAP to be commensurate with the employment growth objective

applications drawings;

- The density that can be achieved on any site will ultimately depend on compliance with 'qualitative' standards such as fit with surroundings, height, open space provision, adequate privacy, car parking etc and the density ultimately proposed should be the outcome of the design process rather than the starting point;
- ~~Where a new 'neighbourhood' centre forms part of a large scale greenfield expansion area, plot ratio in the neighbourhood hub (i.e. only that area forming an integrated part of the shopping / community facilities provided) should be in the region of 1:1~~

Appendix 1, Section 4.1.2

4.1.2 Intensity of development

The Planning Authority will require all employment developments to be of an appropriate intensity, **making best use of zoned serviced land, while ensuring the highest quality of development and the protection of the residential and visual amenities of the area.** ~~measured by plot ratio and site coverage. The following standards will normally apply, except where other specified in a local plan, or where local conditions require otherwise:~~

Table 4.1 – Density standards

	Site coverage		Plot ratio
	Max initial	Max final	
Offices	60%	75%	1.5
Manufacturing	40%	60%	1
Distribution/Warehousing	30%	50%	1
Retail warehousing	30%	50%	1

The Planning Authority will not permit an employment development where it is considered that there is an unacceptable over development of the site.

Amend Appendix 3 (Housing Strategy) as set out in appended document 'Proposed Amended Housing Strategy'

Update Appendix 8 (SFRA) as set out in appended document 'Addendum II to SFRA'

Section 3.1	Prescribed bodies (Group 1)
Section 3.1.2	EMRA https://consult.wicklow.ie/en/submission/ww-c2-16
General	<p>The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in order to prepare the Draft Plan and, in particular, that this work follows a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the RSES and the establishment of the Office of the Planning Regulator. Accordingly, the Assembly welcomes the overall approach and effort of Wicklow County Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.</p> <p>The Assembly is also aware of upcoming guidance for Development Plans to issue from the Department of Housing, Local Government and Heritage (DHLGH) and acknowledges that the absence of these guidelines, at this time, will create challenges for some local authorities. Furthermore, the Assembly notes the difficulties posed to Local Authorities undertaking the Development Plan Review process during the period of COVID-19 restrictions and commends the Council in facilitating online engagement and consultation during the preparation of the Draft Plan.</p>
CE Response	Noted
Chapters 1-2 Introduction Overall Strategy	<p>The Assembly welcomes the inclusion of the first chapter of the Draft County Development Plan (CDP), which provides an overview of the statutory context and planning policy hierarchy with which the CDP is required to be consistent with, including 'Project Ireland 2040' the National Planning Framework (NPF), the RSES, the National Transport Authority's 'Transportation Strategy for the Greater Dublin Area 2016-2035' and the National Climate Action Plan.</p> <p>The Assembly also welcome the recognition given to the Dublin Metropolitan Area Strategic Plan (MASP), which is a key policy document to support sustainable population and economic growth in the Dublin Metropolitan Area, which includes parts of Bray and Greystones in Wicklow County Council.</p> <p>The Plan is also informed by Ministerial Guidelines, including Specific Planning Policy Requirements (SPPRs) of Section 28 Guidelines as listed in Section 3.9 Core Strategy and in Appendix 10, and the required environmental assessments Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) in Appendices 6, 7 and 8, respectively.</p> <p>The Assembly further welcomes the setting out in Chapter 2 of the overarching cross-cutting themes of Healthy Placemaking, Climate Change and Economic Opportunity that inform the plan, which align with the key principles and National and Regional Strategic Outcomes identified in the NPF and RSES. This is supported by the identification of relevant National and Regional Policy Objectives (NPOs and RPOs) relating to the themes and embedded within the local, national and EU policy hierarchy.</p>
CE Response	Noted
Chapter 3 Core Strategy	<p>The Assembly acknowledge the work that has gone into the preparation of Chapter 3 which details the Core Strategy and Settlement Hierarchy of the Draft CDP, Zoning Principles, Key Transport Infrastructure Proposals, a County Retail Hierarchy, and compliance with Section 28 Ministerial Guidelines. Chapter 4 - Settlement Strategy provides further detail on the role and function of settlements, growth targets and housing occupancy controls relating to their level in the County Settlement Hierarchy.</p> <p>Statutory Requirements</p>

Local Authorities are required to prepare and incorporate a Core Strategy that shows the Development Plan is consistent with National and Regional Objectives under the National Planning Framework (NPF) and the relevant Regional Spatial and Economic Strategy (RSES), in accordance with the provisions of Section 10 of the Act. The Assembly draws the particular attention of the Council to Section 10 (2A), (2B) and (2C) of the Act and asks Wicklow County Council to ensure consistency in this regard.

National and Regional Population Projections

Section 3.1 Population sets out the statutory context for the application of population projections in the Draft CDP, which is welcomed by the Assembly. Table 3.1 sets out initial Population Projections for County Wicklow to grow up to 157,500 population to 2026 and up to 164,000 2031 in line with the National and Regional Population Projections in the NPF Implementation Roadmap issued under DHPLG Circular FPS04/2018 and Appendix B of the RSES.

The County population projections then apply an additional 25% headroom up to 2026 as allowed for in the Methodology for Transitional Projections in the NPF Implementation Roadmap, and a further 9,500 population to 2031 to be allocated directly to facilitate the growth of Bray as a Metropolitan Key Town. As allowed for in the Transitional Population Projections for the Dublin Metropolitan Area Strategic Plan (MASP), in line with National Policy Objective (NPO 68) of the NPF, which was approved by this Assembly on the 10th July 2020.

The total County population projections in Table 3.1 allow for County Wicklow to grow up to 161,269 by 2026 and up to 173,500 population by 2031. This equates to an additional population increase of 18,769 (high) in 2026 and an additional population of 31,075 (high) in 2031, over the 2016 census baseline population, which is considered to be consistent with the population prescribed for the County in the RSES and the NPF, as adjusted according to the transitional arrangements allowed for in the NPF Implementation Roadmap for headroom and NPO 68 of the NPF.

Notwithstanding that the Core Strategy population projections are generally consistent with the projections to 2026 and 2031 in the NPF and RSES, it is recommended the Core Strategy should also set out the population projections for the plan period, which is estimated to cover a six-year period from 2022 to 2028. The Draft CDP should also be strengthened through the inclusion of a robust evidence-based analysis of population trends and distribution that will set the context and justification for the allocation and distribution of population growth in the County over the plan period.

Housing Targets

Section 3.2 Housing sets out the methodology for integrating National and Regional Population Projections into the number of housing units to be delivered between 2020 -2031 in the County.

Table 3.3 sets out a projected new housing demand for the period from 2021 to 2026 of 4,891 units, which is stated to be in accordance with the 'Housing Supply Target Methodology for Development Planning' Section 28 Guidelines published by DHLGH in December 2020, and that thereafter it is assumed that housing demand will be delivered evenly up to 2031. It is recommended that the Core Strategy should also set out clearly the projected Housing Demand for the plan period, which is estimated from 2022 to 2028, and to demonstrate consistency in this regard with the methodology in Table 1 of the Housing Supply Target (HST)

	<p>Methodology Guidelines, which incorporates potential adjustments to facilitate convergence with the NPF Roadmap and application of additional headroom, where justified.</p> <p>Table 3.4 includes an additional allowance for a further 3,820 units to be allocated directly to facilitate the growth of Bray as a Metropolitan Key Town to 2031, which is consistent with the Transitional Population Projections for the Dublin MASP and NPO 68 of the NPF. This is to be delivered in a linear manner over the period to 2031 which would equate to 382 units per annum to be delivered up to and during the plan period. The phased allocation to Bray is considered to be consistent with the short (2026) to medium (2031) term phasing for 'Bray-Fassaroe' in Table 5.1 of the MASP.</p> <p>To inform housing policies in the Draft CDP, the Council states that it has prepared an interim Housing Strategy in the absence of Ministerial Guidance on the preparation of an evidence-based Housing Need Demand Assessment (HNDA), as required by NPO 37 of the NPF and RPO 9.5 of the RSES. The Assembly welcome the stated intention of the Council to review the Housing Strategy following the adoption of relevant Section 28 Guidelines. The Council will further note the recent publication in April 2021 of HNDA Guidelines by the DHLGH and the accompanying Circular 14/2021, which states that the HST Methodology Guidelines will continue to facilitate decisions regarding new housing supply targets for the six-year period of development plans that are being formulated currently, to be determined in advance of the full integration of HNDA methodology into the Housing Strategy.</p>
<p>CE Response</p>	<p>The CE is satisfied that the Core Strategy fulfils the requirements of Sections 10 (2A), (2B) and (2C) of the Act as well as the various Ministerial guidelines under Section 28.</p> <p>In order to ensure greater consistency and clarity, amendments to Chapter 3 and 4 of the draft Development Plan and the draft Housing Strategy are recommended, as set out in the documents appended to this report. In particular, the proposed amendments set out the population and housing growth targets for the plan period, which is up to Q2 2028 (assuming the plan is adopted in Q3 2022), rather than solely 2026, end 2028 and end 2031.</p> <p>In addition, further information is provided in the proposed amendments to the Housing Strategy regarding the method of calculation of plan period housing targets, to show greater consistency with the 'Housing Supply Target Methodology for Development Planning' Section 28 Guidelines published by DHLGH in December 2020.</p> <p>This interim Housing Strategy will in due course be replaced by a HNDA, as required by NPO 37 of the NPF and RPO 9.5 of the RSES.</p>
<p>Chapter 3 Core Strategy</p>	<p>The Assembly welcomes the graded approach to the allocation of population set out in Table 3.5 'Settlement Hierarchy' for the County, which is considered to be generally consistent with the settlement strategy and hierarchy in the RSES subject to the observations set out in this report.</p> <p>The Assembly also welcome the evidence-based approach taken by the Council in the subsequent Tables in Section 3.4 – 'Population and Housing Allocations' and Section 3.5- 'Zoning' and the setting out of Zoning Principles for the location of new development that relate to the advancement of the plan and the preparation of new Local Area Plans (LAPs) that include delivery of:</p> <ol style="list-style-type: none"> 1. Compact Growth, with targets of 30% of all new homes that are targeted in settlements within their existing built-up footprints, in accordance with NPO 3c of the NPF and RPO 3.2 of the RSES; 2. Population and Housing Targets, which are set out in the Draft CDP up to 2031;

3. Higher Densities, in accordance with SPPR 4 of the Urban Development and Building Heights Guidelines for Planning Authorities;
4. Sequential Approach, with a focus on town centre and infill/brownfield sites as part of a 'Tiered Approach to Land Zoning' set out in the NPF.

These principles are welcomed and could be further strengthened to include policies or objectives for monitoring of residential development permitted in settlements designated under the Settlement Hierarchy, including delivery of compact growth and residential development permitted for single rural houses, in line with NPO 36 of the NPF, in order to ensure compliance with the population allocations defined by the Core Strategy.

Population and Housing Allocations

In Section 3.4, Table 3.6 set out population allocations and Table 3.7 sets out housing allocations up to 2031 for each of the settlements in Levels 1-4, with aggregate growth targets for settlements in Levels 5-10 between 2016-2031. Table 3.8 provides further breakdown of 'Settlement/Aggregate Housing Targets' to 2026 and 2028, which is welcomed, and it is recommended that the Core Strategy should also set out the settlement/aggregate population targets for the plan period to 2028.

Table 3.9 (Section 3.4) sets out 'Housing development completed, underway and permitted' since 2016, which is a positive addition and could be further supported with a narrative on expected delivery rates for extant development, based on an analysis of past delivery and current trends in the County, and by inclusion of relevant information on residential development completed, underway and permitted in rural villages, clusters, and the open countryside. This is supported by NPO 20 of the NPF, which requires that development plans quantify the demand for rural housing to '*Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and County development plan core strategy processes.*'

Compact Growth Targets

The Assembly welcome Objective CPO 4.2 to secure delivery of compact growth targets and Table 3.9 (Section 3.5) 'Compact Growth Housing Targets 2022-2031', which sets out minimum housing targets to provide at least 30% of all new homes on lands within the built-up area of higher order settlements, in line with the NPF and RSES.

This is a very positive addition to the Draft CDP and could be further strengthened to include a requirement for monitoring of compact growth permitted in settlements designated under the Settlement Hierarchy, in line with NPO 36 of the NPF, and supported by the Zoning Principles of 'Compact Growth' and a 'Sequential Approach' as set out in Section 3.5 of the Draft CDP. This is further reinforced by RPO 5.5 that supports a clear sequential approach for future residential development in the MASP and by RPO 4.2, which requires that development should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services, and so that the assimilative capacity of the receiving environment is not exceeded.

It is noted that Table 3.10 indicates the majority of higher order settlements Levels 1-4 (with the exception of Baltinglass and Rathdrum), have a surplus of zoned lands outside the built-up area (expressed in housing yield), and that this will be addressed in new LAPs following the adoption of the Draft CDP. For LAP towns, it is noted that this is estimated on current zoned lands excluding lands already developed or under construction and disregarding extant permissions

	<p>as yet to commence.</p> <p>While the Assembly notes the strategic intent of the Council to promote compact growth in the following statement in Section 3.4 of the Core Strategy <i>“there shall be no quantitative restriction inferred from this Core Strategy and associated Tables on the number of units that may be delivered within the envelope of the town”</i>, it is nevertheless recommended that this statement be amended for clarity to ensure that future residential development is subject to the parameters set by the targeted population and housing growth within the County Settlement Hierarchy as set out in Tables 3.6 and 3.8 of the Draft CDP and is in line with regional and national population projections.</p> <p>With reference to lower order settlements, it is stated that that <i>“all of the targeted growth in towns/villages at Levels 5-9 can be accommodated within the existing built-up footprint of these settlements”</i> and this is welcomed as an extremely positive statement in the Draft CDP.</p> <p>It is considered that the Core and Settlement Strategy could be further strengthened by setting out clear parameters for the provision of compact growth, in particular for the LAP areas in higher order settlements Levels 1-3, in accordance with the projected growth targets in the County Settlement Hierarchy, and this is further elaborated in Section 2.5 Core Strategy and in particular Sections 2.5.2 Compact Growth Targets and 2.5.3 Land use Zoning.</p>
<p>CE Response</p>	<p>With respect to monitoring the delivery of new homes and in particular the monitoring of their location vis-à-vis the objective that not less than 30% will be delivered in the built up area of towns, this will be ensured through (a) providing a robust zoning regime for each town that in essence would prevent more than 70% of new housing development occurring outside of the built of area of each town (other than those developments in such locations already under construction or with permission that is still implementable during the lifetime of the plan), and (b) the monitoring of grants of permission, as well as commencement and completion data, utilising new data collection systems which it assumed will be shortly forthcoming from the Department, on foot of their signalling through the new Draft Development Plan Guidelines that this will be a new requirement on all Local Authorities.</p> <p>In order to ensure greater consistency and clarity, amendments to Chapter 3 and 4 of the draft Development Plan and the draft Housing Strategy are recommended, as set out in the documents appended to this report. In particular, the proposed amendments set out the population and housing growth targets for the plan period, which is up to Q2 2028 (assuming the plan is adopted in Q3 2022), rather than solely 2026, end 2028, and end 2031 as in the draft plan.</p> <p>The information that is already provided annual in the Core Strategy and Housing Strategy with respect to annual housing unit completions, ‘development under construction’ and ‘extant permission as yet to be commenced’ cannot be supplemented any further as (a) completions data provided by the CSO is not sufficiently detailed to determine the exact location of each unit completed and in particular, it is difficult to get robust data with respect to rural housing; (b) it cannot be assumed that development under construction will be completed nor indeed can the completion dates be accurately forecast and (c) no information is available with regard to the extant permission as yet commenced as to their likely commencement / completion date.</p> <p>The CE is satisfied that the housing growth annual targets as set out in the Core Strategy and Housing Strategy (as proposed to be amended and enhanced) are realistic and reasonable having regard to the patterns of housing growth evident in the County since 2016.</p>

With respect to rural / village housing, the data collection systems available to the Local Authority are not considered adequately calibrated and robust at this time to accurately provide data on rural / village housing commencements / completions. The CE looks forward to new system for capturing and managing that data being provided on foot on the new data obligations proposed in the new draft Development Plan Guidelines.

With regard to projecting the need for rural housing, no methodology has been made available to do this and it is very difficult to estimate or predict rural housing demand / development as it depends on many complex social and economic considerations. For example, between 2006 and 2011, it is estimated that that 400 new rural houses were completed (i.e. average of 80 p.a.) whereas between 2011 and 2016, it is estimated that 325 units were completed (average of 65 p.a.). Since 2016, it is estimated that 100 rural dwellings have been completed per annum. In this development plan, it is assumed that rural housing will grow at a rate of approximately 70 units per annum 2021-2031.

The purpose of this sentence / objective *"there shall be no quantitative restriction inferred from this Core Strategy and associated Tables on the number of units that may be delivered within the envelope of the town"* is to ensure that even where housing growth in any town comes close to or meets the overall town target for that period, a situation would not arise where good town centre / infill development / regeneration projects would have to be refused. In many locations, there is capacity in town centre / infill sites for more than 30% of the targeted growth for that town, yet the NPF and draft guidelines would suggest that notwithstanding this possible capacity, it is still permissible to provide for up to 70% of the targeted growth in out of centre, greenfield locations.

All of the plans that form part of this County Development Plan, as well as all of the LAPs that will follow, are / will ensure a robust development framework in each town that appropriately manages out of centre, greenfield development in favour of infill / brownfield / regeneration / town centre sites.

<p>Chapter 3 Core Strategy</p>	<p>Land use Zoning</p> <p>Further to the above and notwithstanding the welcome evidence-based content of Tables 3.5 – 3.10, it is noted that there is no quantification in the Core Strategy of the Draft CDP of lands zoned for residential use or a mixture of residential and other uses, as required under Section 10 (2A) of the Act.</p> <p>To this end, the Assembly recommend the inclusion in the Core Strategy of a table which clearly sets out the overall quantum of zoned residential lands that is required to provide for the targeted growth at settlement/aggregate level within the settlement hierarchy for the County.</p> <p>The Council are directed in this regard to the ‘Methodology for a Tiered Approach to Land Use Zoning’ in Appendix 3 of the NPF for current development or area plans. As part of an infrastructural assessment to identify lands that cannot be serviced during the life of a development or area plan and to take into account any strategic land bank objectives in the current LAPs and Town Plans as part of a phased approach to the provision of serviced lands. It is noted that strategic land banks are identified in Level 4 and 5 Town Plans for lands where development may only be considered for detailed zoning and development after 2028. It is further noted that Section 1.2.1 Zoning Objectives for Level 5 Settlements indicate these lands may only be considered for development after 2027 and it is recommended that this be updated to reflect the plan period of the Draft CDP.</p> <p>It is further highlighted that the land use zoning maps in Volume 2 of the Draft CDP proposes amendments to extend the plan boundaries and zoned land in Baltinglass, Newtownmountkennedy, Aughrim, Dunlavin, Roundwood and Shillelagh, and would potentially allow housing growth to exceed the Core Strategy growth target for these towns in conflict with NPO 9, with potentially significant adverse effects on the environment as highlighted in Table 8.3 of the Strategic Environmental Assessment (SEA) Report. It is recommended that the Council provide a robust and clear rationale, that outlines the suitability, or otherwise, of these land use zonings in accordance NPO 3c of the NPF and RPO 3.2 of the RSES and the recommendations of the SEA environmental report.</p>
<p>CE Response</p>	<p>In order to address this issue, revisions are proposed to the Core Strategy and Housing Strategy, including the provision of a table detailing the capacity of existing zoned land in the current LAPs and the housing capacity targets for the towns that form part of this plan.</p> <p>This data is not provided as a simple statement of land area zoned, as capacity is available on a range of zone types and on infill sites, and it is not possible to state a robust figure for the amount of available zoned land in any town with capacity for residential development, other than for those greenfield / larger blocks land zoned for new residential development. In addition, land that is zoned for ‘town centre’ or ‘mixed use’ type of development may or may not deliver residential units depending on the location and circumstances and could in fact deliver only commercial floor space. No methodology has been provided in guidelines for dealing with this anomaly. However the estimate capacity for residential each town has been determined by an assessment of all ‘obvious’ potential residential development sites and application of an appropriate density per site, taking in account site constraints that may arise on a case by case basis.</p> <p>With respect to the availability of services, no lands that are ‘unserviceable’ within the lifetime of the plan have been proposed for zoning in this draft plan. That is not to say that there are no wastewater treatment plant capacity constraints or drinking water treatment / storage limitations in certain towns but rather the lands are either already served by or are easily</p>

connected to the existing systems. Where such deficiencies exist, the Council is working closely with Irish Water to secure upgrades, which it is planned will occur within the lifetime of this development plan. The infrastructural assessment set out in the plan will be improved in this regard to include maps (sourced from IW) showing existing water and wastewater networks.

The recommended amendments in this regard are set out in the documents appended to this report.

The concerns of the Assembly with regard to additional zoning in Baltinglass, Newtownmountkennedy, Aughrim, Dunlavin, Roundwood and Shillelagh are noted.

Baltinglass: It is recommended that the additional zoning (as detailed in the SEA report) be omitted.

Newtownmountkennedy: The lands in question already have permission and development has commenced thereon. It is recommended that these lands be retained in the plan.

Aughrim: It is recommended that the additional zoning (as detailed in the SEA report) be omitted.

Dunlavin: Without the inclusion of these sites, there would be no land zoned for new residential development in this town other than a single site owned by the Local Authority, identified for social housing. It is not sustainable or logical to provide for a development plan for Dunlavin up to 2028 that makes no provision for new private housing. All of the sites in question are infill sites, within the built up envelope of the town and are very close the town centre. The development of these sites would therefore not be contrary to the principles of compact and sequential development. Therefore it is recommended that these lands be retained in the plan.

Roundwood: It is recommended that the additional zoning (as detailed in the SEA report) be omitted.

Shillelagh: It is recommended that the additional zoning (as detailed in the SEA report) be omitted.

<p>Chapter 4 Settlement Strategy</p>	<p>The Assembly commends the Council for undertaking an evidence-based analysis of settlements in the County in accordance with the RSES Asset Based Methodology, to inform the designation of settlements in the County Settlement Hierarchy, which is set out in Table 3.5 of the Draft CDP and builds on the Settlement Strategy and Settlement Hierarchy in the RSES, and the strategic development areas in Table 5.1 of the MASP.</p> <p>The Assembly also welcomes the graded approach to the allocation of population as appropriate to the level in the settlement hierarchy for the County, and the use of consistent terminology reflective of the RSES as follows;</p> <ul style="list-style-type: none"> • Key Towns: Level 1 – Bray, and Level 2 - Wicklow-Rathnew. • Self-Sustaining Growth Towns: Level 3 - Arklow, Greystones-Delgany, Blessington. • Self-Sustaining Towns: Level 4 - Baltinglass, Enniskerry, Kilcoole, Newtownmountkennedy (NTMK), Rathdrum. • Towns and Villages: 11 no. Small Towns at Level 5 - Ashford, Aughrim, Carnew, Dunlavin, Tinahely and Level 6 - Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh. • Villages: 27 no. Villages at Level 7 and Level 8 Villages. • Rural: 29 no. Rural Clusters and the Open countryside. <p>Notwithstanding the general consistency in the terminology and settlement typologies, it is recommended that consideration be given to the further rationalisation of designated settlements within the County Hierarchy, with particular reference to the high number of designated settlements in Levels 7-9 and this is further elaborated in Section 2.4.5 Villages and Rural Clusters.</p> <p>The inclusion of supporting information in Chapter 4 – Settlement Strategy with reference to growth targets and the role and function of towns relative to their position in the Settlement Hierarchy is a positive addition to the Draft CDP. With reference to the 21 listed towns, it is noted that Volume 2 of the Draft CDP contains a set of ‘Small Town Plans’ for Ashford, Aughrim, Avoca, Baltinglass, Carnew, Donard, Dunlavin, Laragh-Glendalough, Newcastle, Newtownmountkennedy, Rathdrum, Roundwood, Shillelagh and Tinahely. Chapter 4 also maps settlement boundaries for Level 7-9 Settlements.</p> <p>However, the larger towns of Bray, Greystones, Wicklow – Rathnew, Arklow, NTMK and Blessington currently have their own stand-alone ‘Local Area Plans’ (LAPs), which do not form part of the Draft CDP and it is intended that these will be reviewed after the adoption of the Plan. The Assembly welcomes the inclusion of Settlement Strategy Objective CPO 4.8 that commits the Council to preparing new LAPs for Bray Municipal District (including Enniskerry), Greystones-Delgany and Kilcoole, Wicklow-Rathnew, Arklow and Blessington during the lifetime of the CDP, and this should be further strengthened by setting out the intention of the Council to incorporate the land zoning objectives for these settlements into any future iterations of this CDP.</p>
<p>CE Response</p>	<p>The concern raised by the Assembly is noted, and it is recommended that the number of settlement tiers is rationalised and with particular regard to the villages and rural clusters, that the number of such settlements be reduced.</p> <p>The recommended amendments in this regard are set out in the documents appended to this report.</p> <p>With regard to the recommendation that the zoning provisions for the LAP towns be integrated into ‘future iterations’ of the County Development Plan, it is unclear what is being requested, as LAPs comprise ‘stand alone’ plans, while only towns of population of 5,000 or under may have their plan full set out in the CDP.</p>

<p>Chapter 4 Settlement Strategy</p>	<p>Key Towns (Levels 1 and 2)</p> <p>Bray and Wicklow-Rathnew are designated as Level 1 and Level 2 Key Towns in the Wicklow County Hierarchy. This is consistent with the RSES, which designates Bray and Wicklow-Rathnew as 'Key Towns' in the third tier of the RSES Settlement Hierarchy (with the former located within the Dublin Metropolitan Area). Key Towns are defined as large economically active towns that provide employment for their surrounding areas with the capacity to act as growth drivers for the County.</p> <p>The Core Strategy allocates 52% of the total population growth to 2031 in the County to the Key Towns, providing for population growth in Bray and Wicklow-Rathnew to increase by 10,779 and 5,357 respectively over their 2016 populations to 2031. This equates to a total population in 2031 of 29,646 (+36%) in Bray and 14,114 (+ 38%) in Wicklow-Rathnew.</p> <p>It is noted that the significant growth identified for these towns i.e. 30% or more above 2016 population levels are in accordance with NPO 9 of the NPF, and are consistent with their designation in the RSES Settlement Hierarchy.</p> <p>Self-Sustaining Growth Towns (Level 3)</p> <p>The Wicklow County Hierarchy identifies Arklow, Greystones-Delgany and Blessington as Level 3 'Self-Sustaining Growth Towns', defined in the RSES Settlement Hierarchy as towns with a moderate level of jobs and services, including sub County market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.</p> <p>The Core Strategy allocates 25% of the total population growth in the County to these 3 towns reflecting a graded approach in the settlement hierarchy. The Core Strategy also sets out population increases of 3,215 in Arklow (+24%), 3,611 in Greystones-Delgany (+20%) and 802 in Blessington (+15%) over their 2016 populations. This equates to a total population in 2031 of 16,441 in Arklow (+24%), 21, 632 in Greystones-Delgany (+20%) and 6,036 in Blessington (+15%). It is noted the level of planned growth for these 'Self-Sustaining Growth Towns' is below the significant growth rates for Key Towns.</p> <p>Notwithstanding this and noting the level of development that is already underway in Greystones-Delgany (1,738 units constructed/under construction since 2016 - Table 3.9), that need to be taken into account in the Core Strategy, it is recommended that further consideration should be given to the designation of Greystones-Delgany. Having regard to past and current trends of rapid commuter- focused population growth, without equivalent increases in jobs and a weak employment base, characterised by a low ratio of jobs to resident workforce, it is recommended that a more appropriate designation as a 'Self-Sustaining Town', would promote 'catch up' investment in local employment, services and sustainable transport options and enable Greystones-Delgany become more self-sustaining.</p> <p>Self Sustaining Towns (Level 4)</p> <p>The County Hierarchy identifies Baltinglass, Enniskerry, Kilcoole, Newtownmountkennedy (NTMK) and Rathdrum as Level 4 'Self-Sustaining Towns', which are defined in the RSES as towns with a high level of population growth and a weak employment base that are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining.</p>
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The Core Strategy provides for growth in these 5 towns from approximately 13,640 in 2016 to 16,660 in 2031, which equates to an increase of 3,020 (+22%) over 2016 population, or 10% of the total allocated growth in the County reflective of the graded approach within the settlement hierarchy.

Population growth in Level 4 towns overall is targeted to be in the 20%-25% range and it is stated that variation in future growth rates between towns is due to developments already underway in some towns (particularly Rathdrum and NTMK). It is noted that the projected growth rates for NTMK (+47%) and Rathdrum (+45%) are significantly in excess of higher tier settlements and also exceed the 30% threshold for significant growth set out NPO 9 of the NPF. It is acknowledged that Table 3.9 sets out the units that are constructed/under construction since 2016 in NTMK (837) and Rathdrum (269), which would account for a significant proportion of the proposed growth. Nevertheless, it is recommended that the Core Strategy should include an analysis and rationale of the proposed growth rates, based on past delivery and potential including extant permissions, that outlines the suitability, or otherwise, in accordance with NPO 9, of the proposed growth rates for NTMK and Rathdrum.

Towns and Villages (Levels 5- 6)

The RSES defines 'Towns and Villages' as providing local service and employment functions. The Wicklow County Hierarchy identifies Type 1 Small Towns (Ashford, Aughrim, Carnew, Dunlavin, Tinahely) have populations between 800-1500, and Type 2 Small Towns (Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh), which are more rural with populations of 400-900.

The Core Strategy provides for growth in these 11 small towns and villages from approximately 9,545 in 2016 to 11,555 in 2031, which equates to an increase of 2,020 (+21%) over 2016, or 6% of the total allocated growth in the County reflective of the graded approach in the settlement hierarchy.

While the overarching Settlement Strategy policies for Towns and Villages are found in the 'Small Town Plans' in Volume 2, the inclusion of supporting information in relation to population growth, the role and function of towns and housing occupancy controls in Volume 1 Chapter 4 – Settlement Strategy is a positive addition to the CDP. The Assembly also welcomes the statement in the Core Strategy that all of the targeted growth in Levels 5-9 can be accommodated within the existing built-up footprint of these settlements, which will support achievement of compact sustainable growth.

Villages and Rural Clusters (Levels 7- 9)

The Settlement Hierarchy identifies 37 Rural Villages (12 Level 7 Large Villages and 22 Level 8 Small Villages) which are described as rural villages that have a moderate or limited level of existing infrastructural services with populations generally under 500 and 100 people respectively.

A further 29 no. Level 9 Rural Clusters are designated, and the stated purpose of this designation is to direct rural generated housing into rural clusters rather than the open countryside. Settlement Boundary Maps for these villages and rural clusters are set out in Chapter 4-Settlement Strategy

The Core Strategy provides for growth in rural villages and clusters (Levels 7-9) from approximately 33,327 in 2016 to 35,280 in 2031, which equates to an increase of 1,953 (+6%)

over 2016 or 1% of the total allocated growth in the County reflective of the graded approach in the settlement hierarchy.

The Assembly consider the inclusion of housing policy CPO 6.31, which supports the 'Serviced Site Initiative', new homes in small towns and villages' as a positive addition to the Draft CDP. This is in keeping with RPO 4.78 which support the development of a 'New Homes in Small Towns and Villages' initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements to meet housing demand."

Notwithstanding the above, having regard to the high number of rural type settlements in the County Hierarchy, it is recommended that consideration be given to further rationalisation of the number of designations with particular reference to identified issues in Table 8.3 of the Strategic Environmental Assessment (SEA) Report in relation to environmental capacity and infrastructural deficits in certain Towns, Villages and Rural Clusters.

It is recommended that the Draft CDP be amended to ensure the designation of these settlements does not undermine National and Regional Strategic Outcomes in the NPF and RSES of compact growth and sustainable transport and the strategic environmental objectives in the Draft CDP, and to set out a rationale and evidence of same.

Open Countryside and Rural Housing (Level 10)

The Settlement Hierarchy defines 'Open Countryside' at Level 10 and the narrative in Chapter 4 – Settlement Strategy, defines this as all the rural area outside of the designated settlements.

The Core Strategy provides for a growth in rural population from approximately 33,327 in 2016 to 35,280 in 2031, which equates to an increase of 1,953 (+6%) over 2016 population, or 6% of the total allocated growth in the County.

The Assembly notes the inclusion of rural housing policies in Chapter - 6 of the Draft CDP and welcomes the stated intention of the Council to support the sustainable development of rural areas in Wicklow by facilitating appropriate activities while protecting the natural environment and managing rural housing and other rural uses.

To support this, it is recommended that criteria detailing the requirement for housing in the open countryside be included in the Core Strategy, with reference also to the requirement to manage urban generated growth in Rural Areas Under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas, and the inclusion of a map to demonstrate same. It is furthermore recommended that the Council demonstrate compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements, in line with RPOs 4.80 and 4.81, and NPO 19 of the NPF.

Housing occupancy controls

The Core Strategy sets out Housing Occupancy Controls for each tier in the settlement hierarchy. With regard to Level 7-10, rural villages and clusters have housing occupancy controls relating to the provision of new homes in a graded approach reflective of their position in the hierarchy.

	<p>Chapter 6 – Objective CPO 6.41 (rural housing policy) seeks to manage new development in the open countryside by applying criteria for a demonstrable social or economic housing need, which is considered to be consistent with the requirement to manage urban generated housing in rural areas.</p> <p>It is noted that the Draft CDP also proposes for to apply a local needs criterion to Level 1- 6 settlements, specifically CPO 6.2, which states <i>“that for multi-house developments of 10 units or more that 25% of applicant’s purchasers of any new home must have lived for at least 3 years duration in County Wicklow, within 15km of the proposed development site, prior to purchasing a home. This does not include units delivered in accordance with Part V”</i>. The Assembly note that local needs criteria in development plans are generally applied in the context of rural areas and consider the application of such housing occupancy controls in higher order urban settlements may be overly restrictive and undermine the National and Regional Strategic Outcomes of compact growth and urban regeneration.</p> <p>It is recommended that the Council ensure that related policy in this regard is consistent with NPO 19 of the NPF and the content of Circular Letter PL 2/2017 <i>“Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans.”</i></p>
<p>CE Response</p>	<p>The issue raised with respect to Greystones – Delgany is noted; however it is considered that ‘Self-Sustaining Growth Town’ is the appropriate categorisation for this settlement, having regard to the considerable growth on the settlement since 2016 which is still ongoing with over 1,000 units currently under construction, likely to be delivered in the next 5 years. It would be a misnomer to not identify Greystones-Delgany as a growing town. However, in the approach to future growth, in particular additional residential development, it is the goal to moderate housing growth, to initiate a programme of reviewing the appropriateness of peripheral zoned greenfield sites, and to renew focus on the development of infill and town centre / brownfield sites. This approach is not considered to be inconsistent with the Self-Sustaining Growth Town typology.</p> <p>The growth ‘targets’ for Newtownmountkennedy and Rathdrum reflect:</p> <ul style="list-style-type: none"> (a) Existing housing development <i>already competed</i> since 2016, and housing currently <i>under construction and expected to be completed</i> during the lifetime of the new plan; (b) The need to ensure that growth in the town centres and existing infill sites within the built up part of these towns can be facilitated during the lifetime of the plan. <p>To reduce population and housing growth targets for these towns would require a restriction being imposed on desirable town centre regeneration and infill as all the growth capacity would already be taken up by less desirable but already completed / under construction edge of centre / out of centre greenfield development. This is clearly illogical and would be contrary to the goals of the NPF.</p> <p>In order to try to reverse this imbalance in the medium to longer term (i.e. the majority of housing being located outside of the centre rather than in or close to the centre) very limited greenfield lands are proposed for new housing development in these towns that do not comprise infill sites. However, having reviewed the proposed zoning provisions for these towns, it is considered that there are some (limited) opportunities for a further reduction in greenfield zoning on some edge of centre sites, and these proposed revisions are shown on the maps set out in this report (see Part 2 of this report).</p> <p>The concern raised with regard to the number of smaller settlements identified in the settlement hierarchy is accepted, and it is recommended that the Level 9 ‘Rural Clusters’ be</p>

omitted from the plan. The recommended amendments in this regard are set out in the documents appended to this report (in particular Proposed Amendments to Chapters 3 and 4)

The issue raised relating to the lack of reference to the rural housing strategy / objectives in the Core Strategy including the inclusion of an appropriate map, is noted, and the lack of such information in the Core Strategy would in fact be contrary to the requirements of Section 10 (2A) of the Planning Act.

This proposed amendment is set out in the attached documents '[Proposed Amended Chapter 3 – Core Strategy](#)' and '[Proposed Amended Chapter 6 – Housing](#)' appended to this report.

The concern raised in relation to this objective is noted, and it is recommended that it be omitted.

This proposed amendment is set out in the attached documents '[Proposed Amended Chapter 6 – Housing](#)' appended to this report.

<p>Chapter 5 Towns & Villages</p>	<p>The NPF and RSES place a strong emphasis on strengthening Ireland’s urban structure by targeting compact growth in urban areas, facilitating access to services, protecting and enhancing the historic character and heritage to strengthen the sense of place and build healthy, attractive, liveable places.</p> <p>The Assembly welcome the inclusion of dedicated Chapters on Placemaking and Regeneration, Town and Village Centres (Chapter 5) Housing (Chapter 6), Community Development (Chapter 7) and Built Heritage (Chapter 8) aimed at the delivery of improved public realm and physical and social infrastructure to create a vibrant network of towns and villages throughout the County, in line with the principles of Healthy Placemaking, which also underpins the RSES.</p> <p>Placemaking and Regeneration</p> <p>The Assembly welcome in particular the inclusion of a chapter dedicated to Town and Village Centres, which reference to the Framework for Town Centre Renewal, the undertaking of town centre health checks, the identification of placemaking and heritage projects and inclusion of settlement specific objectives to support compact growth, regeneration and revitalisation of settlements as appropriate to their level in the County Settlement Hierarchy.</p> <p>This is further supported by policies and objectives contained within Chapters 7 – Community Development, including guidance for social infrastructure audits and a community facilities hierarchy (Table 7.1), and in Chapter 8 Built Heritage, which supports actions in the County Heritage Plan, to promote Wicklow’s built heritage, supported by the maps which identify sites and areas of archaeological and architectural importance, and the schedule of Protected Structures in Appendix 4.</p> <p>The Assembly welcome that Town Plans for Levels 4 and 5 settlements include a land use zoning map, a heritage map, and a map showing renewal and regeneration areas where opportunities to use the Vacant Site Levy will be examined. The Town Plans also identify town centre opportunity sites and areas that will be subject to the preparation of Action Area Plans to manage their phased development. Also welcomed it the statement that only locations that are already served or have committed investment in water and wastewater infrastructure shall be identified for new development and that sustainable mobility will be promoted as part of any new development.</p> <p>Further to the above, it is considered that the inclusion of specific objectives for the higher order Level 1-3 settlements in the hierarchy, in tandem with the timely preparation of Local Area Plans (LAPs) and existing Town Plans will benefit the Council in developing competitive bid proposals for Project Ireland 2040 - Urban and Rural Regeneration and Development Funds (URDF & RRDF), the Town and Village Renewal Scheme and other funding sources and will support the COVID-19 pandemic recovery.</p>
<p>CE Response</p>	<p>Noted</p>
<p>Chapter 6 Housing</p>	<p>The Assembly welcome the inclusion of a dedicated Chapter 6 - Housing and the Housing Strategy in Appendix 3 of the Draft CDP and acknowledges the extensive work that has gone into the preparation of this chapter which sets out policies and objectives to cater for housing need in the County, the appropriate mix of housing types and sizes, provision of specialist and social and affordable housing, and policies to manage housing in rural settlements and in the open countryside.</p> <p>The Assembly also welcomes the consolidation of rural housing policies in Chapter 6 supported by Appendix 2 – Single Rural Houses Design Guide, and the inclusion of Section 6.3, which sets</p>

	<p>out Key Housing Principles including sustainable communities, compact growth and active land management, 'walkable' neighbourhoods, quality design, application of a sequential approach and phasing of zoned/designated lands, and prioritisation of environmental considerations and climate action.</p> <p>The Chapter also sets out compliance with Ministerial Guidelines, including Sustainable Residential Development in Urban Areas (2009), Sustainable Urban Housing: Design Standards for New Apartments (2018) and the Urban Development and Building Heights Guidelines (2020).</p> <p>As stated above in Sections 2.3 and 2.4 of this submission, DHLGH, in December 2020, published 'Housing Supply Target Methodology for Development Planning' Section 28 Guidelines, and published the Housing Need Demand Assessment (HNDA) Ministerial Guidelines in April 2021 and it is recommended that the Draft CDP be updated to comply with these Guidelines, and any other relevant Ministerial Guidelines prior to the finalisation of the County Development Plan.</p>
CE Response	<p>In order to ensure greater consistency and clarity, amendments to Chapter 3 and 4 of the draft Development Plan and the draft Housing Strategy are recommended, as set out in the documents appended to this report. In particular, the proposed amendments set out the population and housing growth targets for the plan period, which is up to Q2 2028 (assuming the plan is adopted in Q3 2022), rather than solely 2026, end 2028 and end 2031.</p> <p>In addition, further information is provided in the proposed amendments to the Housing Strategy regarding the method of calculation of plan period housing targets, to show greater consistency with the 'Housing Supply Target Methodology for Development Planning' Section 28 Guidelines published by DHLGH in December 2020.</p>
Chapter 9 Economic Development	<p>The NPF and RSES target both orderly population and employment growth in urban areas in accordance with the settlement hierarchy. The Assembly welcome that Economic Opportunity is identified as one of the cross-cutting themes in the Draft CDP, in alignment with the Key Principles underpinning the RSES and the Economic Strategy in the RSES.</p> <p>Chapter 9 Economic Development sets out policies and objectives that outline where the Council will support new or expanded employment generating development, in accordance with the Settlement Hierarchy and Economic Development hierarchy designating the higher order towns of Bray, Wicklow-Rathnew, Arklow, Greystones-Delgany and Blessington as the key focus for economic growth. The Draft CDP also identifies strategic employment locations ay Bray-Fassaroe and Greystones, which are set out in Table 5.1 of the Dublin MASP.</p> <p>The draft CDP also proposes a small number of specific tourism and economic development zoning objectives, which are detailed on maps in Chapters 9 and 11, which should be tested against the Guiding Principles for the Strategic Location of Employment Development set out in Section 6.3 of the RSES and the Guiding Principles for Integration of Transport and Land use in Section 8.3 of the RSES.</p> <p>The Assembly welcome the inclusion of policies that support implementation of the Local Economic and Community Plan (LECP), in line with RPO 6.12 in the RSES the stated intention of the Council to work with Local Enterprise Offices (LEOs), the Enterprise Agencies, Higher Education Institutes (HEIs), Regional Skills Fora, and other stakeholders, and to build on the Mid-East Regional Enterprise Plan (REP) to support local economic development and respond to new opportunities and challenges such as Brexit, Climate Action, Digital Economy, and the</p>

	<p>Covid-19 pandemic economic impacts.</p> <p>Also welcomed is the evidence-based analysis of Wicklow’s employment trends and economic profile in Section 9.2, which sets the context for the Council’s aim to increase the ‘Jobs Ratio’ to a sustainable level of 0.7 in the County by 2031. It is recommended that the evidence-based approach should be enhanced by the inclusion of information on the quantum of employment generating zoned lands in the County, and any requirement for additional zoned employment lands that are proposed in the Draft CDP.</p> <p>The Draft CDP supports the role of regional ports including Wicklow and Arklow, and existing rural industries, while promoting diversification of the rural economy, and growth in key sectors such as film, food, bioeconomy, wholesale/retail, transport, tourism and recreation, forestry, and the marine.</p> <p>The Draft CDP also sets out Guiding Principles for the location of strategic employment development and to promote sustainable land use and transportation patterns, whereby ‘people intensive’ employment is located close to higher order centres and public transport routes, whereas ‘goods based’ employment types have good access to road transport corridors, also supporting the potential of developing remote working hubs and enterprise spaces in the County, which is welcomed and is consistent with the Economic Strategy in the RSES.</p>
<p>CE Response</p>	<p>With respect to the employment and tourism zones identified in Chapters 9 and 11, and the ‘Guiding Principles for the Strategic Location of Employment Development’ set out in Section 6.3 of the RSES and the ‘Guiding Principles for Integration of Transport and Land use’ in Section 8.3 of the RSES:</p> <p>Mountkennedy Demesne (data centre): This zoning would not accord with the principles set out in the RSES. However, having regard to (a) the fact that there already is permission on the lands for a data centre and (b) the Minister’s ‘acceptance’ of this zoning during the course of the last development plan subject to the zoning being strictly for data centre use only; it is considered that this zoning should be retained in the plan.</p> <p>Kilpedder Interchange: This zoning would not accord with the principles set out in the RSES. Permission has already been granted and development commenced on the southern part of these lands. With respect to the northern side of the Farrankelly Road, while permission was granted in 2009 for an industrial / warehousing development on the eastern part of these lands, this permission lapsed in 2014. In the intervening years, permission has been refused on a number of occasions, for a variety of reasons, for various industrial / warehousing developments on this side of the road. On this basis, it is recommended that the zoning be reduced in scale to omit the northern portion.</p> <p>Inchanappa (Film Studio): This zoning would not accord with the principles set out in the RSES. However, having regard to (a) the fact that there already is permission on the lands for a major film studio development and (b) the Minister’s ‘acceptance’ of this zoning during the course of the last development plan subject to the zoning being strictly for film studio use only; it is considered that this zoning should be retained in the plan.</p> <p>Druids Glen, Brook Lodge, Rathallagh, Belmont Demesne: All of these locations are already developed for rural tourism use, such as country hotels, golf courses, outdoor activities and therefore are not required to accord with the principles described. These are rural location dependent developments and are already in situ. The zoning of the lands is to facilitate and support the ongoing use and future development / improvement of these important regional tourism sites.</p>

With respect to the zoning of lands for employment use:

- For the larger LAP towns, in the preparation of the next set of LAPs full details will be provided of all employment zoned lands (both existing and proposed) and how this relates to the employment growth strategy for each settlement.
- With regard to the Level 4 town plans that form part of this County Development plan, it is recommended that the 'Introduction to Level 4 Plans' includes additional data on the amount of employment land proposed for zoning in the table already provided regarding employment growth desired (as set out below).
- With respect to Level 5 town plans, data on the 'jobs ratio' is not available at this scale and therefore it is not possible to quantify the existing jobs provision, and from that develop a desired level of jobs growth.

For each of these towns therefore it is not possible to 'tally' the proposed amount of jobs growth with new employment zoning. The approach in these towns therefore has been to maintain existing zoned employment land from the previous development plan, except where that zoning comprises unserviced / unserviceable lands, or otherwise does not accord with sound planning principles, such as compact and sequential growth.

Proposed amendments to '**Introduction to Level 4 Plans**'

1.1.3 Economic Development & Employment

This table also show the amount of land proposed to be zoned in each town for new employment. While it is assumed that a proportion of jobs growth will occur in the town centre and other mixed use lands that are not specifically zoned for employment alone, or will occur on existing developed employment land through intensification, sufficient zoned employment land is zoned in each town to meet all of the jobs growth required, on the assumption of 80 employees per hectare, plus an additional 'headroom' of 100% to ensure that there will be no shortage of site choice for developers of new employment.

LEVEL 4	Jobs ratio 2016	Targeted future jobs ratio 2031	Jobs growth targeted up to 2031	Quantum of zoned employment land (ha)
Baltinglass	0.81	1.01	+500	13
Enniskerry	0.33	0.41	+100	1 ³
Kilcoole	0.46	0.57	+100	10 ³
Newtownmountkennedy	0.78	0.97	+1,100	28
Rathdrum	0.82	1.03	+600	15

³ To be reviewed in the next LAP to be commensurate with the employment growth objective

<p>Chapter 10 Retail</p>	<p>The Assembly welcome the inclusion in the Core Strategy of Section 3.7 setting out the County Wicklow Retail Hierarchy (Table 2.7), which is consistent with the Settlement Hierarchy and the Retail Hierarchy of the RSES (Table 6.1), and of a dedicated Chapter 10 – Retail, which recognises the importance of retailing in terms of employment and attracting people into town centres, and the challenges facing the sector from increased online retail and the impacts of the Covid-19 pandemic.</p> <p>The stated objectives of the Retail Strategy are welcome, including, to promote access by walking, cycling and public transport, to strengthen retail cores by addressing vacancy and derelict/underutilised sites, provision of a diverse mix of uses including residential and living over the shop opportunities, and to promote the town centre first for expansion of retail floorspace as part of a sequential approach. The Strategy sets broad guidance as to the location and function of retail activity and a general statement of additional retail development requirement for higher order settlements in accordance with the Retail Planning Guidelines for Planning Authorities, and could be further strengthened by including information on the overall quantum of retail floorspace available and the need for additional retail floorspace, to support the settlement hierarchy.</p> <p>Table 10.1 Retail Hierarchy and Strategy for County Wicklow and Table 10.2 Retail formats sets out guidance and criteria for the assessment of development proposals over the plan period. The Strategy supports the high order retail function of Bray and Wicklow Key Towns as Level 2 Major Town Centres. Level 3 Town/District Centres have been assessed as Tier 1 Towns serving a wide catchment (Arklow, Blessington), and Tier 2 Towns serving the immediate district (Greystones, Baltinglass, Rathdrum and NTMK). A further number of Level 4 and 5 Neighbourhood/Local and Village centres are identified, as appropriate to their level in the settlement hierarchy and local retail functions.</p> <p>The Assembly welcome in particular the objectives to identify and develop key town centres opportunity sites and the inclusion of ‘Core Retail Area’ maps in the Draft CDP, which will support the diversity and vibrancy of town centre core areas and underpinned by policy objectives in Chapter 5 - Placemaking and Regeneration, which is in keeping with importance of placemaking as key to attracting and retaining talent and investment, and a number of RPOs in the RSES, including RPO 6.12.</p>
<p>CE Response</p>	<p>With respect to the request to indicate the overall quantum of retail floorspace available and the need for additional retail floorspace, unfortunately this information is not available as resources are not available to carry out a detailed survey of all retail floorspace in the County as part of this plan making process. In addition, in the absence of an updated Regional Retail Strategy, which was committed in the RSES, as it is difficult to develop retail floorspace growth objectives without regional data and analysis with respect to regional floorspace, regional retail spending and spending flows, and retail turnover.</p> <p>When the new regional retail strategy is developed, the Wicklow Retail Strategy can be updated to provide more detailed information of floor space requirements in various locations.</p> <p>In the meantime, this plan focusses on quality and location, rather than quantum or setting floor space limits; having regard to changes in retail patterns (such as online shopping), all forms of new retail will be facilitated, but only where they are in the right locations and support town centres.</p>
<p>Chapter 11 Tourism &</p>	<p>The Assembly welcome the objectives in Chapter 11 - Tourism and recreation to protect and enhance the natural and cultural assets and recreational amenities, which are key to the</p>

Recreation	<p>County's tourism offer and which make a positive contribution to the economic and social wellbeing of the County along with the need to guide new proposals in the best locations.</p> <p>The stated objectives of the Tourism Strategy are welcome, including to support the development of Wicklow-Rathnew as a recreation and tourism hub and destination town, and to develop the towns of Bray, Arklow, Greystones, Blessington, Baltinglass, Enniskerry, Rathdrum and Tinahely/ Shillelagh/Carnew (South West Wicklow) as visitor hubs in collaboration with Fáilte Ireland, and to develop the recreation and tourism potential of rural areas.</p> <p>The Strategy includes specific land use zoning objectives for a small number of tourism and recreation complexes in the County, and specific objectives to develop a network of walking and cycling routes and flagship greenways capitalising on key tourism and recreational assets such as the Wicklow Mountains National Park, the Wicklow Way and Glendalough and to develop the recreational use of the coastline, rivers and lakes, which will support the development of the Strategic Greenway Network including RPOs 7.24 and 7.25, in the RSES.</p> <p>The Assembly welcome the inclusion of supporting information, including the Laragh - Glendalough Land Use and Tourism Plan in Volume 2 – Part 4 of the Draft CDP and the information contained in related Chapters that detail policy supports to protect, enhance and promote the natural and cultural heritage, and leisure and recreation assets which contribute to the County's unique tourism offer.</p> <p>The Assembly also welcome the inclusion of Environmental Protection Objectives CPO 11.47 – 11.49 to ensure the potential environmental effects of new projects and increased visitor numbers are considered when progressing any projects that arise from the Draft CDP.</p>
CE Response	Noted
Chapter 12 Sustainable Transportation	<p>The Regional Assembly welcome the Council's stated commitment in Chapter 12 Sustainable Transportation, to integrated transport and land use, and promoting walking, cycling and public transport to facilitate sustainable travel patterns, which is key to addressing climate change, supporting economic prosperity and improving the quality of life for those who live in County Wicklow.</p> <p>The Assembly welcome the stated commitment of the Council to the use of Area Based Transport Assessments which integrate national and regional transport policies and objectives into local land use plans and significant development areas in the preparation of LAPs in the County.</p> <p>The attention of the Council is further brought to RPO 8.6 of the RSES, which identifies a number of Local Transport Plans (LTP) to be prepared for selected settlements, including Arklow and Wicklow-Rathnew, in conjunction with the NTA. The Local Authority may also consider the identification of other settlements, in line with the County Settlement Hierarchy, that would benefit from a similar coordinated approach.</p>
CE Response	<p>With respect to Local Transport Plans (LTPs) / Area Based Transport Assessments (ABTAs) indicated as an objective in the RSES, it is intended that such plans will be developed in the short term for all towns in Levels 1-3 of the hierarchy i.e. Bray (and environs), Wicklow – Rathnew, Arklow, Greystones – Delgany and Blessington. A LTP has already been completed from Bray and Environs and work is underway on the ABTAs for Arklow and Greystones – Delgany. This objective is already stated in the plan.</p> <p>Thereafter in the medium term or as and when required, further LTPs / ABTAs will be carried</p>

out for the medium size towns, Level 4 of the hierarchy, if not already included in the ABTAs already completed (e.g. Kilcoole may be integrated into G-D). It is noted that there is a slight error in the objective set out in the Draft Plan in this regard and therefore it is recommended that it be amended as follows:

Chapter 12

CPO 12.3 In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy, (namely Bray and environs, Wicklow – Rathnew, Arklow, Greystones – Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy) and any other settlement where it is deemed necessary by the Planning Authority and utilise these assessments and plans to inform land use and investment decisions.

<p>Chapter 12 Sustainable Transportation Transport Infrastructure and Services</p>	<p>The Council's attention is brought to Tables 8.2-8.5, which set out Rail, Bus, Road and Park & Ride Projects in the RSES including an appropriate level of commuter rail service in the South-East, improved DART services serving Bray and Greystones, improved bus services and expansion of the Local Link rural transport programme and upgrading of the N11/M11 road.</p> <p>This is supplemented by Section 5.6 Key Transport Infrastructure in the Dublin Metropolitan Area, which supports the westward expansion of Bray to Fassaroe and Old Connaught linked to public transport improvements set out in the 'Bray and Environs Transport Study' (2019) including in the longer term the Luas Green Line Extension to Bray, to be carried out in collaboration between Wicklow and Dún Laoghaire Rathdown County Councils and the transport agencies, NTA and the TII.</p> <p>It is noted that Public Transport Objectives in the Draft CDP to promote the Luas extension from City West / Tallaght to Blessington, to upgrade the Dublin-Rosslare rail line, and the N81 to Blessington have not been identified in the RSES. These projects, or any other projects that have not been identified in the NTA Strategy for the Greater Dublin Area (GDA) 2016-2035, will be subject to further assessment as part of the Review of the NTA Transport Strategy, which is currently underway. Such projects are considered to be premature pending the outcome of this Review, which will set the policy framework for public transport investment and roll out of cycling infrastructure for counties of Dublin, Meath, Kildare and Wicklow.</p> <p>It is therefore recommended that the Council review and update the transport objectives and land use maps in the Draft CDP accordingly, to ensure consistency with the Transport Investment Priorities in Section 8.4 of the RSES, and any update of the NTA Strategy for the GDA.</p> <p>The Assembly notes and welcomes objectives to protect and improve access to Wicklow and Arklow port to facilitate offshore renewable energy development, and to ensure all new or upgraded transport infrastructure is climate resilient.</p>
<p>CE Response</p>	<p>The issues raised under this heading are addressed in the response to the submission from the National Transport Authority.</p>
<p>Chapter 12 Sustainable Transportation Sustainable mobility</p>	<p>The Assembly welcome the inclusion of objectives to reduce the need to travel and reliance on private vehicles, and to increase the shift to sustainable transport by supporting investment in key public transport. This includes policy objectives to facilitate the roll out of electric vehicles (EV) charging infrastructure, and to apply maximum parking standards in locations where public transport and parking enforcement are available.</p> <p>The Assembly also welcomes the progress that has been made in improving walking and cycling infrastructure in response to the COVID-19 pandemic and supports the continued roll out of public realm and active travel interventions, in line with the principles of universal design which should incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified.</p> <p>The Assembly recommends early and ongoing engagement with the transport agencies to ensure the integration of transport and land use in the draft CDP and any upcoming local land use plans and to incorporate mode shift targets into the planning and design of future development with reference to the Government's Smarter Travel Policy or any update thereof, along with any future demand management measures to support modal shift to sustainable travel that may arise from the current Review of the NTA Strategy for the GDA.</p>

CE Response	Noted
Chapters 13, 14, 15, 16 Environment and Infrastructure	<p>The provision of water and wastewater services (Chapter 13), waste (Chapter 15) and telecommunications and energy infrastructure (Chapter 16) is critical to sustain planned growth in the County and is linked to the capacity of the receiving environment.</p> <p>The Assembly welcome the inclusion of a dedicated Chapter 14 - Flood Risk Management, Chapter 17 - Natural Heritage and Biodiversity, Chapter 18 - Green Infrastructure and Chapter 19 - Marine Planning and Coastal Zone Management, which recognise the supporting role of natural ecosystems to provide health and wellbeing and economic benefits to the County.</p> <p>The Assembly also welcome the Council's commitment to the provision of high-quality infrastructure to ensure there is adequate capacity to support future development and will promote enhanced co-ordination between local authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan led manner, including through the fora of the RSES and MASP Implementation Groups.</p>
CE Response	Noted
Chapters 13, 14, 15, 16 Environmental Infrastructure and Flood Risk	<p>The Draft CDP sets out policy supports to provide adequate water supply, wastewater treatment, manage surface water, and minimise waste in accordance with the principles of the circular economy, and to promote sustainable development in terms of location and resource use and facilitate the provision of strategic energy infrastructure and telecommunications infrastructure, including broadband connectivity as part of the National Broadband Plan, within the County.</p> <p>Chapters 13, 15 and 16 set out objectives to support climate action and achieve national obligations in relation to emissions and achieving good air and environmental quality, with reference to relevant policy and legislation including the EU Renewable Energy Directive, National Energy & Climate Plans, Regional Waste Management Plans, Guidelines on River Basin Management, the Climate Action Plan 2019 and 'National Adaptation Framework 2018' and any updates thereof.</p> <p>The County Wind Strategy is set out in Appendix 5 and supports a plan led approach to maximise wind energy development, setting out suitable areas and guidance for assessing wind energy developments within the County. Prior to the finalisation of the Draft CDP, it is recommended that the Council ensure the Plan has full regard to the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in 2019, which are expected to be finalised in the near future.</p> <p>The Draft CDP also recognises the range of renewable energy potential including wind, solar, hydro-energy, bioenergy and small-scale renewable electricity generation, which is welcomed.</p> <p>Chapter 14 recognises the impact of climate change in relation to increased flood risk and coastal erosion and is accompanied by a Strategic Flood Risk Assessment (SFRA) in Appendix 8, which is informed by 'The Planning System and Flood Risk Management Guidelines'. Further to the SFRA, this Chapter sets out policy objectives that have been integrated into the Draft CDP, which will contribute towards both flood risk management in the County and compliance with the Flood Risk Guidelines.</p> <p>The Assembly welcome the inclusion of policy objectives to deliver Flood Defence Schemes in the County in collaboration with the OPW and other agencies, to promote Sustainable Urban Drainage Systems (SUDS) and protect urban watercourse in line with the Guidelines 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland.</p>

CE Response	<p>With respect to the Wind Energy Strategy, the CE is generally satisfied that it accords with the Wind Energy Development Guidelines 2006 and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change; some enhancements are however proposed to Chapter 16 in this regard.</p> <p>Regard has not been taken of the Draft Revised Wind Energy Guidelines published in 2019 being in draft form since 2019, however, it is clearly stated in the draft development plan that <i>'Upon the making of any new guidelines the Wind Energy Strategy and the provisions of the CDP relating to wind energy will be updated if required'</i> (Chapter 16, Section 16.2.1.1).</p>
Chapters 13, 14, 15, 16 Green and Blue Infrastructure	<p>The Draft CDP sets out policy and objectives to conserve and enhance biodiversity, protected habitats and species and to identify, protect and enhance Green Infrastructure and promote the sustainable management of natural heritage, including the marine and coastal zones, and consider these are reflective and supportive of the content of the RSES and in particular Chapter 7.</p> <p>The Assembly welcomes in particular the inclusion of a dedicated Chapter 16 - Green Infrastructure (GI) and the recognition given to GI as a key strategic asset for the County, and of Tables listing the range of strategic GI resources and maps delineating natural and cultural assets, public rights of way, regional cycle/walkways and Strategic Green Belts and Buffer Zones.</p> <p>The attention of the council is also drawn to RPO 7.2 of the RSES that supports the integration of an Ecosystem Services Approach Table, Section 7.7 of the RSES which sets out Guiding Principles for the preparation of local Green Infrastructure Strategies and Table 7.1, which lists strategic GI Assets and greenways including the Wicklow Way, Dublin Mountains Way, Coastal Greenway from Wicklow to Greystones (part of East Coast Trail), Arklow- Shillelagh recreational trail, and Blessington Greenway, subject to careful routing and design to ensure protection of environmentally sensitive sites.</p> <p>Also welcomed is Chapter 17 which details policy and objectives to protect and enhance Natural Heritage and Biodiversity and sets out a suite of supporting maps including designated European sites, proposed Natural Heritage Areas, special views and prospects, landscape character areas, areas of outstanding natural beauty, Tree Preservation Orders and other areas of environmental sensitivity.</p> <p>The Council is also to be commended for the preparation of a dedicated Chapter 19 - Marine Spatial Planning and Coastal Zone Management, which sets out policy objectives to guide spatial planning of marine areas in the County, which is supported by the recently published National Marine Planning Framework, and Coastal Zone Management objectives and accompanied by a series of mapped coastal 'cells' that will support further marine policy in this area, in collaboration with the DHLGH and other stakeholders and for the development of the marine economy.</p>
CE Response	Noted
Climate	<p>The Draft CDP sets out a detailed context and policy framework for the integration of Climate Action as one of three key overarching principles that inform the plan, in Chapter 2 – Overall Strategy. Thereafter the Draft CDP includes a section, where appropriate, that details climate considerations specific to the theme of individual Chapters, to ensure the holistic integration of climate considerations across and throughout the Draft CDP.</p> <p>The Assembly welcome the stated intent of the Draft CDP to accelerate Climate Action and to secure a 'just transition' in line with the UN Sustainable Development Goals, to support</p>

	<p>achievement of the EU 2030 Climate and Energy Framework and 2050 Climate Neutrality objective, the National Climate Action Plan 2019 and Climate Action & Low Carbon Development (Amendment) Bill 2021. In 2019, Wicklow County Council declared a Climate and Biodiversity Emergency, adopted the Climate Change Adaptation Strategy and signed a Climate Action Charter. The Charter commits to monitor, evaluate and report on 23 specific action items, and the Council are currently working on an Energy Plan to deliver targets with regard to Council's infrastructure assets.</p> <p>Local authorities are also now required under Section 10 (2) of the Planning Act to include in their development plans measures to reduce anthropic greenhouse gas emissions and adapt to climate change. This is further reinforced by RPO 3.6 of the RSES that requires local development plans to undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress. EMRA are currently leading an ESPON research project QGasSP (Quantitative Greenhouse Gas impact assessment for Spatial Plans), the outputs of which may assist the Council in assessing and monitoring the impact of spatial policies in their statutory land use plans and to map decarbonisation pathways to Climate Neutrality.</p> <p>The attention of the Council is also drawn to the requirement for local authorities to designate 'decarbonising zones' under Circular Letter LGSM01-2021- Local Authority Decarbonisation Zones, the Climate Action Plan 2019 during the lifetime of the CDP. The Assembly welcome the recognition given to the Eastern and Midlands Climate Action Regional Office (CARO), which will play a key role in supporting local authorities to develop and implement climate action measures as part of the implementation of their Draft CDP and local Climate Action Plans.</p> <p>Section 2.2.2 of the Draft CDP sets out the sectors for the integration of climate considerations into the Plan and would benefit from the inclusion of a list of the relevant sections and/or CPO Objectives that relate to climate action and the establishment of a baseline to support monitoring. Integrating climate action into the Economic Strategy of the Draft CDP and any upcoming LECP will also help the Council to leverage European Green Deal opportunities and position climate as a driver for growth to support the transformative change that will be needed to achieve the Climate Neutrality Objective.</p> <p>Further observations and recommendations of the Assembly in relation to Climate Action are contained within a number of other sections in this submission, reflective of the holistic approach taken in the development of the Draft CDP.</p>
<p>CE Response</p>	<p>While would be possible to include a list of all the relevant sections and / or objectives that relate to climate action if necessary, the purpose of same is not that clear from the submission, and it would only add volume to the final plan. If the EMRA is satisfied with the overall content of the plan with respect to climate action, then this seem somewhat superfluous.</p> <p>With respect to establishing a climate 'baseline' for the County, no consistent methodology has been as yet provided in regulations or guidance from the Department, the Regional Assembly or the Climate Action Regional Offices (CARO) in this regard to date, and it is an evolving area. In its work in establishing a decarbonisation zone in Arklow, Wicklow County Council will be sourcing, collecting and analysing all available and relevant data to establish the 'carbon footprint' of the settlement and this project will be utilised as a learning exercise for establishing what data is available and necessary to establish such baselines. In this regard therefore it is not possible at this time to set out in this plan a climate action 'baseline' but it may be possible in the future.</p>

Chapter 20 Implementation & Monitoring	The Assembly welcome the inclusion of a dedicated Chapter 20 – Implementation and Monitoring, that will monitor progress in implementing the ‘Strategic County Outcomes’ and the ‘Core Strategy’ of the Draft CDP, as set out in Chapters 2 and 3, and which are broadly aligned with the National and Regional Strategic Outcomes of the NPF and RSES and the UN Sustainable Development Goals.
CE Response	Noted
Appendices	<p>Also welcomed are the Development & Design Standards set out in Appendix 1 of the Draft CDP to be applied to future development proposals and are considered to provide a comprehensive framework for the assessment of planning applications in the County.</p> <p>The Council is to be commended for the inclusion of monitoring to ensure effective delivery of the CDP and for greater transparency on the progress made in its implementation.</p> <p>The attention of the Council is also directed to the development of an emerging Regional Development Monitor by the Regional Assembly, which may provide additional guidance in monitoring delivery, and to comments in relation to the monitoring of housing and compact growth delivery which are set out in Section 2.0 Core and Settlement Strategy, and in relation to environmental monitoring in the following Section 9.0 SEA, AA and SFRA.</p>
CE Response	Noted
SEA, AA & SFRA	<p>The Assembly welcomes the preparation of the Draft CDP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), which are set out respectively in Appendix 6 and Appendix 7.</p> <p>The SEA environmental report sets out the iterative process to date including a description of the key environmental issues, an assessment of alternatives for the plan and an assessment of the environmental effects arising from the Draft CDP provisions.</p> <p>By integrating the various recommendations and mitigation measures arising from the SEA, AA and SFRA processes into the draft CDP, which are detailed in the environmental report, it is stated that <i>“the Council have ensured that both the beneficial environmental effects of implementing the Plan have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset”</i>. Observations in relation to Motions that were advised against, subsequently agreed upon as amendments to the Chief Executive’s Draft Plan and that would have potential for likely significant negative environmental effects (identified in Table 8.3 of the environmental report), are set out in the above Section 2 Core and Settlement Strategy.</p> <p>The attention of the Council is drawn to EPA Guidance on SEA Statements and Monitoring (Second Review of Strategic Environmental Assessment Effectiveness in Ireland), published January 2020, which provides best practice on devising monitoring measures, suitably detailed indicators and the frequency of monitoring and reporting. This guidance shall inform the iterative SEA process and preparation of the monitoring programme as part of the County Plan’s SEA statement.</p> <p>The Draft CDP is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. It is concluded that the draft CDP is not foreseen to give rise to any significant effects on designated European Sites, alone or in combination with other plans or projects. The AA process is ongoing and will inform and be concluded at adoption of the CDP.</p>

CE Response	Noted
Conclusions	<p>It is considered that the Draft Wicklow County Development Plan 2021-2027, and in particular the Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.</p> <p>The Regional Assembly welcomes the publication of the Wicklow County Development Plan, which marks the beginning of the alignment of planning policy at County and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and welcome further opportunities to engage in the statutory process of the making of the County Development Plan.</p>
CE Response	Noted
CE Recommendations	
Proposed Amendments to Volume 1	
Amend the draft plan as set out appended document 'Proposed Amended Chapter 3 – Core Strategy'	
Amend the draft plan as set out appended document 'Proposed Amended Chapter 4 – Settlement Strategy'	
Amend the draft plan as set out appended document 'Proposed Amended Chapter 6 – Housing'	
Amend Chapter 9 (Employment) as follows:	
Amend CPO 9.15 and Map 09.02 to remove 'Employment Zoning' form northern side of Farrankelly Road at Kilpedder Interchange.	
Amend Chapter 12 (Sustainable Transportation) as follows:	
CPO 12.3	In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy, (namely Bray and environs, Wicklow – Rathnew, Arklow, Greystones – Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy) and any other settlement where it is deemed necessary by the Planning Authority and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plans.
Amend Volume 1 maps as set out in Part 2 of this report.	
Proposed Amendments to Volume 2	
Amend 'Introduction to Level 4 Plans' as follows	
1.1.3 Economic Development & Employment	
<p>This table also show the amount of land proposed to be zoned in each town for new employment. While it is assumed that a proportion of jobs growth will occur in the town centre and other mixed use lands that are not specifically zoned for employment alone, or will occur on existing developed employment land through intensification, sufficient zoned employment land is zoned in each town to meet all of the jobs growth required, on the assumption of 80</p>	

employees per hectare, plus an additional 'headroom' of 100% to ensure that there will be no shortage of site choice for developers of new employment.

LEVEL 4	Jobs ratio 2016	Targeted future jobs ratio 2031	Jobs growth targeted up to 2031	Quantum of zoned employment land (ha)
Baltinglass	0.81	1.01	+500	13
Enniskerry	0.33	0.41	+100	1 ⁴
Kilcoole	0.46	0.57	+100	10 ⁴
Newtownmountkennedy	0.78	0.97	+1,100	28
Rathdrum	0.82	1.03	+600	15

Amend Volume 2 maps as set out in Part 2 of this report.

Proposed Amendments to Volume 3

Amend Appendix 3 (Housing Strategy) as set out in appended document '**Proposed Amended Housing Strategy**'

Amend Appendix 9 (Infrastructural Assessment Report) as follows:

Add new maps showing the water, wastewater and storm networks for Level 4-6 settlements that form part of the CDP

⁴ To be reviewed in the next Kilcoole LAP to be commensurate with the employment growth objective

Section 3.1	Prescribed bodies (Group 1)
Section 3.1.3	National Transport Authority https://consult.wicklow.ie/en/submission/ww-c2-181
Strategic Overview	The NTA has cooperated closely with Wicklow County Council in addressing a number of planning and transport issues in since the approval of the Transport Strategy. This includes the preparation of the Bray and Environs Transport Study and on-going engagement on schemes to address travel demand on the south-east corridor by sustainable means. This cooperation is reflected in the content of the Draft Development Plan and the NTA is satisfied, subject to the recommended changes below being made, that the Draft Plan would be consistent with the Transport Strategy in accordance with Section 9 (6A) of the Planning and Development Act 2000 (as amended).
CE Response	Noted
Core Strategy	The NTA supports the principles and objectives of the Core Strategy and the approach being taken to consolidate residential development into the higher order centres in the County. The NTA is of the view that such an approach is essential in meeting the requirements for close integration between transport planning and land use planning, and facilitating Wicklow County Council to meet its obligations with regard to the Government's Climate Action Plan. NTA Recommendation The NTA recommends that, in the making of the Development Plan, the approach being taken to ensure population growth is consolidated into higher order centres is maintained by the local authority.
CE Response	Noted
Employment Zonings	There are a number of significant employment zonings on the N/M11 Corridor outside the defined settlement boundaries. The NTA is concerned that development at these locations have the potential to be inconsistent with the Transport Strategy's principles that trip intensive uses should be consolidated into higher order centres. This relates to the following zonings: <ul style="list-style-type: none"> - Mountkenedy Demesne; and - Kilpedder Interchange <p>Together these sites, if developed, have the potential to add significant levels of traffic to the N/M11 and conflict with the objectives of the improvement scheme currently under preparation for this corridor. Notwithstanding the principal uses for which the sites are zoned, it is the view of the NTA that the wording of the zoning objectives do not provide sufficient restrictions in this regard.</p> NTA Recommendation The NTA recommends that the proposed zonings and the detailed wording of the objectives are reviewed in the context of the Transport Strategy, the <i>Spatial Planning and National Roads</i> guidelines, and any recommendations made by TII. In the event that these zonings are retained, the NTA further recommends that a policy is added to the Development Plan that development at these locations will be subject to a transport and traffic management framework which will include, <i>inter alia</i> , proposals for public transport services and reduced car parking provision, and which will be agreed with the NTA and TII.

CE Response	<p>With respect to the proposed zonings along the N11:</p> <p>Map 09.01 at Mountkenedy Demesne (Data Centre)</p> <p>These lands have been zoned for employment use since 1999 and more specifically for data centre use only since 2016. It is noted that this zoning may not be consistent with the Transport Strategy's principles, and it is already noted in this report that this zoning would not accord with the principles set out in the RSES. However, having regard to</p> <ul style="list-style-type: none"> (a) the fact that there already is permission on the lands for a data centre; and (b) the Minister's 'acceptance' of this zoning during the course of the last development plan subject to the zoning being strictly for data centre use only, notwithstanding any possible conflict with the Transport Strategy's principles or the principles of the Spatial Planning and National Road Guidelines for Planning Authorities 2012 as signalled by not making a Direction to the Council to remove this zoning although it had been raised as an issue in the Department submission to the plan in 2015/2016; <p>it is considered that this zoning should be retained in the plan.</p> <p>Map 09.02 at Kilpedder Interchange</p> <p>These lands have been zoned since 1999; the appropriateness of this zoning was previously confirmed by the Minister (by way of a Ministerial Direction providing for the inclusion of this zoning in the Plan) as part of the making of the 2016 Development Plan, notwithstanding any possible conflict with the principles of the Transport Strategy or the <i>Spatial Planning and National Road Guidelines for Planning Authorities 2012</i>. Permission has already been granted and development commenced on the southern part of these lands. With respect to the northern side of the Farrankelly Road, while permission was granted in 2009 for an industrial / warehousing development on the eastern part of these lands, this permission lapsed in 2014. In the intervening years, permission has been refused on a number of occasions, for a variety of reasons, for various industrial / warehousing developments on this side of the road. In light of the concern expressed by the NTA (and others), it is recommended that the employment zoning be removed on the northern portion of these lands.</p> <p>It is not considered appropriate or necessary to include specific objectives that development on these particular sites would be subject to transport and traffic management framework which will include, <i>inter alia</i>, proposals for public transport services and reduced car parking provision, etc as any application for future development on this lands would be subject to the following objectives / standards of the development plan:</p> <p>CPO 12.4 All planning applications for large employment based developments and/or trip intensive developments, where the Planning Authority considers that a significant peak and/or off peak travel will be generated, are required to include a Mobility Management Plan.</p> <p>CPO 12.31 Traffic Impact Assessments will be required for new developments in accordance with the thresholds set out in the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG) and the 'Traffic & Transport Assessment Guidelines' (TII).</p> <p>CPO 12.43 To protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions, significant applications either in the vicinity of or remote from the national road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development</p>
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taken in conjunction with other developments with planning permission that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts.

Appendix 1 Development Design Standards

2.1.1 Enhancing Sustainable Accessibility

*New significant residential or mixed use development proposals (being defined as developments in excess of 50 units of housing / more than 50 employees in any settlements in Levels 1-4 in the hierarchy, 25 units / employees in Levels 5-10, and **all developments** in excess of 500m distance to a public transport service, as well as other format / sizes / locations are may be deemed necessary by the Local Authority) shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means **other than** the private car:*

- (a) local services including shops, schools, health care and recreational facilities, and*
- (b) public transport services.*

Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.

4.1.16 Mobility Management Plans

The Planning Authority shall require all planning applications for large employment based developments, where the Planning Authority considers that a significant peak and/or off peak travel will be generated, to include a Mobility Management Plan. Developments for which mobility management could be applied include:

- *People intensive employment developments, including office (including office based industrial) and high technology and services based developments;*
- *Retail (e.g. large one-off stores), including retail warehousing and distribution;*
- *Health, education and community based institutions.*

A Mobility Management Plan is an integrated strategy designed with the common aim of addressing the total mobility requirements of the development in a sustainable way. Its aim is to shift the emphasis from car borne commuting to increased use of sustainable transportation modes. The Plan shall include aims and specific works objectives which minimise the impact on traffic of a development through:

- *Providing appropriate parking spaces;*
- *Optimising links with the public transport system;*
- *Providing facilities for cyclists and pedestrians;*
- *Meeting the needs of people whose mobility is impaired;*
- *Respecting existing public rights of way;*
- *Encouraging modes of transport other than personal travel by private car.*

National Roads

The NTA are engaged with Wicklow County Council and Transport Infrastructure Ireland (TII) in developing an approach to addressing the issues experienced on the N11/M11 Corridor and the south-east area in general. The overall thrust of this approach is to protect the carrying capacity of the national road for use by strategic traffic; to manage increased demand for travel in such a way that it is catered for by sustainable modes; and to improve traffic safety. To this end, and in accordance with the Transport Strategy, a suite of measures is being considered for this corridor including the rationalisation of direct accesses and junctions; bus priority; enhanced bus and rail services; and a set of Park and Ride facilities. As such, it is not the view of the NTA that any

statement in the Development Plan should link the upgrading of the N/M11 to the population growth required in the County under the RSES and NPF.

The NTA is also concerned that CPO 12.36 includes reference to a third interchange on the N/M11 at Arklow.

In relation to National Roads more generally, the NTA are of the view that the Development Plan is required to demonstrate how the *Spatial Planning and National Roads Section 28 Guidelines* have been taken into account. The submission of TII on the Draft Development Plan is important in this regard.

NTA Recommendations

The NTA recommends the following:

- that reference to the N/M11 upgrade accommodating population growth in section 12.3 is removed;
- that the references to the following interventions set out in CPO 12.36 on the N/M11 corridor are reviewed in the context of the *Spatial Planning and National Roads Guidelines* and any recommendations of TII in this regard:
 - The provision of a third interchange at Arklow;
 - Upgrade to the Ballyronan Interchange; and
 - Upgrade to the Glen of the Downs Interchange and
- that the recommendations of TII as they relate to the national road network in general are fully taken into account in the next stage of the Development Plan process.

<p>CE Response</p>	<p>While the CE notes the work being undertaken by the TII to improve the M/N11, clearly any such improvement must facilitate any increased demand on the M/N11 arising from population and employment growth in County Wicklow that is directed by the NPF and RSES. The M/N11 is not a route solely for the use of those passing through Wicklow from Dublin to Wexford; it provides for strategic, regional traffic movements generated in Wicklow.</p> <p>It is agreed that increased demand for travel arising out of population or employment growth in Wicklow should be accommodated by sustainable modes where possible, and therefore the improvement of the M/N11 must be accompanied by a suite of sustainable transport measures, projects and services to allow this to happen. It is considered that the plan puts in place to suitable framework for such measures to be delivered in tandem with M/N11 improvements.</p> <p>Therefore no change is recommended in this regard.</p> <p>With respect to CPO 12.36 (Objectives for the M/N11),</p> <ul style="list-style-type: none"> - notwithstanding that a northern link into Greytsones from the Glen Of the Downs interchange is only a long term concept and has not been studied in depth, it is considered prudent that the possibility of such a link should be retained in the plan in order to ensure no development / road improvements that occur during the lifetime of this plan would prejudice this possibility in the longer term; - the improvement of the Ballyronan interchange has long been an objective of the TII / Council given its substandard configuration from the outset and therefore it is reasonable that this is retained in the plan; - The Arklow by-pass was designed and constructed in such a manner as to facilitate the possibility of the third interchange. It is therefore illogical to omit this possibility notwithstanding the fact that this project is not listed in current spending plans. <p>With regard to overall consistency with the guidelines detailed, the CE is satisfied that the draft development plan generally accords with same, and no <i>particular</i> inconsistency is pointed out by the NTA.</p>
<p>Electric Vehicles</p>	<p>Due to the rural nature of much of Wicklow, and the dispersed settlement pattern along two main corridors, it is likely that the private car will continue to play a pre-eminent role in meeting the demand for travel for residents of the County.</p> <p>As such, in order to meet Wicklow County Council’s obligations under the Climate Action Plan, a much greater emphasis will have to be placed on electric vehicles over the lifetime of the Development Plan. This relates to the provision of public charging points (including fast-chargers); provision for charging in new developments; and the allocation of parking spaces for the exclusive use of electric vehicles. As Wicklow County attracts significant numbers of visitors travelling by car from Dublin and other parts of Ireland, the provision of a network of charging points would also be of benefit in terms of the visitor experience.</p> <p>NTA Recommendation</p> <p>The NTA recommends the following measures to encourage and facilitate significantly higher levels of electric vehicle use in Wicklow:</p> <ul style="list-style-type: none"> - Amend CPO 12.7 to state that Wicklow County Council will identify appropriate locations for public electric vehicle charging points (including fast chargers) and work with other agencies and landowners to ensure their provision; and - Amend CPO 12.8 to state that 20% of parking spaces will be provided with charging points in new residential, office and industrial developments.

<p>CE Response</p>	<p>As already set out in objective CPO 12.7 the Council is committed to facilitating the development of services and utilities for electric vehicles and alternative fuel vehicles types, including the roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations. It is considered that how the Council contributes to the achievement of this objective, which may or may not include the identification of sites, would be more appropriately addressed by the Council's climate action and energy team, through their various strategies and programmes and therefore no change is recommended.</p> <p>With respect to electric car charging points in new developments, there are now national standards in this regard (SI No. 393/2021 – EU (Energy performance of Buildings) Regulations 2021) which require</p> <ul style="list-style-type: none"> - in respect of existing buildings (other than dwellings) with more than 20 car parking spaces, there shall be installed before Jan 2025 one or more recharging points; - in respect of new buildings or building undergoing major renovation (other than dwellings) with more than 10 car parking spaces, there shall be installed at least one recharging point and ducting infrastructure for at least 1 in 5 spaces to enable the subsequent installation of recharging points - With respect to new buildings or buildings undergoing major renovation containing one or more than one dwelling, which has more than 10 car parking spaces shall have ducting installed for each car parking space to enable subsequent installation of recharging points. <p>These regulation do not require 20% of all spaces be provided with charging points in new residential, office and industrial development, but rather for new office and industrial developments require 10% of spaces be providing with charging points and 20% be provided with ducting and for new residential buildings, require ducting only.</p> <p>In this regard, the standards already set out in the draft Plan are over and above those required by the Regulations. It is considered however that these standards could be enhanced as set out below:</p>
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Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Installation of at least 1 recharging point. Installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces) Installation of ducting infrastructure for every parking space within property boundary.
New (single-unit residential) buildings	New 'own door' dwelling with car parking space located within the property boundary.	Installation of recharging points for electric vehicles on site.
New (single-unit residential) buildings	New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.	Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents Installation of ducting infrastructure for every parking space within development.

Public Transport Objectives

The NTA is generally supportive of CPOS 12.20 to 12.29 as they broadly demonstrate consistency with the Transport Strategy by incorporating a large number of significant public transport improvements which are being pursued by the NTA including Luas to Bray; BusConnects; Local Link; and improvements to the south-east rail line through County Wicklow. These objectives also incorporate the transport integration requirements of the NTA including Park and Ride; cycle parking at train stations and pedestrian links to public transport services. There are, however, a number of changes recommended as follows:

Luas to Blessington

- The NTA does not foresee the extension of Luas to Blessington occurring for a range of transport planning and feasibility reasons, including:
- Extremely low demand for travel from Blessington which can be comfortably accommodated by an improved bus service;
 - Absence of any significant centres of population or other activity between the existing Red Line termini and Blessington;
 - The requirement for the N81 to carry general traffic, including a significant proportion of HGVs; and
 - The cost of such a scheme.

NTA Recommendation

The NTA strongly recommends that reference to Luas being extended to Blessington is removed from the Development Plan as its inclusion would render the Development Plan inconsistent with the Transport Strategy.

Bus Priority

The NTA welcomes the inclusion of CPO12.27 as it relates to the incorporation of elements of BusConnects and the NTA's investment priorities in improved regional and commuter bus services. This objective could be strengthened by including reference to the provision of bus priority within settlements in Wicklow where appropriate. There may be locations in towns such as Blessington and those along the east coast where, in order to reduce delays to services through towns, the delivery of a bus priority scheme of some nature (bus lane, priority signalling etc.) may be desirable during the lifetime of the Development Plan.

NTA Recommendation

The NTA recommends that CPO12.27 incorporates a reference to the provision of bus priority within settlements in County Wicklow where passengers experience undue delay caused by traffic. Related to this, the NTA recommends that bus priority, where identified as necessary, is referenced in CPO 12.45 Blessington Inner Relief Road.

CE Response	<p>Luas to Blessington: The issue raised by the NTA is noted, and it is recommended that Objective CPO 12.21 be amended as follows:</p> <p>CPO 12.21 To promote the development of transport interchanges and ‘nodes’ where a number of transport types can interchange with ease. In particular:</p> <ul style="list-style-type: none"> ▪ to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and /or Regional Authority ; ▪ to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES; ▪ to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Rathdrum, Wicklow and Arklow; ▪ to require electric vehicle charging points to be incorporated into all car parks at public transport nodes; ▪ to promote car sharing parking spaces at premium locations in car parks; ▪ to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe; ▪ to promote the Luas extension from City West/ Tallaght to Blessington; ▪ to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus services / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations; ▪ to encourage the improvement of bicycle parking facilities at all transport interchanges; ▪ to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and ▪ to support the development of bus shelters, that shall incorporate disabled access and bicycle parking facilities where possible.
	<p>Bus Priority: The issue raised by the NTA is noted, and it is recommended that Objective CPO 12.27 be amended as follows:</p> <p>CPO 12.27 To promote the delivery of improved and new bus services both in and out of the County but also within the County by:</p> <ul style="list-style-type: none"> ▪ supporting the development and delivery of bus service enhancement projects, including BusConnects and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate; ▪ facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted); ▪ requiring the developers of large-scale new employment and residential developments in the designated key towns in the County that are distant (more than 2km) from train / Luas stations to fund / provide feeder bus services for an initial period of at least 3 years; ▪ promoting the growth of designated settlements to a critical mass to make bus services viable and more likely to continue; ▪ provision of bus lanes on M11 / N11; ▪ to work with Bus Eireann and the NTA to improve services in south and west

	<p style="text-align: center;">Wicklow.</p> <p>With respect to the Blessington inner relief road, the vision for this route does not involve its use as a diversion for public transport services, but rather, the diversion of private cars and HGVs, with public transport services remaining in the town centre, where accessibility to the most users can be facilitated. It is through the removal of through-passing cars and HGVs that opportunities will become available to alter the pedestrian, cycling and car parking arrangements in the town centre with a view to enhancing the overall vitality and appearance of the town centre. Therefore no change is recommended in this regard.</p>
<p>Review of NTA Transport Strategy</p>	<p>The NTA is in the process of reviewing the Transport Strategy with a view to publishing a draft in the coming weeks. While the Draft County Development Plan is broadly consistent with the principles of integrated land use and transport planning, and while it incorporates the objectives of the 2016 strategy as appropriate, it is important that the emerging requirements of the NTA in terms of transport in Wicklow are taken into account in the later stages of the Development Plan process.</p> <p>To this end, the NTA and Wicklow County Council have maintained contact as both authorities develop their respective plans and it is intended that this liaison continues through the next stages of their preparation. The NTA look forward to this on-going cooperation as a means of ensuring our statutory requirements are met and that the benefits of such a collaborative approach are reflected in the content and in the implementation of our respective plans.</p>
<p>CE Response</p>	<p>This report sets out the CE's recommendation to the elected members with respect to any changes believed necessary to the Draft Plan. Once the report is issued to the members, the CE has no further opportunities to propose or recommend further changes to the Draft Plan. If the new Transport Strategy is not completed by the time this report and its final recommendations issue, it will not be possible to recommend further changes.</p>
<p>CE Recommendations</p>	
<p>Proposed Amendments to Volume 1</p>	
<p>Amend Chapter 9 (Employment) as follows:</p> <p>Amend CPO 9.15 and Map 09.02 to remove 'Employment Zoning' from northern side of Farrankelly Road at Kilpedder Interchange.</p>	
<p>Amend Chapter 12 (Sustainable Transportation) as follows:</p> <p>CPO 12.8 To require the implementation if the following standards for EV charging in new developments:</p>	

Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Installation of at least 1 recharging point. Installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces) Installation of ducting infrastructure for every parking space within property boundary.
New (single-unit residential) buildings	New 'own door' dwelling with car parking space located within the property boundary.	Installation of recharging points for electric vehicles on site.
New (single-unit residential) buildings	New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.	Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents Installation of ducting infrastructure for every parking space within development.

CPO 12.21

To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular:

- to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and /or Regional Authority ;
- to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;
- to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Rathdrum, Wicklow and Arklow;
- to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;
- to promote car sharing parking spaces at premium locations in car parks;
- to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;
- ~~to promote the Luas extension from City West/ Tallaght to Blessington;~~ to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus services / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;
- to encourage the improvement of bicycle parking facilities at all transport interchanges;
- to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and
- to support the development of bus shelters, that shall incorporate disabled access and bicycle

parking facilities where possible.

CPO 12.27

To promote the delivery of improved and new bus services both in and out of the County but also within the County by:

- supporting the development and delivery of bus service enhancement projects, including BusConnects and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate;
- facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);
- requiring the developers of large-scale new employment and residential developments in the designated key towns in the County that are distant (more than 2km) from train / Luas stations to fund / provide feeder bus services for an initial period of at least 3 years;
- promoting the growth of designated settlements to a critical mass to make bus services viable and more likely to continue;
- provision of bus lanes on M11 / N11;
- to work with Bus Eireann and the NTA to improve services in south and west Wicklow.

Section 3.1	Prescribed bodies (Group 2)
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Name	Department of the Environment, Climate & Communications	Sub ID: C2-1
Topic	Issues raised	
Waste Management	In respect of waste within documentation, local authority should consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans.	
Chief Executive's Response		
This submission does not have any comment or suggestion to make regarding the draft plan content. The provisions of the draft plan relating to waste management (as are applicable for inclusion in a land use plan) were informed by the Eastern-Midlands Region Waste Management Plan (as set out in Chapter 15 of the draft plan) and by the waste management team of Wicklow County Council.		
Chief Executive's Recommendation		
No change		

Name	Health & Safety Authority	Sub ID: C2-2
Topic	Issue raised	
	<p>The Health & Safety Authority is an Authority prescribed under Article 13 of the Planning & Development Regulations 2001-2015 and as such is required to be consulted in relation to Development Plans under sections 11-13 & 24 of the Act. The approach of the Authority to land-use planning is set out in the document 'Policy & Approach of the Health and Safety Authority to COMAH risk-based land-use Planning'. It is available from our website at: https://www.hsa.ie/eng/Your Industry/Chemicals/Legislation Enforcement/COMAH/Land Use Planning/.</p> <p>The document should be consulted to fully understand the advice given in this letter.</p> <p>The Authority would expect the planning guidelines to contain:</p> <ol style="list-style-type: none"> 1. An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU. 2. The Consultation distances and generic advice, where applicable, supplied by the Authority to Dublin City Council (sic) in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority. 3. A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments. 4. There are currently two notified establishments in the area of the Draft Wicklow County Development Plan. These two sites are <ul style="list-style-type: none"> • Sigma Aldrich Ireland Limited – Vale Road, Arklow, Co. Wicklow • Zoetis Ireland – R755, Copse, Co. Wicklow, A67 X704 	
Chief Executive's Response		
It is unclear if the HSA has reviewed the content of the draft plan in advance of making this submission, or whether this is a generic response (reference to Dublin City Council is noted), as the issues raised are addressed in the draft plan in Section 15.1.2 and Objective CPO 15.8. The submission does not specify if there are any particular changes or enhancements to the draft plan provisions that are recommended.		
Chief Executive's Recommendations		
No change		

Name	Irish Aviation Authority	Sub ID: C2-9
Topic	Issues raised	
Aviation	No observations to raise	
Chief Executive's Response		
n/a		
Chief Executive's Recommendation		
No change to Plan.		

Name	EPA	Sub ID C2-19
Topic	Issues raised	
SEA	<p>The EPA is one of the statutory environmental authorities under the SEA Regulations. In its role as an SEA environmental authority, it focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the Plan. Its functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.</p> <p>As a priority, it focuses efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, it provides a 'self-service approach' via the guidance document '<u>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</u>' (copy of which attached to the submission). This document is updated regularly and sets out the EPA's key recommendations for integrating environmental considerations into Local Authority Land Use Plans. The EPA suggests that WCC takes this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the Plan.</p> <p>Wicklow County Council should also ensure that the Plan aligns with key relevant higher- level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.</p> <p>Content of the Environmental Report</p> <p>The SEA Regulations set out the information to be contained in an Environmental Report.</p> <p><i>Assessment of Alternatives</i></p> <p>You should describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative. You should assess the alternatives against the 'Strategic Environmental Objectives' identified in the SEA ER.</p> <p><i>Assessment of Environmental Effects</i></p> <p>You should assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.</p> <p><i>Mitigation Measures</i></p> <p>Where you have identified the potential for likely significant effects, you should provide appropriate mitigation measures to avoid or minimise these. You should ensure that the Plan includes clear commitments to implement the mitigation measures.</p> <p><i>Monitoring</i></p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.</p> <p>If the monitoring identifies adverse impacts during the implementation of the Plan, Wicklow County Council should ensure that suitable and effective remedial action is taken.</p>	

Guidance on SEA related monitoring is available on the EPA website at <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

State of the Environment Report – Ireland’s Environment 2020

In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our State of the Environment Report *Ireland’s Environment – An Integrated Assessment 2020* (EPA, 2020) should be considered, as relevant and appropriate. This should also be taken into account, in preparing the Plan and SEA.

Future Amendments to the Plan

You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.

SEA Statement – “Information on the Decision”

Once the Plan is adopted, you should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

Environmental Authorities

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (formerly Minister for Culture, Heritage and the Gaeltacht (functions transferred from Minister for Environment, Heritage and Local Government/ Minister for Housing, Planning and Local Government to Minister for Culture, Heritage and the Gaeltacht by S.I. 192 of 2011);
- Minister for Environment, Climate and Communications; and
- Minister for Agriculture, Food and the Marine.
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

Chief Executive’s Response

- (a) The EPA’s submission is noted and welcomed. The Draft Plan and associated Strategic Environmental Assessment have been undertaken in accordance with the EPA guidance document ‘*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*’.
- (b) The Draft Plan has been prepared in accordance with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.

- (c) Alternatives are described in SEA Environmental Report Section 6 "Description of Alternatives". Alternatives are assessed, including against Strategic Environmental Objectives, as appropriate, in SEA Environmental Report Section 7 "Evaluation of Alternatives". Section 7 identifies the selected alternative.
- (d) The full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects, are assessed and documented in SEA Environmental Report Section 8 "Evaluation of Plan Provisions".
- (e) Appropriate mitigation measures are identified in SEA Environmental Report Section 9 "Mitigation Measures" and have been fully integrated in the Draft Plan.
- (f) The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement. The cited guidance has been and will be taken into account in undertaking the SEA and preparing the Plan.
- (g) 'State of the Environment Report – Ireland's Environment 2020' has been and will be taken into account in undertaking the SEA and preparing the Plan.
- (h) Proposed material alterations will be screened using a method similar to that used for the Plan.
- (i) An SEA Statement containing the required information will be prepared at the end of the process. The cited guidance will be taken into account in preparing the SEA Statement.
- (j) Relevant environmental authorities are being consulted with as part of the SEA/Plan preparation process.

It is noted that the EPA has not identified any deficiencies / omissions / errors in the SEA of the Draft Plan.

Chief Executive's Recommendation

No change

Name	Department of Defence	Sub ID: C2-23
Topic	Issues raised	
Military Aviation	<p>The Minister for Defence is responsible for the regulation of military aviation. Safeguarding at Coolmoney Camp and the Glen of Imaal is intended to protect current and future aircraft operations and take account of the security requirements associated with some of those operations.</p> <p>Military lands in the Glen of Imaal area are the Irish Defence Forces main training and largest live fire range areas. The training area has been in continuous use for over a century. The facility consists of the training lands in the Glen of Imaal including the Air Firing Range and also Coolmoney Camp at Knockanarrigan. The training area is constantly in use for Defence Forces troop exercises such as overseas readiness, casualty evacuation (casevac), and air firing involving both Army and Air Corps assets. For these reasons access to the Glen of Imaal by Air Corps low level aircraft is of vital importance to the Irish Defence Forces.</p> <p>Danger Area 5 (EI-D5) is an area of airspace surrounding the Glen of Imaal for use by the Irish Defence Forces and is outlined in Aeronautical Information Publication (AIP) Ireland 9 (The lateral limits of EI-D5 are shown on map attached to submission). The vertical limits of this airspace is from the surface to a maximum of 40,000 feet. EI-D5 is activated frequently for ground firing, aircraft conducting live firing and also for flying Defence Forces drones. As a rule, Irish Air Corps flight within this airspace will not comply with the rules of the air. Hazards will exist to the safety of objects and/or persons inside the Danger Areas.</p> <p>Coolmoney Camp at Knockanarrigan is the primary location used to accommodate, administer, equip and brief all troops prior to entering the Glen of Imaal range area. The area surrounding Coolmoney Camp is routinely used for preparation and rehearsal training including the use of helicopters to practice troop drills. The lands surrounding the camp are seen as a safe area removed from the live range area for troops to rehearse all helicopter drills prior to entering the live range area to use live ammunition. It is the position of the Department of Defence that all proposed tall structures within 5NM of military installations be assessed as to any impact on military flight operations. The rationale of a 5NM assessment area is to protect airspace for instrument arrival and departure procedures planned for the near future.</p> <p>Separate to any training requirements, the necessity for operational (non training) aircraft to have freedom of movement in the Glen of Imaal area cannot be understated.</p> <p>The purpose of safeguarding Coolmoney Camp and the Glen of Imaal is to ensure the viability of the Glen of Imaal and Coolmoney Camp as a site for air operations. Aerodrome safeguarding must protect both current and future uses considering the longest possible view both in terms of future use and developments in air navigation technology. In this regard, the Department of Defence safeguards EI-D5 as a live firing range and Coolmoney Camp for use as a site compatible with air operations including for implementation of instrument arrival and departure procedures. If development were to encroach upon the Glen of Imaal and Coolmoney Camp, its viability as a location for air operations would be lost.</p> <p>Restricted Development within 5NM of Coolmoney Camp and the Glen of Imaal area.</p> <p>The main focus of this submission is the control of development in the following areas:</p>	

- a. Within 5NM of Coolmoney Camp.
- b. Within the Glen of Imaal and the lateral limits of the EI-D5. All proposed development within the Glen of Imaal should be assessed for any impacts on the use of Coolmoney Camp and EI-D5 by the Irish Defence Forces for flight operations.
- c. The development of wind turbines or other tall structures within the EI-D5 should not be allowed.
- d. Development in general should be restricted so that increased population density or movement within the EI-D5 is avoided.

Chief Executive's Response

While it is considered excessive to restrict development in the manner requested, which could include a restriction on necessary rural development, including housing, in the vicinity of the sites described, it is considered that the most appropriate way to address these concerns is to include a map in the plan showing the military areas described, and include a new requirement in the development standards.

Chief Executive's Recommendations

Amend the plan as follows:

Volume 3, Appendix 1

- include a map in the Development Plan (Appendix 1) showing the Glen of Imaal training areas, the 5NM distance around the Coolmoney Camp and the lateral distance limits of EI-D5 as provided by the Department of Defence
- Add the following development standard in Appendix 1
'Applications for development located within the zones shown on Map X at the Department of Defence Glen of Imaal training area, Danger Area 5 (EI-D5) airspace surrounding the Glen of Imaal or Coolmoney Camp at Knockanarrigan shall address possible adverse impacts arising from the development, if any, on the safe operation of these military installations, including impact on military flight operations'

Name	Meath County Council	Sub ID: C2-43
Topic	Issues raised	
<p>Cooperation & collaboration</p>	<p>Meath County Council welcomes the publication of the Draft Development Plan and the opportunity to engage in the consultation process. Meath County Council acknowledges that the Draft Plan is centred on 3 overarching themes- Healthy Placemaking, Climate Change and Economic opportunity. The Draft Plan sets out a strategic vision for County Wicklow based around these principles.</p> <p>Meath County Council recognises the importance of collaboration in the achievement of cohesive development, efficient delivery of services and addressing key challenges including our changing climate at Regional level. Historically Meath County Council has built a strong working relationship with Wicklow County Council. It is the intention of Meath County Council to maintain this important relationship into the future for the betterment of both Counties</p> <p>The review of the current Meath County Development Plan 2013-2019 is ongoing. Pre-Draft consultation took place from 14 December 2016 -17 February 2017 inclusive. Pursuant to Section 11 (b) (ii) of the Planning & Development Act, 2000 as amended, the review process was suspended May 2018- May 2019, pending the preparation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly. The Draft Plan was on public display 18 December 2019 to 6 March 2020 inclusive. Pursuant to the Emergency Measures in the Public Interest (Covid-19) Act, 2020, the statutory timelines were paused from 29 March to 23 May 2020. Material Amendments to the Draft Meath County Development Plan 2021- 2027 took place from 31 May 2021 to 29 June 2021 inclusive. The Chief Executive’s Report on submissions received on the material amendments was issued to the Elected Members on 10 August 2021. The anticipated adoption date of the Meath CDP 2021-2027 is September 2021.</p> <p>Issues of Mutual Interest</p> <p>Cycling</p> <p>Meath County Council is working collaboratively with the NTA and other stakeholders to deliver the NTA Cycle Network Plan for the Greater Dublin Area. Chapter 5 of the Draft Meath County Development Plan, MOV OBJ 25 states: <i>‘To implement, in conjunction with the NTA, the recommendations of the NTA strategy regarding walking and cycling infrastructure’</i>. Similar policy support in the Draft Wicklow Development Plan is welcomed.</p> <p>Tourism/Recreation</p> <p>The focus of the draft Plan on supporting tourism development in the context of Ireland’s Ancient East will assist the region as a whole in attracting visitors. Meath County Council supports continued collaboration at regional level to market the region as a tourist destination.</p>	
Chief Executive’s Response		
Noted.		
Chief Executive’s Recommendations		
No change		

Name	Office of Public Works	Sub ID: C2-44
Topic	Issues raised	
General	<p>The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Wicklow County Development Plan 2021-2027. The OPW welcomes the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines' and the proposed measures set out in the Flood Risk Management Plans (FRMPs) based on the work undertaken for the CFRAM Programme, and the preparation of a Strategic Flood Risk Assessment (SFRA).</p> <p>In particular the OPW welcomes:</p> <ul style="list-style-type: none"> • CPO 14.01 supporting the implementation of recommendations in the OPW Flood Risk Management Plans • CPO 14.06 To implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009) • CPO 13.3 and CPO 14.16 regarding minimum riparian zones • CPO 14.07 to prepare or update flood risk assessments and flood zone maps for allzoned lands within the county • CPO 14.10 prohibiting development in flood plains or other areas known to provide attenuation except where justified with the Justification Test • Flood Risk Assessment 'Level 6 Mitigation Objective': To restrict the types of development permitted in Flood Zone A and Flood Zone B to the uses that are 'appropriate' to each flood zone, as set out in Table 3.2 of the Guidelines for Flood Risk Management (DoEHLG, 2009). <p>The following comments highlight opportunities for the Draft Plan before it is finalised</p>	
Flood Zone Mapping	<p>It is difficult to assess the zonings/sites at flood risk or if the sequential approach has been applied without the land use zoning maps overlaid with the flood zone maps.</p>	
Flood Relief Schemes	<p>The OPW welcomes policy objective CPO 14.05 regarding working with the OPW and other agencies to delivery Flood Defence Schemes as identified in the current and future FRMPs, in particular Avoca River (Arklow) and Avoca River (Avoca) The OPW recommends that the text in this objective could be clarified to ensure zoning or development proposals support and do not impede or prevent the progression of these measures.</p> <p>There are also schemes planned for Baltinglass, Blessington, Greystones & Environs, and Wicklow & Ashford, which are to be delivered in the second tranche of schemes.</p>	
Settlements Level 6	<p>Level 6 Settlements have three zoning types, Primary Zone, Secondary Zone and Tertiary Zone. These zonings allow highly vulnerable, lesser vulnerable and water compatible development. To ensure no encroachment onto, or loss of the flood plain, the OPW recommends that a water compatible development type zoning such as <i>Open Space</i> would be used for lands identified as being at risk of flooding.</p>	
Settlements Level 7 to 9 and Rural Areas	<p>The OPW welcomes the commentary on both the settlements level 7 to 9 and rural areas, that as the Justification Test has not been applied or passed that new, highly and less vulnerable development should be located in Flood Zone C and only minor development as per Section 5.28 (as amended) of the Guidelines and water compatible</p>	

	uses will be permitted in Flood Zones A and B.
Justification Tests	<p>The OPW welcomes the inclusion of Plan-making Justification Tests supplied in the SFRA, and policy objective CPO 14.08 <i>"The zoning of land that has been identified as being at a high or moderate probability of flooding (flood zones A or B) shall be in accordance with the requirements of the Flood Risk Management Guidelines and in particular the 'justification test for development plans' (as set out in Section 4.23 and Box 4.1 of the guidelines)." The OPW also welcomes the precautionary approach as set out in Section 4.5.1 of the SFRA whereby infill development is not considered exempt from the requirement for a Justification Test.</i></p> <p>However, proposed land use zones, some of which are classified as highly vulnerable development in the Guidelines within Flood Zones A and B are shown in the settlement zoning maps. Examples of these are detailed in the Comments on 'Specific Settlements' section below. No commentary has been provided to demonstrate that the Plan Making Justification Test has been applied in proposing vulnerable development zoning within Flood Zones A and B.</p> <p>Where it is intended to zone or otherwise designate land which is at moderate or high risk of flooding, then the appropriateness of the particular development should be rigorously assessed through the application of the Justification Test. The Guidelines set out that, at the Plan-making stage, land use zoning be informed by the suitable level of FRA and if necessary a Justification test. Chapter 5 of the Guidelines set out that <i>"most flood risk issues should be raised within strategic assessments undertaken by local authorities at the plan-making stage. Therefore as more plans are reviewed and zoning considered should be less needs for development management processes to require detailed flood risk assessment"</i>.</p> <p>As flood risk assessments are integrated with the SEA process, Section 3.10 also highlights the need that FRA's be <i>"undertaken as early as possible in the process so that the SEA is fully informed of the flood risks and impacts of the proposed zoning or development"</i>.</p> <p>If it is the case that these sites are already developed then Circular PL 2/2014 provides further advice and detail to planning authorities on older developed areas of towns and cities located in Flood Zone A and B. <i>"Where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non- structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced"</i>.</p> <p>The guidance on highly vulnerable existing development is mentioned in Section 4.2.2 of the SFRA, where it states that <i>"With the exception of Avoca, no settlements with extensive areas of existing residential development within Flood Zone A and B were identified"</i> However, there are significant areas of Existing Residential zoning within Flood Zones A and B in settlements such as Aughrim and Baltinglass.</p> <p>For sites that are intended to be zoned for development following the application of a Justification Test where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no</p>

	<p>encroachment onto, or loss of the flood plain, or that only water compatible development such as <i>Open Space</i> would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.</p>
<p>National Indicative Fluvial Mapping (NIFM)</p>	<p>The OPW NIFM has been used as dataset in producing the flood risk mapping. It is stated in Table 2-1: Indicators of Flood Risk of the SFRA that these maps are predictive flood maps, however it should be noted that these maps are indicative maps and are not predicative. The data shows the modelled extent of land that might be flooded by rivers during a theoretical or 'design' flood event.</p> <p>While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed.</p>
<p>Consideration of Climate Change Impacts</p>	<p>The OPW welcomes the discussion on climate change in the SFRA and in particular the consideration of future scenarios when assessing flood risk and the allowance for climate change in setting finished floor levels. However, this discussion is focused on incorporating climate change into development design and the Draft Plan has not addressed how climate change has been considered in the production of this development plan. Planning authorities can consider climate change impacts in the Plan-making Stage, such as by avoiding developments in areas potentially prone to flooding in the future providing space for future flood defences and setting specific development management objectives, It should be noted that the flood maps prepared under the CFRAM, NIFM and ICPSS Programmes include maps for two potential future scenarios taking account of different degrees of climate impact. Consideration might be given to policy objectives in relation to climate change and flood risk.</p>
<p>Coastal Change</p>	<p>The OPW welcomes the following objectives on coastal change:</p> <p>CPO 14.03 and 14.04/19.15 and regarding an adaptive approach to the natural evolution of, and the protection of natural coastal defences</p> <p>CPO 19.5 <i>To work with the OPW and any other relevant bodies to address the effects of sea level changes, coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable area"</i></p> <p>C&M 04 Natural Coastal Defences, <i>"We recognise the value of the County's natural coastal defences including estuaries, dunes and sand dunes and ensure their protection from inappropriate development and interference"</i></p> <p>It should be noted that the Government has established an Inter-Departmental Group on Coastal Change Management to scope out an approach for the development of a national coordinated and integrated strategy to manage the projected impact of coastal change to our coastal communities, economies, heritage, culture and environment. The Inter-Departmental Group is jointly chaired by the Department of Housing, Planning and Local Government and the OPW and will bring forward options and recommendations for the Government to consider as soon as possible.</p>
<p>Mitigation Measures</p>	<p>The Flood Mitigation Measures at Site Design outlined in Section 4.11 of the SFRA are welcomed by the OPW and provide guidance on how residual flood risk can be</p>

	managed to acceptable levels.
SuDS and Natural Water Retention Measures	<p>The OPW welcomes the policy objectives CPO 14.02, and 14.11 – 14.15, in relation to SuDS and natural water retention measures, and the inclusion of Chapter 18 on Green Infrastructure.</p> <p>The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.</p>
CFRAM Update	<p>In Section 8 SFRA Review and Monitoring, it is noted that the CFRAM Studies run on a six yearly cycle, and cycle 2 is due in at least 2026. The CFRAM Programme has been completed and implementation of the outputs from this work is underway. The EU Floods Directive requires Member States to review the PFRA, the FRMPs and the flood maps on a six-yearly cycle. As part of the OPW commitment to carry out these reviews the NIFM Programme has been completed, the OPW continues to update predictive flood mapping to provide the best available flood risk information through the map review programme, where a Flood Map Review Request Form has been submitted to the OPW and the criteria to trigger a review have been met.</p>
Applications for Development in Areas at Risk of Flooding	<p>The OPW welcomes the guidance for all development proposals in Section 4.9 of the SFRA, confirmed and strengthened by Policy Objective CPO 14.09, which are provided in a clear and concise format in the form of a checklist.</p>
Historic Flood Events	<p>Table 2-1 in the SFRA references historic flood events from www.floodmaps.ie. Please note that this website is no longer available and historic flood events are now available on www.floodinfo.ie.</p>
Areas for Further Assessment (AFAs)	<p>Section 1.5 and Table 2-1 of the SFRA provide lists of AFAs in Wicklow. It is noted that Bray has been omitted from this list.</p>
Baltinglass	<p>The commitment in the SFRA that <i>“Where there is existing residential within Flood Zone A or B, new development should be limited to minor development only (Section 5.28 as amended) with no new, major development permitted within this area.”</i> is welcomed, and the OPW suggests that this could be supported with a settlement objective.</p>
Rathdrum	<p>There are areas of <i>Mixed Use, Existing Residential, and Tourism</i> in Flood Zones A and B. It is stated in the commentary on this settlement in the SFRA that as none of these areas will pass the Plan-Making Justification Test, development be restricted to minor works as per Section 5.28 of the Guidelines. The OPW recommends this be supported with a settlement objective as outlined above in the Justification Test discussion.</p>
Ashford	<p>The OPW welcomes objective ASH12 to <i>“safeguard the integrity of streams and rivers in the plan area, in particular all watercourses that are hydrologically linked to The Murrough European site, including the use of adequate buffer zones between watercourses and proposed developments.”</i></p> <p>There are areas of <i>Community & Educational, Employment and Public Utility</i> lands in Flood Zones A and B. It is noted in the commentary on this settlement that the <i>Community & Educational</i> and <i>Employment</i> lands would not pass a Justification Test, and the <i>Public Utility</i> lands fail a Justification Test in the addendum. It is set out in the</p>

	<p>commentary on the <i>Community & Educational</i> and <i>Employment</i> that as only a small portion of the zoned lands is in Flood Zones A and B, the sequential approach could be applied to development management to locate development within Flood Zone C. The conclusion to the Justification Test for the <i>Public Utility</i> lands states that the zoning objective “does not proscribe exactly where in the zone development should occur”. The OPW suggests that an objective could be applied to these zonings as outlined above in the Justification Test.</p>
Aughrim	<p>The OPW welcomes settlement objective AUG10 “To ensure that only ‘water-compatible’ uses are permitted on the employment zoned lands that are at flood risk and which are identified for such use on the land use zoning objectives map (refer Table 3.1: Classification of the vulnerability of different types of development, Flood Risk Management Guidelines DoEHLG/OPW, 2009).”</p> <p>It is noted in the commentary on this settlement that as <i>Employment</i> zoning is less vulnerable, it is considered appropriate within Flood Zones A and B. This is not the case, as a Plan-Making Justification Test is required when zoning less vulnerable lands in Flood Zone A.</p> <p>For the area zoned as <i>Tourism</i> in Flood Zones A and B, it is set out in the SFRA that future development is to be restricted to minor development. The OPW suggests that this be supported with a settlement objective similar to AUG10.</p> <p>For the area zoned <i>Mixed Use</i> to the east of the settlement at the confluence of the Aughrim and Aughrim Lower rivers, it is stated in the commentary that as these lands do not pass the Justification Test, the sequential approach should be applied to development management “with less and highly vulnerable development focused to the east and which Flood Zone C and water compatible uses within Flood Zone A / B”. The OPW suggests that as this land does not pass the Justification Test, either an objective be applied to the zoning to support the above approach, or the lands at flood risk are rezoned as a water compatible type zoning.</p> <p>There are areas of highly vulnerable <i>Existing Residential</i> in Flood Zone B, shown to be at increasing risk in future scenarios. No commentary has been provided on this in the SFRA. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.</p>
Carnew	<p>There is an area of <i>Existing Residential</i> in Flood Zones A and B to the north of the settlement. This settlement is described as having no lands at risk of flooding in Table 1-3, and no commentary has been provided on this settlement in the SFRA.</p>
Tinahely	<p>There is an area of <i>Public Utility</i> which can allow highly vulnerable uses in the centre of the settlement in Flood Zones A and B. No commentary has been provided on this zoning. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.</p>
Avoca	<p>It is noted that development with Flood Zones A and B in the Primary Development Zone is premature until the Avoca flood relief scheme has been completed and until that time development is to be restricted to minor works as per Section 5.28 of the Guidelines. Flood Relief Schemes are designed to mitigate the risk of flooding to existing communities and properties only.</p> <p>It is noted that flood extents are shown to increase in CFRAM future scenario mapping</p>
Newcastle	<p>It is noted that flood extents are shown to increase in CFRAM future scenario mapping.</p>

Laragh-Glendalough	It is stated in the commentary that new development is to be located in Flood Zone C in Secondary Development Area, and avoided in Flood Zones A and B. The lands of the Secondary Development Area which overlaps with Flood Zones A and B is currently water compatible sports use which is to be retained. The areas of Flood Zone A and B in the Primary Development Area are currently <i>Open Space</i> which is to be retained. The OPW recommends this be supported with an objective.
Inchanappa South and Ballyhenry, Ashford	It is set out in the commentary on this <i>Employment</i> zoning that as the zoning is less vulnerable, the Plan Making Justification Test is not required. As per Table 3.2 in the Guidelines and Table 1-6 in the SFRA, the Plan Making Justification Test is required for lessvulnerable development in Flood Zone A. It is stated in the commentary that the areas within Flood Zones A and B should be retained for water compatible purposes. The OPW recommends rezoning these lands as a water compatible type such as Open Space to reflect the land use and to ensure no encroachment onto, or loss of, the flood plain.

Chief Executive's Response

General
Noted - no change required.

Flood Zone Mapping
The SFRA of the draft plan prepared and published map showing lands at risk of flooding overlaid with the proposed and use zoning maps for all plans in Levels 4-6 of the hierarchy and any other location where development zoning is proposed, as set out in **Section 5** of the SFRA report. In addition, each town plan is accompanied by a full town plan map showing flood zones. It is unclear why this has been requested by the OPW when this has already been provided. However, additional maps can be included in the SFRA, please be appended to this report 'Addendum II to the SFRA'.

Flood Relief Schemes
In order to address this concern, it is recommended that Objective CPO 14.05 be strengthened as follows:

CPO14.05 To continue to work with the OPW and other agencies to deliver Flood Defence Schemes in the County as identified in current and future FRMPs, in particular:

- Avoca River (Arklow) Flood Defence Scheme;
- Avoca River (Avoca) Flood Defence Scheme;
- Low cost works in accordance with the OPW's Minor Works Scheme;
- Coastal Protection Projects, where funding allows.

and ensure that development proposals support, and do not impede or prevent progression of such schemes.

Settlements Level 6
The Level 6 plans are simple 2 or 3 zone plans, which are considered appropriate for these smaller settlements. These plans do not provide the full range of zoning objectives as found in higher order plans, where it is necessary to clearly show how development zones don't conflict with flood zones unless the justification test is passed. The OPW has suggested that a water compatible zone type (open space) be added into these plans, where land is at risk of flooding. However this does not take into account that some of these lands (for example those lands located in the town cores) may pass the justification test for zoning. In order to ensure that no inappropriate development occurs in areas at risk of flooding in these simple format plans, these plans include a very clear objective to manage flood risk and this is considered to adequately address the concerns of the OPW:

Flood Risk Assessment 'Level 6 Mitigation Objective'

To restrict the types of development permitted in Flood Zone A and Flood Zone B to the uses that are 'appropriate' to each flood zone, as set out in Table 3.2 of the Guidelines for Flood Risk Management (DoEHLG, 2009). The planning authority may consider proposals for development that may be vulnerable to flooding, and that would generally be inappropriate as set out in Table 3.2 of the Guidelines, subject to all of the following criteria being satisfied:

- *The planning authority is satisfied that all of the criteria set out in the justification test as it applies to development management (Box 5.1 of the Guidelines) are complied with.*
- *The development of lands for the particular use is required to achieve the proper planning and sustainable development of the settlement, and complies with at least one of the following:*
 - (i) *The development is located within the 'primary lands' and is essential for the achievement of the 'vision' or for the achievement of a specific objective for these lands.*
 - (ii) *The development comprises previously developed and/or under-utilised lands/sites,*
 - (iii) *There are no suitable alternative lands for the particular use, in areas at lower risk of flooding.*

Settlements Level 7 to 9 and Rural Areas

Noted.

Justification Tests

Where it is proposed to zone lands for vulnerable uses on land at risk of flooding, the SFRA sets out how the Justification test has been passed. However, it would seem that the OPW does not find the assessment sufficiently clear and therefore additional information is proposed to be provided, as set out in the appended 'Addendum II to the SFRA'.

With respect to lands that already developed in flood risk areas (such as in some town centres) and where it is proposed to maintain the existing use zoning, with respect to Circular PL 2/2014, the SFRA addresses same in detail, in particular in Section 4.5.

With regard to the concern raised regarding 'existing residential' zones in area is risk of flooding in Baltinglass and Aughrim, further assessment is provided in 'Addendum II to the SFRA' forming part of this report.

National Indicative Fluvial Mapping (NIFM)

It is noted that the NIFM maps are indicative and not predictive and this will be corrected in the final text of the SFRA.

Consideration of Climate Change Impacts

It is considered that the interaction of climate change and flood risk management is addressed adequately in the Draft Plan and associated SFRA, in particular Section 14.1.7 of the Draft Plan and associated flood risk management objectives set out in Chapter 14 and I the SFRA (in particular Section 4).

Coastal Change

Noted.

Mitigation Measures

Noted.

SuDS and Natural Water Retention Measures

It is requested that the SFRA provides more guidance on techniques for managing surface water run-off at key development sites, and that the SFRA identifies where integrated and area based measures are

appropriate to order to avoid reliance on individual site solutions. These are considered good suggestions but it is considered that this would be more appropriately dealt with through the LAP process, as it is only in these larger towns that key or significant development sites are identified where these objectives would be possible to fulfil.

CFRAM Update

Information regarding the CFRAM / PFRA / FRMP programme and cycle is noted and will be updated in the final SFRA.

Applications for Development in Areas at Risk of Flooding

Noted.

Historic Flood Events

Website update is noted and this will be updated in the final SFRA.

Areas for Further Assessment (AFAs)

The omission is Bray AFA will be corrected in the final SFRA

Baltinglass, Rathdrum

In light of the concern raised, it is recommended that a new objective be added to the 'Introduction to Level 4 Plans' as follows:

Where existing development is located within Flood Zones A or B, new development shall be limited to minor development only; any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan.

Ashford

In light of the concern raised, it is recommended that a new objective be added to the 'Introduction to Level 5 Plans' as follows:

Any proposals for new development in Flood Zones A or B shall be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of this SFRA and the relevant policies and objectives in the County Development Plan, and in particular, where the lands at risk of flooding form part of a larger development site, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within the site.

Aughrim

The concern with respect to the 'Employment' zones in areas at risk of flooding is noted; the appended 'Addendum II to the SFRA' sets out a more detailed 'Justification Test' for these zones. In addition, the new objectives recommended above under 'Ashford' to be included in the 'Intro to Level 5 Plans' will address this concern.

With respect to the 'Tourism' zone which is located in an area at risk of flooding, these lands are already fully developed for this use, and therefore it is recommended that the following objective be included to the 'Introduction to Level 5 Plans' :

Where existing development is located within Flood Zones A or B, new development shall be limited to minor development only other than water compatible development; any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan.

Carnew

The issue raised is noted and it is recommended that further information with regard to flood risk assessment (including more detailed Justification test) is set out in the Addendum II.

Tinahely

The site on concern is the existing WWTP, and having regard to the Justification Test carried out, is it considered that this zoning meets the requirements of the guidelines. Nevertheless, as set out above, the 'Intro to Level 5 Plans' which includes Tinahely is recommended to be amended to include the following objective:

'Where existing development is located within Flood Zones A or B, new development shall be limited to minor development only other than water compatible development; any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan'.

Avoca

The concern raised is noted. Notwithstanding the Flood Risk Management objectives already set out for Avoca in the 'Intro to level 6 Plan' (detailed above in this response), it is considered appropriate that an additional objective for Avoca be included as follows:

'Notwithstanding the Flood Risk Mitigation Objective set out in the 'Introduction to Level 6 Plans', no development, other than minor works as per Section 5.28 of the Guidelines for Flood Risk Management (DoEHLG 2009) shall be considered in Flood Zones A or B until the Avoca Flood Relief Scheme is completed'.

With regard to CFRAM future scenario mapping, these maps can be included in in the final SFRA.

Newcastle

With regard to CFRAM future scenario mapping, these maps can be included in in the final SFRA.

Laragh-Glendalough

To address the concern raised, it is recommended that the following new objective be included in the Laragh – Glendalough Land use and Tourism Plan:

Where existing development is located within Flood Zones A or B, new development shall be limited to minor development only other than water compatible development; any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan.

Inchanappa South and Ballyhenry, Ashford

The issue raised is noted and it is recommended that further information with regard to flood risk assessment (including more detailed Justification Test) is set out in the Addendum II.

Chief Executive's Recommendations

Amend the Draft Plan as follows:

Amend Volume 1 as follows:

Chapter 14, Objective CPO 14.05

CPO14.05 To continue to work with the OPW and other agencies to deliver Flood Defence Schemes in the County as identified in current and future FRMPs, in particular:

- Avoca River (Arklow) Flood Defence Scheme;
- Avoca River (Avoca) Flood Defence Scheme;
- Low cost works in accordance with the OPW's Minor Works Scheme;
- Coastal Protection Projects, where funding allows.

and ensure that development proposals support, and do not impede or prevent progression of such schemes

Amend Volume 2 as follows:

Level 4 Plans

New objective be added to the 'Introduction to Level 4 Plans' as follows:

Where existing development is located within Flood Zones A or B, new development shall be limited to minor development only; any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan.

Level 5 Plans

New objectives be added to the 'Introduction to Level 5 Plans' as follows:

Where existing development is located within Flood Zones A or B, new development shall be limited to minor development only other than water compatible development; any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan.

Any proposals for new development in Flood Zones A or B shall be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of this SFRA and the relevant policies and objectives in the County Development Plan, and in particular, where the lands at risk of flooding form part of a larger development site, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within the site.

Level 6 Plans

New objectives be added to the 'Avoca Specific Objectives'

'Notwithstanding the Flood Risk Mitigation Objective set out in the 'Introduction to Level 6 Plans', no development, other than minor works as per Section 5.28 of the Guidelines for Flood Risk Management (DoEHLG 2009) shall be considered in Flood Zones A or B until the Avoca Flood Relief Scheme is completed'.

Laragh – Glendalough Land use and Tourism Plan

New objective be added as follows:

Where existing development is located within Flood Zones A or B, new development shall be limited to minor development only other than water compatible development; any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan.

Volume 3 – SFRA

Amend the SFRA by the addition of 'Addendum II' (attached)

National Indicative Fluvial Mapping (NIFM): It will be noted that the NIFM maps are indicative and not predictive

CFRAM Update: Information regarding the CFRAM / PFRA / FRMP programme and cycle will be updated in the final SFRA.

Historic Flood Events: Website update is noted and this will be updated in the final SFRA.

Areas for Further Assessment (AFAs): The omission is Bray AFA will be corrected in the final SFRA

Name	Health Service Executive		Sub ID: C2-45
Topic	Issues raised		
General	<p>The Environmental Health Service (EHS) is making this submission under the remit of Healthy Ireland and relevant health supporting strategies. Healthy Ireland is our national framework for action to improve the health and wellbeing of the people of Ireland. Our aim is to maximise the health gain for the population of Wicklow by recommending key health actions which we feel could be incorporated into the Wicklow Development Plan.</p> <p>The Environmental Health Service commends Wicklow County Council for the draft development plan 2021-2027. Many objectives outlined throughout the plan are closely aligned with the objectives of the above mentioned health strategies. Proposals promoting active transport, sustainable housing for all, increasing the use of green infrastructure and climate adaption and mitigation measures will have an added bonus of improving the health of the population.</p>		
Climate	<p>Wicklow County Council signed up to the Climate Action Charter in December 2019. This charter includes substantial targets with regard to mitigation of climate change and increase energy efficiency. Wicklow County Council is currently in the process of drawing up an implementation plan which takes in all the actions from the Climate Action Charter and the Climate Adaptation Strategy. The implementation plan will list all the actions, who is responsible for delivering and an indication of the time to deliver it.</p> <p>Wicklow County Council is also working on a Draft Energy Plan / Energy Performance Strategy (2020) which seeks to deliver the targets of the Charter with regard to Council's infrastructure / assets. Upgrading of the public lighting to LED lights is an example of such a project.</p> <p>The Climate Action Charter, Climate Adaptation Strategy and Energy Plan/Energy Performance Strategy should all be fully integrated into the Wicklow Development Plan 2021 – 2027.</p> <p>There is a need to adopt a strategic approach to monitoring the effectiveness of the climate action outlined in the Development Plan. Wicklow County Council needs to provide measurable targets aimed at reducing carbon footprints, transport emissions, energy demands, flood risks and infrastructure vulnerability in the county.</p> <p>Citizen Engagement</p> <p>Wicklow County Council should strive to be a leader on climate action and should aim to partner and collaborate on climate action initiatives with local community groups, local enterprise and local schools and higher-level institutions. Training on climate mitigation measures should be provided to local authority staff and to the agriculture, construction and industry sector. It is recommended that Wicklow County Council also implement education strategies for the general public and build innovative initiatives for local citizen engagement, particularly with young people.</p> <p>Eliminating Pollution</p> <p>Wicklow County Council needs to implement measures to cut pollution rapidly and efficiently. It is recommended that a detailed local survey and audit of greenhouse gas emissions for the County is completed. An initiative like this can assist in a targeted approach in the reduction of greenhouse gas emissions at county level and will enable reductions on GHG emission to be measured over a period of time.</p> <p>Clean Energy</p> <p>Wicklow County Council must create opportunities for alternative, cleaner sources of</p>		

	<p>energy within the county and should aim to deliver a number of sustainable energy communities throughout the County.</p> <p>Sustainable Agriculture</p> <p>Data shows that agriculture is the largest emitter of greenhouse gasses (GHG) accounting for 33% of total emissions¹. Action must be taken by Wicklow County Council to address these emissions and CPO 9.39 <i>“To ensure that agricultural developments do not cause increased pollution to watercourses”</i> is welcome.</p> <p>Wicklow County Council should facilitate the development of pilot schemes that support climate change mitigation and adaptation measures, especially in the energy and agriculture sectors. Specific objectives which promote sustainable farming practices within the county should be included in the development plan and Wicklow County Council should implement policies to help reduce greenhouse gas emission from agricultural practices. The council should also work with the agricultural sector providing education based programmes which highlight the relevant climate and sustainability action required.</p> <p>Sustainable Industry</p> <p>Wicklow County Council should develop educational initiatives and work in conjunction with industry to ensure more sustainable and more environmentally-respectful production cycles. Wicklow County Council should consider hosting climate action workshops and energy audits in an effort to bring about the necessary behavioural change required to achieve our decarbonisation goals. It is also recommended that Wicklow County Council leads by example and implements the following measures:</p> <ol style="list-style-type: none"> 1. Promote and facilitate the incorporation of energy efficient design into proj 2. Develop and implement an energy management programme for all public buildings to ensure energy efficiency i.e. the big switch off. 3. Develop new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management. <p>Construction</p> <p>It is recognized that there is a need for the construction sector to use cleaner materials and to incorporate more energy efficient design. Wicklow County Council should assist contractors to calculate their carbon footprint both in the use of their building materials and the construction methods applied.</p> <p>Mechanisms for reducing or offsetting their carbon footprint should be outlined. Information provision on the use of green construction materials and how to develop low carbon buildings would assist this process.</p> <p>Wicklow County Council should also specifically require new developments to prioritise the principle of Passivhaus or equivalent standard, incorporate green infrastructure and nature based solutions and should demonstrate resilience to predicted future climate change impacts.</p>
<p>Sustainable Mobility</p>	<p>The transport sector is a large consumer of energy and as a result contributes significantly towards Ireland’s greenhouse gas (GHG) emissions, emitting approximately 12m tonnes of CO2 equivalent in 2017. EPA projections indicate that emissions from the transport sector will reach an estimated 15m tonnes of CO2 equivalent by 2030 and it is likely that the growing transport sector will continue to present challenges to the achievement of climate related targets.</p> <p>The private cars remain the largest source of GHG emissions in the transport sector accounting for 51.5% of total transport emissions. Wicklow County Council recognises the need to take action on transport emissions and outlines its sustainable transport</p>

proposals in Chapter 12 of the Draft Development Plan where it is a stated aim to *"craft land use policies to produce settlements of such form and layout that facilitates and encourages sustainable forms of movement and transport, prioritising active travel modes of walking and cycling, and for larger settlements, public transport"*.

CPO 12.11 aims *"To improve existing or provide new pedestrian and cycling infrastructure of the highest standards on existing public roads, as funding and site constraints allow."*

It is the opinion of the EHS that funding should be set aside specifically for use inactive travel schemes. A list of road improvement works are outlined in CPO 12.36 – CPO 12.55 of the development plan. It is disappointing to see that a similar list of pedestrian ways or cycle lane improvement works were not identified or outlined. Specific active travel schemes should be identified in the Development Plan and dedicated funding set aside to ensure they implemented.

CPO 12.13 aims *"To facilitate the development of pedestrian and cycle linkages through and between new and existing developments to improve permeability and provide shorter, more direct routes to schools, public transport, local services and amenities while ensuring that personal safety, particularly at night time, is of the utmost priority."*

To assist with the above it is recommended that Wicklow County Council carries out a 'permeability audit' in towns and villages to fully establish the existing pedestrian and cycle infrastructure and to highlight areas where investment can be made to form a coherent network. Connectivity issues must be resolved, linking housing, large employment centres, educational facilities and town centres.

It is also recommended that a 'quality audit' of these routes is carried out to ensure they are safe, well lit and enticing for users. The landscaping or 'greening' of these pedestrian/cycle routes should be considered, not only in the interest of making them more attractive for use but also to facilitate the movement of fauna, creating ecological corridors and thus having a positive effect on biodiversity.

Public consultation and engagement is critical, the council must listen to and address the opinions and concerns members of the public may have.

It is recommended that Wicklow County Council Investigate how much traffic congestion is due to local traffic undertaking journeys of under 2k in large towns within the county. Pedestrian and cycle facilities should be provided in these instances that would facilitate a modal shift away from the car to walking or cycling. It is recommended that specific targets for trips by bicycles and pedestrians are set by Wicklow County Council and progress on achieving these targets is monitored throughout the lifetime of the development plan.

The proposals to provide safe and segregated cycle and pedestrian facilities are in conjunction with any new roads or road improvement works as outlined in outlined in CPO12.12 are welcome, as are the provisions for increased 'Park and Ride' and 'Park and Stride' facilities. Common commuter routes in the county should be identified. The Council should ensure public transport options are available on these routes and provide park and ride facilities to serve these routes. It is recommended that designated or free car parking spaces are reserved for car sharing or 'go' cars.

An advertising campaign should be implemented to ensure that the public is aware of all sustainable transport options available to them. Wicklow County Council should consider the development of a transport app or other similar initiative, which outlines all available modes of transport and provides real-time travel information.

Measures which improve the customer experience of public transport should be implemented. Examples include:

- Schemes to provide quality bus corridors.
- Carry out structural improvements to provide shelter at all busstops.

	<ul style="list-style-type: none"> ● Provide real time travel information at bus stops. ● Allow for integrated ticketing between modes of transport. ● Provide bike parking at public transport nodes. ● Provide rented bike facilities at train, bus and tourist areas. <p>CPO 12.3 which allows for the provision of 'Area Based Transport Assessments' and 'Local Transport Plans' for all towns in Levels 1-4 of the County settlement hierarchy, is another welcome proposal as are the requirements for mobility management plans and accessibility reports which require developers to demonstrate access through transport means other than private car.</p> <p>CPO 12.6 "To support transport reduction initiatives such as working from home, remote working hubs / hot-desking" is another welcome initiative.</p> <p>CPO 12.28 aims "To support and facilitate the existing service providers and encourage the further development of the Local Link Rural Transport Programme(and any other or subsequent rural transport programmes)" Local Link schemes are essential to combat loneliness and prevent isolation, therefore the success of such schemes should not be assessed purely on economic terms but also on their social, environmental and climatic impacts.</p> <p>It is recommended that tourism is also considered alongside transport measures. The possibility of safe active travel routes or public transport access to all tourist destinations should be considered and facilitated if possible to reduce levels of emissions from car usage. Secure bike parking should be provided at all tourism amenities.</p>
<p>Green Infrastructure</p>	<p>Wicklow County Councils efforts to protect Biodiversity and improve green infrastructure in the county are outlined in Chapter 18 of the Draft Development Plan. Proposals include the identification and mapping of wetlands and locally important biodiversity areas; the preparation of conservation management prescriptions for Council owned lands; audits of Geological heritage sites, of key threatened species such as swift, and of identified biodiversity threats such as the assessment of river barriers to fish migration.</p> <p>The development and implementation of 'County Wicklow's Biodiversity Action Plan' is welcome. Wicklow County Councils efforts to act in an educational capacity and raise public awareness with their leaflet series 'Biodiversity in County Wicklow' is also to be commended.</p> <p>CPO 18.3 states <i>"New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment."</i></p> <p>It is also recommended that all urban areas are examined specifically for ways in which biodiversity can be improved. The 'greening' of pedestrian walkways and cycleways has already been suggested above. Other initiatives that could be implemented to improve the appearance and function of towns include tree planting, small pocket parks, green walls, small nature/wildlife reserves, wildflower meadows or urban gardening and allotments.</p> <p>CPO 13.21 aims to <i>"Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit"</i> and CPO 13.22 <i>"To promote the use of</i></p>

	<p><i>green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions</i>” are all welcome initiatives.</p> <p>It is recommended that all construction within the county, regardless of where it is, should be requested to implement a landscape plan which aim to increase green, permeable surfaces for drainage and planting to protect biodiversity and support pollination.</p> <p>All surface car parking should be accompanied by landscaping plans which outline measures for planting and sustainable drainage. All existing car parks and urban centres in urban areas should be examined and a programme of remedial planting carried out to improve natural rainwater assimilation capacity.</p> <p>Wicklow County Council should consider the implementation of a ‘Green Infrastructure Strategy’ which could identify all potential green, recreational and open space areas and provide protection for same. Wicklow County Council intentions to implement measures to facilitate the connection or linking of all green recreational areas are welcome. The connection routes themselves should create ‘green ecological corridors’ through which the public can access the recreational facilities.</p> <p>Existing brownfield/vacant sites should be identified as opportunities to implement green areas. Wicklow County Council should allow for the possibility of land being developed not for buildings but for green space as a necessary part of the infrastructure of the developed area.</p> <p>The council’s proactive efforts in relation to the preservation and establishment of rights of way are welcomed. The provision of insurance is often cited as a barrier in granting public access to amenities/ recreation. The council should implement a mechanism for addressing high insurance costs and should facilitate easy access of the general public to green local amenities.</p>
<p>Employment</p>	<p>It is stated in the Draft Development Plan that strategic employment development will be directed into the towns of Bray, Wicklow-Rathnew, Arklow, Greystones and Blessington.</p> <p>CPO 9.6 <i>“To promote the development of employment generating uses at locations which comply with sustainable transportation objectives”</i> is welcome.</p> <p>It recommended that all future employment developments and existing large scale employment sites and industrial estates are examined for sustainable and active travel options and retrofitted as necessary, with the following:</p> <ol style="list-style-type: none"> 1. Strong cycle and pedestrian links to town centres and to parks and/or recreational facilities to improve connectivity. 2. Secure bike parking facilities 3. Shower facilities for staff should be considered. 4. Recreational amenities that promote the health and wellbeing of employees on employment sites should be considered. Any opportunity to promote physical activity and possible health gain for staff should be explored. 5. The quality of design and landscaping of these sites is also of the upmost importance as it is well established that there is a need to reconnect urban society with nature in order to promote health. Options such as soft landscaping, walking trails that maximise contact with green spaces, water features, wildlife gardens to increase biodiversity, outdoor seating facilities are just some proposals that should be considered. <p>The EHS welcomes CPO 12.6 <i>“To support transport reduction initiatives such as working from home, remote working hubs / hot-desking”</i> and CPO 9.7 <i>“To support and facilitate the development of digital / remote working hubs and enterprise / innovation hubs in</i></p>

	<p><i>town centres."</i></p> <p>To ensure progress is made with this objective it is recommended that suitable facilities are identified in the county's designated 'Self-Sustaining Growth Towns' and utilised for such a purpose. Again the location of these hubs is of crucial importance and connectivity to town centres by modes of sustainable and active travel should be a key consideration.</p>
<p>Social Inclusion & Health Inequalities</p>	<p>CPO 7.4 aims <i>"To recognise the needs of those with disabilities throughout the County."</i></p> <p>The strategic Development Plan for County Wicklow should:</p> <ol style="list-style-type: none"> 1. Focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, new-build housing, leased housing or rented housing. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. The plan should be based on best practice in including people with disabilities in local communities and should facilitate dispersed housing with personal supports. 2. All residents in congregated settings should be assessed by the local authority to establish their eligibility and need for social housing support. 3. Consideration should be given to reserving a certain proportion of dwellings for people with disabilities. 4. Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants. 5. Support people with disabilities to access employment and education opportunities. 6. Support people with disabilities to access mainstream community services. <p>It is the general experience of the EHS that younger children are better catered for with playground facilities but adolescents and older people are not well provided for. The EHS welcomes CPO 7.36 <i>"where a deficiency in facilities for teenagers/young adults and/or indoor community space is identified in an area, the proposed development should include proposals to address this deficiency in consultation with young people and appropriate stakeholders"</i></p> <p>It is recommended some spaces are developed as 'alcohol-free' venues with</p> <ol style="list-style-type: none"> 1. the young people being centrally involved in the development and management of the programmes and venues; 2. late night and weekend opening; and increased access to school facilities in out-of-school hours. <p>Connectivity and transport issues to these facilities should also be considered by Wicklow County Council.</p> <p>Specific measures that tackle isolation and exclusion of young people from minority backgrounds should also be implemented.</p>
<p>Obesity</p>	<p>Currently, in Ireland, six in ten adults and one in four children are overweight or obese.³ According to World Health Organization forecasts, Ireland could top the European league tables in the coming years.⁴ Due to societal health inequalities it is proven that communities from a lower socio-economic background suffer increased rates of obesity.⁵ More action needs to be taken to address the rising levels of overweight and obesity that are placing an increasing burden on individuals and society.</p> <p>Wicklow County Council can influence and regulate the built environment to improve health and reduce the extent to which it promotes obesity:</p>

	<ol style="list-style-type: none"> 1. An assessment of food outlets in all towns and villages in Wicklow should be carried out. Wicklow County Council should implement measures to prevent a proliferation of fast food outlets in these towns and to ensure that choices of healthy food options are equally available. 2. Support community based initiatives that develop programmes that support healthy lifestyles and the prevention of obesity in children and adults. 3. Promote through planning and the built environment the benefits of healthy eating, physical activity and non-sedentary behaviour. 4. Improve availability of and access to healthier food choices. Support developments that aim to improve the health of the population. 5. Facilitate community gardens/allotments through identifying and releasing suitable publicly owned land. These could be used not only for food production but for educational purposes. 6. Wicklow County Council should work with local producers to develop and facilitate the availability of locally produced, healthy, high quality food. 7. Wicklow County Council should explore the option of providing shared commercial kitchen spaces or production units to assist small enterprises and start-up food businesses in towns throughout the county. 8. Wicklow County Council should examine the feasibility of the creation of local markets in towns and villages in the county. Suitable spaces, with adequate drainage, electricity and running water could be reserved and provided. 9. Wicklow County Council should implement a strategy to look at food poverty within the county to ensure that affordable healthy food choices are available to all. Food waste and acceptable reuse measures should also be examined as part of this strategy.
Waste	<p>Section 15.3 discusses Waste Management within the county. Wicklow County Council should implement measures and set targets to reduce its own waste. Other waste measures which could be implemented include:</p> <ol style="list-style-type: none"> a) Implement waste prevention measures with local business and community groups. b) Include community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities. c) The use of easily accessible public recycling bins should be considered for public areas, paths and green spaces that will allow for adequate waste segregation and will encourage the use of the waste management hierarchy. d) Food waste reduction initiatives and incentives should be implemented in homes and in business.
Water	<p>CPO 13.14 aim is to <i>"To require all new developments to integrate water demand reduction designs and technologies in all aspects of the development"</i>. This is a welcome initiative.</p> <p>While bearing in mind the need to conserve water especially during drought periods the EHS would like to see public drinking water facilities become available in public areas during the lifetime of this plan. This would be subject to the public water supply being adequate for community needs. The implementation of free water refills schemes in towns and villages in the county should also be considered.</p>
Noise	<p>All the noise pollution objectives outlined in section 15.3 of the Draft Development Plan are welcomed by the Environmental Health Service. The EHS also recommends that Wicklow Council apply WHO/Europe's Night Noise Guidelines for Europe⁷ when assessing planning with potential noise implications. This guidance provides governments with stronger justifications for regulating exposure to night noise and clear guidance on desirable limits. According to these guidelines, annual average night exposure should not exceed 40 decibels (dB), corresponding to the sound from a quiet</p>

	<p>street in a residential area.</p> <p>Persons exposed to higher levels over the year can suffer mild health effects, such as sleep disturbance and insomnia. Long-term average exposure to levels above 55 dB, similar to the noise from a busy street, can trigger elevated blood pressure and heart attacks. By recommending that countries introduce limits on night noise, the guidelines complement the 2002 European Union Directive on Environmental Noise.</p> <p>It is also recommended that the noise environment within the county is measured and mapped. In particular, quiet areas should be identified and Wicklow County Council should implement measures to specifically protect these quiet noise environments. The council could encourage public participation in this process through the use of 'the HushCity' App or other similar citizen science initiatives.</p>
<p>Monitoring & Implementation</p>	<p>Chapter 20 of the Draft Wicklow Development Plan discusses Implementation and Monitoring. Wicklow County Council recognise the importance of the implementation process. 10 desired 'strategic county outcomes' have been listed in chapter 20 of the Draft Development Plan.</p> <p>It is stated that implementation of the plan will be achieved by:</p> <ol style="list-style-type: none"> 1. Application of the objectives and standards of this plan in the assessment of all applications for planning permission, including Local Authority development Investment in infrastructure underpinning the development objectives of the plan. In this regard, the desired 'Strategic County Outcomes' and the 2. 'Core Strategy' of the plan shall set the priorities for the provision and improvement of infrastructure by both the Local Authority and other agencies, subject to the availability of funding; 3. Integrating the strategies, policies, and objectives of the plan with lower-order plans such as local area plans and action area plans; 4. Ongoing monitoring of the strategies and objectives of the plan and identifying any needs for adjustment of objectives over the lifetime of the plan and in future reviews. It is stated that <i>"As far as practicable, every effort has been made to craft objectives that are specific, measurable, achievable, and realistic"</i>. <p>It is stated that the Planning Department of the Council is the main section responsible for monitoring and implementing the Plan. Possible sources of funding have also been highlighted in the draft development plan.</p> <p>No further details are provided on the data sources which will be utilised to monitor progress on the policy objectives outlined in the Development Plan. Whilst the difficulty in measuring long term objectives are recognised Section 6 of the <i>'Development Plans: Guidelines for Planning Authorities, June 2007'</i> outline requirements for monitoring and evaluation. Setting out the measurement criteria should be an integral part of the development plan process.</p> <ol style="list-style-type: none"> 1. It is recommended that criteria for 'measuring progress' is outlined for individual policy objectives (where applicable). Wicklow County Council could consider setting specific targets in the Development Plan as a goal to work towards. 2. The EHS recommend progress should be constantly measured throughout the timeframe of the plan. It is acknowledged that a progress report is required after 2 years and a review must be carried out after 4 years. 3. Wicklow County Council should highlight and promote areas where progress is being made and also examine areas where less was achieved and investigate the reasons why. Any barriers to the implementation of the policy objectives should be identified. 4. It is recommended that local communities are involved in the monitoring process.

The results of all monitoring and progress reports should be made public. The progressive nature of the Wicklow County Development plan will only be considered a success if it is effectively implemented.

Chief Executive's Response

Climate

While the submission contains a number of excellent suggestions with regard to climate actions (such as those relating to citizen engagement, training / education in climate actions / measures / best practice, the establishment of 'sustainable energy communities', eliminating pollution, clean energy, sustainable agriculture, industry etc), these would be more operational / implementation matters for Wicklow County Council's environmental protection and climate action teams and programmes and not specifically a matter for the CDP. Where relevant to the Development Plan given its remit, any Government and local strategies / policies relating to climate change have been integrated into the Draft Plan, as will any future measures if necessary by way of variations to this plan or future plans.

With respect to targets and monitoring of climate actions, and the collecting of data with respect to establishing a baseline against which to measure success of measures, and measuring current greenhouse gas emissions, no consistent methodology has been as yet provided in regulations or guidance from the Department, the Regional Assembly or the Climate Action Regional Offices (CARO) in this regard to date, and it is an evolving area. In its work in establishing a decarbonisation zone in Arklow, Wicklow County Council will be sourcing, collecting and analysing all available and relevant data to establish the 'carbon footprint' of the settlement and this project will be utilised as a learning exercise for establishing what data is available and necessary to establish climate baselines against which future success of climate actions can be measured.

With regards to the construction industry, the standards that are applicable with respect to materials, energy efficiency etc are national standards set out in the Buildings Regulations and not something the CDP can override.

Sustainable Mobility

Again this submission sets out a number of excellent suggestions under this topic, and where they are relevant to the Development plan; these matters have already been addressed to the extent possible. Issues such as the funding of sustainable transport measures, public consultation regarding future transport projects, the carrying out of various transportation surveys / audits, delivery of public transport services, advertising campaigns, provision of transport apps / travel information, integrated ticketing etc are not a matter for the CDP but rather for the plans and programmes of the NTA and the Council's own Roads and Transportation Department.

With respect to the suggested listing of sustainable transport projects (such as footpath and cycleways) the Draft Development plan clearly references the Council Sustainable Transport Plan to be prepared, which will be the vehicles for the identification of such project, as well as the Local transport Plans / Area Based Transport assessment that are planned to be carried out for the larger towns in the County. These plans / studies will include permeability and accessibility 'audits' as suggested.

With regard to sustainable transportation to tourism sites, the Draft Development plan sets out support for a network of trails, greenways and walking / cycling routes serving key tourism destinations.

Green Infrastructure

The suggestion are noted and welcomed and where relevant are already included in the Draft Development

Plan; for example suggestions re landscaping, pollinators are to be found in Appendix 1 'Development & Design Standards'; the 'Green Infrastructure Strategy' is set out in Chapter 18; measures for the protection of natural corridors detailed in Chapter 17 sustainable drainage requirements are set out in Chapter 13.

In its approach to brownfield / vacant sites, there is an emphasis on such sites which are generally located in town / urban centres, where services are available, being devoted to re-development of buildings rather than being set aside as green spaces. Opportunities to deliver pocket parks in urban areas or areas for biodiversity will be examined as they arise.

The Plan would have no role however in a programme to purchase such sites for this purpose or in the remedial landscaping of existing urban areas or car parks; this may be an action that could be undertaken via the climate action team. The Council has no role in issues arising insurance for landowners where amenity routes / public rights-of-way are present.

Employment

The suggestion with respect to sustainable transport at new employment developments are noted and are already addressed in the Draft Development Plan. The Plan would have no role in retrofitting existing employment sites to make them more sustainable, but this may be an area that the climate change and transportation teams could examine.

With respect to remote working hubs, the Draft Plan clearly sets out support for same but the delivery of such facilities would be an operational and funding matter for the Council's economic development division.

Social Inclusion & Health Inequalities

The suggestions are supported but for the most part are not matters for the development plan. For example, the Development plan would have no role with respect to establishing 'alcohol free' venues and tackling isolation and exclusion of young people from minority backgrounds.

The development and delivery of social housing for those with disabilities would be a matter for the Council's housing programme rather than the CDP; the Draft Plan in its objectives and Housing Strategy clearly set out support for such housing.

With respect to access to services and facilities generally, the Draft Plan is clear that 'universal design' is to be considered in all new developments.

Obesity

Again while the concerns and suggestions are noted, in many instances these are not matters related to the land-use planning or are already addressed in the Plan in so far as is possible given the remit of the plan.

With respect to fast food, the Development Plan already includes an objective in this regard; with respect to the enhancement of the built environment, such that it promotes healthy lifestyles, this is a key objective that pervades all aspects of the plan.

Waste

The suggestion with regard to waste management are noted; in many instances these really matter for waste management strategy and not the CDP; where overlap with the CDP applies, appropriate objectives and standards are already set out in the Draft Plan.

Water

The delivery of free public drinking water facilities is generally support and facilitated by the Council and a number of Districts have already developed a number of new drinking water points. This would be an operational and funding matter, rather than a matter for the CDP.

Noise

The guidelines mentioned are noted and can be referenced in the development plan.

With regard to noise measurement and mapping, this would be more of an action of the County Noise Action Plan.

Monitoring & Implementation

While the monitoring suggestions are noted, it is considered that the measures already set out adequately meet the monitoring and implementation obligations. In some cases, the implementation of certain objectives is an ongoing measure and there is no fixed target goal to be met; in some cases there are no metrics for measures success of objectives. However progress will be monitored for example through the 2-year and 4-year reports, and any difficulties can be determined at those stages.

Chief Executive's Recommendations

Amend the Draft Plan as follows

Appendix 1

1.4.3 Noise Pollution

Noise nuisance is defined in Section 108 of the EPA Act 1992 as "*Any noise which is so loud, so continuous, so repeated, of such duration or pitch or occurring at such times as to give reasonable cause for annoyance to a person in any premises in the neighbourhood*". The Planning Authority will use the Development Management process to ensure that future development are designed and constructed in such a way as to minimise noise disturbance and prevent noise nuisance. **The Planning Authority will have regard to the WHO / Europe Night Noise Guidelines (2009) in the assessment of applications with potential night-time noise implications.**

In this regard, the Planning Authority may require developers to produce a Sound Impact Assessment and Mitigation Plan where a noise-generating use is proposed and specialist input is deemed necessary, for any new development that the Planning Authority considers will impact negatively on pre-existing environmental sound levels.

Name	Failte Ireland	Sub ID: C2-47
Topic	Issues raised	
Objective	<p>Fáilte Ireland has prepared this submission to support and assist Wicklow County Council in the formulation of planning policies and frameworks for the period 2021-2027. Fáilte Ireland is seeking to enhance the partnership approach between the County Council and Fáilte Ireland and ensure that the expertise of both organisations is shared.</p> <p>The submission seeks to enhance the policy coverage in the Draft Development Plan to ensure a meaningful framework is established for the enhancement of tourism in the County, and the wider region, during the Plan period. It has been prepared with inputs from professional planners as well as various strands within Fáilte Ireland. It provides the Council with a concise single submission from Fáilte Ireland dealing with all aspects of tourism, from strategic planning to visitor experience and destination management.</p> <p>The submission has been prepared having regard to the tourism profile of the County; the existing policy context in the Draft Plan; and an established template for sustainable tourism policies being used by Fáilte Ireland to guide Planning Authorities.</p>	
Commentary on Draft Plan	<p>Fáilte Ireland is generally supportive of the Draft Plan and again welcomes the opportunity to assist the County Council in the important area of policy preparation. The Authority is acutely aware of the complex range of issues that a Development Plan must tackle. It is also mindful of both the responsibilities and limitations of the prevailing legislation and the role that the Development Plan plays in a statutory context. Our submission has been fully informed by these considerations.</p>	
Proposals for the Draft Wicklow County Development Plan	<p>We have prepared this part of the submission drawing on existing strategies for the enhancement and management of tourism in the County.</p> <p>Wicklow is well placed as a key part of Fáilte Ireland's Ancient East regional brand to optimise the potential for tourism through proper planning and development. The consideration of natural and heritage resources, strategic planning for accommodation and promotion of inter-agency tourism strategies in the Development Plan will build on the previous success of strong tourism consideration in Development Plans.</p> <p>As clearly set out in the Development the Plan County's tourism and recreational attractions are important assets, which form the basis of the County's tourism industry and which are fundamental to the enjoyment of the County by both visitors and residents.</p> <p>Attractions range from areas of scenic beauty, which provide attractive natural bases for outdoor pursuits, such as the Wicklow Mountains, which comprise of mountain peaks, valleys, rivers and lakes, the coastline with long stretches of sandy beaches and dunes and the numerous woodlands and the Plan identifies policies and objectives to continue to provide for the positive development of tourism and recreational assets while ensuring that these facilities are managed in a sustainable manner so as to protect against any potential detrimental impacts on the environment and local communities</p> <p>The Development Plan also correctly identifies the County's attractiveness to day trippers and to expanded tourism breaks given its proximity to Dublin and as such the opportunity and need to increase dwell time in the County.</p> <p>We welcome the identification of Fáilte Ireland's Regional Brand, 'Ireland's Ancient East' and other Fáilte Ireland Strategies in the Plan.</p> <p>Proposed statements are based on identified gaps in policy coverage, most recent</p>	

	<p>Fáilte Ireland plans and programmes, and recommended good practice in the area of sustainable tourism. We have set out explanatory text for discussion among the plan-writing team and then included suggested text intended for consideration as a direct insert to the Plan itself.</p>
<p>Additional Tourism Considerations</p> <p>Regional Tourism Plan (RTPs)</p>	<p>Fáilte Ireland is in the process of preparing Regional Tourism Plans for each of the four Regional Experience Brands (Dublin, Wild Atlantic Way, Ireland’s Ancient East and Ireland’s Hidden Heartlands). The purpose of the Regional Tourism Plans is to identify the sustainable tourism development priorities that will help to unlock the commercial potential of the region bringing benefits to all stakeholders and industry. Each plan will be prepared based on the VICE model which is a methodology for working towards sustainable tourism that seeks to strike an appropriate balance between the needs of the Visitor, the Industry and Community and the Environment. The plans will be for the period to 2025 and will be grounded in Fáilte Ireland’s new Corporate Strategy. There will be a strong spatial element to the plans which will seek to identify where development should take place in order to unlock the tourism potential of the region. The Regional Tourism Plans will also provide a strategic framework for a suite of Destination and Experience Development Plans (DEDPs) which will sit underneath them. They will set out the overall goals of each of the proposed DEDPs as well as the timing and sequence for the preparation of these plans. A number of DEDPs are already in progress. Once the RTPs are in place by Q4 of 2021, they will become primary reference documents to inform Fáilte Ireland’s submissions on County and City Development Plans. This will ensure that our submissions on County and City Development Plans are informed by a strong regional context in addition to the agreed tourism needs of each county or city. The Local Authorities will be consulted on the preparation of the RTPs which will also be subject to Strategic Environmental Assessment.</p> <p>We request the inclusion of an objective supporting the preparation and implementation of Regional Tourism Plans in the County Development Plan, to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.</p>
<p>Additional Tourism Considerations</p> <p>Accessible Tourism</p>	<p>In order to improve the experience of those who live and visit Wicklow County, the Council should promote accessible tourism in the county. This entails ensuring that facilities are accessible to people with mobility issues, people with learning disabilities, visual or hearing impairment, young children and elderly people. Achieving a high level of accessibility is both socially and economically important. It is considered that the Development Plan would benefit from the insertion of a section on Accessible Tourism and the incorporation of the following Policy Objective.</p> <p><u>Proposed new policies, to be inserted into Tourism Chapter:</u> <i>It is an objective of the Council to support the provision of accessible tourism.</i></p>
<p>Chapter 11 Introduction</p>	<p>The draft Development Plan currently states outdated Tourism Figures. It is considered that updated visitor figures are available and should be included in the Development Plan.</p> <p><u>Proposed amended text, p241:</u> <i>Tourism and recreation make a positive contribution to the economic and social wellbeing of County Wicklow. Fáilte Ireland’s figures indicate that in 2019, Wicklow welcomed 2% of the 9,700 million overseas tourists who came to Ireland, spending 2%</i></p>

	<p>of the €5.2bn overseas tourism expenditure in Ireland, with a further 319,000 352,000 domestic visitors generating an estimated €49m €53m in revenue...</p>
<p>Chapter 11</p> <p>Section 11.1.2</p> <p>Regional Spatial & Economic Strategy</p>	<p>We welcome that the Development Plan includes objectives to support Fáilte Ireland brands and the preparation of Visitor Experience Development Plans (VEDP) however in line with existing and Proposed Fáilte Ireland Plans this should be amended as follows:</p> <p><u>Proposed amended objectives, RPO 6.8 & 6.15:</u></p> <p>RPO 6.8 <i>To support the sustainable development of tourism in the Region in line with the strategic objectives of both the Ireland's Ancient East and Ireland's Hidden Heartlands regional experience brand proposition.</i></p> <p>RPO 6.15 <i>Support the preparation, delivery and implementation of Visitor Experience Development Plans Destination Experience Development Plans within the Region to underpin the overarching regional tourism brands and to deliver greater tourism benefits and to promotethe natural and cultural assets of the Region.</i></p>

<p>Chapter 11</p> <p>Section 11.1.3</p> <p>Fáilte Ireland Strategies</p>	<p>We welcome the reference and support to key Fáilte Ireland Tourism initiatives however we request the following amendments to text and objectives</p> <p><u>Proposed amended text, p244:</u> <i>Fáilte Ireland, the national tourism development authority, aims to develop, guide and promote tourism as a leading indigenous component of the Irish economy. Its current strategy for Wicklow is encompassed in the 'Ireland's Ancient East' programme.</i></p> <p><u>Proposed amended text, Ireland's Ancient East Section:</u> <i>Introductory Text, p244</i> <i>...The new destination Regional Experience brand has been designed to appeal to the key customer segments – namely the Culturally Curious and the Great Escapers, and to present this large geographic area in a cohesive and unified manner.</i></p> <p><i>Bullet Point 6, p245</i> <i>To ensure Ireland's Ancient East Regional Experience brand is delivered in accordance with the principles of sustainable tourism, ensuring that economic, social and environmental benefits are delivered in a balanced way.</i></p> <p>Development Guidelines for Tourism Destination Towns</p> <p><u>Proposed additional text</u> <i>Funding has been allocated to Wicklow County Council under the Developed and Emerging Destination Towns Capital Investment Programme 2019 by Fáilte Ireland. The funding is for the development of the Abbey/Friary Grounds and to improve the attractiveness of Wicklow Town.</i></p> <p>As noted in Section 11.1.2 the Council supports Fáilte Ireland Destination Experience Development Plans and it is considered that a section on these should be inserted into the Development Plan.</p> <p><u>Proposed new section text, within Section 11.3:</u></p> <p><i>Destination Experience Development Plans</i></p> <p><i>The role of Fáilte Ireland's Destination Experience Development Plans (DEDP's) for Wicklow County is to support the development of world-class experiences focused on the region's rich ancient heritage while adding to the overall destination proposition. Wicklow has benefited previously through the Tales of Two Worlds plan which had a particular focus on the Great Houses and Gardens of the region. While that plan is now complete, Fáilte Ireland aims to continue to develop DEDP's to address experience development gaps across the region. These plans will provide the context for tourism operators and stakeholders to work in partnership, create new and improved existing visitor experiences, and communicate coherent and unified stories to the visitor.</i></p>
<p>Chapter 11</p> <p>Section 11.1.4</p> <p>Local Strategies</p>	<p>We welcome reference to the Wicklow Tourism Strategy & Marketing Plan 2018 – 2023, the County Wicklow Statement of Tourism Strategy 2017 – 2026 and the County Wicklow Outdoor Recreation Strategy 2020 - 2025 and suggest that the Development Plan acknowledges the expiration of these plans during the lifetime of the Development Plan and includes an objective to review and prepare updated plans.</p>

<p>Chapter 11</p> <p>Section 11.2</p> <p>Strategy for Tourism & Recreation</p>	<p>We request the following amended text in Section 11.2 to ensure the Development Plan provides for the most up to date figures.</p> <p><u>Proposed amended text, p246:</u></p> <p><i>Wicklow Mountains National Park covers 20,000 hectares making it the largest national park in Ireland. The Park is an invaluable recreational space for locals and tourists. The most visited area is Glendalough, which attracted 732,824 732,362 visitors in 2019 and was third fourth on Ireland's top ten 'free to enter' attractions for 2019. Powerscourt House Gardens and Waterfall were ninth eight on the top ten fee-charging attractions during 2019 with 472,523 487,876 visitors.</i></p> <p>Tourist Hubs & Recreation</p> <p>We request the following amended text on Page 248.</p> <p><i>Proposed amended text, p248:</i></p> <p>Fáilte Ireland is actively developing visitor experience development plans such as the Vikings Visitor Experience Development Plan. This sets out to strengthen the county's offering as a Viking destination. Another bespoke programme is the 'Great houses and Gardens Experience'.</p> <p><i>The role of Fáilte Ireland's Destination Experience Development Plans (DEDP's) for Wicklow County is to support the development of world-class experiences focused on the region's rich ancient heritage while adding to the overall destination proposition. Wicklow has benefited previously through the Tales of Two Worlds plan which had a particular focus on the Great Houses and Gardens of the region. While that plan is now complete, Fáilte Ireland aims to continue to develop DEDP's to address experience development gaps across the region. These plans will provide the context for tourism operators and stakeholders to work in partnership, create new and improved existing visitor experiences, and communicate coherent and unified stories to the visitor."</i></p> <p><i>Coillte in partnership with Fáilte Ireland are redeveloping Avondale House and Forest Park into a state-of-the-art visitor destination. The redevelopment is hugely significant from a tourism and economic perspective for the County and the region and has the potential to leverage further tourism development and investment.</i></p> <p><i>Fáilte Ireland, the National Tourism Development Authority and Coillte, Ireland's largest commercial forestry company have announced plans to re-develop Avondale House and Forest Park into a state-of-the-art visitor attraction. A total of €8 million will be invested in the re-development of Avondale House and Forest Park with Fáilte Ireland contributing more than €6.1million to the project. The redevelopment of Avondale House and Forest Park is hugely significant from a tourism and economic perspective for Ireland's Ancient East and for Wicklow. The development of this new world class visitor experience provides a major opportunity for tourism businesses across Wicklow to leverage this significant investment.</i></p> <p>In respect of Avondale House and Forest Park, Fáilte Ireland would welcome policy objectives to support this vitally important visitor attraction in the Draft Plan.</p>
<p>Chapter 11</p>	<p>We request the proposed minor amendments and additions to the Tourism & Recreation Infrastructure objectives:</p>

<p>Section 11.3 Tourism & Recreation Infrastructure</p>	<p>Proposed amended policies</p> <p>CPO 11.17: To facilitate the development of hostels and alternative accommodation offerings along established walking / hiking routes and adjacent to existing tourism / recreation facilities.</p> <p>CPO 11.25 To cooperate with Wicklow County Tourism, Bord Fáilte Ireland and other appropriate bodies in facilitating the development and erection of standardised and branded signage for tourism facilities and tourist attractions.</p> <p>CPO 11.31 To develop Wicklow-Rathnew as a recreation and tourism hub and its designation by Fáilte Ireland as a Destination Town due to its attractive coastal location, heritage assets and its proximity to key destinations such as the Wicklow Mountains, Glendalough and Brittas Bay and the key attractions within the town including the Wicklow Gaol, the Murrough, coastal walks, beaches, architectural heritage, sports facilities and as a terminus of the planned Greystones – Wicklow Coastal Route.</p> <p>CPO 11.XX Support the preparation, delivery and implementation of a Visitor Experience Masterplan for Glendalough and Wicklow Mountains National Park and Visitor Orientation Plan for County Wicklow in partnership with Fáilte Ireland, NPWS and the OPW.</p>
<p>Chapter 11 Tourism Amenities and Assets Maps</p>	<p>Fáilte Ireland would also like to see tourism policies and objectives clearly set out where possible through the inclusion of maps in the draft Development Plan.</p> <p>Such a map should illustrate:</p> <ul style="list-style-type: none"> - Key nodes of tourism activity in the County – both existing and proposed specific tourism centres (major tourism attractions, water access etc.); including the list of key assets. - Existing transport links between nodes and identified routes– whether walking, cycling or road based including greenways and blueways. - Strategic tourism centres where key services such as hotels etc. are located; Further guidance is available (link provided); - Sensitive environments where the provision of services must be sensitive and appropriate to the robustness / sensitivity of the receiving environment and in particular its existing tourism significance; - Areas/Assets of unrealised tourism potential where proactive policies will aim to encourage the development of this sector. - Branding – reference and use of Fáilte Ireland Tourism Brand logos applicable to the county i.e. Ireland’s Ancient East.
<p>Wind Energy Strategy</p>	<p>Whilst Fáilte Ireland is generally supportive of the development of transmission infrastructure and is supportive of the economic benefits associated with its growth and development, potential impacts on landscape and the natural environment (including those on tourism assets and attractions) must be considered and should be more clearly set out in the Development Plan.</p>

General Comments	We would request that consistency of spelling of Fáilte Ireland be used across the document noting the spelling includes a 'fada'.
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Chief Executive's Response

Regional Tourism Plans

While the Local Authority will as a matter of course support Fáilte Ireland in any way possible in the preparation of the RTPs (through WCC's economic development unit and Wicklow County Tourism), it would not be considered necessary for Wicklow County Development Plan to include an objective in this regard, as these are plans being prepared by another state agency and the Council would have no control over whether the plan is made (objectives must be implementable) and in addition, until it is known what is in the RTP for the region, it will not be clear if will be possible to explicitly support the implementation of all of the objectives that may be contained therein, as conflicts may arise, for example with the protection of the environment or local / community goals. However, the CE considers is appropriate and sufficient to make reference in the 'context' section of Chapter 11 to the forthcoming RTP and DEDPs.

Accessible Tourism

It is not considered necessary to include an objective with respect to 'accessible tourism' as this would suggest that there are some sectors where accessibility is important / essential and other not; the Draft plan clearly sets out that is requires all new development to be accessible.

Chapter 11 – Introduction

The corrected text is noted and will be integrated into the plan.

Chapter 11 – Section 11.1.2

Faillte Ireland is suggesting changing text that is quoted directly from the RSES – it is not within the gift of WCC to do this.

Chapter 11 – Section 11.1.3

The suggested text is generally noted and some can be integrated into the plan. It is not considered necessary or appropriate to include text regarding the funding allocated to WCC for the Abbey / Friary Grounds as this is not a 'development' matter.

Chapter 11 – Section 11.1.4

It is not considered necessary to acknowledge that some of the local tourism strategies may expire during the lifetime of CDP or to support the review and update of these plans; this does not need to be stated in the CDP for it to occur (they are separate processes) and indeed these plans could be extended or replaced with something else.

Chapter 11 – Section 11.2

The text changes to Section 11.2 are noted and generally can be integrated into the plan. It is noted that the same paragraph is suggested for inserted in Section 11.1.3 and 11.2 and therefore it will only be inserted in Section 11.1.3.

With respect to Avondale House and Forest Park, while an objective supporting its development is provided in the Rathdrum Town plan, it is recommended that an new objective be added under Section 11.3, 'Tourism & Recreation Themes and Products'.

Chapter 11 – Section 11.3

The suggested amendments are supported and it is recommended they be integrated into the plan.

Tourism Maps

It is not considered appropriate to include the maps suggested, as notwithstanding the advice given as to what locations such a map might include, it is considered that

- it may be inequitable and provide unfair advantage for the sites listed vis-a-vis smaller sites;
- it may be misleading and disadvantages to some to show 'sensitive environments' as this may suggest that such areas are 'out of bounds' to new tourism development when this may not be the case e.g. the entire coast and the mountains;
- it would not be possible to show areas with tourism potential without more detail study and analysis of same from Fáilte Ireland, and indeed environmental assessments such as SEA and AA;
- that it may be inappropriate to include 'proposed' locations when they are not already in situ;
- it is unclear what the 'planning' purpose of such a map would be – it would appear to be more of a 'advertising' exercise, which is a function of Fáilte Ireland, not the CDP.

In addition, it is unclear why Fáilte Ireland branding would be detailed in the CDP other than as a means of promotion / advertising.

Wind Energy Strategy

The manner in which landscape and natural environment are to be considered in the assessment of Wind farms is clearly set out in the Wind Energy Strategy in Appendix 3

Chief Executive's Recommendations

Amend Chapter 11 as follows:

11.0 Introduction

Tourism and recreation make a positive contribution to the economic and social wellbeing of County Wicklow. In 2017, 275,000 overseas tourists visited the County generating revenue of €73m with a further ~~319,000~~ 352,000 domestic visitors generating an estimated ~~€49m~~ €53m in revenue. The tourism sector took a significant hit as a result of the Covid-19 pandemic.

11.1.3 Fáilte Ireland Strategies

In March 2015, the Government published the Tourism Policy Statement People, Place and Policy – Tourism to 2025 which sets out clear and ambitious targets for the development of Irish tourism. The ambition of this policy statement is to have a vibrant, attractive tourism sector that makes a significant contribution to employment across the country; is economically, socially and environmentally sustainable; helps promote a positive image of Ireland overseas, and is a sector in which people want to work.

Fáilte Ireland's Tourism Development & Innovation A Strategy for Investment 2016 – 2022 is a broad strategy for investment in the tourism sector and seeks to identify the areas of investment that need focus on what will deliver sustainable growth in the Irish tourism sector resulting in higher revenue and more jobs.

The tourism sector's best prospects for growth lie in generating increased levels of overseas revenue. The

focus of the Government's 2025 Tourism Policy is to increase the economic contribution of tourism to the Irish economy, by increasing the value of tourism service exports.

Fáilte Ireland, the national tourism development authority, aims to **develop**, guide and promote tourism as a leading indigenous component of the Irish economy. Its current strategy for Wicklow is encompassed in the 'Ireland's Ancient East' programme.

Fáilte Ireland is in the process of preparing Regional Tourism Plans for each of the four Regional Experience Brands (Dublin, Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartlands). The purpose of the Regional Tourism Plans is to identify the sustainable tourism development priorities that will help to unlock the commercial potential of the region bringing benefits to all stakeholders and industry. Each plan will be prepared based on the VICE model which is a methodology for working towards sustainable tourism that seeks to strike an appropriate balance between the needs of the **Visitor**, the **Industry** and **Community** and the **Environment**. The plans will be for the period to 2025 and will be grounded in Fáilte Ireland's new Corporate Strategy. There will be a strong spatial element to the plans which will seek to identify where development should take place in order to unlock the tourism potential of the region.

The Regional Tourism Plans will also provide a strategic framework for a suite of Destination and Experience Development Plans (DEDPs) which will sit underneath them. They will set out the overall goals of each of the proposed DEDPs as well as the timing and sequence for the preparation of these plans.

Ireland's Ancient East

Ireland's Ancient East (IAE) has been developed by Fáilte Ireland as a branded visitor experience encompassing the rich heritage and cultural assets that Ireland has to offer in the midlands/eastern half of the country. The initiative is designed to allow visitors peel back the layers of time and to go off the beaten track to experience thousands of years of history. Covering the South and East and part of the Midlands, it focuses on the wealth of cultural and heritage attractions in the area. The new destination brand has been designed to appeal to the key customer segments – namely the Culturally Curious and the Great Escapers, and to present this large geographic area in a cohesive and unified manner. Fáilte Ireland has established a strategic partnership with the OPW which will enable key heritage assets to be opened and made accessible through a sensitive, sustainable tourism approach.

The key strategic objectives of the Ireland's Ancient East initiative are:

- To drive growth in international visitor numbers, tourism revenue and associated tourism employment in the regions which currently underperform in these areas.
- To move Ireland's east and south from a transit and day tripping zone to a destination which attracts international overnight visitors.
- To develop a world class visitor experience, which delivers fully on the brand promise.
- To differentiate the Ireland's East and South destination, within the international tourism marketplace, on the basis of the quality of its heritage experiences and a clear and memorable narrative, which links all experiences within it.
- To disperse visitor traffic across the geography by encouraging the exploration of both the well-known attractions (in some cases congested) and lesser known sites and experiences (hidden gems).
- To ensure Ireland's Ancient East **Regional Experience Brand** is delivered in accordance with the principles of sustainable tourism, ensuring that economic, social and environmental benefits are delivered in a balanced way.

Destination Experience Development Plans

The role of Fáilte Ireland's Destination Experience Development Plans (DEDP's) for Wicklow County is to support the development of world-class experiences focused on the region's rich ancient heritage while adding to the overall destination proposition. Wicklow has benefited previously through the Tales of Two Worlds plan which had a particular focus on the Great Houses and Gardens of the region. While that plan is now complete, Fáilte Ireland aims to continue to develop DEDP's to address experience development gaps across the region. These plans will provide the context for tourism operators and stakeholders to work in partnership, create new and improved existing visitor experiences, and communicate coherent and unified stories to the visitor.

11.2 Strategy for Tourism & Recreation

Outdoor Recreation

Wicklow Mountains National Park covers 20,000 hectares making it the largest national park in Ireland. The Park is an invaluable recreational space for locals and tourists. The most visited area is Glendalough, which attracted ~~732,824~~ 732,362 visitors in 2019 and was ~~third~~ fourth on Ireland's top ten 'free to enter' attractions for 2019. Powerscourt House Gardens and Waterfall were ~~ninth~~ eighth on the top ten fee-charging attractions during 2019 with ~~472,523~~ 487,876 visitors.

Tourist Hubs and Destination Towns

~~Fáilte Ireland is actively developing visitor experience development plans such as the Vikings Visitor Experience Development Plan. This sets out to strengthen the county's offering as a Viking destination. Another bespoke programme is the 'Great houses and Gardens Experience'. The Council will support such programmes that help deliver sustainable tourism within the county.~~

Fáilte Ireland, the National Tourism Development Authority and Coillte, Ireland's largest commercial forestry company have announced plans to re-develop Avondale House and Forest Park into a state-of-the-art visitor attraction. A total of €8 million will be invested in the re-development of Avondale House and Forest Park with Fáilte Ireland contributing more than €6.1million to the project. The redevelopment of Avondale House and Forest Park is hugely significant from a tourism and economic perspective for Ireland's Ancient East and for Wicklow. The development of this new world class visitor experience provides a major opportunity for tourism businesses across Wicklow to leverage this significant investment.

Coillte in partnership with Fáilte Ireland are redeveloping Avondale House and Forest Park into a state-of-the-art visitor destination. The redevelopment is hugely significant from a tourism and economic perspective for the County and the region and has the potential to leverage further tourism development and investment.

11.3 Tourism & Recreation Objectives

Accommodation

CPO 11.17 To facilitate the development of hostels and alternative accommodation offerings along established walking / hiking routes and adjacent to existing tourism / recreation facilities.

Other Visitor Facilities

CPO 11.25 To cooperate with Wicklow County Tourism, Bord Fáilte Ireland and other

appropriate bodies in facilitating the development and erection of standardised and branded signage for tourism facilities and tourist attractions.

Tourism and Recreation Themes & Products

- CPO 11.31** To develop Wicklow-Rathnew as a recreation and tourism hub **and its designation by Fáilte Ireland as a Destination Town** due to its attractive coastal location, heritage assets and its proximity to key destinations such as the Wicklow Mountains, Glendalough and Brittas Bay and the key attractions within the town including the Wicklow Gaol, the Murrough, coastal walks, beaches, architectural heritage, sports facilities and as a terminus of the planned Greystones – Wicklow Coastal Route.
- CPO 11.XX** Support the preparation, delivery and implementation of a Visitor Experience Masterplan for Glendalough and Wicklow Mountains National Park and Visitor Orientation Plan for County Wicklow in partnership with Fáilte Ireland, NPWS and the OPW.
- CPO 11.XX** Support the development of Avondale House and Forest Park into a state-of-the-art visitor attraction, including (but limited to) visitor information and orientation services, and outdoor recreational attractions and facilities, with strong linkages to Rathdrum and surrounding amenities and villages’.

Name	Department of Housing, Local Government & Heritage		Sub ID: C2-54
Topic	Issues raised		
Archaeology	<p>Archaeological heritage is discussed in Chapter 8 of the draft Development Plan. The Department previously commented at the Development Plan review/SEA scoping stage of the preparation of the development plan in a detailed submission dated 10/01/2020 (ourref. FP2019/096). The draft Development Plan has clearly taken into consideration the observations and recommendations outlined in our previous submission and detailed objectives relating to the protection of the archaeological heritage have been included in the draft Development Plan.</p> <p>All references to the "Department of Culture, Heritage & the Gaeltacht" in Chapter 8 should be amended to read "Department of Housing, Local Government & Heritage".</p>		
Nature Conservation	<p>The Department of Housing, Local Government and Heritage (DHLGH) would like to commend Wicklow County Council for its commitment to the protection and enhancement of the county's natural heritage which is woven throughout this plan. This is not simply contained in the Introduction or the chapter on natural heritage and biodiversity but is reflected in many other sections of the draft plan and declared up front in SCO6. It is good to see the recognition of the place of Appropriate Assessment in the planning process decisions which will be made based on this plan (1.4.2).</p> <p>The County's commitment to wider biodiversity (in addition to designated sites) is also welcomed. This is seen in CPOs dealing with:</p> <ul style="list-style-type: none"> • SUDs • Connectivity of green spaces and wildlife habitats • The implementation of the county Heritage and Biodiversity Action Plans • The protection of natural resources from degradation through tourism • The control of invasive alien species • The support of the development of site specific conservation objective and <p>The commitment to maintaining the conservation value of Natural Heritage Areas (NHAs) amongst many other objectives.</p> <p>The Department would also like to make a number of specific comments on aspect or objectives of the plan and point out some challenges.</p>		

<p>The AA/NIS for the CDP</p>	<p>A screening for Appropriate Assessment was carried out for the plan which led to a determination that the plan needed a Stage 2 Appropriate Assessment. It is the Department's opinion that the screening out of a number of Special Protection Area (SPA) sites because they did not have a <i>hydrological</i> connection with Wicklow was incorrect. Birds are highly mobile species and many fly long distances foraging and therefore should have been considered.</p> <p>In Table 3.1 Screening of European sites, the Light-bellied Brent Geese <i>Branta bernica hrota</i> have been omitted from a number of SPAs including The Murrrough SPA 004186, South Dublin SPA 004024 and North Bull Island SPA 004006. There is evidence that these birds use multiple sites for feeding and so there is a connection between the sites. Other Special Conservation Interest (SCI) species, e.g. gulls, can travel long distances for feeding purposes – the lesser black backed gull <i>Larus fuscus</i> forages up to 181km from its roost site (Thaxter <i>et al.</i> 2012¹) to give just one example. The Department therefore recommends that the AA Screening and NIS are revised to ensure that the connections between the SPAs are examined carefully and that the impacts on these mobile SCI species are assessed.</p>
<p>European Sites</p>	<p>CPO 17.5 states that projects which will have adverse effects on the integrity of a European site will not be permitted on the basis of the plan. The Department would like to remind Wicklow County Council that this is actually the law and that there is no legal basis for allowing such projects to progress anyhow except under IROPI/Stage 4 Appropriate Assessment.</p> <p>CPO 17.6 is also the law of the land and all projects likely to have a significant effect on a European site must be screened for AA.</p> <p>The Department is concerned about what will happen in the decision-making process when development, tourism and financial interests in projects clash with the protection of European sites and indeed broader biodiversity values expressed elsewhere in the plan.</p>
<p>Coastal pathway</p>	<p>Despite the various commitments given to the protection of European sites within the plan there are a number of contradictory objectives which could lead to damage of these sites. One such is CPO 18.6 on promoting and developing coastal paths, strategic walkways and cycleways. Map no 18.07 shows this route through several extremely sensitive European sites. The engineering specifications for greenways and cycleways are completely unsuitable for inclusion in European sites, not least because of the amount of habitat loss but also because of the additional recreational pressure and disturbance this will bring.</p> <p>This coastal pathway appears in several other objectives including CPO 11.31 and CPO 11.37. This suggests that the environmental issues with this route are not actually being taken seriously by Wicklow County Council despite the objectives on conserving natural heritage.</p>
<p>Tourism</p>	<p>One of the major threats to the natural heritage of the county is the expansion of tourism. NPWS welcomes the emphasis being put on centring the provision of facilities close to existing settlements. In Chapter 11 the size of the Wicklow Mountains National Park should be corrected to read 22,000ha.</p> <p>CPO 11.47 states that the Council and those receiving permission for tourist</p>

	<p>developments "<i>shall seek to manage</i>" increases in visitor numbers or changes in visitor behaviour which would cause significant environmental damage. This is not strong enough. Such changes <i>must</i> be managed. This objective should be strengthened.</p> <p>Consideration should also be given to CPO 11.37 regarding increasing the number of cyclists at the Sally Gap. Neither the Old Military Road nor the R759 are safe for motorists, cyclists nor pedestrians at present due to the narrowness and undulating nature of the roads. Currently there are many stretches where two cars have difficulty passing and where it is impossible to safely overtake groups of cyclists. Much recent media publicity was given to injuries received by cyclists on these routes which act as important business and commuting routes across the mountains and which are not treated or ploughed in winter. The feasibility of such an objective should be examined from a road-user safety point of view.</p>
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<p>Wind, solar and other forms of energy</p>	<p>The Department recognises that the Council are waiting for the updated national guidelines on wind energy before completing this chapter and look forward to the opportunity to comment on this as an amendment to the plan when it is written. Off-shore wind energy must be subjected to the strictest of environmental scrutiny, and the Department will be commenting on such proposals within its statutory responsibilities.</p> <p>CPO 16.4 supports the creation of solar farms. While many of these farms will be placed on farmland it should be recognised that there will be implications for wider biodiversity through the creation of such farms so the siting of developments will be important.</p>
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Chief Executive's Response

<p>Archaeology Department titles will be corrected as requested.</p> <p>Nature Conservation Comments noted</p> <p>The AA/NIS for the CDP Please see addendum to the NIS as appended to this report.</p> <p>European Sites Comments noted; the concern about potential conflict between development, tourism and financial interests and the protection of European sites is noted but no resolution to same can be provided as part of this process, and this is presumably a conflict that is present across the nation and the wider EU. CPO 17.5 and 17.6 have been integrated into the Plan in order to communicate these issues to prospective developers and in order allow the AA to demonstrate that the Plan will not affect the integrity of any European site. All developments seeking permission under the Plan are required to comply with its provisions, including those relating to the protection/management of European sites and biodiversity. This will help to ensure appropriate protection/management of these environmental components.</p> <p>Coastal pathway Objective CPO 18.6 is extremely general and non-specific about the location of possible coastal pathways; in addition Map 18.07 does not show the location of a future coastal path / route but rather it simply denotes the 'coastline'. In order to ensure that no conflicts arise with the protection of European Sites from such a project (if such a project is ever further developed), the Draft Development Plan includes the following</p>
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objectives:

CPO 18.17 *Where projects for significant green infrastructure identified in this chapter are not already provided for by existing plans / programmes or are not already permitted, then the feasibility of progressing these projects shall be examined, taking into account planning need, environmental sensitivities as identified in the SEA Environmental Report and the objectives of the plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new green infrastructure in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection.*

CPO 18.18 *Where relevant, the Council and those receiving permission for development under the plan, shall seek to manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant environmental effects, including loss of habitat and disturbance. Management measures may include ensuring that new projects and activities are a suitable distance from ecological sensitivities; visitor/habitat management plans will be required for proposed projects as relevant and appropriate. Potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.*

(Note: Similar provisions are set out in Chapter 11 Tourism)

As well as the following objectives in Chapter 17:

CPO 17.4 To contribute, as appropriate, towards the protection of designated ecological sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).

To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including but not limited to the following and any updated/superseding documents:

- EU Directives, including the Habitats Directive (92/43/EEC, as amended) , the Birds Directive (2009/147/EC) , the Environmental Liability Directive (2004/35/EC) , the Environmental Impact Assessment Directive (2011/92/EU, as amended), the Water Framework Directive (2000/60/EC), EU Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC); EU 'Guidance on integrating ecosystems and their services into decision-making' (European Commission 2019)
- National legislation, including the Wildlife Acts 1976 and 2010 (as amended) , European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008 (as amended) and the Flora Protection order 2015.
- National policy guidelines (including any clarifying circulars or superseding versions of same), including 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018), 'Guidance for Consent Authorities regarding Sub-Threshold Development' (2003), 'Tree Preservation Guidelines', 'Landscape and Landscape Assessment' (draft 2000), 'Appropriate Assessment Guidance' (2010);
- Catchment and water resource management plans, including the National River Basin Management Plan 2018-2021 (including any superseding versions of same),
- Biodiversity plans and guidelines, including National Biodiversity Action Plan 2017-2021 (including

- any superseding versions of same) and the County Wicklow Biodiversity Action Plan;
- Ireland's Environment – An Integrated Assessment 2020 (EPA), including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.

CPO 17.5 Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan .

CPO 17.6 Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.

The suggestion that WCC is not taking is environmental obligations seriously is therefore rejected.

Tourism

The information regarding the size of the National Park (20,000ha) in Chapter 11 was sourced directly from the National Parks website. This can be amended as a not material change at a later time once the actual size has been clarified.

Objective CPO 11.47 can be strengthened as requested.

With respect to Objective CPO 11.37, while the concerns expressed are noted, no road safety concerns with this objective have been identified by the Roads & Transportation professionals in the Council, and indeed fundamentally the objective is about improving cycling and walking routes in the interest of both visitor experience and aspects such as safety. No change is therefore recommended.

Wind, solar and other forms of energy

Noted. The natural heritage and biodiversity objectives of the plan will be applied where permission is sought for solar farms.

Chief Executive's Recommendations

Amend the Draft Development Plan as follows

Volume 1

Chapter 11 Tourism

CPO 11.47 Where relevant, the Council and those receiving permission for development under the plan, shall ~~seek to~~ manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant environmental effects, including loss of habitat and disturbance. Management measures may include ensuring that new projects and activities are a suitable distance from ecological sensitivities; visitor/habitat management plans will be required for proposed projects as relevant and appropriate.

Name	Coillte	Sub ID: C2-63
Topic	Issues raised	
Tourism / Recreation, Community	<p>Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Wicklow County Council to deliver on local and wider needs in a manner which aligns with the overall vision for the county.</p> <p>We are rooted in communities all over Ireland and our record of providing land for and facilitating local sports clubs is a good demonstration of that local commitment. We will also continue to work with communities and the Council to facilitate the development of a wide range of accessible recreational, community and sporting facilities, ranging from playing pitches, clubhouses to walking and bike trails.</p> <p>Coillte is particularly proud to have helped deliver significant recreational developments including Centre Parcs in Longford. The development of this site created 750 jobs during construction and resulted in over 1,000 longterm associated jobs. It is estimated that the location of Center Parcs at Ballymahon will generate in the region of €30 million per annum to the local economy.</p>	

<p>Forestry</p>	<p>Ireland has a vibrant forest industry today which supports over 12,000 jobs mostly in rural Ireland. Despite having the lowest forest cover in Europe at just 11% compared to a European average of over 40% this sector contributes over €2.3 billion annually to the economy.</p> <p>Ireland has a competitive advantage for tree growth, our natural oceanic climate and mild winters means that certain conifer tree species can reach commercial maturity in just 35 years which can often take up to 80 years in central and northern Europe. The wood grown from these Irish trees is a valuable commodity and is used for a variety of applications, in construction, in pallet manufacturing and in the processing of innovative panel board products among others. Using Irish, locally grown, wood and wood based products for construction is a climate efficient and sustainable substitute for conventional carbon heavy construction products, such as concrete, brick and steel.</p> <p>The regulation of the forestry sector is overseen by the Department of Agriculture, Food and the Marine who ensure that all the environmental, economic and social aspects of forestry and forest operations are considered fully before licences to carry out operations are issued. The issuing of licences may also be challenged and queried by the public and subject to a robust framework of appeal overseen by the Forestry Appeals Committee. The Department has oversight of the primary legislation governing all aspects of forestry in Ireland, The Forestry Act 2014 and this Act is specifically cognisant of growing forests for a variety of benefits to Irish society, including biodiversity, recreation and wood production.</p> <p>The ownership of Irish forests today is approximately 50% privately owned and 50% State owned and many private owners (over 21,000 in total in Ireland) have invested significantly in growing their forests to commercial maturity. In addition, all of the State's forest management practices are fully certified as sustainable according to precise national and international criteria.</p> <p>Coillte note that the regulation of forest practices and policy resides with the Department of Agriculture, Food and the Marine and their professionally qualified inspectorate. Given the current issues emerging around climate change and the ability of sustainably grown wood products to address this challenge our forests and forest management practices have never been more relevant.</p> <p>Coillte manages 29,072 hectares of forestry in County Wicklow and allows members of the public to access the forests for amenity use, according to the principles of Leave No Trace. Coillte is committed to managing its forest estate in County Wicklow in a fully sustainable manner and to continue to work in partnership with the Council and other stakeholder groups within the county.</p> <p>Coillte welcomes the forestry objectives of the draft Plan, supporting afforestation and the promotion of Wicklow as a "centre of excellence" in forestry (research and management) (CPO 9.42, CPO 9.44 and CPO 9.45).</p> <p>In this context, it is respectfully requested that the Council consider the inclusion of reference to the regulatory framework as detailed above in the <i>Draft Wicklow County Development Plan 2021-2027</i>, while nonetheless continuing to support the forestry industry in the county.</p>
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<p>Tourism, Recreation and Amenity</p>	<p>Coillte welcomes policy objectives of the draft Plan, to protect and enhance the existing; and support the development of new walking and cycling routes, providing <i>"a strategic national network of trails"</i> in the county, including the development of an outdoor recreation hub at Glendalough (CPO 11.34, 11.37, CPO 11.45).</p> <p>In this regard, Coillte is committed to protecting and enhancing the recreation infrastructure in the county, including the walking trails at Avoca, Ballygannon, Ballymoyle Hill, Carrawaystick, Crone Ballyreagh Woods, Cloon Curtlestown Wood, Devil's Glen Forest, Glenart Wood, Rath Wood, Roddenagh Wood, Trooperstown, Lacken Wood, Djouce Woods and Ballinafunshoge Forest; at forests comprising multi-access trails at Kindlestown; Mountain Bike Trails (MBT) at Ballinastoe; and at Avondale Forest Park.</p> <p>Coillte also welcomes the position of the Council to support the redevelopment of Avondale House and Forest Park into <i>"a state-of-the-art visitor destination"</i> with the potential to provide long term benefits to the local economy and tourism sector. Coillte is committed to the delivery of this tourism facility in partnership with Fáilte Ireland and full collaboration of the Council (Pg.246).</p> <p>With significant expertise in the delivery of recreation infrastructure, Coillte welcomes the opportunity to explore the provision of further recreation infrastructure at appropriate locations in the Coillte estate, in collaboration with the Council and relevant stakeholders.</p> <p>As set out above, Coillte allows members of the public to access the forests within the Coillte estate for amenity use, supporting and enabling their use <i>"for recreation and tourism purposes"</i>, RPO 6.21, Regional Strategic and Economic Strategy (RSES) 2030, Eastern and Midland Region Authority (EMRA), as referenced in the draft Plan.</p> <p>Located at a range of scenic locations in the county, the Coillte estate is in a strong position to play a key role in supporting the provision of new tourism and recreation uses, including thematic tourism/active recreational projects at appropriate locations in the county. It is considered that investment in outdoor recreation and forest-based activities drives economic activity, supporting job creation and sustaining local communities.</p> <p>It is considered that the provision of appropriately scaled tourism and recreation projects would support and enable the use of forests within the Coillte estate for recreation and amenity purposes, whilst taking account of the unique <i>"environmental sensitivities"</i> (RPO 6.21); and also support the use of the forests for <i>"appropriate recreation facilities at suitable location"</i> as promoted in the draft Plan (CPO 9.44).</p> <p>The draft Plan identifies the importance of the tourism sector to the local economy, as a key destination for domestic and international markets, with 275,000 overseas and 309,000 domestic tourist stays in 2017, generating revenue of €73m and €49m, respectively for the local economy. The draft Plan also highlights the proximity of County Wicklow to Dublin city, and the potential <i>"to act as an accommodation base for those visiting Dublin and the east"</i> (Pg.241).</p> <p>As referenced above, Coillte has significant expertise in the delivery of forest-based tourism accommodation, including at Center Parcs, Ballymahon, Co. Longford, and for example, forest-based accommodation within Killykeen Forest Park by Cabú. It is considered that this holiday accommodation typology can successfully integrate into</p>
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	<p>a forest setting, whilst ensuring the protection of the forest/woodland environment, subject to appropriate design.</p> <p>In this context, it is considered that this forest-based tourism accommodation typology can support the active recreation tourism sector, including significant potential demand from Dublin city as identified in the draft Plan, providing appropriate locations for forest-based tourism accommodation.</p> <p>In this context, Coillte supports the inclusion of policies in the <i>Draft Wicklow County Development Plan 2021- 2027</i> under which forest-based tourism accommodation (such as woodland lodges) can be facilitated at suitable locations in the Coillte estate, subject to all environmental and design considerations.</p> <p>Further, it is requested that the Council also consider the inclusion of policy support for forest-based tourism accommodation (such as woodland lodges) as a separate tourism accommodation typology, distinct from models such as camping, glamping, hostels, hotels as referenced in the <i>Draft Wicklow County Development Plan 2021-2027</i>. It is considered that this would support the delivery of a broader mix of tourism accommodation in the county, serving the recreation based tourism sector.</p> <p>In this regard, the Council is requested to consider the provision of planning policies / land use zoning objectives, to support the provision of development on Coillte lands where suitable; to provide, for example, tourism, commercial, community and/or other uses which would support and enable national, regional and local objectives, in the making of the <i>Draft Wicklow County Development Plan 2021-2027</i>.</p>
<p>Renewable Energy</p>	<p>As mentioned above, Coillte RE (hereafter referred to as 'Coillte') is one of the biggest developers and supporters of renewable energy in the State and has enabled in excess of 30% of all installed wind farms through wayleaves/rights of way and as a land supplier and developer. We are also targeting the delivery of 1GW of new onshore wind projects enabled by Coillte lands in the period to 2030 to support the achievement of national targets in line with government policies including the Climate Action Plan 2019 and the 2020 Programme for Government.</p> <p>Subject to final shareholder approvals, the Renewable Energy division of Coillte will be transferred to a newly formed joint venture in the coming months, co-owned on a 50:50 basis by Coillte and ESB. A significant milestone was reached in relation to this in Feb. 2021 when the Competition and Consumer Protection Commission (CCPC) provided its regulatory approval for the joint venture. The joint venture will build on the prior history of wind farm development and delivery by the two companies, which includes the Raheenleagh Wind Farm in County Wicklow.</p> <p>Carbon and Renewable Energy Targets</p> <p>On the 9th August 2021, the Intergovernmental Panel on Climate Change (IPCC) published its 6th Assessment Report (AR6) with the overarching assertion that, <i>"It is unequivocal that human influence has warmed the atmosphere, ocean and land"</i>. This report confirms with alarming certainty the detrimental and linear relationship of CO2 emissions and global temperature rise in D1.1:</p> <p style="text-align: center;"><i>"This Report reaffirms with high confidence the AR5 finding that there is a near-linear relationship between cumulative anthropogenic CO2 emissions</i></p>

and the global warming they cause. This relationship implies that reaching net zero anthropogenic CO2 emissions is a requirement to stabilize human-induced global temperature increase at any level, but that limiting global temperature increase to a specific level would imply limiting cumulative CO2 emissions to within a carbon budget.”

The detrimental effects of rising global temperatures are evidenced in regionally intensified weather patterns. Severe heat waves that happened only once every 50 years are now happening roughly once a decade. Tropical cyclones are getting stronger. Most land areas are seeing more rain or snow fall in a year. Severe droughts are happening 1.7 times as often while fire seasons are getting longer and more intense. Ireland is not immune to these climatic changes, with average temperatures exceeding long-term averages in 23 of the past 25 years. The urgency with which Ireland and the rest of the world need to tackle climate breakdown is clear and reflected in our national targets outlined below, with the electricity sector a key component in reaching decarbonization.

The criticality of onshore wind in Ireland’s energy mix is apparent when the near-term trajectories in the Clean Energy Package Governance Regulation (2018) are considered. This requires all member states to submit National Energy and Climate Plans (NECP) setting out how each member state will contribute to the decarbonisation objectives of the European Union. Section (34) of the document notes (emphasis added):

*“Integrated national energy and climate plans should be stable to ensure the transparency and predictability of national policies and measures in order to ensure investment certainty. National plans should however be updated once during the ten-year period covered to give Member States the opportunity to adapt to significant changing circumstances. For the plans covering the period 2021 to 2030, Member States should update their plans by 30 June 2024. **Objectives, targets and contributions should only be modified to reflect an increased overall ambition in particular as regards the 2030 targets for energy and climate.** As part of the updates, Member States should make efforts to mitigate any adverse environmental impacts that become apparent as part of the integrated reporting”.*

In addition, on 17th June 2019 the Government published the ‘Climate Action Plan 2019’ (CAP). This sets out the agreed course of action over the coming years to tackle climate breakdown. It is a visionary and transformational plan and at its heart recognises that *“We [Ireland] are close to a tipping point”* and *“decarbonisation is now a must if the world is to contain the damage and build resilience in the face of such a profound challenge.”* (Exec. Summary pg. 8). In particular, the CAP places the decarbonisation of the electricity sector at the centre of its ambitions. In real terms it mandates this sector to move from 12 million tonnes of CO2 equivalent emissions in 2017, to 4.5 million tonnes by 2030. In other words, a massive reduction of 7.5 million tonnes (62.5%).

Other sectors, namely transport, the built environment, agriculture and industry are also tasked with significant CO₂ emission reductions but of a comparatively lower order namely 37.5%, 31.25%, 7.5% and 6.25% respectively. This makes transforming the electricity sector the single greatest lever in the CAP in terms of CO₂ reduction (Ref. EirGrid Strategy Launch 2019, CEO presentation).

The 2019 CAP provides a roadmap of what must be achieved and in relation to electricity, requires 70% of all our demand to come from renewable energy sources by 2030. This almost doubles the previous target of 40% by 2020. To achieve the 70% target, the CAP earmarks a target of 3.5GW off-shore wind and a doubling of existing on-shore wind from circa 4GW (today) to 8.2GW by 2030, signalling onshore wind as crucial in the roadmap to decarbonization.

To put the scale of the ambition into further context it should be noted that it has taken 20+ years to achieve the current level of renewable penetration onto the Grid. The challenge is now to achieve twice as much in half the time. This is of particular significance in the context of the lifetime of the draft Plan to 2027.

It should be noted the 2020 programme for government commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to move to net zero emissions by 2050. The 2050 target was set into law by the Climate Action and Low Carbon (Amendment) Bill 2021 as passed through the Oireachtas and signed into law 23rd July, 2021. This increases the CAP offshore target to 5GW; proposes a strengthened role for the Climate Change Advisory Council, proposes an annually revised Climate Action Plan and new oversight and accountability by the Oireachtas. Every sector, including the energy sector, must contribute to meeting the 2050 target by implementing policy changes as outlined throughout the programme for government.

Coillte believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this national CO₂ reduction ambition and the associated requirement for renewable energy, in the form of plan-led 'Renewable Energy Strategies' (RESs) as an utmost priority. Coillte is familiar with Wicklow's current Renewable Energy Strategy (Appendix 5) and recognises the high quality of that document. Indeed, the successful Raheenleagh Wind Farm, which was consented under this strategy is a template for future projects in the County. We welcome the revision of the RES following and the updated Landscape Character Assessment (LCA) from 2003.

The targets discussed will not be achievable without a functioning onshore wind sector, and there is likely to be considerable reliance on wind to deliver on our intermediate targets to 2025 and 2027. Given the relatively high likelihood that a significant portion of new offshore capacity will only start to be delivered onto the system post 2027, (and in volumes that may fall short of the targets set out in the NECP), these requirements clearly point to a need to maintain focus on the delivery of new onshore capacity, which will be better placed to support these earlier intermediate targets, in addition to making a material ongoing contribution to the long term decarbonisation targets. Coillte support policy objectives NPO 54 – 58 of the draft Plan.

A Regional Approach to Renewable Energy Strategies (RESs) and Preparing/Updating RESs

Need for each county to consider the national renewable energy targets in the Climate Action Plan to achieve an additional 4GW of energy was mentioned by the Planning Regulator, Mr. Niall Cussen in his remarks at the Joint Committee on Climate Action debate on Tuesday, 23rd Feb. 2021, Decarbonising Transport: Discussion². He said:

"Turning briefly to improving the sustainability of our energy sources, communities want real action on climate. One of the best ways to tap that desire would be to show how every county in the country could play its part in delivering an estimated extra 4 GW of renewable electricity to 2030 and, indeed, more offshore energy generation to a carbon-free society by 2050. Yet our assessments of some local authority development plans find effective bans on the roll-out of sustainable energy sources. On top of the updated Wind Energy Development Guidelines we need a national renewable energy roadmap with county-specific targets and the designation of sustainable energy zones which can be built by the regional assemblies working with the local authority climate action regional offices."

"The Planning Act under section 10(2)(n) already demands forward planning that reduces future patterns of energy consumption, shifts our present energy needs towards renewable sources and adapts to climate changes already happening. The pace in implementing this law is quickening since the publication of the NPF, the establishment of our office and the coming into being of local authority climate action plans under the legislation promised. Local government and local authority planning, however, has a central role to play in the Avoid-Shift-Improve approach I mentioned but it needs clear policy frameworks and resources to work with to ensure that local authority members focus on the task at hand."

"Notwithstanding this and our statutory mandate, legislated for by the Oireachtas and supported by the Minister for Housing, Local Government and Heritage, we will work to ensure that all the constituent cogs in our country's planning process work together in the planet's and not just in local interests."

Coillte has been advocating a regional approach to Renewable Energy Strategies (RESs) in all its submissions over the last number of years. This would complement the local authority's individual RESs and WESs. In the absence of a Regional RES and in the context of the current County Development Review cycle we have made a number of suggestions as to how each local authority could update / prepare its RES.

In summary we suggest each local authority engage closely with neighbouring local authorities and with other local authorities in the Region to strive to attain the same important benefits and synergies of a Regional RES. In this regard Coillte commend the Council for preparing the objectives of this plan, *"having regard to the plans of the adjoining planning authorities of Dún Laoghaire-Rathdown, South Dublin, Kildare,*

Carlow and Wexford."

A regional steering group comprising planners from each local authority and/or SRA, would be optimum. A set of guiding principles would be agreed and used by all local authorities in developing local authority RESs. To this end the methodology and principles set out in "SEAI's Local Authority Renewable Energy Strategy" [2013] remain valid and should be considered. This approach would also ensure county targets are linked to the overall national ambition, as suggested by the Planning Regulator, rather than being based on the individual county demands. A regional approach would ensure a sufficient quantum of land (with sufficient headroom) is identified to account for site level attrition. Each county RES would ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands.

In relation to grid capacity, we also recommend that existing constraints are not considered hard constraints when preparing RESs. This is because, amongst other things, the development of the Grid will react to (planning) consented developments where necessary. In essence this means that a planning consent, or indeed a critical mass of planning consented projects triggers grid development/reinforcement where necessary. This issue of existing grid availability was recognised in the SEAI [2013] document which suggested that "*local authorities may consider policies and objectives which could underpin and support infrastructure and network deployment to achieve national energy targets while realising local RE potential*". Coillte wholly supports the delivery and upgrading of grid infrastructure to facilitate Renewable Energy potential and the policies and objectives on this in the draft Plan.

Wicklow's Renewable Energy Strategy (2016) in Appendix 5 of the draft Plan states that (emphasis added):

*"In light of these requirements [Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (Dept. of Housing, Planning, Community and Local Government) July 2017], for the purpose of this draft Development Plan (2021), it is not intended to review the Wind Energy Strategy as set out in the 2016 County Development Plan (**other than updates to reflect current statutes or other clarifications**) until new guidelines are made, and the 2016 WES is herewith subsumed in the 2021 County Development Plan."*

In the context of national government targets since 2016, the draft Plan and subsequent RES need to set out more distinctly how the County will facilitate a proportionate level of the additional 4.2GW of onshore wind growth as a matter of priority and to comply with SPPR No. 2. The current RES fails to set out clearly how its policies and designations for renewable energy will contribute to the national renewable energy targets in a critical.

The absence of these specific targets and supporting policies fails to acknowledge that counties with renewable energy potential should do more than others with less

potential and / or greater populations in order to achieve the Country's national targets. In other words, all counties, including Wicklow, must focus on national targets not individual demands as previously outlined.

Renewable Energy and Economic Growth

The Energy Sector is a key sector for job growth, throughout the lifetime of the Plan. Wind Energy development can generate significant construction and operation jobs throughout its lifetime and contribute to rural communities through community benefit funds and to the local authority through rates.

In relation to communities Coillte operate a 'Fair Play Model' of engagement that commits to transparent dialogue and the sharing of information on an on-going basis with those most impacted by proposed developments. This model focuses on the residents of dwellings within 2 km and recognises the need to ensure people located further away from the development are informed as details become more defined.

Coillte is also committed to ensuring that local communities' benefit from having a wind farm in their locality in terms of a Community Benefit Fund which supports the development of local recreation amenities and provides additional community project funding. Community benefit schemes relating to RESS projects will have significant community benefit, providing an opportunity to transform rural communities where projects are located. The Public Consultation on Good Practice Principles for Community Benefit Funds under the RESS³ published 30th March 2021 provided welcome guidance on Community Benefit Funds administration, structure, and quantity, indicating a 50MW project will create approximately €300,000 annually. We are also working hard around Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.

Coillte is an active member of the Wind Energy Ireland (WEI, formerly called IWEA) and our staff actively participate in several of the Association's committees. WEI statistics confirm that in terms of initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms, take the form of rents payable to landowners, financial support for local communities in the form of community benefit schemes and commercial rates payable to local authorities. Combined, these amount to approximately €25,000 per MW per annum. A review carried out by WEI indicated over €1,000,000 was paid to Wicklow County Council from wind farms in the form of commercial rates in 2020.

Therefore, Coillte believe that wind energy is of strategic importance to the county both in addressing Climate Change and in growing the Wicklow economy and providing employment opportunities in both rural and urban communities.

Working in Partnership on Wind Projects

The scale of the overall Climate Action Plan ambition is considerable and requires considerable collaboration between all parties involved or associated with renewable energy including the communities that will ultimately host the infrastructure. Coillte has an experienced team in wind farm planning and development and is available to work in partnership with Wicklow to support the realisation of the CAP targets.

Sustainable Timber Products	<p>Timber is without doubt one of the most environmentally friendly and versatile building materials available and being a natural carbon sink can be considered truly renewable. Coillte requests that Wicklow County Council promote the use of sustainable timber products in the forthcoming <i>Wicklow County Development Plan 2021-2027</i>.</p>
Conclusions	<p>Coillte welcomes the opportunity to make this submission to Wicklow County Council with respect to the <i>Draft Wicklow County Development Plan 2021-2027</i>. Coillte has engaged positively with Wicklow County Council throughout the years and wishes to continue this important collaboration.</p> <p>In preparing the Draft County Development Plan, Coillte request that the Council:</p> <ol style="list-style-type: none"> 1. Continue to support sustainable rural based enterprises such as forestry and tourism in the county and make adequate provisions and objectives to facilitate their delivery. 2. Have regard to the regulatory framework established under The Forestry Act 2014 and overseen by the Department of Agriculture, Food and the Marine with respect to the forestry sector. 3. Ensure the zoning of sufficient lands with associated objectives for recreational, commercial, tourism and community uses. 4. Support the provision of accessible recreational, community and sporting facilities in the county. 5. Support the provision of tourism infrastructure, including the provision of forest-based tourism accommodation (such as woodland lodges) at appropriate locations in the Coillte estate. 6. Support the provision of forest-based tourism accommodation (such as woodland lodges), as a tourism accommodation typology in the draft Plan. 7. Promote the use of sustainable timber products in the Development Plan policies and objectives. 8. Maintain the policies and objectives in the draft Plan that recognise, promote and facilitate onshore wind and support community involvement and gain. 9. Clearly set out how the updated RES will facilitate a proportionate level of onshore wind necessary to meet targets in the Climate Action Plan. 10. Ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands in the updated RES and ensure a sufficient quantum of land (headroom) is designated suitable for wind to account for site level attrition. 11. Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process by updating the Renewable Energy Strategy based on national targets and the principles of the SEAI LARES. 12. Work in partnership with other government agencies and third parties, including the public, to achieve these goals.
Chief Executive's Response	
<p>Tourism / Recreation, Community Noted – no changes suggested or recommended</p>	

Forestry

It is not recommended to include more information of the forestry regulatory framework in the Development Plan as suggested – the CDP is not meant to be a description of all legislation / regulation affecting all and any sectors of the economy – as the OPR has already pointed out, there is perhaps too much of such information already in the plan.

Tourism, Recreation & Amenity

It is not considered necessary to amend the plan as suggested to include specific objectives with regard to forest-based tourism accommodation; the Draft Plan already provides detailed objectives and standards with respect to all tourism accommodation types, whether they be located in forest or farmland, and it is not considered necessary to make a distinction between 'woodland' types holiday homes / campsites / glamping pods and other located in not woodland settings; especially as the same policies will apply.

It is also not recommended to add a new forestry 'zoning objectives' in the Plan; in the first instance complete data is not available identifying all of the existing 'forestry' land in the County that could be covered by such zoning and therefore mistakes / omission would be inevitable; secondly the objectives of the Draft Plan are already considered more than adequate to address future development in forested areas and finally, generally zoning objectives are reserved for areas identified for significant new development (such as settlements) and not large swathes of the County; in a similar vein we do not have an 'agriculture' zone demarcating farmed lands.

Renewable Energy

The suggestions set out in this part of the submission are noted; those that relate to national or regional cooperation on energy strategies, principles and targets would not be matters that can be addressed unilaterally in this Development Plan but the CE would support the development of a regional renewal energy strategy.

With respect to meeting the County's share of national renewable energy targets, having regard to the national target outlined by the OPR (12GW) and of this the wind energy targets being +3.5GW of off-shore wind energy and +4.2GW of additional on-shore wind energy (source: 2019 Climate Action Plan), in accordance with the methodology for determining a target for Wicklow as set out by the OPR, County Wicklow should endeavour to deliver 3% of the on-shore growth requirement (Wicklow comprising 3% of the land mass of the republic of Ireland), which equates to +126MW.

It is considered that the WES set out in the draft Development Plan makes adequate provision for the delivery of such a quantum of on-shore wind energy generation and in particular, 52,500ha are identified in the WES as 'most favoured' for the development of wind farms (where wind energy development will be considered favourably for consent), and another 59,000ha is identified as 'less favoured' where wind farm development will also be considered, but taking into account the additional sensitivities in these areas compared to the 'most favoured' areas. This accounts for c. 55% of the total area of the County, which is considered high, taking into account that considerable areas of the County are protected upland or coastal areas. It should be borne in mind however much of this land may not the capacity to be developed for wind energy if mandatory set-backs from dwellings are required by future Government policy. The prevalence of one-off rural dwellings in certain counties should be taken into account in this regard, as this may limit the ability of certain counties to provide their 'share' of the national output.

Sustainable Timber Products

The CDP is a land-use and development framework which sets the requirements and principles for sustainable development. In order to build sustainable new structures, there may be a range of buildings products that would need climate and sustainable criteria, and it would be inappropriate to promote one products or building methodology over another.

Conclusions

- The Development Plan supports sustainable rural based enterprises such as forestry and tourism in the county and makes adequate provisions and objectives to facilitate their delivery.
- It is not appropriate or necessary to include information in the Development Plan on the regulatory framework established under The Forestry Act 2014 as this is stand alone legislation / regulation that must be adhered to separately from the Development Plan
- Development objectives, including zoning in appropriate locations, are provided for recreational, commercial, tourism and community uses.
- The Development Plan supports the provision of accessible recreational, community and sporting facilities in the county.
- The Development Plan supports the provision of tourism infrastructure, including the provision of forest-based tourism accommodation
- It is inappropriate to promote the use of sustainable timber products in the Development Plan
- The Development Plan supports onshore wind and renewable energy
- The WES set out in the Draft Plan does not limit the development of wind energy projects on the basis of grid capacity issues
- The Development Plan recognises and responds to the scale and urgency of climate change
- The Council is committed to working in partnership with other government agencies and third parties, including the public, to achieve these goals.

Chief Executive's Recommendations

Amend the Draft Plan as follows:

Volume 1, Chapter 16 Energy Infrastructure & Communications

16.2.1 Electricity Generation

In accordance with the provisions of section 28(1C) of the *Planning and Development Act 2000* (as amended), and having regard to the Government's commitment in the *Climate Action Plan 2019* to achieve 70% of electricity from renewable sources by 2030 (adding 12GW of renewable energy capacity nationally), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and section 28 guidelines *Wind Energy Development Guidelines 2006* and the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017*, the development plan aims to put in place the appropriate supports that will allow County Wicklow to contribute its share of the additional national renewable electricity target (excluding off shore wind energy generation), which estimated to be **255MW**.

16.2.1.1 Energy

Having regard the County target for renewable energy generation set out above (255MW), and national targets of 4.2GW to be sourced from on-shore wind, the on-shore wind generation target for County Wicklow is **126MW** (unless other sources of renewable energy generation allow the overall target of

255MW to be met).

It is considered that the WES set out in the Development Plan makes adequate provision for the delivery of such a quantum of on-shore wind energy generation and in particular, 52,500ha are identified in the WES as 'most favoured' for the development of wind farms (where wind energy development will be considered favourably for consent), and another 59,000ha is identified as 'less favoured' where wind farm development will also be considered, but taking into account the additional sensitivities in these areas compared to the 'most favoured' areas. This accounts for c. 55% of the total area of the County, which is considered high, taking into account that considerable areas of the County are protected upland or coastal areas.

Name	Arts Council / An Comhairle Ealaíon	Sub ID: C2-83
Topic	Issues raised	
Emerging Trends and Spatial Considerations for the Wicklow County Development Plan	<p>Planning for arts and culture means more than the development of tangible infrastructure and services such as theatres, libraries and museums or the preservation of cultural and built heritage. Arts and culture can play a contributing role to the social and economic development of places by creating vibrant places to live and creating social cohesion through festivals and events, community cultural activity, tourism interest and local identity and association with a particular place.</p> <p>The provision of arts and culture in formal and informal spaces, for example, in the built and natural environment such as parks and open spaces, can make a significant contribution towards social, cultural and physical wellbeing to the community.</p> <p>The Covid-19 pandemic has had a significant effect on the Arts in Ireland with shutdowns effecting the arts, entertainment, cultural and live events sectors. However, the pandemic has also demonstrated that the arts, including, music, drama, entertainment and art are essential to the wellbeing of the country. The pandemic has also influenced how public spaces are viewed and used by society. During the pandemic and its recovery, such spaces, designed, configured and equipped to a high standard, are critical to public enjoyment and reengagement with cultural events and live entertainment.</p>	
Contribution of Arts and Culture toward 'Proper Planning'	<p>The provision of Arts and culture can contribute toward community and societal development in a number of ways including for example;</p> <ul style="list-style-type: none"> • Place-making and psychological well-being: Arts and cultural assets including venues and the public realm (formal and informal public accessible spaces and buildings), can contribute toward place making by creating places where people want to go, interact, and to live near offering distinctive sense of place and personal satisfaction. • Creation of Stronger Communities: Arts and culture infrastructure can contribute toward social capital by facilitating the space and locations in which communities can mix, integrate and bond, and can enable informal social engagement. • Physical and Economic Value: High-quality and engaging spaces and arts and culture activities can assist in area renewal/regeneration and attract visitor to boost economic activity and prosperity. <p>The 'Life Worth Living' (The Report of the Arts and Culture Recovery Taskforce¹) November 2020, sets out a number of recommendations on how best the arts and culture sector can adapt and recover from the unprecedented damage arising from the Covid-19 pandemic, and, the importance of outdoor public spaces to access arts and cultural events in the aftermath of the pandemic. 'Recommendation 9' of the taskforce report promotes the development of a capital improvement programme to 'Re-imagining our Public Spaces' that includes:</p> <ol style="list-style-type: none"> 1. a targeted and accelerated public realm capital improvement programme to fund local authorities to adapt, equip or otherwise improve public spaces for cultural and events activities, taking account of public health guidelines and of the needs of the local arts community, to include a competitive fund that would encourage the development of spaces of regional strategic importance by local authorities; and 2. a targeted fund to incentivise the Private Sector to activate appropriate private spaces for public attendance at artistic, cultural and entertainment events. <p>Under these recommendations, Local Authorities are encouraged to prioritise place making projects and encourage/incentivise private sector with large spaces/buildings in creative activation or facilitation of spaces of local or regional scale for public</p>	

	enjoyment.
Planning Obligations for Arts & Culture	<p>The provision of cultural and arts infrastructure, like any social capital, requires planning and foresight commensurate with identification of need and tangible outputs. The provisions of Section 10(2) of the Planning and Development Act 2000 (as amended) set the basis for spatial planning for the arts by requiring each Development plan to include objectives for:</p> <ul style="list-style-type: none"> • the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population; • the protection of structures, or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. • the preservation of the character of architectural conservation areas; • the preservation, improvement and extension of amenities and recreational amenities; <p>At a regional level, the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands region acknowledges that the arts and culture play a role on shaping peoples identify and seeks to promote the development and protection of the arts through a number of regional policy objectives, for example;</p> <p>RPO 9.24: Promote and facilitate the role of arts and culture in recognition of its importance to people’s identity and the potential for economic development through a unique cultural tourism offering throughout the Region.</p> <p>RPO 9.25: Seek to work with all relevant stakeholders to promote equality of access to and engagement with arts and cultural services and in the promotion of culture and heritage led urban and rural regeneration.</p>
Observations on the Wicklow County Development Plan 2021-2027	<p>The Arts Council acknowledge and welcome the approach by Wicklow County Council in the draft Plan to the concept of healthy placemaking and provision of appropriate social infrastructure including arts and culture infrastructure as set out in Chapter 2 ‘Overall Strategy’ and associated references set out in in Chapter 7 ‘Community Development’.</p> <p>That said, there appears to be insufficient clarity in relation to the practicable implementation of and responsibility for, those strategy objectives in the more detailed development management provisions in the draft Plan, and absence of objectives which seek to indicate how, when and where such infrastructure will be provided during the life of the development plan. Furthermore, responsive to current and emerging trends and other plans and strategies, the Arts Council would welcome greater recognition of Arts and Culture as component part of social and cultural infrastructure, and greater synergy where appropriate, between land use planning provisions in the development plan, and spatial objectives set out in the Wicklow County Arts Plan.</p> <p>In this regard, the Arts Council respectfully request that the following observations are considered in the finalisation of the Wicklow County Development plan 2021-2027.</p> <p>1. Implementation of Objectives at Development Management</p> <p>The Arts Council welcome the provisions of CPO7.3 which support the delivery and improvement of community infrastructure ‘in accordance with the ‘Hierarchy Model of Community Facilities’ prepared under the Development Levy Scheme’ and identified in Table 7 of the draft Plan. Furthermore, CPO 7.38 refers to new ‘community buildings’ which could provide for a variety of active /passive recreational sports and cultural activities. However, it is unclear from a development management perspective how and what type of infrastructure is necessary, where it will be provided, and whether such infrastructure provision will be the responsibility of the local authority, private</p>

developer, other agency or hybrid arrangement.
If as per the intent of Chapters 2 and 7 to provide for improvements to physical infrastructure (including infrastructure that will facilitate arts and culture) then the Arts Council would welcome the development plan in identifying the locations and/or development instances, including responsibility for the delivery of such infrastructure.

2. Value and Function of 'Arts and Culture' in Planning

While the draft Development Plan includes a number of specific policy objectives in Chapter 7 which relate to the provision of Arts and Culture in the County, there is little recognition of the value and function of arts and culture infrastructure as essential social infrastructure in land use planning.

Arts and Culture can be used in and alongside place making to engage communities, enhance the aesthetics of public realm and promote public enjoyment of an area. The Arts and Culture sector can also contribute to the revitalisation of towns and villages through the use of underutilised or vacant buildings to create artist workspaces, creative hubs and exhibition spaces, or through the provision of permanent or temporary public art in the public realm, or through place based arts practice, live entertainment, festivals and cultural events in public open spaces. The Arts Council's Framework Agreement with Wicklow County Council (2020 – 2027) specifically calls out a spatial strategic need to engage communities in place based arts practice in the West Wicklow area of Baltinglass and Blessington.

Thus, the Arts Council would recommend that the Development Plan include specific policy objectives which expressly recognise the value and function of arts and culture infrastructure as essential social infrastructure in land use planning and seek to promote and facilitate 'arts and culture' in accordance with proper planning and sustainable development.

3. Recognition of, and synergy between the CDP and existing County Arts Plan

The Arts Council note and welcome that the draft Plan makes reference to the County Arts Plan in section 7.3.4 and details that the objectives and actions set out in the Arts Plan will 'be reflected in increased resources and support to the arts community'. That said, the Arts Council would welcome greater recognition and collaboration in the spatial approach between the development plan and Wicklow Arts Plan.

Growing the Arts in Wicklow – Arts Plan 2020-2025 recognises the role that planning can have on the provision and enhancement of arts and culture infrastructure in the County. Goal 2, Objective 5 of the Arts Plan sets out the following key action; 'Ensure local authority area plans provide for the arts within wider social, recreational and community infrastructure'..

The Arts Council would welcome the development plan recognising this spatial objective, and the inclusion of a specific policy objective which seeks to support and facilitate this and, how such infrastructure might be provided for equitably throughout the county in a land use planning perspective.

4. Future Planning for Arts and Culture

Formulation of a Spatial Framework

The Arts Council would encourage the County Development Plan to adopt a policy approach for the preservation, enhancement and provision of Arts and Culture which have been/are identified of value in contributing toward physical, social and economic benefit for the County.

Future arts and cultural requirements could be informed by an evidence based local

needs assessments taking into account – current and future population, socio economic evidence, age dynamics, current arts and cultural assets provision and access, community aspirations, opportunity for place based arts development, place making enhancement through physical infrastructure and development including provision of communal multi-use open space where it can have the most impact.

A county register of arts and cultural assets could be established, which can include infrastructure such as arts centres, museums, heritage buildings, or townscapes, or public spaces and locations which either individually or collectively, contribute to access to, and/or provision of arts and culture. This could build upon the ‘survey to map the arts ecology in the County’ which is detailed as a Key Action under Objective 6 ‘Build capacity and development function of Wicklow County Council Arts Office’ in the County Wicklow Arts Plan.

This information could be used to generate a baseline database of arts and cultural assets and their spatial distribution/concentration across the county based on the type of activity, level of provision, and key attributes. This information can inform locational decisions and future needs and can inform other service providers interested in co-location of service and activities.

Chief Executive’s Response

Emerging Trends and Spatial Considerations for the Wicklow County Development Plan

Noted – no changes suggested or recommended with respect to the issues raised in this part of the submission.

Contribution of Arts and Culture toward ‘Proper Planning’

Noted – no changes suggested or recommended with respect to the issues raised in this part of the submission.

Planning Obligations for Arts & Culture

Noted – no changes suggested or recommended with respect to the issues raised in this part of the submission.

Observations on the Wicklow County Development Plan 2021-2027

- The practical implementation of arts / culture programmes and projects lies within the remit of the Council’s Community, Cultural and Social Development directorate, in particular through the County Arts Office. It is not the role of the County Development Plan, which is primarily a land-use framework, to set out a detailed delivery and implementation plan or schedule for arts and cultural projects / infrastructure delivery.
- With respect to the delivery of community infrastructure via the development management process, developments of a certain scale are required through the objectives and standards of the Plan to carry of Social Infrastructure Audits, which will include infrastructure supporting the arts and culture, and where deficiencies are identified to agree with the Local Authority what infrastructure is required to be delivered either by the developer or by the developer in conjunction with the Local Authority, when it is to be provided and what its format / operational structure will be. This naturally will entail consultation with the Council CCSD directorate, which includes the Arts Office. Until such assessments are carried out, or indeed more localised arts / culture plan are developed by the Arts office, it is not possible to identify in the CDP exactly where and when new facilities will be delivered.
- It is considered that the Draft Plan identifies the importance of arts and culture, under the overall heading of ‘community development’. It is not considered that there are any additional measures, and indeed none are suggested, to further enhance address arts and culture in the Plan, and it is considered that the Draft Plan goes as far as it can within its remit as a land-use framework, to support the arts. The ‘plan’ for the development of the arts in Wicklow is County Arts Plan, not the CDP; the locational or spatial extent of arts and cultural projects would be matter for the County Arts

Plan.

- The idea of the establishment of a register/ baseline of all arts / cultural assets in the County is supported and would be a useful tool in both the carrying out of Social Infrastructure Audits by developers of large scale projects and in the development of the County Council's own arts development programme. Again this would be matter for the County Arts Plan, rather than the CDP.

Chief Executive's Recommendation

No change

Name	TII	Sub ID: C2-84
Topic	Issue raised	
NATIONAL ROAD NETWORK: Managing Exchequer Investment and Statutory Guidance	<p>i. General</p> <p>TII notes and acknowledges the inclusion of Sections 3.6 and 12.3 of the Draft Development Plan along with CPO 12.41.</p> <p>Project Ireland 2040, National Development Plan, 2018 – 2027, outlines the investment priority to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the National Planning Framework and under NSO 6 High-Quality International Connectivity to maintain access to international markets via maintaining strategic transport access to Ireland ports and airports.</p> <p>As outlined in the Authority’s Issues Paper submission, the Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T regulations target a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). The TEN-T regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe.</p> <p>The M/N11 corridor is also a strategic road corridor of national significance providing access to the south east of the country, in addition to providing access to international markets for freight and tourist traffic through Rosslare Euro- port. While the N81, national secondary road, facilitates important regional and inter-regional connectivity within and through County Wicklow to the South East.</p> <p>Recommendation</p> <p>TII advises that the Transport Chapter needs to be reviewed to ensure that that the requirements of National Strategic Outcomes 2 and 6 are acknowledged especially under Section 3.6 Transport and Accessibility.</p> <p>ii. M/N11 National Development Plan Scheme</p> <p>The N/M11/N25 Dublin to Rosslare route is identified as part of the EU TEN-T Comprehensive Network. Such a designation has repercussions and action requirements for policies and objectives which should be considered in the new County Development Plan. The international dimension is reflected in the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES) Regional Policy Objective RPO 8.16.</p> <p>RPO 8.16: Support the improvement and protection of the TEN-T network to strengthen access routes to Ireland’s ports, including investment in the ongoing development of the N11/M11 to improve connectivity to Rosslare and improvements to the Dublin-Wexford Rail line.</p> <p>It is therefore critical that, in addition to National Strategic Outcomes (NSO) 2 and 4, the requirements of NSO 6 High- Quality International Connectivity needs to be acknowledged in the Transport Chapter and in particular Section 3.6 Transport and Accessibility.</p> <p>It is noted that Section 3.6 of the Draft Plan addresses the need to continue upgrading the N11 and supports a number of specific objectives for the M/N11. The Authority advises that improvements to the N/M11 are not only necessary to meet requirements of existing development, public transport, and to meet population and employment</p>	

growth, as identified in the Draft Plan, but, critically, to provide access to the south east of the country. In addition to providing access to international markets for freight and tourist traffic through Rosslare Euro-port and via the M50 through Dublin Port and Airport. TII therefore advises that the inclusion of specific references to schemes such as CPO 12.26, CPO 12.27 and CPO 12.36 need to be reviewed and evaluated to ensure that they are compatible with the M/N11 National Development Plan Scheme progress and objectives including NSO 6 High-Quality International Connectivity.

Recommendation

TII advises that specific references to inclusions related to the NDP scheme such as CPO 12.26, CPO12.27 and 12.36 need to be reevaluated and potentially amended to ensure that they are compatible with the M/N11 National Development Plan Scheme progress and objectives.

iii. M/N11 Development Plan Schemes

TII welcomes the inclusion of objectives that are consistent with projects listed in the National Development Plan. However, it is noted that a number of objectives under CPO 12.36 and Map 12.01 are included in the absence of an evidence base and are not supported by the NDP, TII nor the NTA Transport Strategy, in particular:

a) M11 Arklow Bypass, Third Interchange

With reference to the provision of a third interchange on the Arklow Bypass, the Authority advises that the Council will be aware that such a proposal is not scheduled in the National Development Plan, the Authority's programme of work and is not a TII priority. It is also noted that the proposal is also not included Section 2.1.3, Strategic Transport Infrastructure, Appendix 9, and "Strategic Infrastructural Assessment".

TII considers that issues related to local traffic and transportation issues should be addressed in a future Local Transport Plan for Arklow. TII advises that any proposed additional connectivity to the M11 at this location would require demonstration of consistency with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.

In addition a Motorway Order is required for the development of a new junction on the M11. The Authority advises, as previously highlighted, that it would not be supportive of proposals for a motorway junction at this location.

Recommendation

TII recommends that the Council reviews the objective in accordance with EU TEN-T Comprehensive Network provisions, Project 2040 policy objectives NSO 2, 4 and 6, the NTA Transport Strategy for the Greater Dublin Area, EMRA RSES, and also the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

b) Upgrade to N11 Ballyronan Junction

With reference to Newtownmountkennedy, the objective to upgrade the Ballyronan Interchange to facilitate improved access to Newtownmountkennedy and a possible link road from Ballyronan to Kilcoole is noted with concern.

The Council is aware of potential future capacity constraints at this location arising from planned development in the area included in the existing zonings and has previously committed to prepare a framework plan to 'consider all aspects of the existing developed and undeveloped zoned lands in Newtownmountkennedy on the adjacent N11 junction' in the context of other planning permissions granted in this area. The Authority has not received a copy of the framework plan nor notice that work on the

plan has commenced despite the Council committing to undertake this work in 2011 (copy attached to submission).

The Council is reminded that Project Ireland 2040, National Development Plan, 2018 – 2027, outlines the investment priority to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the National Planning Framework.

TII considers it is inappropriate to continue to include the objective in advance of any works to meet the requirements of Government policy outlined by Section 2.7 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) as supported by Project Ireland 2040, National Development Plan, and 2018 – 2027.

TII also is of the opinion that the objective is inappropriate in advance of proposals being developed to address the N11/M11 Junction 4 to Junction 14 Improvement Scheme currently been progressed. It is also noted that the proposal is also not included Section 2.1.3, Strategic Transport Infrastructure Appendix 9, and "Strategic Infrastructural Assessment".

Recommendation

TII recommends that the Council review and amend the objective to upgrade to N11 Ballyronan Junction and associated zoning indicated in Newtownmountkennedy Specific Objectives (Level 4 Town Plans) in accordance with Project 2040 policy objectives, and also the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) as outlined in Section 2.7 of the Guidelines and also the N11/M11 Junction 4 to Junction 14 Improvement Scheme currently been progressed.

c) Upgrade to the N11 Glen of the Downs Junction (CPO 12.44 also applies)

The proposal for upgrading the N11 junction at the Glen of the Downs to facilitate a northern link road from the N11 to Greystones, (also identified as an Objective for Regional Roads), is not provided for in the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035. It is also noted that the proposal is also not included Section 2.1.3, Strategic Transport Infrastructure Appendix 9, and "Strategic Infrastructural Assessment". TII also considers the objective is inappropriate in advance of proposals being developed to address the N11/M11 Junction 4 to Junction 14 Improvement Scheme currently been progressed.

Recommendation

TII recommends that the Council should review the objective and associated zoning in accordance with Project 2040 policy objectives, and also the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) as outlined in Section 2.7 of the Guidelines and also the N11/M11 Junction 4 to Junction 14 Improvement Scheme currently been progressed.

iv. N81

The Authority also acknowledges the proposed road improvement objectives related to the N81 outlined in CP0 12.37 of the Draft Plan. The Authority advises that the Council will be aware that such a proposal is not scheduled in the National Development Plan. Therefore is not a TII current priority. It is also noted that the proposal is also not included in Section 2.1.3, Strategic Transport Infrastructure Appendix 9, and "Strategic

	<p>Infrastructural Assessment".</p> <p>However, it is acknowledged that it is beneficial to identify road schemes that are proposed to be delivered at a local level within the term of the Plan. Though, the Council will be aware that TII may not be responsible for financing these additional projects.</p> <p>Recommendation</p> <p>The Council will be aware that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances, the relative priority or timeframe for national road schemes may be subject to alteration.</p> <p>v. Leinster Orbital Route (LOR)</p> <p>The support for the Leinster Orbital Route is noted. However the Authority notes the inclusion of an objective identifying possible route corridors to link from Arklow west to the line of the Leinster Orbital Route.</p> <p>The Council will be aware that such a route from Arklow is not a scheme identified in the NTA Transport Strategy nor one for which national road investment funding is scheduled. However, it is acknowledged that it is beneficial to identify road schemes that are proposed to be delivered at a local level within the term of the Plan. Though, the Council will be aware that TII may not be responsible for financing these additional projects. It is also noted that the proposal is also not included Section 2.1.3, Strategic Transport Infrastructure Appendix 9, and "Strategic Infrastructural Assessment".</p> <p>Recommendation</p> <p>The Council will be aware that the implementation of all national road schemes is subject to national policy and budgetary constraints. In these circumstances, the relative priority or timeframe for national road schemes may be subject to alteration.</p>
<p>ACCESS TO NATIONAL ROADS</p>	<p>i. General</p> <p>The Authority welcomes the inclusion of Objective CPO 12.41 and Section 2.1.4 Public Roads Appendix 1 Development and Design Standards in relation to safeguarding the capacity and safety of the national road network in line with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012). However, it is a concern that the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities and Road Safety Audit, TII Publication: TII GE-STY-01024 are not included in key documents under Section 2.1 of Appendix 1 Development and Design Standards</p> <p>In addition, TII advises that Section 2.6 of the DoECLG Guidelines requires that where a less restrictive approach to the control of development accessing national roads may be applied this should only be as part of reviewing or varying the relevant development plan. As outlined in the Authority's initial submission on the Draft Plan process, the Authority is available to discuss proposals with the Executive of Wicklow County Council; where the Council proposes to identify 'exceptional circumstances' for agreement with TII, a sufficient and robust evidence base will need to be established.</p> <p>ii. Development at National Road Junctions</p> <p>There are a number of development objectives included in the Draft Development Plan that TII consider require review to ensure consistency with the provisions of the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy, the NTA Transport Strategy and official policy outlined in the National Planning Framework, National Development Plan and the DoECLG Spatial Planning and National Roads Guidelines, in particular; Objectives for Economic Development; Objective 9.3, 9.5, 9.14</p>

& 9.15. The Authority notes with concern the absence of reference to protection of road assets, including national roads in Chapter 9 and in particular Section 9.5 Objectives for Economic Development as well as Objective 9.3, 9.5, 9.14 and 9.15. In particular, TII considers that the protection of national road assets are not supported by Objective CPO 9.3 and CPO 9.5 despite the requirements outlined in Section 2.1.4 Public Roads Appendix 1 Development and Design Standards. It is noted that the Appendix is referenced in CPO 9.14 for architectural issues only. Objective CPO 9.15 seeks to provide for employment development at a number of specific locations that interface with the strategic national road network N11/M11. The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) indicate a requirement to demonstrate that the zoning proposals are consistent with the requirements of the DoECLG Guidelines prior to adoption in the new Development Plan.

The Council will note the requirement for evidence based analysis and mitigation when considering zoning objectives/designations at junctions on national roads. It appears that this is absent from this Draft Development Plan. It is the Authority's opinion that it is inappropriate to continue to pursue the objectives and zoning proposals at junctions on the N/M11, in the absence of the requirements outlined in Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

The Council will be aware that the Authority has previously commented on a number of the relevant zoning proposals during the process of drafting and adoption of the County Development Plan, 2016 – 2022.

The Authority outlines the following detailed observations in relation to the specific locations concerned under CPO 9.15:

□ **Map ref. 09.01 (Mountkennedy Demesne, Kilpedder)** indicates a zoning objective to facilitate a Data Centre facility. TII acknowledges the past planning history of the subject site.

As indicated earlier, the Council has previously committed to preparing a framework plan for lands adjoining the N11 junction at this location. This framework plan remains outstanding.

The Authority still awaits a copy of the Junction Upgrade Strategy for the Ballyronan Junction as previously committed to by the Council. The Authority also recommends that previous correspondence between the Council and the Authority on this matter is taken into consideration in the development of any zoning strategy for Newtownmountkennedy, please find attached copy of referred to correspondence. It should be noted that this letter was agreed prior to the publication of Section 28 Statutory Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities, the NTA Transport Strategy for the Greater Dublin Area and the National Planning Framework.

The proposals to zone lands at this location appear to be inconsistent with the zoning principles outlined in Section 3.5 of the Draft Plan and are proposed in the absence of the evidence base required under Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

TII consider that the proposed intensification of the direct access to the N11, national primary road, is considered to be at variance with the provisions of the DoECLG Spatial Planning & National Roads Guidelines (2012).

The Authority advises that there is a requirement for an evidence based analysis to support zoning objectives/designations at junctions on national roads. It appears that this is absent in this location. It is therefore recommended that a review of the zoning objectives is undertaken having regard to the impact the development of such lands

could have on the safety and efficiency of the national road network in the area and the impacts such proposals may have for any future upgrade works at the location concerned.

Furthermore, in advance of studies/options to implement identified 'essential improvements' to the N11/M11, the proposal is considered premature and has the potential to conflict with objectives for the M/N11 included in the Draft Plan including road capacity and safety improvements to the main carriageway and associated junctions.

□ **Map ref. 09.02 (Kilpedder Interchange);** although the subject site may be accessed from the non-national road network, the implications for the N11 are not clearly addressed by the Draft Development Plan.

TII considers that the proposed intensification of the junction access to the N11, national primary road, is currently at variance with the provisions of the DoECLG Spatial Planning & National Roads Guidelines (2012).

The Authority advises that there is a requirement for an evidence based analysis with appropriate mitigation to support zoning objectives/designations at junctions on national roads. It appears that this is absent in this location. It is therefore recommended that a review of the current zoning objectives is undertaken having regard to the impact the development of such lands could have on the safety and efficiency of the national road network in the area and the impacts such proposals may have for any future upgrade works at the location concerned.

Furthermore, in advance of studies/options to implement identified 'essential improvements' to the N11/M11, the proposal is considered premature and has the potential to conflict with Objectives for the M/N11 included the Draft Plan including road capacity and safety improvements to the main carriageway and associated junctions, the Spatial Planning and National Roads Guidelines for Planning Authorities, the provisions of the NTA Transport Strategy and in advance of proposals being developed to address the N11/M11 Junction 4 to Junction 14 Improvement Scheme currently been progressed.

□ **Map Ref.09.03 (Ashford);** The Authority acknowledges the purpose of the proposed zoning objective to support the development of established film studios in the area. However, the zoning proposal is progressed in the absence of any transport assessment and/or evidence base as required by the DoECLG Spatial Planning and National Roads Guidelines.

The Authority notes that the specific zoning objective at this location requires the "agreement" of a Masterplan for the entire area. The Authority considers that such an approach to be inappropriate given the significant strategic national road network issues that are unresolved in the proposed zoning designation, specifically concerning the absence of appropriate transport assessment or transport modelling as part of the required evidence base.

With regard to the approach to require a Masterplan, TII would draw the Councils attention to the provisions of both the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines which advise that such plans can supplement or complement but not replace statutory plans.

Also, the DoECLG Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use such non-statutory documents for development management, planning authorities should incorporate them in the development plan or local area plan for the area by way of variation and where possible, public consultation should be integrated into the preparation on non-statutory frameworks. This is not evident in the proposals to zone the subject lands.

TII consider that there is an absence of appropriate plan-led evidence based planning and the absence of future liaison and collaboration with TII in relation to planning exercises promoted by the local authority that have significant implications for the strategic national road network in the area concerned.

In summary, the Council will be aware that there is a requirement for an evidence based analysis to support zoning objectives/designations at junctions on national roads. It appears that this is absent in the locations proposed under CPO 9.15. It is the Authority's opinion that it is inappropriate to continue to pursue the zoning proposals at junctions on the N/M11, in the absence of the requirements outlined in Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines. Such issues should be addressed in advance of any decision to adopt the subject relevant objectives for economic development and particular the zoning designations proposed under CPO 9.15 in the Draft Plan.

Recommendation

The Authority recommends that;

- CPO 9.3 and CPO 9.5 should be amended to reflect national policy as it relates to roads and the requirements outlined in Section 2.1.4 Public Roads Appendix 1 Development and Design Standards.
- An exercise is undertaken to evaluate and amend Employment Development Zonings Map ref. 09.01 (Mountkenedy Demesne, Kilpedder) Map ref. 09.02 (Kilpedder Interchange); Map Ref. 09.03 (Ashford) to demonstrate that the zoning proposals are consistent with the requirements of the DoECLG Guidelines and the N11/M11 Junction 4 to Junction 14 Improvement Scheme currently been progressed prior to adoption into the new Development Plan.

iii. Volume 2 Part 1 Self Sustaining Town Plans

The Authority notes under Section 3.5 that current plans for a number of towns are subsumed in to the draft County Development Plan. In addition, there is the commitment to prepare new local area plans for the main settlements in the County. The Authority would welcome consultation on the relevant local area plans where there may be implications for the national road network in the area. In relation to existing settlement plans included in the Draft Plan, the Authority provides the following observations;

i. Baltinglass

TII notes Action Area Plan 1 has frontage on the N81 with a proposal for the location of a discount food store. TII is seriously concerned with this Action Area Plan and the mechanism for the preparation and endorsement of this action area plan. The subject area proposes significant development which will predominantly rely on access via the N81 where a speed limit greater than 50kmph applies. It is considered that this action area plan will materially impact the national road network As indicated in Section 1.2.3 of Volume 2, the approach to the preparation of this action area plan appears to require a developer-led Action Area Plan which will inevitably be part of the development management process.

There is no indication of the evidence base required nor statutory provisions which would apply. In addition, TII would draw the Councils attention to the provisions of both the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines which advise that such plans can supplement or complement but not replace statutory plans. Although the Council will note that the Guidelines refer primarily to non-statutory studies or frameworks prepared by local authorities and not developers.

Also, the DoECLG Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use such non-statutory documents for development management, planning authorities should incorporate them in the development plan or local area plan for the area by way of variation and where possible, public consultation should be integrated into the preparation on non-statutory frameworks. The primary issue, in this regard, relates to the absence of appropriate statutory plan-led evidence-based planning and the absence of future liaison with TII in relation to planning exercises promoted by the local authority that may have significant implications for the national road network in the area concerned. The Authority considers that such issues can be addressed in advance of adoption of the County Development Plan.

The Council will be aware that the DoECLG Spatial Planning and National Roads Guidelines require that development should be Plan-led, as outlined above. The promotion of developer led action area exercises without consultation and liaison by the local authority with TII (and the NTA) and in the absence of strategic transport evidence base requirements is wholly inappropriate and leads to substantial risks for national roads assets and future development. The DoECLG Guidelines also require that planning authorities must also ensure that they consult with the NRA (now TII) in preparing any local area plans or other non-statutory plans where there may be material implications for national roads.

Recommendation

Action Area Plan 1 has material implications for the national roads network. The Authority requests that Action Area Plan 1 is reviewed to clearly address the deficiencies in consultation, liaison and evidence base requirements and statutory basis.

ii. Newtownmountkenny

Related to issues of concern already highlighted in this correspondence in relation to CPO 9.15, CPO 12.36 and Map 12.01 which need to be addressed prior to adoption of the Draft Development Plan, TII also notes the provision in Section 3.9 Part 3 Newtownmountkenny, for an Action Area Plan 2 Garden Village.

TII is seriously concerned with regard to the mechanism for the preparation and endorsement of this action area plan which has significant development which will predominantly rely on access via a new link road to Ballyronan Interchange. It is acknowledged that this proposal has been included for a significant time, however, TII is of the opinion that this approach to development at this location does not reflect the changing circumstances and policies which have occurred in the intervening period. In addition, it is considered that this action area plan will materially impact the national roads network.

Section 1.2.3 of Volume 2, indicates that the approach to the preparation of this action area plan appears to require a developer-led Action Area Plan which will inevitably be part of the development management process. There is no indication of the evidence base required nor statutory provisions which would apply.

TII would draw the Councils attention to the provisions of both the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines which advise that such plans can supplement or complement but not replace statutory plans. Although the Council will note that the Guidelines refer primarily to non-statutory studies or frameworks prepared by local authorities and not developers.

Also, the DoECLG Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use such non-statutory documents for development management, planning authorities should incorporate them in the development plan or local area plan for the area by way of variation and where possible, public consultation

	<p>should be integrated into the preparation on non-statutory frameworks. The primary issue, in this regard, relates to the absence of appropriate statutory planned evidence-based planning and the absence of future liaison and collaboration with TII in relation to planning exercises promoted by the local authority that may have significant implications for the strategic national road network in the area concerned. The Authority considers that such issues should be addressed in advance of adoption of the County Development Plan.</p> <p>The Council will also be aware that the DoECLG Spatial Planning and National Roads Guidelines require that development should be plan-led, as outlined above. The promotion of developer led action area exercises without consultation and liaison by the local authority with TII (and the NTA) and in the absence of strategic transport assessment with recommendations is wholly inappropriate and leads to substantial risks for national roads assets and future development. The DoECLG Guidelines also require that planning authorities must also ensure that they consult with the NRA (now TII) in preparing any local area plans or other non-statutory plans where there may be material implications for national roads.</p> <p>Recommendation</p> <p>TII advises that Action Area Plan 2 Garden Village has material implications for the national road network. The Authority requests that Action Area Plan 2 Garden Village (page 51-52) is reviewed to clearly address the deficiencies in consultation, liaison and evidence base requirements and statutory basis.</p>
<p>SPECIFIC POLICIES AND OBJECTIVES</p>	<p>The Authority acknowledges and welcomes the inclusion of objectives in the Draft Plan that relate to safeguarding the strategic function of the national road network. However, it is noted that there are a number of policies and objectives outlined elsewhere in the Draft Plan, and, if read in isolation may not guide applicants/developers to appropriate policy concerning development impacting on national roads.</p> <p>In that regard, TII would welcome, in the interests of clarity, additional cross referencing in the Draft Plan with Objective CPO 12.41 and Section 2.1.4 Public Roads Appendix 1 Development and Design Standards with objectives that facilitate development proposals with the potential to impact directly on national roads or that generate a transport demand on the national road network contained elsewhere in the Draft Plan.</p> <p>i. Housing</p> <p>The Authority notes with concern the absence of reference to protection of public road assets, including national roads in chapter 4 and in particular Section 4.3 Settlement Strategy Objectives.</p> <p>Consistent with the provisions of the DoECLG Spatial Planning and National Roads Guidelines, it is the opinion of the Authority that such appropriate housing development needs to be facilitated in a manner that does not conflict with safeguarding the strategic function of the national road network in the area concerned, in the interests of road safety and in accordance with the provisions of official policy. In terms of the Draft Plan approach to Rural Housing, the Authority acknowledges the tradition of rural living in County Wicklow and the identified need of particular rural settlement housing categories to live in the urban and countryside.</p> <p>However, TII would highlight that the Spatial Planning and National Road Guidelines for Planning Authorities states that the provisions related to national roads applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant. The Council will also be aware of the provisions of Section 3.3.4 of the Sustainable Rural Housing Guidelines (2005).</p> <p>Recommendation</p>

The Authority advises that

- A cross reference is included with Objective CPO 12.41 and Section 2.1.4 Public Roads Appendix 1 Development and Design Standards of the Draft Plan especially in relation to Settlement Level 5-9 to ensure applicants/developers are fully aware of the provisions of official policy concerning access to national roads at the earliest stages of project development to ensure consistency with the provision of official policy.
- An additional CPO 4.3 should be added as follows:
"To ensure that the safety and capacity of Wicklow's roads are safeguarded in accordance with Section 2.1.4 Public Roads Appendix 1 Development and Design Standards of the Draft Plan."

ii. Retailing

The Authority notes and welcomes the support for safeguarding town centres and promotion of the sequential test outlined in the Objectives for Centres and Retail. The following recommendation is advised in the interests of clarity to ensure future applicants are aware of implications for proposals on national roads.

Recommendation

TII recommends that CPO 10.5 is amended as follows:

"To assess all planning applications having regard to the 'Retail Planning Guidelines for Planning Authorities' and Retail Design Manual (DoECLG, 2012), and Spatial Planning and National Roads Guidelines for Planning Authorities (2012) unless otherwise stated herewith."

iii. Energy Infrastructure and Communications

Chapter 16 of the Draft Plan refers to the County's approach to Energy. It is noted with concern that matters related to the interactions of such infrastructure and roads are not dealt with. TII would particularly emphasise the importance of such assessments where there may be implications for the safety and efficiency of the strategic national road network given the high speed and highly trafficked nature of such roads such as the M/N11. For example, Solar PV development proposals referred to under 16.2.1.2, TII requires the submission of Glint and Glare Assessment to assess impacts on road user safety. It is important that mitigation proposed is robust from the earliest stages of construction and/or commissioning and is sufficient to function year round.

In addition, for all renewable energy developments requiring grid connection (Section 16.2.7) to the national grid, TII recommends that an assessment of all alternatives for grid connection routing should be undertaken. It is considered inappropriate to only consider utilising the strategic national road network as a grid connection route when alternatives are available. From a review of the Draft Plan, it does not appear that this issue is considered.

In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance and safety works to existing roads. Constraints and costs arise to on-line road improvements and upgrades also especially for national roads.

Recommendation

Having regard to the foregoing, TII would welcome an objective included in the adopted Development Plan, in relation to renewable energy and in relation to safeguarding the national road network. It would also be important that objective CPO 6.20 indicates that it should be demonstrated that an assessment of all alternative grid

connection routing options have been undertaken prior to any proposals being brought forward for grid connection routing utilising the road network including national road .

iv. Appendix 1 Development and Design Standards

The following need to be addressed:

- (a) DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities and Road Safety Audit, TII Publication: TII GE-STY-01024 are not included in key documents under Section 2.1
- (b) TII advises that Design Manual for Roads and Bridges (DMRB) has been subsumed into TII Publications. It is recommended that the Draft Development Plan text is checked to ensure that this matter has been dealt with consistently throughout the text especially in Appendix 1.

- (c) Signage/Advertising: Section 4.1.4 and 4.2.4 do not align with Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines nor TII Policy on the Provision of Tourism and Leisure Signage on National Roads (2011).

The Authority acknowledges that advertising and signage has been addressed in CPO 12.68 – 12.74 of the Draft Plan and the reference to TII Policy on the Provision of Tourist and Leisure Signage on National Roads is welcome. However, the Planning Authority is also referred to Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. The Authority would welcome reference to Section 3.8 of the DoECLG Guidelines within the relevant sections of the Draft Plan in the interests of clarity.

TII notes with concern that the Council 'will' facilitate signage for Failte Ireland approved tourist accommodation at the ends of motorway/dual carriageway off-slips only, however, in the Authority's opinion, the text should advise that the Council 'may' facilitate such signage proposals. Amending 'will' for 'may' ensures closer compliance with the Policy on the Provision of Tourist and Leisure Signage on National Roads (2011).

Recommendation:

The Authority is of the opinion that the exceptions to the general presumption against signage on national roads included in CPO 12.70 conflict with the provisions of the Section 28 DoECLG Guidelines and TII Policy on the Provision of Tourist and Leisure Signage on National Roads and TII requests that the Council review this matter in the interests of road safety and consistency with official policy.

- (d) Traffic and Transport Assessment (TTA) and Road Safety Audits (RSA): The Authority recommends that planning applications for significant development proposals should be accompanied with TTA and RSA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring and other planned/proposed developments on the road network.

In that regard, the Authority notes the reference to the TII/NRA Traffic and Transport Assessment Guidelines in Section 2.1.4. However it is noted that the requirements for Traffic and Transport Assessment and Road Safety Audit are not included in the text of Section 2.13, Section 2.1.4, Section 3.2, Section 3.2.4, Section 4.0, Section 4.1.8, Section 4.2, Section 4.3, Section 4.3.5, Section 4.3.6, Section 5.0 or Section 7.0.

Chief Executive's Response

A: National Road Network

- i. General, and
- ii. M/N11 National Development Plan Scheme

It is not considered necessary to include further detail of NSO-2 and NSO-6 of the NPF in the plan, particularly in Section 3.6 as suggested, as said NSOs are already set out in various parts of the plan. The draft plan as written provides more than adequate detail regarding national, regional and county objectives and priorities regarding transportation; however it is accepted that additional detail regarding 'international connectivity' should be included as this affects the M/N11 particularly. In light of this suggestion, an amendment is recommended to Section 3.6 as set out in the appended document.

With respect to amending various objectives such as 12.26, 12.27 and 12.36 to include more reference to the M/N11 role as a carrier of interregional traffic, including freight, from the south-east to Dublin and vice-versa, there is a concern that such a change in emphasis of the description or characterisation of the function of the M/N11 could serve to 'limit' or constrain this route to one whose *primary* purpose is the carrying of such inter regional traffic, rather than as a route that does indeed carry such traffic but also serves the existing and future residents of Wicklow for access to local and Dublin jobs markets, for inter-town movements and for public transport etc. It is important that both functions are retained and one not prioritised over the other. It is noted that the NDP does not suggest that carrying traffic from Dublin to the south-east is the only function of the M/N11. Therefore no changes are recommended to these objectives.

- iii. M/N11 Development Plan Schemes

Arklow third interchange - While it is noted that a third interchange at Arklow is not scheduled in the NDP, and that it is not a 'priority' for the TII, the Arklow by-pass was designed and constructed in such a manner as to facilitate the possibility of the third interchange. It is accepted however that further assessment and justification for this objective may be necessary and therefore as suggested this objective will be assessed as part of the commenced Arklow and environs ABTA, and in the event that it cannot be justified on traffic grounds, this objective can be reviewed in due course. The ACTA is unlikely to be completed by the time this Draft Plan can be amended, so any further amendment, if found necessary, would have to be made by way of variation. In the meantime however it is not recommended to omit this objective.

Ballyronan interchange - the improvement of the Ballyronan interchange has long been an objective of the Council given its substandard configuration from the outset and therefore it is reasonable that this is retained in the plan. With respect to the link road to the Kilcoole Road from Ballyronan, the feasibility and necessity for this link has not been assessed in detail at this time, although the ABTA for the Greystones- Delgany – Kilcoole area commenced in late 2021 is likely to examine the issue of access to south Kilcoole, at this time is considered appropriate to omit this objective from the plan.

Glen Of The Down junction - notwithstanding that a northern link into Greystones from the Glen Of the Downs interchange is only a long term concept and has not been studied in depth, it is considered prudent that the possibility of such a link should be retained in the plan in order to ensure no development / road improvements that occur during the lifetime of this plan would prejudice this possibility in the longer term, for example any large scale development at the Greystones 'end' of the possible route.

iv. N81

It is noted that not all of the objectives outlined in 12.37 for the N81 are currently in the NPD or scheduled for funding. The TII's acceptance that some of the improvements are more localised projects, which there is no issue with including in the plan, is noted.

v. LOR

It is noted that the Leinster Outer Orbital Route is not a scheme identified in the NTA transport strategy and that funding is not at this time allocated to same. The TII does not make reference to the fact that this scheme is included in the RSES.

The TII has pointed out that these projects are not included in the 'Strategic Infrastructure Assessment' appendix. With respect to Arklow and Glen Of the Downs, these are considered to be long term objectives and therefore development in these settlements is not at this time dependent on the delivery of these objectives within the lifetime of the plan. With regard to the Ballyronan interchange, the various studies carried out by the TII with respect to the N/M11 Junction 4 to Junction 14 Scheme did not identify any capacity issues with respect to this junction at this time, and it appears that adequate capacity is likely to be available to meet the planned growth of Newtownmountkennedy. However the purpose of the upgrade is not necessary to enhance capacity, but rather safety (as this junction was not built at the outset to national standards) and potentially to provide for a new local link to address particular HGV traffic on Kilcoole Main Street. However, future development in Kilcoole is not dependent on the delivery of this link and it was not included in the infrastructural assessment for Kilcoole.

B: Access to National Roads

i. General

Issues raised noted – no changes to plan recommended.

ii. Development at National Road junctions

With respect to Objective 9.3, 9.5 and 9.14, these are generic objectives regarding the location and design of new employment generating development (not necessarily employment development on or near the national road network) and it is not considered necessary to add reference to protection of road assets, as that is a given for all development types (having regard to the various objectives already set out in Chapter 12 and Appendix 1) and adding such text would only serve to complicate and lengthen said objectives; indeed such an additional provision if considered essential could be added to many other objectives of this plan. Where objectives or standards apply to all development types, it is sufficient for this to be stated once and not repeated anywhere and everywhere that it might be applicable.

With respect to Objective 9.15, the TII advises that it is inappropriate to pursue the following zoning objectives in the absence of evidence based analysis that such zoning are consistent with the DoECLG Spatial Planning and National Road Guidelines and points out that these zoning are also inconsistent with the Draft Plan's zoning principles.

Mountkennedy Demesne, Kilpedder (Data Centre): While the TII considers this objective 'premature' pending more detail traffic assessment, the fact that there is already permission for the development type supported by this zoning is not acknowledged, and therefore pre-development analysis is somewhat moot at this stage. Furthermore, the Minister's acceptance of this zoning in the previous Development Plan is also not noted.

Kilpedder Interchange: It is put forward that the implications of this zoning on the adjacent the national road interchange, have not been addressed nor has the impact of same on the M/N11 improvement scheme. Again however the TII does not note the fact that some of these lands are already developed or have permission for development for employment uses. Again

the Minister's acceptance of this zoning in the previous Development Plan is also not noted. However, having regard to the concerns raised, and indeed raised in other submissions; it is recommended that the zoning be reduced in scale to omit the northern portion.

Ashford (Film Studios): It is suggested that this zoning is inappropriate as it has been progressed in the absence of necessary transport assessment and / or evidence as required by the guidelines. The requirement of the agreement of a masterplan for the lands is also questioned, and suggested that it is inappropriate given the issues that arise with respect to potential impacts on the national road network, and that such issues should be resolved prior to zoning. Again however the TII does not note the fact that most of these lands already have permission for development for film studio use. Again the Minister's acceptance of this zoning in the previous Development Plan is also not noted. In these circumstances, it is recommended that the zoning be retained in the plan and no change is recommended.

**iii. Volume 2
Baltinglass**

The TII is concerned with the impact of the development of Action Area 1 which directly accesses the N81 where a speed limit greater than 50kph applies. While it is stated that the development would have a 'material impact' on the national road, the primary concern relates to the absence plan-led evidence-based planning and the absence of future liaison with the TII/NTA, and ensuing implications for the N81, through the master planning process. Attention is drawn to the DoECLG Sustainable Residential Development in Urban Areas Guidelines as regards master plans; and raises concerns regarding 'developer-led' approach.

In response to this, it is not clear how the TII considers it could be excluded from the process when it is in fact making a submission with respect to the proposed zoning at the plan-making stage, and thereafter were an application made, it would be a prescribed authority to which any application would be referred. Other agencies (such as the NTA) and indeed the public similarly have opportunities through this development plan process and the planning application stage to engage with the process. It is noted that the TII in this regard, although given the opportunity, has not in fact set out that it objects to the designation of these lands for future development, or that it has identified a significant adverse impact of traffic safety or the carrying capacity of the road that would arise from its development.

Therefore it is recommended to retain this action area, subject to the amendments recommended on foot of other submissions are detailed in Section 2 of this report.

Newtownmountkennedy

The TII raises concerns with respect to Action Area 2 south of Garden Village, and the impacts of the development of this land on the national road network. In light of the concerns raised by the TII and by others in other submissions, it is recommended that this Action Area be omitted.

C: Specific policies and objectives

i. Housing

It is suggested that there should be more cross referencing in housing objectives with the need to protect public road assets. However as set out above, the necessary objectives with regard to the protection of road assets and infrastructure are already included in the plan, (in particular Chapter 12, especially Objective 12.43 and Appendix 1) and therefore it is not considered warranted to re-state these in multiple locations through the plan.

With respect to housing seeking to provide access from the national road, the draft plan is very clear with respect to requirement in this regard (Objective 12.41, Appendix 1, Section 2.1.4).

Therefore no changes are recommended.

- ii. **Retailing**
It is requested that Objective 10.5 is amended to include reference to the *Spatial Planning and National Roads Guidelines*; this is not however considered necessary as these guidelines apply to all development types.

- iii. **Energy Infrastructure and Communications**
Concerns are raised about the interaction of energy proposals for the safety and efficiency of the national road network.
With respect to 'glint and glare', from solar farms, the Draft Plan references the standards / guidance that will be utilised in the assessment of such applications, such as that developed in the UK by BRE National Solar Centre, which clearly details how to assess and address such issues.
With respect to grid connection issues and the possible use of the national road as a grid connection route, this is not considered a matter that the development plan should provide policy on, as it will be up to the TII to make a decision on any application for such use of the road / that comes before them, and their own standards / policies would apply.
In terms of traffic movements and traffic safety generally, any impacts arising from such large scale projects are already adequately addressed in the objectives and standards set out in the Draft Plan.

- iv. **Appendix 1**
The 'Spatial Planning and National Roads Guidelines' are already listed in the Development & Design Standards introduction, but not in Section 2.1, and it is recommended that this be amended. The 'Road Safety Audit' document is also recommended to be listed. It is recommended that the DMRB detail be changed from 'NRA' to 'TII'.
Signage: The CE is satisfied that the plan objectives sufficiently accord with the TII guidance and no changes are recommended.
TTA / RSA: Such assessments are required for all development types when certain criteria / thresholds are fulfilled, as required by Objectives 12.31 and 12.32 of the Draft Plan. It is not considered necessary therefore to reference these in the 10+ sections listed by the TII where they *might* be relevant in the Development and Design Standards appendix.

Chief Executive's Recommendations

Amend the Draft Plan as follows:

Volume 1

Chapter 3, Section 3.6

See '**Proposed Amendments to Chapter 3**' appended to this report.

Chapter 9, Objective 9.15

Kilpedder Interchange (Map 09.02) - Amend scale of zoning as shown in map booklet appended to this report.

Volume 2, Newtownmountkennedy Town Plan

Omit Action Area 2 Garden Village including Ballyronan link road objective (map and associated text in Sections 3.4, 3.6, 3.7, 3.9)

Volume 3, Appendix 1

Introduction – add the following guidance documents to Section 2.1

DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities

Road Safety Audit, TII Publication: TII GE-STY-01024

DMRB detail be changed from 'NRA' to 'TII'.

Name	Geological Survey of Ireland (GSI)	Sub ID: C2-109
Topic	Issue raised	
Geoheritage	<p>We are pleased to see the 62 Wicklow County Geological Sites (CGSs) listed in Table 4.1, Section 4.8.1 'Geological Sites' and delineated in map form in Figure 4.8 'County Geological Sites' in the draft SEA report and in Schedule and Map 17.07 of the draft CDP.</p> <p>In Chapter 17 'Natural Heritage and Biodiversity' of the CDP, we commend the inclusion of county geological sites in the following policy objectives: 17.28, 17.29, and 17.30.</p> <p>The Geological Heritage Programme views the Local Authorities as critical partners in protecting, through the planning system, those CGS which fall within their county limits. In many cases these are often sites of high amenity or educational value, already zoned or listed in the plan. Listing in the CDP provides protection of the sites against potentially damaging developments that normally require planning permission, such as building, quarrying, landfilling or forestry. It is also important that the democratic process of public consultation and approval by councillors of the CDP means that stakeholders in the sites and all the local community can buy into the process.</p> <p>County geological Sites have been adopted in the National Heritage Plan, and will form a major strand of geological nature conservation to complement the various ecological and cultural conservation measures. It is important to note however, that management issues for the majority of geological heritage sites may differ from ecological sites, and in some cases development may facilitate enhanced geological understanding of a site by exposing more rock sections - for example, in a quarry extension. Consultation at the earliest stages can identify any issues relevant to an individual site or proposed development.</p> <p>County Geological Sites are the optimal way of addressing the responsibility of each authority under the Planning and Development Act 2000 and its amendments, to protect sites of geological interest.</p>	

<p>Culture and Tourism</p>	<p>Over the past number of years geology has become a large part of Irish tourism. Ireland currently has three UNESCO Global Geoparks, and a number of other geotourism projects. These Geoparks, along with other tourism initiatives such as the Wild Atlantic Way, Irelands Ancient East, and Irelands Hidden Heartlands have bolstered tourism in various parts of Ireland and helped to increase its levels in areas that were previously not as popular with tourists. We are encouraged by Wicklow County Council continuing this trend, making the geological audit information easily available to the general public by way of a popular book, 'Glaciers, Glens and Granites' due to be published later this year. We would encourage geology to be a significant part of any tourism initiatives that may be introduced.</p> <p>We welcome the inclusion of policy objective CPO 17.31. In Chapter 9 Economic Development, Extractive Industry section, we note policy objective CPO 9.53.</p> <p>In Volume 2, Part 4, Laragh – Glendalough Settlement and Tourism Plan, we welcome the Tourism Objective LG5 to "Particularly promote tourist developments that are associated with the following tourism products or themes:(iv) mining heritage,and (vii) natural heritage and education."</p> <p>In Volume 2, Part 3, Small Town Plans, Section 2.3 Avoca Specific Development Objectives, we are pleased to see the development objective 2. "To particularly facilitate and promote tourist developments that are associated with the following tourism products or themes: (i) the area's mining heritage..... (iii) outdoor recreational activities e.g. walking / Red Kite Walk Loop, activities associated with River Avoca etc."</p> <p>We would ask that the design of any future signage to consider the use of information panels as appropriate to highlight the significance of a County Geological Site or an area of geological and/or geomorphological interest that are in the vicinity of waymarked and signposted walking routes/trails.</p> <p>We would be happy to provide support in relation to how best to present and promote the geological heritage of County Wicklow as a geo-tourism initiative.</p>
<p>Dimension Stone/Stone Built Ireland</p>	<p>Stone Built Ireland is a 2 year research collaboration agreement between Geological Survey Ireland, Trinity College Dublin & the office of Public Works. The project aims to document building and decorative stone in Ireland to inform government agencies, building owners and conservationists of the sources for suitable replacement stone in restoration work and to develop a greater awareness among the general public.</p> <p>In addition to promoting citizen science and awareness of local materials, the inventory will aid the public in complying with part 4 of the Planning and Development Act 2000, which requires owners to conserve protected structures. It will also assist local authorities in issuing Section 57 Declarations, which outline 'the type of works which it considers would or would not materially affect the character of the structure or any element of the structure'.</p> <p>This project will build on work already completed funded by the Irish Research Council (March 2019 - September 2020) that carried out primary research on the topic and developed a simple database and web-based platform as well as hosting various heritage displays at venues. This project would be of benefit to Section 8.3 'Architectural Heritage', in Chapter 8 Built Heritage, of the draft CDP.</p>
<p>Groundwater</p>	<p>Geological Survey Ireland's Groundwater and Geothermal Unit, provides advice, data and maps relating to groundwater distribution, quality and use, which is</p>

especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions.

In the SEA environmental report, we are pleased to see use of our Groundwater data sets in Sections 3.6 'Water', 4.9.5 'Ground Water' and 4.9.6 'Aquifer Vulnerability and Productivity' and as maps in Figure 4.12 'Groundwater Vulnerability' and Figure 4.13 'Groundwater Productivity'. We welcome the listing of Public Water Supply and Group Scheme Preliminary Source Protection Areas in Section 4.8.3 'Source Protection Areas' and in map form in Figure 4.8. Please ensure that use of our data or maps is attributed correctly to 'Geological Survey Ireland'.

Geological Survey Ireland has mapped groundwater resources (aquifers) and their vulnerability across Ireland, plus protection areas around selected groundwater-fed drinking water supplies.

We note reference to the Wicklow Groundwater Protection Scheme undertaken jointly between Geological Survey Ireland and Wicklow County Council. The local authority should include the Groundwater Protection Scheme information within the CDP/SEA via a combination of the land mapping outlined above and the groundwater protection responses for potentially polluting activities available on our website.

Geological Mapping	Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data in your future assessments. We welcome use of these datasets for policy objective CPO 17.27, in Chapter 17 'Natural Heritage and Biodiversity' of the CDP.
Geohazards	<p>Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.</p> <p>In the SEA report, we are pleased to see use of our online mapping data sets for Landslide Events and Landslide Susceptibility in Section 4.8.4 'Landslides' and as a map in Figure 4.9 'Landslide Susceptibility and Previous Landslide Events'. Please ensure that use of our data or maps is attributed correctly to 'Geological Survey Ireland'.</p> <p>Coastal Vulnerability while seen as a potential geohazard, is discussed in more detail under our marine and coastal unit information below.</p>
Geothermal Energy	<p>We note reference to geothermal energy in Chapter 16 Energy & Information Infrastructure, Section 16.2.1.6 of the draft CDP. We commend the inclusion of geothermal policy objectives in the draft CDP. Geothermal energy harnesses the heat beneath the surface of the Earth for heating applications and electricity generation, and has proven to be secure, environmentally sustainable and cost effective over long time periods. Geothermal applications can range in depth from a few metres below the surface to several kilometres. Ireland has widespread shallow geothermal resources for small and medium-scale heating applications, which can be explored online through Geological Survey Ireland's Geothermal Suitability maps for both domestic and commercial use. We recommend use of our Geothermal Suitability maps to determine the most suitable type of ground source heat collector for use with heat pump technologies. Ireland also has recognised potential for deep geothermal resources.</p> <p>The Roadmap for a Policy and Regulatory Framework for Geothermal Energy was launched at the Geoscience 2020 Conference in November 2020. The Assessment of Geothermal Resources for District heating in Ireland and the Roadmap for a Policy and Regulatory framework for Geothermal Energy in Ireland documents have been developed to support the Government's commitments under the Climate Action Plan 2019 and the Programme for Government.</p>
Natural Resources (Minerals/Aggregates)	<p>Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. Geological Survey Ireland highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process.</p> <p>Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our Minerals section of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer.</p> <p>We welcome the inclusion of policy objective CPO 17.32 in Chapter 17 'Natural Heritage and Biodiversity' of the CDP:</p> <p>In Section 4.11.8 'Minerals and Aggregates' of the draft SEA report, we are</p>

	<p>pleased to see mention of our Aggregate Potential Mapping, Bedrock Mapping, Quaternary and Physiographic, and National Aquifer and Recharge datasets that would be of benefit to planning and individual projects. We welcome the inclusion of the Mineral Localities map in Figure 4.18.</p> <p>In Chapter 9 Economic Development, Extractive Industry section, we commend the inclusion of our 'Geological Heritage Guidelines for the Extractive Industry' guide listed in Policy Objective CPO 9.54: "To have regard to the following guidance documents (as may be amended, replaced or supplemented) in the assessment of planning applications for quarries and ancillary facilities".</p> <p>Aggregates are an essential natural resource for the construction industry and with the Government of Ireland "Building Ireland 2040" plan, understanding of aggregate source and supply will be important. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer. We would welcome the consideration of aggregate potential sterilisation included as part of the draft SEA / CDP.</p>
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<p>Geochemistry of soils, surface waters and sediments</p>	<p>Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality.</p> <p>Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and litho-geochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture (Terra Soil), waste soil characterisation (Geochemically Appropriate Levels for Soil Recovery Facilities) and mineral exploration (Mineral Prospectivity Mapping).</p>
<p>Geophysical data</p>	<p>Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gamma-ray radiation) of soils & rocks as part of the Tellus programme. These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk. The Tellus programme provides expertise to the Environmental Protection Agency (EPA) for the determination of radon risk. The data is used in mineral exploration or is useful in aiding site investigation works for large scale projects. The Geochemistry and Geophysical datasets would be of benefit in Chapter 4 'Environmental Baseline', Section 4.8 'Soil' of the SEA environmental report. These datasets would be a useful addition to the list of Geological Survey Ireland datasets that would be useful in "planning and assessing individual projects with regard to the environmental topic(s) of soil and/or material assets".</p>
<p>Historic Mines</p>	<p>The EPA, Geological Survey Ireland and the former Exploration & Mining Division undertook a joint project entitled "Historic Mine Site - Inventory and Risk Characterisation (HMS - IRC)". This project carried out detailed site investigations and characterisation on priority historic mine sites in the country. A risk ranking methodology was developed which categorised the sites according to the risks posed to human and animal health and the environment. The project commenced in January 2006 and was completed in December 2008. A final report and a GIS geodatabase was produced on completion of the project. Reports and maps available at https://www.epa.ie/enforcement/mines/. The project provides an understanding of the impacts of historic mining sites in Ireland and their status at the time of the study.</p> <p>There are several historic mine sites in the county including Avoca, Glendalough–Glendasan and Glenmalure districts. The data from this project would be of benefit when assessing and/ or promoting the Industrial Heritage of Wicklow in Section 8.3 'Architectural Heritage', in Chapter 8 Built Heritage, of the draft CDP.</p> <p>In Volume 2, Part 4, Laragh – Glendalough Settlement and Tourism Plan, we welcome the Tourism Objective LG5 to "Particularly promote tourist developments that are associated with the following tourism products or themes (iv) mining heritage."</p> <p>In Volume 2, Part 3, Small Town Plans, Section 2.3 Avoca Specific Development Objectives, we are pleased to see the development objective 2. "To particularly facilitate and promote tourist developments that are associated with the following tourism products or themes: (i) the area's mining heritage."</p>

<p>Marine and Coastal Unit</p>	<p>Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders.</p> <p>Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping & Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure & Tourism and Coastal Behaviour.</p> <p>Of particular interest to tourism is the extensive database of shipwrecks mapped by the INFOMAR programme, many lost close to the coast and with engaging human interest stories associated with them</p> <p>INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment We would therefore recommend use of our Marine and Coastal Unit datasets available on our website and Map Viewer.</p> <p>The Marine and Coastal Unit also participate in coastal change projects such as CHERISH (Climate, Heritage and Environments of Reefs, Islands, and Headlands) and are undertaking mapping in areas such as coastal vulnerability and coastal erosion.</p>
<p>Coastal Vulnerability Index</p>	<p>Geological Survey Ireland is undertaking a new coastal vulnerability mapping initiative. Maps produced by this project will provide an insight into the relative susceptibility of the Irish coast to adverse impacts of sea-level rise through the use of a Coastal Vulnerability Index (CVI). Currently the project is being carried out on the east coast and will be rolled out nationally, detailed information and maps are available here. These index-based maps will offer a simple, easy visual representation of sensitive areas based on robust methods and conceptualised metrics from latest research, adapted to the Irish context. This will enable coastal managers to prioritize or concentrate efforts on adaptation. We note reference to the CVI mapping initiative in Section 4.11.6 Coastline, of the SEA Report. The CVI data for Wicklow is due to be published at the end of October 2021.</p> <p>The above datasets will be of benefit to the policy aims and objectives contained in Chapter 14 Flood Risk Management and Chapter 19 Marine Planning and Coastal Zone Management of the CDP, in particular, the Coastal Erosion & Flooding and Marine Economy / Blue Economy areas.</p>
<p>Chief Executive's Response</p>	
<p>Geoheritage Noted – no changes suggested or recommended.</p> <p>Culture & Tourism The only suggestion under this heading relates to signage and information panels, which are already supported in the Draft Plan (CPO 8.27, CPO 11.8). No change is therefore recommended.</p> <p>Dimension Stone/Stone Built Ireland Noted – no changes suggested or recommended.</p> <p>Groundwater The data sources are noted; the Draft Plan and SEA include groundwater vulnerability mapping. No changes</p>	

are required.

Geological mapping

Noted. The datasets detailed will be utilised WCC where necessary. No changes are required.

Geohazards

Noted. This is addressed in objective CPO 17.27. No changes are required.

Geothermal Energy

Noted – no changes suggested or recommended.

Natural Resources (minerals / aggregates)

Noted – no changes suggested or recommended.

Geochemistry of soils, surface waters and sediments

Noted – no changes suggested or recommended.

Geophysical data

Noted – this is addressed in the SEA section of this report.

Historic Mines

Noted. The datasets detailed will be utilised WCC where necessary. No changes are required.

Marine and Coastal Unit

Noted. The datasets detailed will be utilised WCC where necessary. No changes are required.

Coastal Vulnerability Index

Noted. The datasets detailed will be utilised WCC where necessary. No changes are required.

Chief Executive’s Recommendations

No change

Name	Health Service Executive	Sub ID: C2-131
Topic	Issues raised	
General	<p>In regards to the Wicklow County Development plan, and the future of the communities within the Wicklow County Area, we would like to raise a number of priority areas which we at the Department of Public Health believe are major issues for consideration in the drafting of the Development Plan.</p> <p>Our recommendations are based on national policies, national and international scientific evidence, and practical observations and local knowledge from our Public Health operational work in County Wicklow.</p> <p>A number of current government policies and frameworks will be referenced below. A key government framework on which this submission is built is the Healthy Ireland: A Framework for Improved Health and Wellbeing 2013 – 2025. There are four major Goals to this framework:</p> <ul style="list-style-type: none"> • Increase the proportion of people who are healthy at all stages of life • Reduce health inequalities • Protect the public from threats to health and wellbeing • Create an environment where every individual and sector of society can play their part in achieving a healthy Ireland 	
Communities	<p>There is now widespread recognition that communities have a vital role in improving health and wellbeing. People should be supported by the amenities of their community and feel enabled to achieve their health goals in these settings. International evidence has shown that a number of interventions improve social cohesion and liveability. To achieve the goals of healthy Ireland and meet targets relating to improved health and reduced health inequalities, it is essential to focus on effective ways to empower people and communities to improve and take responsibility for their own health and wellbeing.</p> <p>We suggest the development of community health in the following areas:</p> <p><u>Reduce health inequalities</u></p> <ul style="list-style-type: none"> • Address health inequalities by ensuring additional efforts are made to involve local communities at risk of poor health. This includes people who are vulnerable, marginalised, isolated, elderly, disabled or living in deprived areas • Develop communities that provide for people of different physical, social and cultural needs, and that financial means are not a barrier to interaction across communities • Address and prioritise health literacy in developing future policy, educational and information interventions • Develop strategies to enhance social connectedness across the life course and to connect people most in need to resources, services, education and healthcare <p>Develop a community which supports life-long health</p> <ul style="list-style-type: none"> • Develop communities which promote health by encouraging people to be active and choose sustainable transport methods • Increase “open spaces” and access to green and blue spaces, particularly for children, as per the policy action in “Better Outcomes Brighter Futures” framework. This is promoted by the HSE “National Healthy Childhood Programme”. • Support childhood health and reduce obesity by developing healthy environment initiatives to promote and increase physical activity and active transport. Monitor and restrict exposure to high calorie, salt, sugar foods and advertising. This could include no “fry zones” close to schools, playgrounds and transit routes. Reduce 	

	<p>exposure to pollutants and chemicals, including air and noise.</p> <ul style="list-style-type: none"> • Support and link existing partnerships, strategies and initiatives that aim to: <ol style="list-style-type: none"> 1. Improve the decision-making capacity of children and young people through strengthening self-esteem, resilience, responses to social and interpersonal pressure, health and media literacy (including social media literacy) 2. Fully implement Social Personal and Health Education in primary, post-primary and Youth reach settings, including implementation of the Physical Education programme and the Active Schools Flag initiative and increase the proportion of young people who complete full-time education 3. Improve the capacity of parents, carers and families to support healthier choices for their children and themselves 4. Support older people to maintain, improve or manage their physical and mental wellbeing and help to remove barriers to participation of older people in all aspects of cultural, economic and social life in their communities 5. Enable people to age with confidence in comfort, security and dignity in their own homes and communities for as long as possible. <p>Improve social and business infrastructure:</p> <ul style="list-style-type: none"> • Support local industry and business while fostering local culture and heritage • Aim for the provision of the key infrastructure, such as availability of high speed broadband, to support development of local business and to facilitate remote working where appropriate • Creating 'activity friendly' environments such as cycle lanes, playgrounds and well-lit paths. De-prioritise towns and villages as a place for private transport predominantly cars <p>Involve people in the development of a healthy community:</p> <ul style="list-style-type: none"> • Support development of collaborations and partnerships to encourage local communities to take part in initiatives to improve their health and wellbeing and reduce health inequalities. Use local networks and community and voluntary organisations to help achieve this • Involve people in peer and lay roles to represent local needs and priorities • Strengthen participation in decision making for health and wellbeing at community level. For example, through local authorities, community services funded by Government or through the health service user involvement strategy <p>Protect the community from threats to health and wellbeing:</p> <ul style="list-style-type: none"> • Social determinants of health (including income and social protection, environmental health, education, unemployment, working conditions, housing, social inclusion) account for 30-55% of health outcome and addressing these appropriately is fundamental for improving health (6). • Aim to reduce the impact of SARS-CoV-2 on Wicklow Communities. Ensure ongoing compliance with infection control and public health advice, promote vaccination uptake, promote ongoing mental and physical wellbeing during the pandemic.
<p>Transport and Travel</p>	<p>Transport enables access to social and economic opportunities such as education, employment and recreation all of which influence population health. In 2019, 79.9% of all road journeys were made via private vehicle demonstrating the dominance of cars in Ireland's transport sector. Unfortunately, this bears a number of consequences for population health. Fossil-fuel powered transport contributes to air pollution, noise pollution and is a driver of anthropogenic climate change. Road traffic accidents are also a significant driver of morbidity and mortality. Lastly, car reliance is a likely</p>

	<p>contributor to obesogenic environments. In light of this, we suggest facilitating a modal shift from private vehicles to more sustainable options such as public transport where possible active transport where possible in Wicklow. Naturally, private vehicles will remain necessary for some transport.</p> <p>Increase access to and use of public transport:</p> <ul style="list-style-type: none"> • Public transport usability and accessibility should be at the centre of all transport policies. This should ultimately aim to make public transport the easiest and most affordable transport option for Wicklow’s residents. This is likely to require expansion of bus and rail network to provide more frequent connections. • Public transport options should be sustainable (electric or low-emission where possible). • Emphasis should be placed on provision of regular public transport to socioeconomically disadvantaged areas. This can be a catalyst for reducing disadvantage in communities as it ensures access to social and economic opportunities, such as education and employment, particularly for those who would be otherwise unable to avail of them. This could help reduce health inequalities in Wicklow. <p>Facilitate active transport (e.g. walking and cycling)</p> <ul style="list-style-type: none"> • Active transport should be encouraged and supported through promotion, safety provision and dedicated infrastructure. This will benefit population health directly, through increased physical activity, and indirectly, via mitigation of climate change and reduced air and noise pollution. • Although we recognise that active transport may not be suitable for longer commutes, many shorter journeys that are currently undertaken via car could be suitable for walking or cycling if the correct infrastructure was in place. • Protected cycling lanes should be implemented, as these have been shown to increase cyclist safety and safety concerns about cycling is one of the barriers to more widespread uptake of cycling. • Implementing active transport infrastructure to encourage children to cycle or walk safely between school and home should be a key priority. Between 1986 and 2016, the proportion of children walking or cycling to primary school halved in Ireland while car usage for journeys to school more than doubled (15). Reversing these trends could increase levels of physical activity amongst children in Wicklow which would be protective of both physical and mental health in later life. <p>Facilitate uptake of electric vehicles</p> <ul style="list-style-type: none"> • Private vehicles will still be necessary for some journeys. Thus it will be important that the residents of Wicklow are provided with the necessary infrastructure for electric vehicles, such as accessible and affordable charging points, to enable transition away from fossil-fuel powered vehicles.
Housing	<p>Housing is known to be a crucial determinant of physical and mental health. While the effects of homelessness are well understood, the effects of inadequate housing are less well publicised. Falls in the elderly population and childhood illness are both associated with poor housing. Population growth means that the demand for quality housing has outstripped supply in many areas of the country, and Wicklow is not immune from this trend. House prices in the have seen a corresponding rise. As of March 2021, house prices in the South-East have risen 5.4% compared with the same period in 2020, a trend that is likely to continue following the switch to remote working for many former commuters. The following policies can help promote a healthy housing strategy.</p> <p>Building sustainable communities:</p>

	<ul style="list-style-type: none"> • Promoting walkable, smaller scale town centres. • Promoting a sense of place and local identity. • Decentralise provision of public services. • Integrate with transport policy to promote active transport. • Promoting the concept of the “15 minute city” <p>Design of new developments:</p> <ul style="list-style-type: none"> • Accessibility – Ensuring adequate home adaptations are made for older residents or those with reduced mobility to allow them to remain in their homes for longer. • Co-ordinate the development of social and affordable housing to create balanced developments, thereby avoiding social class segregation. • Optimising the use of brownfield sites and regeneration to reduce the burden on greenfield areas. • Promoting the ongoing use of health impact assessments in the planning stages of new developments, to incorporate air and noise pollution measures <p>Facilitating a designated lead to deliver these targets within a specified timeframe and with adequate resources.</p>
<p>Environment and Climate Change</p>	<p>Climate change is the greatest threat to global health of the 21st century. At present, Ireland is already experiencing the effects of climate change and this will intensify over the coming years without effective adaptation and mitigation policies at local, national and international levels. It is worth noting that implementing climate mitigation and adaptation policies are not only of benefit in terms of climate change, many also have ancillary health benefits. For instance, decarbonisation of energy sources reduces air pollution, modal shifts to active transport increases physical activity levels, and reduces air and noise pollution, and increasing greenspace has been associated with a wide range of health benefits. As outlined in Healthy Ireland, there are a number of concerning health trends in Ireland; We have an ageing population, increasing non-communicable disease burden and our health services are under strain. The global Covid-19 pandemic has exacerbated the pressure on our health services and without appropriate action, climate breakdown will do the same. Therefore, we suggest prioritisation of policies to combat climate change that have health co-benefits. Examples of such policies are detailed below:</p> <p>We suggest</p> <ul style="list-style-type: none"> • Expanding and supporting the possibilities for local, sustainable energy production such as personal solar panel, solar farms and wind energy. This could also provide opportunities for local employment. • Supporting expansion of digital infrastructure to facilitate remote working. Remote working will reduce emissions associated with commuting and may also enable individuals to have more time for recreation including exercise and time with families. • Appropriate management of greenspace to optimise accessibility while simultaneously supporting biodiversity and aiding carbon sequestration. • As detailed in the transport section; facilitate a modal shift to public and active transport where possible and promote uptake of electric vehicles.
<p>Chief Executive’s Response</p>	
<p>There is considerable overlap in this submission with other submissions of the HSE (3 received). A number of the issues raised are addressed already in this report (see Submission C2-45).</p> <p>This submission does not suggest any particular changes or amendments that might be made to the Draft Plan to address the areas of concern outlined, so it is not evident that this submission relates to the Draft</p>	

Wicklow County Plan but rather is a more general submission for development plans, such as might be expected at the first stage consultation.

It is generally considered that the issues raised are addressed in the Draft Plan, where they are relevant to such a land-use framework:

Communities

The suggestions made in this regard are all already addressed in the Draft Plan – for example in Chapter 2, where Healthy Placemaking is identified as cross cutting high level goal of the plan, Chapter 5 (Placemaking for Towns & Villages), Chapter 7 (Community Development), Chapter 8 (Built Heritage), Chapter 9 (Economic Development), Chapter 12 (Sustainable Transportation), Chapter 16 (Energy and Communications), Chapter 17 (Natural heritage & Biodiversity), Chapter 18 (Green Infrastructure)

Transport & Travel

The suggestions made in this regard are all already addressed in the Draft Plan – in particular in Chapter 12 (Sustainable Transportation), Chapter 16 (Energy and Communications),

Housing

The suggestions made in this regard are all already addressed in the Draft Plan – in particular in Chapter 6 (Housings) and the Housing Strategy, Chapter 5 (Placemaking for Towns & Villages), Chapter 12 (Sustainable Transportation), the Design & Development Standards (Appendix 1)

Environment and Climate Change

The suggestions made in this regard are all already addressed in the Draft Plan – for example in Chapter 7 (Community Development), Chapter 9 (Economic Development), Chapter 12 (Sustainable Transportation), Chapter 16 (Energy and Communications).

Therefore no changes are recommended on foot of this submission.

Chief Executive’s Recommendations

No change

Name	Irish Water (IW)	Sub ID: C2-216
Topic	Issues raised	
EMRA Regional Spatial and Economic Strategy	Irish Water acknowledges the planning policy and direction provided in the National Planning Framework and the adopted East and Midlands Region Regional Spatial and Economic Strategy (RSES) and we are committed to supporting the policies therein, subject to budgetary and environmental constraints. In this regard we would draw your attention to Section 10 of the RSES which provides general policy direction in relation to the sustainable management of water.	
IW Investment Plan (2020 to 2024)	Irish Water's Investment Plan is the budgetary plan for the five year period from 2020 to 2024 inclusive, in line with our strategic objectives as detailed in the Water Services Strategic Plan (WSSP). It sets out where we are continuing to invest and prioritise where we can deliver the most urgently needed improvements to drinking water quality, leakage, water availability, waste water compliance, efficiencies and customer service. In providing these services we play a central role in enabling economic growth, protecting both the environment and the health and safety of our customers and the public. The list of projects and programmes included in our Investment Plan is continuously being refined and is subject to budget, technical and environmental constraints, as well as statutory approvals. Further information can be found on the CRU Website www.cru.ie	
The National Water Resources Plan (NWRP)	Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country. A three-pillar approach will be used in the NWRP: <ul style="list-style-type: none"> • Lose Less- leakage reduction and network efficiency • Use Less- water conservation measures • Supply smarter – sustainable supplies. <p>Following public consultation, the NWRP Framework Plan was adopted in Spring 2021. The next stage of the NWRP is now underway which will involve the development of four regional water resources plans which will identify plan-level approaches to address the identified need in a sustainable manner. Consultation on the regional plans will commence later in 2021.</p>	
Proposed Core Strategy & Availability of water services Wastewater	It is the policy of Irish Water to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or waste water treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance. (This could be highlighted in Chapter 13 of Draft CDP) The County is served by 38 wastewater treatment plants. Available capacity at any plant varies daily. Where there are constraints, applications for developments would be on a first come, first served basis. If no project is associated with a constrained area, then any infrastructure will be developer led. Irish Water can work with developers to form the best solution for a particular site. This would be through the	

	<p>Connections and Developer Services section of Irish Water’s website. https://www.water.ie/connections/developer-services/</p> <p>Wastewater Networks</p> <p>Throughout the County, general capital maintenance upgrades are on-going through Network programmes based on needs. This includes rehabilitation of sewers, upgrades to pumping stations, assessment of storm water overflows and installation of telemetry inline with national programmes.</p> <ul style="list-style-type: none"> • The Bray Drainage Area Plan (DAP) is near completion. Network Plans are being developed to service growth. • A DAP will start in 2022 to cover Greystones, Kilcoole, Delgany & Newcastle.
<p>Proposed Core Strategy & Availability of water services</p> <p>Water</p>	<p>The National Water Resources Plan (NWRP) is carrying out a review of all WRZs in the country to determine projects to resolve deficits on a nationwide scale. For WRZs where we have deficits leakage control and water conservation will be of utmost importance and the availability of water will be on a first come, first served basis with priority given to domestic customers. Developers of non-domestic developments should review their proposals to see if they can maximise efficiency in their water requirements.</p> <p>The North of the County (extending down to Wicklow town and across to Blessington) falls within the Water Supply Zone for the Greater Dublin Area and supply in the GDA is currently constrained. As stated above, the NWRP will address these issues.</p> <p>The Water Supply Project (WSP), which is an in-flight project, still remains the project identified to deliver a ‘new source’ water supply for the Eastern and Midlands area. Whilst various analysis done to date continues to indicate that WSP is the preferred approach for the Eastern and Midlands Region, this will require review and confirmation in light of the NWRP (Framework and Regional Plans and associated statutory consultations and SEAs). Following the publication of the draft Regional Plan for The Eastern and Midlands Region (Group Area 4), the WSP will be reviewed, after which it is anticipated that WSP will be subject to further public consultation. Abstraction Legislation is expected to be enacted later this year, after which planning permission will be sought from An Bord Pleanála for the Strategic Infrastructure Project.</p> <p>While it is envisaged that domestic development will not be inhibited by the above risks in the immediate future; it is likely that Irish Water will need to upgrade infrastructure to support growth in Wicklow over the Medium to Long term.</p> <p>Proposed non-domestic developments and larger domestic developments will need to be assessed on a case by case basis, to determine how their additional demands can be supplied.</p>
<p>Commentary on Capacity of Infrastructure and Core Strategy</p>	<p>The table (included in submission, not reproduced here) gives a snapshot of capacity of some of the larger settlements in relation to the proposed population targets given in the Draft Plan (<i>Note these figures are estimates and are subject to change</i>). There are constraints in the sewer networks in some settlements. Other areas, particularly if zoning changes are proposed, infrastructure will have to be assessed on a case by case basis. As above, developers should enquire through the above web link.</p>
<p>Climate Change</p>	<p>Irish Water is focused on addressing the impacts of climate change by adapting our assets to be resilient to climate change and mitigating our climate impact by reducing our carbon footprint. Irish Water is preparing a strategy which will respond to global and national climate change legislative and policy frameworks for climate change action and fulfils the requirements of Irish Water’s Water Services Strategic</p>

	<p>Plan 2015, The Water Services Policy Statement 2018 – 2025 and most recently the Climate Change Sectoral Adaptation Plan for Water Quality and Water Services Infrastructure 2019.</p> <p>Irish Water is happy to work with the local authority to ensure the overarching goals of mitigating against, and adapting to, climate change in relation to water and wastewater are achieved.</p>
<p>Drinking Water Source Protection – Chapter 13 of Draft CDP</p>	<p>Irish Water has adopted the World Health Organisation (WHO) Water Safety Plan approach. Drinking Water Safety Plans (DWSPs) seek to protect human health by identifying, scoring and managing risks to water quality and quantity; taking a holistic approach from source to tap. The ‘source’ component of DWSPs is a key component and apriority within Irish Water, as protecting and restoring the quality of raw water is an effective and sustainable means of reducing the cost of water treatment in line with Article 7(3) of theWFD and the revised DWD.</p> <p>Irish Water is committed to working with public bodies and other stakeholders to protect drinking water sources. Good examples of where Irish Water is working in partnership with other stakeholders to protect drinking water quality is through the implementation of our Interim Pesticide Strategy and working with the National Pesticides and Drinking Water Action Group (NPDWAG), as well as catchment-specific NPDWAG Catchment Focus Groups. Irish Water is also currently involved in pilot drinking water source protection projects, which aim to trial catchment scale interventions to reduce the risk of pollution in water supplies.</p>
<p>River Basin Management Plan – Chapter 13 of Draft CDP</p>	<p>Irish Water supports the RBMP Implementation Strategy through participation within the RBMP implementation structures and participation in Water Framework Directive characterisation activities. Irish Water is a member of Water Policy Advisory Committee, National Technical Implementation Group, and Regional Operational Committees. Irish Water works collaboratively with the EPA Catchment Science and Management Unit (CSMU) to facilitate the identification of significant pressures and the setting of environmental objectives. In addition, Irish Water supports the Local Authority Waters Programme (LAWPRO) desktop studies and local catchment assessment work through ongoing data sharing. The objectives and priorities of the RBMP 2018 – 2021 have been incorporated into IW investment plans and work programmes as appropriate, and this will continue into the third cycle.</p>
<p>Sustainable Drainage and Green-Blue Infrastructure – Chapter 13 of Draft CDP</p>	<p>Irish Water welcomes the inclusion of policies and objectives supporting the implementationof Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure. SuDS and Green-Blue Infrastructure are encouraged in new developments including the public realm and retrofitted in existing developed areas. These measures can provide a cost effective and sustainable means of managing stormwater and water pollution at source, keeping surface water out of combined sewers (thus increasing capacity for foul drainage from new developments), while providing multiple benefits e.g. improved air quality, amenity, noise reduction.</p>
<p>Planned road and public realm projects</p>	<p>Planned public realm and road projects have the potential to impact on Irish Water assets and projects e.g. tree planting, building over of assets, new connections, programming network upgrades in advance of road project, provision of future-proofing ducts.</p> <p>Development in the vicinity of Irish Water assets should be in accordance with our Standard Details and Codes of Practice, and Diversion Agreements will be required where an Irish Water asset is diverted or altered.</p> <p>Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Irish Water to plan works</p>

accordingly and ultimately minimise disruption to the public.

Chief Executive's Response

EMRA Regional Spatial and Economic Strategy, IW Investment Plan (2020 to 2024), The National Water Resources Plan (NWRP)

Noted – no changes suggested by IW or recommended by the CE in this regard.

Proposed Core Strategy & Availability of water services - Wastewater

The information provided is noted but does not necessitate any changes to the Draft Plan.

It is not considered necessary to include additional text in the Plan regarding the IW process for taking over responsibility (or not) of development provided treatment facilities or networks without prior agreement with IW, as this is already addressed in Objectives CPO 13.17 and 13.18.

Proposed Core Strategy & Availability of water services - Water

The information provided is noted but does not necessitate any changes to the Draft Plan.

Commentary on Capacity of Infrastructure and Core Strategy

The information provided is noted and it is recommended it is utilised to enhance Appendix 9 'Infrastructural Assessment Report'. The proposed amended Appendix 9 is appended to this report.

Climate Change

Noted – no changes suggested by IW or recommended by the CE in this regard.

Drinking Water Source Protection – Chapter 13 of Draft CDP

Noted – no changes suggested by IW or recommended by the CE in this regard.

River Basin Management Plan – Chapter 13 of Draft CDP

Noted – no changes suggested by IW or recommended by the CE in this regard.

Sustainable Drainage and Green-Blue Infrastructure – Chapter 13 of Draft CDP

Noted – no changes suggested by IW or recommended by the CE in this regard.

Planned road and public realm projects

The issue raised is a project management and operational one, and not a matter for the CDP.

Chief Executive's Recommendations

See proposed amended **Appendix 9** (appended to this report)

Name	ESB	Sub ID: C2-232
Topic	Issues raised	
Planning policy and Draft CDP	<p>ESB acknowledges that the process of preparing a new CDP, as set out in Chapter 1 of the Draft Plan, shall be informed by the hierarchy of planning policy in Ireland. This is confirmed in sections 1.3.4 & 1.3.5 of the Draft Plan. In addition, each Chapter links the policy objectives of the Draft CDP to the objectives of both the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES). The important role of the County Development Plan in addressing Climate change is set out in Chapter 2, and it is recognised that it is addressed throughout the plan as a cross cutting theme. The retention of the Wind Energy Strategy (Appendix 5) will play an important role in influencing a reduction in Green House Gas (GHG) Emissions by guiding the sustainable growth of the County. ESB is working towards the delivery of Ireland’s target (part of the pledged EU target) of at least 40% reduction in domestic GHG emissions by 2030 compared to 1990 levels. The Draft National Energy and Climate Plan envisages a target of at least 55% renewable energy in electricity by 2030. In 2019, the Minister of Communications, Climate Action and Environment committed to raise the amount of electricity generated from renewable sources to 70% by 2030 in the Climate Action Plan with no generation from peat and coal. This ambition is needed to honour the Paris Agreement. It represents a significant change for the electricity industry and ESB is committed to doing its part in supporting and delivering on the Government’s energy policy. This aligns with the Strategic Principles of the Draft Plan set out under section 2.4.2</p> <p><i>“Integrate climate change objectives into the County Development Plan to facilitate the sustainable growth of the County, enhance climate resilience and enable the transition to a low carbon, environmentally sustainable economy. The County Development Plan plays an important role in influencing a reduction in GHG emissions by guiding the sustainable growth of the County, encouraging more compact mixed-use development and greater use of sustainable transport options such as cycling, walking and public transport, restricting development in areas that are at risk of flooding and protecting the natural landscape and biodiversity.”</i></p> <p>In reviewing the Draft CDP, ESB has a number of observations in relation to the key issues identified that may set the framework for the future development of the County. ESB supports a new CDP which will include policies and objectives to support the delivery of energy infrastructure to meet future energy needs.</p>	
Electricity Transmission & Distribution	<p>Both the NPF and the RSES contain promoting policies in relation to Energy Infrastructure and ESB fully supports the reinforcement of those policies at a local level that will accommodate the ongoing generation, transmission and distribution of electricity. The County Development Plan 2021 – 2027 must continue to ensure that the long-term operational requirements of existing utilities are protected. In this regard, ESB support the continuance of CDP Objective CPO 16.14 where it states.</p> <p><i>“To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required.”</i></p> <p>The ongoing need for curtilage management and the restriction of lands uses, which might affect the ability to consolidate and/or expand operations, is essential. Therefore, we support the recognition that existing transmission routes are</p>	

	<p>protected from inappropriate development and their scope for development is maintained.</p> <p>ESB supports the promotion of energy infrastructure objectives and submit that they must continue to protect the County's future capacity for the development of energy generating, processing, transmission and transportation infrastructure whilst encouraging the sustainable development of the County's renewable energy resources. In this context, we welcome the inclusion of Policy Objective CPO 16.15 that outlines support for the development of the transmission grid network to sustainably accommodate both consistent and variable flows of renewable energy generated in County Wicklow.</p> <p><i>"To facilitate planned growth and transmission / distribution of a renewable energy focused electricity generation across the main demand centres."</i></p> <p>The North South interconnector will enhance energy systems resilience and increase the capacity of the grids North and South, helping to facilitate the connection of more renewable electricity generation. This is essential to achieve sustainable energy targets set by the EU. As highlighted in the Draft CDP, Wicklow is well positioned to facilitate landing locations for potential cross channel interconnectors and offshore generated wind energy. ESB support the inclusion of Plan Objective CPO 16.19</p> <p><i>"To support and facilitate the development of landing locations for offshore generated wind energy and for any cross-channel power interconnectors."</i></p> <p>The provision of a secure and reliable electricity transmission infrastructure and transmission grid is essential to meet the growth in demand and ensure that a reliable electricity supply is available. Wicklow has a very strong electrical grid and substation network and this network will be instrumental in supporting the development of the renewable energy industry in the county.</p>
<p>Generation & Renewables</p>	<p>In line with the Government's strategies to reach Ireland's 2030 reduced emissions targets ESB is increasing renewables in our power system from 30% to at least 70% with a broader range of technologies likely to be deployed e.g. offshore wind, solar, biomass etc.</p> <p>ESB welcome the vision and ambition set out in Chapter 2 of the Draft CDP – SC07 Climate Resilience & the Transition to a Low Carbon Economy.</p> <p><i>"Support the transition to low carbon clean energy by facilitating renewable energy use and generation at appropriate locations and supporting the development of off-shore renewable energy enabling infrastructure especially at ports and harbours..."</i></p> <p>In reviewing Chapter 16, Information, Communications and Energy, ESB acknowledge the overall consistency and alignment with the objectives of the NPF, RSES and national guidelines and the ambition of Wicklow County Council to contribute to achieving national targets in consultation with local communities and businesses.</p> <p>ESB is developing assets that will support the grid to transition to a low-carbon future such as battery and energy storage assets and flexible gas fired units that respond quickly to system demand, which will be key to facilitating large scale renewables in the future. Set out below are comments in relation to these renewable technologies and ancillary developments in the context of the Draft Plan and our plans for electricity related development across Ireland.</p>

<p>Hydro Energy</p>	<p>Given ESB’s extensive Hydro Energy installations, including the pumped storage installation at Turlough Hill, we welcome the support for hydro energy in section 16.2.1.3 of the Draft CDP. This is underpinned by the inclusion of Objective CPO 16.7.</p> <p><i>“To facilitate the development of expanded or new river / lake-based hydroelectricity plants, subject to due consideration of ecological impacts, in particular, the free flow of fish and maintenance of biodiversity corridors.”</i></p> <p>At present, about two percent of Ireland’s electricity generating capacity is in the form of hydropower. This power derives mainly from ESB’s hydropower stations, with minor contributions coming from smaller, independently owned sites. Excluding pumped storage at Turlough Hill, the Liffey accounts for almost a quarter of ESB’s Hydro Generating Capacity and is fully integrated into the local and national electricity transmission and distribution network. These vital local and national activities require both curtilage space to enable future consolidation and expansion and buffer space to protect against inappropriate new neighbouring development.</p>
<p>Access to ESB Generation Lands</p>	<p>The primary function of ESB is the generation, transmission and distribution of electricity. The Penstock and Power Station, Dams, Embankments, Reservoirs, Headrace and Tailrace Canals, Transmission and Distribution Stations are elements of an integrated Hydro Electricity Generating System. All elements are part of operational plant and require ongoing inspection, maintenance, repair, upkeep and on occasion emergency safety works.</p> <p>Dams, canals reservoirs and embankments constructed for the purpose of electricity generation and can be extremely hazardous. ESB cannot allow open public access due to issues of public safety, site security and operational requirements as these elements are an integral part of an active Power Station.</p> <p>Objective 18.11, Chapter 18, Green Infrastructure, Draft CDP, states. <i>“To support the development of greenways, blueways and other access routes along natural corridors while ensuring that there is no adverse impact on the flora and fauna, biodiversity or water quality of natural assets. In particular, to support the development of existing and examine the feasibility of new walking and cycling trails along the following routes... the extension of the ‘Blessington Greenway’ walk around the Poulaphuca reservoir;”</i></p> <p>The current 6km Blessington Greenway has been operating successfully for a number of years and in conjunction with Wicklow Co. Co. it is intended to extend the Greenway to 42km. Development of the Greenway has been possible because issues such as ownership, maintenance, impact on station operations and liability for the proposed activities have been successfully addressed.</p> <p>Due to the above operational reasons, ESB grant access for the use of its lands where appropriate by.</p> <ul style="list-style-type: none"> • legal agreement which indemnifies ESB and controls the type of activity, • providing access to responsible bodies or organisations which have a particular interest or knowledge of a specified activity, and, • use of appropriate locations where activities can be carried out in a safe manner and do not impact on the operations of the Hydro Scheme. <p>Access to ESB lands under licence is granted where appropriate to organisations</p>

	<p>that have the expertise to manage and control their activities and can indemnify ESB from any liability associated with such activities. In this context, we support Policy Objective 18.11 in relation to the extension of the Blessington Greenway.</p>
<p>Onshore Wind Energy</p>	<p>As mentioned, ESB in partnership with Coillte operates the Raheenleagh Forest Wind Farm in County Wicklow. There are 11 turbines as part of this development with a generating capacity of 35.2 MW.</p> <p>Based on SEAI analysis, February 2020 provided a record-breaking month with 56% of electricity demand met by wind energy, the highest monthly total since records began. In the 12 months to end of January 2020, wind and other renewable sources, hydro, solar and biomass accounted for 37% of demand. This is an encouraging trend and as highlighted in section 16.2.1.1 Wind Energy, Ireland has rich wind resources available.</p> <p>We note Objective CPO 16.1 that encourages the development of wind energy in accordance with the County Wicklow Wind Energy Strategy. ESB support the planned approach to wind energy development through the identification of areas for wind energy development adopted by Wicklow Co. Co. and note the Councils Wind Energy Strategy will be updated when new Ministerial Guidelines with respect to Wind Energy are made. The detailed step-by-step process has resulted in the Wind Energy Strategy Map (Map No.3) and it provides guidance for the development of wind energy projects in the County.</p> <p>ESB wish to highlight, that there is merit in assessing the County Development Plans and Wind Energy Strategies of adjoining counties. It is noted that there is good consistency across County Development Plan's and the Wind Energy Strategies of some counties. However, there is scope to improve on this consistency further in order to facilitate the development of windfarms across county boundaries. Implementation of Regional Policy Objective (RPO 98 and RPO 99) of the RSES would help ensure consistency across the region. Unless this is achieved, a windfarm development on one side of border may not have scale to compete in future Renewable Electricity Support Scheme auctions and therefore may never get built – thereby reducing opportunity for both counties to benefit from jobs, rates and community benefit schemes associated with the windfarm development.</p> <p>As mentioned above, ESB co-owns the Raheenleagh Forest Wind Farm. In this regard, we wish to highlight that there is an opportunity to strengthen the plan with the inclusion of Development Objective to support the life-extension and repowering of existing wind farms. This entails extending the planning lifetime of existing windfarm with no or minimal new development. Well- maintained windfarms and associated plant can operate safely after a planning expiry date of 20-30 years. Existing wind farms have the benefit of acceptance by local communities and contribute economically to the County through the payment of rates and community benefit funds.</p>
<p>Marine Renewables & Offshore Wind</p>	<p>As highlighted in the Draft Plan, the emergence of opportunities to exploit offshore energy potential have developed significantly in recent years and will continue to do so as technology advances in this sector. The Draft National Marine Planning Framework will deliver a new spatial system for the designation of marine zones for offshore energy. This is recognised and supported in the Draft CDP by Plan Objectives CPO 16.3 & CPO 19.3. Given the extensive coastline in Co. Wicklow, opportunities exist in relation to emerging marine renewables.</p> <p>Floating offshore wind (FOW), it is a fast-maturing generation technology and is moving progressively and steadily towards a real commercial opportunity which could unlock the significant potential in Ireland's deeper offshore areas. Most wind turbines today are fixed to the seabed, so-called bottom-fixed, in waters less than 60 metres deep. The next generation of offshore wind turbines are designed to float</p>

	<p>further out to sea, where winds are stronger, but the water depths make bottom-fixed designs uneconomic.</p> <p>The technical resource available to floating offshore wind off the coast of Ireland is immense, with the SEAI, OREDP and the Programme for Government 2020 referencing up to 30GW. The Programme for Government 2020 acknowledges the role floating offshore energy will play in Irelands future, stating:</p> <p><i>"We will also produce a longer-term plan setting out how, as a country, we will take advantage of the massive potential of offshore energy on the Atlantic Coast. This plan will set out how Ireland can become a major contributor to a pan- European renewable energy generation and transmission system, taking advantage of a potential of at least 30GW of offshore floating wind power in our deeper waters in the Atlantic."</i></p> <p>ESB's Brighter Future Strategy sets out a major aspiration to develop in excess of 2GW of offshore wind in Ireland and the UK by 2030. ESB entered into a development partnership with Equinox a global leader in the development of floating offshore wind having successfully constructed Hywind Scotland, the world's first commercial floating wind farm located off the coast of Peterhead in Scotland. The partnership has identified a number of potential offshore wind development sites, along the Irish coastline. The partnership is currently investigating suitable locations for these projects and will shortly make a foreshore licence application to the Department of Housing, Local Government and Heritage.</p> <p>The creation of a new industry presents a major opportunity for economic growth on the Irish coastline and Wicklow has the potential to be at the centre of that development. Wicklow Co. Co. acknowledge that strategically located port facilities and land based supporting infrastructure will be required to support the ambition of harnessing the energy of the marine area. The continuance and reinforcement of these Objectives and Targets will ensure the development of this key supporting ancillary onshore infrastructure required to support this emerging industry.</p> <p>ESB request that Wicklow County Council update the Wind Energy Strategy (Appendix 5) to reference the potential for offshore wind energy development in the Irish Sea along the Wicklow coastline. There is an opportunity to reinforce the favourable policy provision outlined in Chapters 16 & 19 of the main body of the Draft CDP for land based enabling infrastructure such as electrical grid infrastructure such as substations. The need for infrastructure to support the assembly, deployment, and maintenance of the offshore energy structures should also be recognised.</p>
<p>Solar</p>	<p>No single renewable energy technology will deliver Ireland's transition to a low carbon economy but rather a diverse range of technologies will be required. It is predicted that solar will play a significant role in reducing greenhouse gas emissions and thus provide environmental benefits whilst also being complimentary to economic growth. Mapping for solar irradiation illustrates that Wicklow has significant solar resource potential. There has recently been a significant decrease in the cost of solar PV panels and this technology should offer possibilities for increased development of solar energy for electricity generation in the county.</p> <p>Photovoltaic (PV) systems which produce electricity directly from solar radiation are becoming more widespread as their advantages become apparent and as costs fall. Policy Objective RE 4 Solar Energy Developments in the Draft CDP supports the growth in solar photovoltaics and solar thermal use in the County.</p> <p><i>"To support the development of commercial scale ground mounted solar PV 'Solar</i></p>

	<p><i>Farms' subject to compliance with emerging best practice and available national and international guidance."</i></p> <p>Solar projects will play a critical role in diversifying our renewable generation portfolio for the period out to 2030. Ireland is in a great position to take advantage of the significant reduction in the cost of solar energy over the past few years as the technology has advanced with the potential to provide a clean, diversified renewable electricity source for decades to come. Solar energy is suited to Ireland's climate and we expect to follow the trend of other European countries and see increasing deployment of rooftop and grid scale solar energy. There is a strong correlation between wind and changing weather systems. In times of low wind there are often good solar conditions.</p> <p>As highlighted, Wicklow County Council has significant existing grid network presenting the opportunity to maximise energy generation by solar means. In this regard and in the absence of national planning guidelines for solar developments we welcome that the footnote associated with CPO 16.6 explains the approach that will be taken in the assessment of planning applications for Solar Wind Farms.</p> <p>ESB wish to highlight that solar farms have potential to be built on agricultural land, whilst also accommodating the continued use of the land for grazing or for incorporating biodiversity measures within a project.</p> <p>We also wish to highlight that the overall guidance on solar developments could be strengthened with the provision for extension of duration of permission. Currently, Solar PV developments can take in excess of 5 years to develop to construction phase. Securing a grid connection, relevant support tariff or corporate power purchase agreement and securing project finance has introduced significant delays for developers. Therefore, notwithstanding the provisions of Section 42 of the Planning & Development Act 2000 (as amended), it may be more appropriate for the Planning Authority to retain the option to grant permission for a longer period if requested by the developer in appropriate circumstances.</p> <p>In addition, the lifetime of solar developments is extending with most technologies now suitable for a minimum of 30 years operation. Investment decisions for projects are being made on project lifetimes of up to 40 years. In this regard, ESB request that permissions are granted with a lifetime up to a maximum of 40 years. Concerns regarding the deterioration of the infrastructure can be addressed by the lodgement of a financial security in the form of a bond and the requirement to provide a Decommissioning Plan, as specified. This will ensure that the development is maintained until decommissioned and appropriately restored to agricultural use.</p>
<p>Hybrid Renewables</p>	<p>Hybrid renewables consists of two or more renewable energy sources used together to provide increased system efficiency as well as greater balance in energy supply, whilst optimising use of existing infrastructure. By developing hybrid renewables plant consisting of wind, solar and battery exporting from common point of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved on.</p> <p>As mentioned above, repowering with hybrid renewables can grant a new lease of life to existing windfarms and other generation sites. As recognised in the Draft CDP, County Wicklow is well served by the grid with an existing 220kV and 110kV transmission lines providing a high capacity path for power on the east coast of Ireland. Utilising existing infrastructure will enable accelerated connection of onshore and offshore wind to the system. By utilising hybrid connections, offshore wind projects can be efficiently delivered in a more cost-effective manner when compared to building a dedicated offshore wind grid electrical connection</p>

	<p>infrastructure. For these reasons, ESB encourage Wicklow County Council to consider the inclusion of a Policy Objectives similar to the text below.</p> <p><i>"To support and facilitate the co-location of renewable energy developments and technologies to ensure the most efficient use of land identified as suitable for renewable energy generation".</i></p>
<p>Battery Storage & Hydrogen Energy</p>	<p>Energy Storage systems such as batteries, liquid air and synchronous condensers are some of the technologies being explored that will be essential to smoothing out the natural variability that occurs in renewable energy sources and to provide electricity at times of peak demand. Utility- scale battery storage systems are being utilised in order to enable more efficient use of renewable energy.</p> <p>ESB are installing Battery Energy Storage Systems (BESS) at existing generating facilities across Ireland. BESS will operate by charging batteries using electricity exported from the national grid. When the stored energy is required, it can be released to stabilise the frequency of the electricity network or provide energy during periods of electricity shortages. We welcome the inclusion of Objectives in support of Battery Storage as an appropriate renewable energy resource in the final Plan.</p> <p>In addition, ESB wish to highlight, that Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. This enables zero carbon backup to the power system when intermittent renewables such as wind and solar are not available. Large scale Green Hydrogen production and storage could leverage the continental scale of Ireland's renewable energy potential to enhance Ireland's energy security and to make Ireland a net exporter of energy.</p> <p>There is scope to further expand the Draft CDP with the inclusion of specific policy as set out below for supporting these new technologies.</p> <p><i>"Support the research and development of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport."</i></p>
<p>Renewables-Enabling Plant</p>	<p>Notwithstanding the Government's aim to increase the percentage of electricity generation from renewables to 70% by 2030, the contribution from non-renewable sources will still consist of 30%. Furthermore, on dull still days or nights, almost all electricity may sometimes need to come from non-renewables generation.</p> <p>We note that the requirement for renewables-enabling plant is not acknowledged in the Draft CDP. The inclusion of the text below as a promotional Objective for the development of Renewable Enabling Plant assist in the transition to a low carbon economy.</p> <p><i>"It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand."</i></p> <p>ESB support this provision as it will be a necessary to connect additional non-renewable plant to the grid. This efficient plant can be applied rapidly to provide operational flexibility and the required grid support services, when needed. Typical plant consists of fast-responding gas turbines (i.e. FlexGen plant) to provide backup power and synchronous condensers to provide inertia & grid stability. FlexGen gas turbines need to be located close to existing 110kV or 220kV stations and the gas grid.</p> <p>Overall, ESB supports the promotion of energy infrastructure objectives and submit</p>

	<p>that they must continue to protect the County's future capacity for the development of energy generating, processing, transmission and transportation infrastructure whilst encouraging the sustainable development of the County's renewable energy resources.</p>
<p>Telecommunications</p>	<p>The provision of high-quality telecommunications infrastructure is recognised by Wicklow County Council as critical to the development of a knowledge economy and will help attract inward investment in hi-tech, knowledge-based industries.</p> <p>ESB supports the approach and the view of Wicklow County Council that to facilitate the provision of telecommunications services at appropriate locations within the County, the applicant must demonstrate compliance with national guidance. The Draft Plan recognises that applications for telecommunications development shall be consistent with the updated guidelines (PL 07/2012) that facilitate the improved development of telecommunications infrastructure and promotion of a policy of co-location. Appendix 1 Development & Design Standards, section 2.4 set out the required standards.</p> <p>ESB's telecoms infrastructure in the county continues to assist in delivering enhanced communications networks through the provision of backhaul fibre and shared telecommunications towers. In addition, ESB Telecoms are working with ESB Networks to upgrade internal ESB Communications Networks to facilitate the roll-out of ESB's 'Smart Metering' project. The successful delivery of 'smart metering' is a central component of Ireland's plan to combat climate change through the reduction of unnecessary energy usage. Due to the extent and reach of the electricity network, additional masts may be required in some locations to ensure the delivery of 'smart metering' to all areas. ESB Telecoms will work within the development management standards to deliver this infrastructure.</p> <p>We welcome the inclusion of section 2.4 in Appendix 1, as all ESB Telecoms Mast sites are open for co-location and duplication of infrastructure is reduced as a result. ESB supports the Telecommunications policy that promotes co-location. ESB encourages policies consistent with national guidance to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.</p>
<p>Sustainable Transport & Electric Vehicles</p>	<p>With Ireland's natural advantages in terms of wind and other renewables a large proportion of the power used by electric cars will be carbon free in the future. The Irish Government's Climate Action Plan 2019 has set stretching targets for EV adoption in Ireland to address energy demand and reduce emissions from Transport including achieving:</p> <ul style="list-style-type: none"> • 840,000 passenger vehicles by 2030. • 95,000 electric vans and trucks by 2030. • Procuring 1,200 low-emissions buses for public transport in cities. • Building the EV charging network to support the growth of EVs at the rate required and develop our fast-charging infrastructure to stay ahead of demand. <p>The above targets demonstrate that EV's (incl. plug-in hybrid electric vehicles PHEV's) are central to Government targets for zero carbon emissions transportation systems. The establishment of EV infrastructure by ESB and the associated EV usage aligns with the key principles and benefits of sustainability and the National Climate Change Strategy on reduction of emissions.</p> <p>ESB welcome the inclusion of supportive Objectives such as CPO 12.7 under Climate Action & Environmental Protection Objectives, in Chapter 12. Through CPO 12.8 Wicklow County Council has incorporated the latest standards for the provision of EV Charge points as set out in S.I. No. 393/2021. The implementation of the latest</p>

	<p>standards will facilitate growth in charge point infrastructure, to ensure it becomes a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars.</p> <p>The above standards or similar have been implemented in the latest review of development plans by planning authorities in Ireland. Promoting policies and objectives are facilitating growth in charge point infrastructure, to become a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars.</p>
<p>Other Sustainable Transport</p>	<p>ESB acknowledge that Wicklow County Council has considered Renewable Energy in Transport throughout the Draft CDP. In this regard we wish to highlight that, green renewable hydrogen enables the further electrification of transport, allowing the full decarbonisation of the transport sector, as well as improved air quality as the technology replaces diesel buses, diesel HGV and potentially some diesel trains across Ireland.</p> <p>ESB is currently part of a new, in-service, trial of a fuel cell electric bus in the Dublin area. These buses are powered by hydrogen produced from renewable electricity from ESB's Ardnacrusha hydro- electric power station. ESB has been actively engaging with Hydrogen Mobility Ireland (a partnership of businesses, public sector and academic stakeholders) which is delivering a coordinated approach to the introduction of this new technology. This will ensure that Ireland can benefit from being an early starter in this solution to further decarbonise transport using renewable energy</p>
<p>Conclusion</p>	<p>Investment in infrastructure is crucial to the economic and social well-being of our country. Such investment creates jobs, stimulates economic activity and provides modern, efficient facilities to provide the services that people need including healthcare, education and community services amongst others. There is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. This investment in infrastructure is also necessary to support EU and national policy on Climate Change adaptation and mitigation.</p> <p>ESB, Ireland's leading electricity utility, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. Sustainability, both within the company and in the services we provide, is integral to our corporate strategy. We are committed to reducing carbon emissions and addressing long-term concerns over future fuel supplies. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient and sustainable region. We request that due consideration is given to the issues raised in this submission, most particularly, that the final County Development Plan retains clear policies in relation to:</p> <ul style="list-style-type: none"> • Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the associated Electricity Generation, Storage, Transmission and Distribution operations are strategic and national in nature. • ESB support Policy Objective 18.11 and the extension of the Blessington Greenway. ESB cannot allow uncontrolled public access to our lands at Poulaphuca Reservoir due to issues of public safety, site security and operational requirements. ESB grant access for the use of our land by legal agreements which allow for the control of water levels by ESB to facilitate electricity generation, water supply, fishing etc. Where access is granted for recreational activities it is at selected locations deemed suitable for specific activities. • The final Plan should maintain the planning policies which protect the county's

	<p>future capacity for the development of energy infrastructure whilst encouraging the sustainable development of renewable energy resources, including energy storage systems and landside developments for offshore wind. This will enable ESB to develop and maintain a safe, secure, reliable, economical and efficient electricity Generation, Transmission and Distribution System with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment.</p> <ul style="list-style-type: none"> • Support for hybrid connections (co-location of two or more renewable energy sources) as ESB has determined that enabling hybrid connections alone can expedite the connection of offshore wind. • Wicklow’s coastal location coupled with a good solar irradiation and significant grid network present opportunities to maximise energy generation by solar means. It is appropriate that permissions for Solar PV are granted with a lifetime up to a maximum of 40 years which reflects the operational life and financial modelling for current solar technologies. • Facilitating expansion and improvement in telecommunications infrastructure will help position the county to attract intellectual & physical capital and to act as a mechanism to improve virtual connectivity. • The implementation of the latest standards through CPO 12.8, will facilitate growth in charge point infrastructure, to ensure it becomes a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars.
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Chief Executive’s Response

	<p>Planning policy and Draft CDP Noted – no changes suggested by ESB or recommended by the CE in this regard.</p> <p>Electricity Transmission & Distribution Noted – no changes suggested by ESB or recommended by the CE in this regard.</p> <p>Hydro Energy Noted – no changes suggested by ESB or recommended by the CE in this regard.</p> <p>Access to ESB Generation Lands Noted – no changes suggested by ESB or recommended by the CE in this regard.</p> <p>Onshore Wind Energy The suggestions set out in this part of the submission are noted; those that relate to national or regional cooperation on energy strategies, principles and targets would not be matters that can be addressed unilaterally in this Development Plan but the CE would support the development of a regional renewal energy strategy.</p> <p>With respect to the request for an objective that supports ‘life-extension’ and ‘repowering’ of existing wind farms (i.e. extending the planning lifetime of existing windfarms with no or minimal impact), it is not recommended that such an objective be included in the plan, unless or until same becomes Government policy via the awaited Wind Energy Guidelines. Technologies change, as does what is acceptable or desirable from one generation to the next, and therefore it is considered necessary that the power to periodically re-evaluate such large scale developments is retained.</p> <p>Marine Renewables & Offshore Wind It is not considered appropriate to amend the Wicklow Wind Energy Strategy to include reference to off-shore wind as requested as the WES is an ‘on-shore’ wind strategy and would have no bearing on off shore</p>
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wind development. Where off-shore wind projects require on-shore supporting development, including facilities for assembly, deployment and maintenance, the Draft Plan provides same in Objective CPO 16.2.

Solar

The only suggestion under this heading relates to the duration of permissions and the extension of duration of permission are not matters for the County Development Plan. It is open to the Planning Authority to consider proposals for permission lifespans longer than 5 years and to consider how long a permission with operate through the development management system, on a case by case basis and it is not considered appropriate to include any policy or objective in this regard in the Development Plan.

Hybrid Renewables

The suggested objective is considered reasonable and it is therefore recommended it be added to the Plan.

Battery Storage & Hydrogen Energy

The suggested objective is considered reasonable and it is therefore recommended it be added to the Plan.

Renewables-Enabling Plant

While the issue raised is noted (the on-going need for non-renewable sources), it is not considered desirable to include an objective on the Development Plan to support the development of on non-renewable electricity generating developments. No change is therefore recommended.

Telecommunications

Noted – no changes suggested by ESB or recommended by the CE in this regard.

Sustainable Transport & Electric Vehicles

Noted – no changes suggested by ESB or recommended by the CE in this regard.

Other Sustainable Transport

Noted – no changes suggested by ESB or recommended by the CE in this regard.

Chief Executive’s Recommendations

Amend the Draft Plan as follows:

Volume 1

Chapter 16

Add new objectives:

CPO 16.XX To support and facilitate the co-location of renewable energy developments and technologies to ensure the most efficient use of land identified as suitable for renewable energy generation

CPO 16.XX To support the research and development of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport.

Name	Iarnród Éireann		Sub ID: C2-240
Topic	Issue raised		
General	<p>Iarnród Éireann welcome the updating of the 2021-2027 Development Plan to align with current National and Regional policy, which has developed significantly since the previous Development Plan, concentrating on facilitating compact growth and the alignment of it with public transport infrastructure developments. As the Council is aware, its transport policy at Tier 2 level planning is driven by the National Transport Authority's Transport Strategy for the Greater Dublin Area (2016-2035), which is currently undergoing statutory review. Iarnród Éireann believe it is imperative that the Development Plan ties in with the resultant revised Transport Strategy for the Greater Dublin Area¹, which will provide a framework for the planning and delivery of transport infrastructure and services in Wicklow which are captured in the wider Greater Dublin Area (GDA) over the period to 2022-2042. The Transport Strategy for the Greater Dublin Area provides the backbone for investment in other sectors in Wicklow and the GDA due to the dynamic impact of transport planning with spatial planning. The update of the Transport Strategy for the Greater Dublin Area also comes at a time of a review and update of the National Development Plan and an update of the Climate Action Plan, the outcomes of which will be important to feed into the Development Plan.</p> <p>Iarnród Éireann supports the Councils intentions to, in line with national and regional policy, identify appropriate locations to accommodate compact growth and to consolidate development. Iarnród Éireann strongly believe this should particularly focus locations close to high capacity public transport nodes and in existing settlements where vacant or brown field sites offer potential for re-development.</p> <p>The impact of a significant population growth by 2040 under the National Planning Framework, the changing lifestyle habits as a result COVID-19, and the impacts of climate change, necessitate a rethink of how citizens of Wicklow and Ireland live. The Council has an opportunity in this Development Plan to continue to facilitate a mindset shift for Wicklow towards a more substantial sustainable mobility system integrated into a compact spatial planning framework for housing and commercial development.</p> <p>The remaining parts of this submission will take the shape of Iarnród Éireann's core objective, progress we have made, and our priorities for the future.</p>		
Core Objective and Benefits of Rail	<p>It is Iarnród Éireann's core objective to provide safe, accessible, and integrated rail services for Ireland, that contribute to sustainable environmental, economic, and social development in an efficient manner. It is this key objective that informs our views regarding the future expansion of the suburban rail network within Wicklow County and the wider GDA. By its nature and interrelationship with the wider Intercity rail network, many of the measures proposed for the GDA rail network will have significant spin-off mutual benefits for regional / Intercity rail services and the wider national economy.</p> <p>It is our intention to deliver the following objectives over the Development Plan's period:</p> <ul style="list-style-type: none"> • To continue to put the Customer at the heart of our business • To maximise the railway's contribution to long term sustainable spatial development patterns • To facilitate and encourage economic growth at both a regional and national level • To contribute to the attractiveness of Wicklow as a location to live and do business in • To contribute to and be compatible with all local, regional, and national land-use transport planning policies 		

	<ul style="list-style-type: none"> • To improve rail connectivity and integration in Wicklow and the wider GDA • To facilitate a significant modal shift from the private motor car to public transport and thus to contribute to a significant reduction in road congestion and carbon emissions in line with policy objectives e.g. Smarter Travel, Climate Action Plan • To maintain and renew rail infrastructure and assets to the highest safety standards • To deliver the appropriate quantum of rail capacity to satisfy future needs which will be an attractive value proposition for our customers. <p>Iarnród Éireann believe that heavy rail can play an essential role in supporting the sustainable growth and prosperity of Wicklow and the GDA, and by extension the growth of the wider regions and national connectivity, providing numerous benefits notably:</p> <ul style="list-style-type: none"> • It is a key enabler of local sustainable transport in Wicklow with DART services serving Bray and Greystones, along with outer suburban services between Dublin Connolly and County Wexford serving Kilcoole, Wicklow, Rathdrum, and Arklow. Intercity services to Rosslare Europort also stop at all the aforementioned stations further enhancing the rail options for passengers. This corridor therefore enables inter-regional and Intercity service connection possibilities which are important for connectivity and accessibility on a national level from Wicklow. • The current rail network in Wicklow is an underutilised asset that can be developed with little construction impact on the heavily congested road artery of the M11/N11, providing a continued step change in mobility with limited disruption to traffic flows. • Rail can operate comfortably within a mass transit system, transporting large volumes of passengers, more than any other mode, enabling potential compact dense development growth to be catered for by reliable frequent services. • Rail is largely segregated from other transport modes in the national transport network, avoiding congestion and conflicts associated with road traffic, providing greater punctuality and reliability for citizens of Wicklow. • Rail can provide a step change in improving air quality levels in Wicklow as the Council aims to address climate change and emissions - the average rail passenger creates approximately 28g of CO2 per passenger kilometre vs. 102g per passenger kilometre for road vehicles.
<p>Current Rail Development in Wicklow</p>	<p>The existing Iarnród Éireann rail network plays an important role in the public transport provision in Wicklow as the South Eastern line passes through it, providing DART, outer suburban, and Intercity rail services</p> <p>Iarnród Éireann is committed, subject to funding, to further expand and integrate the railway network, in accordance with national, regional, and local policy, in collaboration with WCC, the Department of Transport, and the National Transport Authority (NTA). Iarnród Éireann’s development of the network in Wicklow is driven by the objectives of NTA’s ‘Transport Strategy for Greater Dublin Area 2016-2035’ and the NTAs ‘Integrated Implementation Plan 2019- 2024’.</p> <p>Since its adoption in February 2016, Iarnród Éireann has made significant progress on the rail objectives contained in the NTAs Transport Strategy for the Greater Dublin Area [hereafter “the Strategy”]. In terms of the Strategy’s rail specific objectives, the majority are included in the NTA’s Integrated Implementation Plan 2019-2024. The Integrated Implementation Plan 2019-2024 supports the delivery of the wider</p>

Strategy. It sets out the central infrastructure investment programme and overall funding provision over the six years. The priorities in the Integrated Implementation Plan align with the objectives and priorities set out in the Strategy, focused on improving public and sustainable transport across the region.

1. DART+ Programme

The DART+ Programme represents the largest heavy rail investment scheme in the history of the State, providing a transformational increase in capacity and frequency of the existing system between Dublin City Centre and the areas of Greystones, Maynooth, Celbridge, Dunboyne, and Drogheda. The DART+ Programme, or simply DART+, is a cornerstone project of the Strategy and the Government's Project Ireland 2040 vision. DART+ is a central pillar in a future integrated sustainable transport system serving Wicklow, the GDA, and the wider Eastern Region². DART+ provides a transformational upgrade change to the future public transport network in two ways; firstly, through infrastructure improvements, including electrification, removal of level crossings, a new depot, and other works, and secondly; through additional rolling stock, combining to double the peak passenger capacity of the heavy rail system into Dublin City Centre from approximately 25,000 passengers per hour in 2019 to over 50,000 by 2028.

DART+, when completed, will have significant benefits to rail passengers from Wicklow offering a higher frequency, integrated rail connections to the heart of Dublin city centre with enhanced interchange possibilities with other existing modes (Luas, bus, Intercity & Suburban rail), as well as the new MetroLink, which will provide end-to-end sustainable transport options to Dublin Airport for Wicklow citizens. Improvements in services south of Greystones are unlocked through DART+. This is discussed later in this submission under our 'Priorities for the future in Wicklow'.

In terms of progress, the DART+ Programme is at Preliminary Business Case stage, a significant milestone to progress its implementation. Development is continuing on each of the infrastructure elements of DART+; DART+ West, DART+ South West, and DART+ Coastal, along with the procurement of new DART+ carriages to maximise the growth in capacity made available through the infrastructure enhancement. The DART+ Coastal infrastructure element is split into two separate sub-elements of DART+ Coastal North and DART+ Coastal South, the latter serving Wicklow County. It is essential that the Development Plan supports the implementation of the full DART+ Programme. The extent of the DART+ Programme and the various elements are summarised in Appendix A.

2. Station Improvement/Other Enhancement Programmes incl. Accessibility

Work is continuing on our Accessibility Programme. Minor upgrade works were substantially completed to 54 stations across the rail network by the end of 2018. During this period Iarnród Éireann also progressed planning and design for more significant upgrades (accessible footbridges typically), at a lesser number of stations, including Connolly Platforms 6/7. The objective of the current Accessibility Programme is to prepare preliminary designs and progress planning and statutory processes for significant accessibility upgrades across 15 stations on the Iarnród Éireann network, 7 of which are within the GDA. The scope will include full compliance with accessibility standards, notably the Technical Specification for Interoperability (TSI) for Persons with Reduced Mobility. These improvements are essential for the inclusivity and mobility of Persons with Reduced Mobility within the transport network, while recognising that the recommended enhancements would improve access for all users, to some degree.

3. Other Fleet Enhancements

In terms of addressing the short term demands on heavy rail services, approval of the business case for 41 intermediate intercity railcars (ICRs) was obtained in 2019. When delivered, the additional fleet will allow for improvements in capacity and frequency on commuter services in the GDA as well as on Intercity services.

4. Network Development

The Strategy anticipated that a number of additional stations will be opened or added to the network in developing areas which have a sufficient level of demand to support the provision of a train station. Iarnród Éireann have progressed the planning and development of a number of new stations to add access to the network, these are:

- Woodbrook DART station on the South-East Line
- Pelletstown station on the Maynooth Line, which will be completed in 2021,
- Kishoge station on the Kildare Line

5. East Coast Railway Infrastructure Protection Programme: Dublin-Rosslare Rail Corridor

Iarnród Éireann welcomes the inclusion of Objective CPO12.13 in the draft Development Plan, in which the Council, as part of a wider objective to improve Dublin-Rosslare services, aims to “ensure coastal protection measures are put in place to protect the railway line from coastal erosion and to consider identifying corridor options for route continuity in the event of coastal land loss”. Below is a brief description of this critical project, including the problem it aims to address, its impacts, and the current status of progress.

The Problem

The Dublin-Rosslare rail line [the “Rosslare Line”] is a critical rail corridor on the Iarnród Éireann network serving one of the principal transport routes on the eastern side of the country along the N11/M11 corridor. DART, suburban, and Intercity services operate along the corridor providing essential mobility and access between key population centres and Dublin. Rail passenger volumes have been growing significantly on the Rosslare Line over the past decade and rail is a popular mode choice for many people living in the towns and settlements served by the railway. There are over 21 million DART passengers and circa 385,000 suburban/Intercity passengers who regularly depend on the railway line along the east coast.

In Ireland, railway infrastructure is susceptible to climate change impacts due to the close proximity of railway lines to dynamic natural features such as coastlines, peatlands, estuaries, and rivers. Natural processes such as erosion, surge levels, wave overtopping, fluvial and pluvial flooding combined with increased extreme weather cycles due to climate change, are exerting ever more pressure onto exposed sections of the network. These challenges are particularly prominent on the Rosslare Line due to its exposed coastal characteristics for large sections of the route. Storm surges and sea level rise, overtopping and damage of sea defences, ingress of sea water onto track and lineside equipment and coastal erosion of the track corridor presents serious challenges to the future operability of the railway and major inconveniences to passengers.

Impacts

The impacts of coastal erosion on the east coast of Ireland from Dublin County, through Wicklow County, and on to Wexford County are increasingly evident with

large swathes of land being lost on an annual basis. Some areas have seen encroachment through an accumulated loss of coast of up to 30 meters in the last 10 years alone resulting in large losses of land and habitats. The erosion rates have increased significantly within the last 20 years compared to the previous 100 years. Incursions have reached such an extent that the existing railway line between Dublin and Rosslare is at real and looming risk of loss to the impacts of climate change.

A range of reactive interventions continue to be routinely undertaken to prevent coastal losses in the short term and to offset the encroachment, however these interventions offer only immediate protection for a limited timescale and do not address the fundamental and underlying impacts of climate change along the entire east coast rail corridor. In 2018, Iarnród Éireann and Wicklow County Council commissioned a Coastal Erosion study to identify the impact of climate change effects on this stretch of coastline. This study examined projected effects up to the 2100 horizon year. The study identified key areas where immediate intervention and long-term intervention is required. The consequential economic, environmental, and social cost of a lack of sustainable intervention on the Rosslare Line will be extremely detrimental to counties on the east coast, with the outcomes unimaginable for future generations.

Preferred Alleviation Programme

To address the very imminent threat to the operability of the Rosslare Line, a number of critical areas requiring urgent intervention on the route have been established for targeted intervention. These designated coastal rail sections represent an urgent need for intervention with varying degrees of criticality and priority, but all of which need to be addressed within the next 7 years to protect the very existence of the south-east rail corridor and the surrounding environment and habitats.

Expected Benefits of the Programme

The programme of interventions proposed will ensure that Iarnród Éireann has the capability to continue to provide sustainable rail services along this key rail corridor for the foreseeable future. It will enable Iarnród Éireann to expand services as planned along the east coast corridor through Wicklow towards Rosslare Europort. The programme is consistent with national policy commitments to strengthen and improve the role of the railway and the future benefits to society, the economy and the environment will be multi-generational.

The project is currently at Strategic Assessment Stage of the Department of Public Expenditure and Reform's (DPER) Public Spending Code. A detailed Cost Effective Analysis of the individual project Coastal Cell Areas is being undertaken to determine the full range of incremental socio-economic costs and benefits associated with the planned critical interventions required, in line with Public Spending Code and the Department of Transport's (DoT) Common Appraisal Framework guidance for Transport Sector Capital Projects & Programmes.

It is of utmost importance to Iarnród Éireann that the Rosslare Line continues operating for generations to come. It is fundamental to the sustainable development of Wicklow County, the wider Eastern Economic Corridor, and the achievement of a number of National Strategic Outcomes under the Government's Project Ireland 2040 plan. It should not be left until the effects of climate change take hold, including the coastal erosion as far as the railway before protection measures take place. Continued support and engagement from Wicklow County Council regarding the optioneering and solutions to address climate change impacts on this coastal route and the development of a long-term strategy along this coastline is welcomed. To this extent, Iarnród Éireann would also welcome collaboration with the Council in the

	<p>sharing of statutory processes to enable this critical infrastructure to progress. Iarnród Éireann would welcome further engagement with the Council on this matter.</p>
<p>Iarnród Éireann Priorities for the future in Wicklow</p>	<p>Iarnród Éireann will now outline its priorities for key expansion projects and enhancements to the rail network to 2027. Further detail on these plans and our wider company strategy can be found in our recently published Iarnród Éireann Strategy 2027 document. Also in the context of wider national rail policy and development, it is worth the Council noting that the Department of Transport (DoT) and the Department of Infrastructure (Northern Ireland) (DfI(NI)) are have awarded the contract to commence an all-island Strategic Rail Review with faster intercity connectivity, improved regional connectivity, and rail freight forming key elements. Iarnród Éireann will prioritise the outcomes of this Review as part of its future plans upon completion of the study. The Development Plan should consider and support the outcomes of that study.</p> <p>In looking ahead, Iarnród Éireann believe that the following high-level measures should be a priority for the Development Plan:</p> <ul style="list-style-type: none"> • Priority should be given to Public Transport and Active Travel schemes, with a particular focus on high capacity modes, such as rail, which are carbon efficient. • Continue to expand heavy rail as a high capacity high frequency mode choice in Wicklow with proven ability to attract private car users, as part of a wider GDA integrated mass transit system. • Promote Transit Orientated Development (TOD) with mixed-use high-density development at key rail nodes and along key rail corridors. • Develop new rail stations in line with emerging spatial planning policy, subject to business case evaluation. • Support ongoing investment in rail infrastructure to ensure its continued renewal, maintenance, and improvement to a high level to ensure a high quality of rail frequency, safety, service, accessibility, and connectivity across Wicklow and the GDA. • Develop an integrated, user friendly, and highly connected public transport network. • Expand park and ride capacity at strategically located rail stations to encourage modal shift. <p>Iarnród Éireann as part of its submission will now outline its priorities for key expansion projects and enhancements to the rail network in Wicklow and the GDA. This section aims to outline why they should be considered for inclusion in the Development Plan.</p> <p>Despite the impact the public transport sector and the wider economy and society is experiencing with COVID-19, it is imperative that the momentum shift towards sustainable public transport is not lost and that the important development of our public transport network and expansion of rail services continues. Iarnród Éireann believe that these proposals provide the opportunity to strengthen the Development Plan so that it will be fit for purpose well into the future.</p> <p>1. Further DART Network Extensions and Enhancements</p> <p>The DART+ Programme will transform the capacity of the rail corridor in Wicklow and the GDA. Iarnród Éireann believe that the revised NTA Transport Strategy for the Greater Dublin Area to 2042 should include provision for a further expansion and enhancement of the DART network in the GDA and wider Eastern Region. The first element of this is the interconnector tunnel known as DART Underground. The</p>

DART+ Programme as defined in the Transport Strategy for the Greater Dublin Area '2016-2035' also incorporates the DART Underground Project, which is defined as "an underground rail link through the city centre, allowing DART services to travel through the tunnel, enabling passengers to connect with DART services across the network". DART Underground will facilitate a new sustainable North to West transport link in the key Dublin city centre areas. This will reduce congestion in Dublin city centre as DART+ service levels will now reach new parts of the city directly and without interchange from the surrounding areas, including Wicklow, further enhancing the appeal of the service.

The completion of DART Underground will further expand the electrified network while removing the remaining operational bottlenecks in the Dublin City Centre DART network post-DART+ implementation, particularly on the Northern Line. Passengers will benefit from the creation of additional paths on the Northern line, faster penetration to the key City Centre areas and additional capacity for through running trains on the Maynooth Line to the South- East Line (towards Bray/Greystones). It can facilitate a further modal shift to sustainable public transport as desired by the Development Plan by providing an even more attractive alternative to the private car. Iarnród Éireann strongly believe that DART Underground is essential in the medium to long-term for the continued development of the rail network for the GDA, post completion of the DART+ Programme as defined in the National Development Plan. The DART+ Tunnel Route Alignment Options and Feasibility Study, currently being undertaken by the NTA, will provide the basis for the progress of an Emerging Preferred Route for a revised DART Underground tunnel. Iarnród Éireann will work with the Authority to ensure that the optimal solution is found for inclusion of the updated Transport Strategy.

The second element of development for the DART is the expansion of the network boundary itself. Iarnród Éireann want to build on the DART+ Programme by extending the DART network further to all areas North, South, East, and West of the GDA incrementally to continue to support compact growth along established rail corridors, promote Transit Oriented Development (TOD). These extensions are also proposed in the context of the environmental consequences of the unsustainable quantum of private cars on Ireland's road network requires action, in particular the air pollutant emissions and greenhouse gas emissions produced. Ireland has set a target to develop a low/near zero carbon emission transport network by 2050. Heavy rail has a pivotal role to play based on the unique ability of electrified rail services to move large numbers of people quickly and safely.

The DART+ Programme and any subsequent network extensions when implemented will also facilitate improved access to/from Wicklow and the Regions. Iarnród Éireann will look at further extending the electrified area across each of the lines and providing enhancements as below:

a) South Eastern Line

- Extending electrification between Greystones station and Wicklow station, providing relief to the congested N/M11 through the enablement of greater modal shift with improved service levels. This electrification will also facilitate additional services at Kilcoole station, providing enhanced sustainable mobility options for residents in the areas of Kilcoole and Newcastle.
- To facilitate the above, further infrastructure upgrades to facilitate the expansion of services between Bray-Greystones could be included. The Council's aim under objective CPO 12.22 of draft Development Plan, which states its desire to "continue to work with Iarnród Éireann and the NTA on the improvement of mainline train and DART services into Wicklow and in particular, to facilitate all

options available to increase capacity through Bray Head and along the coastal route south of Greystones”, is welcomed. The development boundaries under CPO 12.23 are also welcomed in this regard.

b) Northern Line

- Providing four-tracking from Connolly northbound to Clongriffin/Malahide and/or possibly additional tracks further north of Malahide to boost capacity for DART services along with Intercity/Enterprise services between Dublin and Belfast.
- Extending electrification or battery electric services to Dundalk to expand the catchment of lower emission services.

c) Maynooth/M3 Line

- Providing double-tracking and electrification between Maynooth station and Kilcock station to the west³. This provides the dual benefit of boosting the reach of higher frequency DART services while also facilitating more Intercity and outer commuter services through double-tracking.
- Extension of the line from M3 Parkway to the large town of Navan. Iarnród Éireann welcome the reappraisal of the Navan rail Line extension from M3 Parkway by the NTA which is currently ongoing as part of the Transport Strategy review to 2042.

d) Kildare Line

- Providing four-tracking south of Hazelhatch & Celbridge station (the current outer limit of four- tracking and the DART+ Programme) to Newbridge and/or Kildare Station. This provides the dual benefit of boosting commuter capacity by implementing higher frequency DART services and providing further segregation between fast Intercity services and slower stopping commuter services.
- Providing additional stations to support land-use and demand

Iarnród Éireann believe that the above proposed future expansion and enhancements of the DART network will facilitate sustainable higher-frequency transport links to Dublin City Centre to/from Wicklow, internally within Wicklow, and throughout the Eastern Region. It facilitates further modal shift to sustainable public transport by providing an alternative to the car to more citizens. It will increase the length of electrified lines on the rail network further, so that a consistent, higher-frequency timetable can be operated across more of the network to the benefit of the GDA and Wicklow through the additional accessibility and mobility provided. The Development Plan should support the further expansion of the DART network to 2027 and beyond.

2. Increased passenger service levels: Dublin – Gorey / Wexford / Rosslare

Iarnród Éireann is supportive of improving the level of rail services to and within Wicklow County outside of the DART network. The implementation of the increases in service levels would be facilitated, in part, by DART+. DART+ will unlock service frequency improvements for the South-East region through improved interchange opportunities with enhanced DART services at Greystones station. Both of the below priorities align with Objective CPO 12.24 which supports “the undertaking of a study to assess the feasibility of extending regular rail services to south Wicklow.”

Intercity Services

The Dublin-Rosslare rail line is a key component of the Eastern Economic Corridor. Iarnród Éireann is planning to improve Intercity service frequencies and journey times

for customers travelling between the major cities/urban centres and the Capital. Intercity improvements include additional services across all routes to increase capacity and offer an enhanced service frequency to passengers. This will be complemented by a clock-face timetable for Intercity routes to deliver a service pattern where services depart at regular intervals. Iarnród Éireann's future plans for the Rosslare to Dublin services is to increase services towards a two-hourly all-day pattern, subject to demand levels. The introduction of this level of frequency to Wicklow, Rathdrum, and Arklow stations from Dublin will be dependent on the implementation of DART+ and the facilitation of an efficient interchange with enhanced DART+ services at Greystones station. Improving the service levels on rail will be a positive step towards developing the Eastern Economic Corridor to Rosslare Europort.

Outer Suburban Services

Outer suburban services from Gorey Town will benefit from the increased number of Intercity services planned on the Dublin-Rosslare route mentioned above. More regular departures introduced by clock-face timetabling and infrastructure capacity enhancement as a result of DART+ will benefit the Eastern Region. It is Iarnród Éireann's long-term ambition to increase outer suburban services from Gorey to Dublin to every 20 minutes in peak periods and half hourly off-peak subject to funding and demand levels via an interchange at Greystones.

Iarnród Éireann welcomes that the Council aims to ensure that development takes place at appropriate locations and densities where they are most accessible by sustainable modes and along public transport corridors. Iarnród Éireann believe that the rail services levels proposed will support sustainable compact growth, both commercial and residential, along the rail corridor through Wicklow county.

3. Accessibility Programme

As noted earlier in this submission, Iarnród Éireann is progressing with its Accessibility Programme. The Development Plan should support the further expansion of our Accessibility Programme. By providing more accessible stations on the rail network, it enables and encourages journeys that would otherwise have to be taken by road-based transport, or perhaps even no journey, onto the rail network. This has sustainability benefits in terms of the reduction of emissions that result from it, while also ensuring that all who wish to use the railway and can avail of its benefits in terms of frequency, reliability, and journey time.

4. Customer Information Services

Iarnród Éireann is developing a Customer Information Services (CIS) Strategy Report to create a strategic implementation framework for the development of enhanced information systems and information flow to our customers, staff, and third parties. Key amongst these requirements is the ability to provide reliable real time passenger information that is accessible to all, co-ordinated across the network in stations and on trains, and that is consistent across all media.

The development of Customer Information Services (CIS), should be supported by the Development Plan when they are developed and finalised in 2021 as it is a vital customer experience capability required to both attract and retain customers using sustainable rail services and a wider integrated sustainable public transport network.

5. Development of Multimodal Facilities - Sustainable Interchange Programme

Iarnród Éireann's Sustainable Interchange Programme enables more sustainable end-

to-end journeys to be made by rail. The Sustainable Interchange Programme includes the provision of facilities within Iarnród Éireann's stations and local environs to provide for ease of interchange between rail and all other modes, prioritising those that are sustainable – cycling, electric charging, wayfinding, and shared mobility. Iarnród Éireann's Sustainable Interchange Programme when implemented facilitates compact growth along railway corridors due to the improved sustainable mobility offering at each station. Commercial and residential developments can be supported through improved interchange with active mode parking infrastructure, and car park spaces (including electric vehicles), increasing the attractiveness of rail and increasing the rationale for the location of compact developments. By providing more sustainable interchange and electric charging, along with bicycle and vehicle parking facilities at stations, it enables and encourages journeys that would otherwise have to be taken by road-based transport onto the rail network. It enhances the appeal of zero emissions active modes onto low emissions rail services.

The Sustainable Interchange Programme has the potential to promote the concept of Mobility-as-a-Service (MaaS) in the longer-term as digital platforms could be linked to sustainable mobility providers at either end of rail journeys as the interchange capability improves. If the railway does not enable better integration with other modes, passengers may lose out on benefits, and rail may lose prominence in the wider transport system as a result.

Iarnród Éireann believe the Development Plan should support the implementation of the Sustainable Interchange Programme, which facilitates a number of the outcomes desired in CPO 12.20 and 12.21 in terms of interchange facilities.

6. Park and Ride Strategy

Linked to the above priority, Iarnród Éireann also wishes to grow the number of strategic Park and Ride sites across the GDA. Iarnród Éireann has seen success of Park and Ride's at sites such as M3 Parkway and believe it is a model that can attract car users, but the benefits of it are contingent on the level demand. Iarnród Éireann is currently engaging with Councils and the National Transport Authority to develop a Park and Ride Strategy, which will be implemented in line with growing demand. The Development Plan should support the implementation of this Park and Ride Strategy when it is agreed by all parties.

7. Electrification

As noted earlier in this submission, Ireland has set a target to develop a low/near zero carbon emission transport network by 2050. Heavy rail has a pivotal role to play based on the unique ability of electrified rail services to move large numbers of people quickly and safely. Heavy rail has reduced its overall emissions by 48% since 2006, significantly ahead of the EU 2020 target of 20%. There is an opportunity to continue this trajectory. Ireland has the lowest level of electrification across the EU27, meaning it is an area with significant expansion opportunities across the network and key tool to combat increasing transport emissions.

The DART+ Programme will transform the capacity and emissions of the existing lines in the GDA. Iarnród Éireann believe that the Development Plan should include provision for a further expansion and enhancement of the DART network in Wicklow. This will build on the completion of the DART+ Programme.

Intercity electrification also forms part of Iarnród Éireann's long-term strategy to decarbonise the rail network and provide the benefits of significant journey time savings, improved reliability, enhanced passenger quality and lower operating costs. The Dublin to Rosslare line has potential for this investment in the long-term. There are major sustainability benefits to be gained by electrification of rail services on

	<p>existing lines, and this will only be further enhanced with the shift long-term towards renewable energy sources. Iarnród Éireann will include the outcomes on Intercity and inter-regional connectivity from the all-island Strategic Rail Review by DoT/DfI(NI) as part of this priority once they are known.</p> <p>8. Rail Freight</p> <p>The current Transport Strategy for the Greater Dublin Area notes that “given the geographic size of Ireland and the proximity of Dublin Port to the various centres in the GDA, movement by road is, and will continue to be, the dominant mode of freight transfer in the region, and throughout the wider State.” Whilst on the whole, this may be the case, Iarnród Éireann believe the case for rail freight is increasing, given the context of climate change and the environmental targets Ireland must achieve, both nationally and internationally. This is also set against a context of increasing road congestion. While the absolute future travel patterns post-COVID are unknown, there will still be a necessity and demand for sustainable freight transportation across Ireland and rail can play an important role. Iarnród Éireann has developed a Rail Freight 2040 Strategy in the context of:</p> <ul style="list-style-type: none"> • The Governments Project Ireland 2040, National Development Plan, National Mitigation Plan & Climate Change Action Plan • The Strategic Masterplans of Ireland’s Port Authorities • Road Congestion • Pressure on road freight markets e.g. driver shortages • Policy, demand, and sectoral analysis being undertaken to establish demand and opportunities for rail freight <p>Iarnród Éireann believe Wicklow County Council should consider the findings of that report when they are made available. Iarnród Éireann will include the outcomes regarding rail freight from the all-island Strategic Rail Review by DoT/DfI(NI) as part of this priority once they are known.</p>
<p>Other Development Plan Points</p>	<p>Protected Structures</p> <p>Iarnród Éireann has not received notice of any new structures to be added to the Register of Protected Structures and presume that there are no additions on railway property. Any proposals to add railway structures, including but not limited to bridges, to the Register of Protected Structures should be notified to the Senior Track and Structures Engineer, Iarnród Éireann, Pearse Station, Westland Row, Dublin 2 D02 RV00.</p> <p>Proposals on rights of way</p> <p>It is noted in chapter 18 section 18.5 that Wicklow County Council again propose adopting Proposed Rights of Way PROW5 and PROW6. It is also noted that Tables 18.3 A and B states that PROW5 and PROW6 are subject to current legal challenge. The proposals for PROW5 and PROW6 in the 2021-2027 Draft Development Plan are ostensibly the same as those proposed for the 2016-2022 Development Plan as far as their impact on railway level crossings are concerned. With this in mind enclosed are CIÉ’s/Iarnród Éireann’s submissions of March and August 2016, the issues contained within being still relevant on this issue. Iarnród Éireann’s objection to these Proposed Rights of Way being adopted still remains and the legal challenge is still pending. Iarnród Éireann would still seek for PROW5 and PROW6 to be removed from the Draft Development Plan until such a time as there are firm proposals concerning how pedestrians are to access the Proposed Rights of Way without using level crossings. Iarnród Éireann would welcome constructive engagement from the Council on this issue.</p>

	<p>Reopened Stations</p> <p>It is noted under CPO 12.23 that Council aim to “ensure that possibilities for improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and can facilitate future improvements.”</p> <p>Iarnród Éireann is not aware of plans presently to reopen any closed stations along the Dublin-Rosslare rail corridor through Wicklow or to progress developments which could potentially strengthen such business cases. That said, Iarnród Éireann would welcome engagement with the Council and any parties proposing such projects. It is important to point out that due to Iarnród Éireann’s financial position we are unfortunately not in a position to self-finance any capital infrastructure works (including new and reopened stations) from our own funds and that we are entirely dependent on third party funding via the NTA or the Exchequer for any capital infrastructure works to the railway. Iarnród Éireann will itself ensure that no action is undertaken which would preclude any future reopening of stations in Wicklow. These will need to be funded by third parties and meet the conditions required in Appendix B, which apply to all rail infrastructure project proposals</p> <p>Impact of COVID-19</p> <p>To conclude this submission, it is important to acknowledge that the ongoing COVID-19 pandemic has caused wide- ranging challenges and uncertainty throughout society on a global, European, and national level. It has altered some aspects of the way we live our lives and move about. It is likely to have an impact on the population and economic targets projected as part of the Project Ireland 2040 initiative, the levels of which, as of yet, still remain unclear, but are reasonably expected to last a number of years.</p> <p>Although it is not yet possible to determine the full impact on the public transport sector, in the short to medium term, COVID-19 impacts will include a reduction in the number of people in employment, migration to remote and home working and a switch towards more individual modes of transport. In this new environment, Iarnród Éireann will continue to focus on rebuilding customer confidence in our services and develop flexibility and adaptability in our longer-term rail development plans to allow us respond quickly to emerging threats and opportunities.</p> <p>From the perspective of developing a sustainable integrated transport system, COVID-19 does present an opportunity to change habits, resetting people’s method of travel and mindset, and the promotion and priority of sustainable transport by the Council can be a key driver for the recovery of growth, thus making its inclusion a priority in the Development Plan. The continued development of a sustainable integrated transport network for Wicklow and the wider GDA can be a springboard to economic recovery through the jobs it creates during its implementation, and it sustains post-completion.</p>
<p>Concluding Comments</p>	<p>It is clear to us, that an essential pillar of any modern country is a sustainable public transport network, and the draft Development Plan provides a solid foundation to support an increase rail capacity on an incremental basis, facilitating commuter and Intercity rail passenger growth to support Wicklow and Ireland’s growth ambitions to 2040 and beyond. This increase will have a dual benefit of boosting the wider recovery from COVID-19. Prior to COVID-19 the GDA transport network was struggling to facilitate the demands asked of it, if long-term economic growth is to be regained and sustained then investment in rail should be a priority.</p> <p>The priorities identified in this submission, combined with the active projects and programmes ongoing, such as the DART+ Programme, will allow rail travel to meet</p>

the potential it offers in facilitating the projected population growth in the National Planning Framework for Wicklow and the Eastern Region. It is essential that the pre-COVID-19 mindset shift towards public and active transport is not lost, and that the private car does not become the first choice for citizens in the recovery from the pandemic.

Chief Executive's Response

General

With respect to alignment with the future NTA Transport Strategy for the Greater Dublin Area, which it is understood will be published in draft for consultation in October – November 2021, it is not known when the final NTA strategy will be adopted, and the County Development plan process must continue along the programme set out in legislation, and therefore it is not certain that it will be possible to *fully* integrate the NTA Strategy into the Wicklow Plan. It is hoped that the vast majority of strategies, policies and objectives already set out in the Draft Plan, which align with current NTA strategy, will also be consistent with the new NTA Strategy, but in the event of any significant divergence, variation of the Wicklow Plan could be considered in due course if deemed necessary. In addition, having regard to the submission from the NTA set out in Section 3.1 (Part 1) of this report, it can be seen that a number of amendments are recommended by the CE to the Draft Plan to accord with the NTA's suggestion to ensure better alignment.

Core Objective and Benefits of Rail

Noted – no changes suggested by IE or recommended by the CE in this regard.

Current Rail Development in Wicklow

Noted – no changes suggested by IE or recommended by the CE in this regard.

Iarnród Éireann Priorities for the future in Wicklow

- (a) With respect to the 'All-Island Strategic Rail Review', it would not be possible for the Development Plan at this stage to consider and support the outcomes of this study as this would be premature pending the completion of the study. In the event that the policies and objectives that are adopted in the Development Plan do not align with any future Department of Transport or NTA strategies / programmes with respect to rail Infrastructure, variation of the Plan could be considered in the future.
- (b) It is requested that the Development plan supports the further expansion of the DART network; this is provided for in numerous objectives including 12.20, 12.21, 12.22, and 12.23; amendments are recommended to strengthen these objectives.
- (c) With regard to accessibility, and IE's accessibility programme, it is recommended that two small changes be made to Objectives 12.20 and 12.21 to support same.
- (d) With regard to customer information services, while it is requested that the Development Plan supports same, it is not clear what exactly is required; it does not seem necessary to include an objective that relates to an operational matter for IE. Therefore no change is recommended.
- (e) It is requested that the Development Plan supports the 'Sustainable Interchange Programme' and the NTA future park-and-Ride Strategy; however these are both already addressed in Objective CPO 12.21 and therefore no change is recommended.

Other Development Plan Points / Concluding Comments

- (a) By law, IE would be advised if any additional / deletion / amendments to the RPS are proposed
- (b) With respect to IE's objections to PROW5 and PROW6, the issues they raise were considered previously in the making of the 2016 CDP and are still subject to legal action. No further comment is therefore considered warranted.

Chief Executive's Recommendations

Amend the Draft Plan as follows:

Volume 1

Chapter 12

CPO 12.20 To cooperate with the NTA and other relevant transport planning bodies in the delivery of a high quality, integrated **and accessible** transport system in County Wicklow.

CPO 12.21 To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular:

- to support the development of bus shelters, ~~that shall incorporate disabled access~~ and bicycle parking facilities where possible
- **to promote and support the development of fully accessible public transport services and infrastructure, that can be used by all people, regardless of their age, size, disability or ability.**

CPO 12.22 To continue to work with Iarnrod Eireann and the NTA on the improvement of mainline train and DART services into Wicklow and in particular,

- To facilitate all options available to increase capacity through Bray Head ~~and along the coastal route south of Greystones.~~
- **To support the delivery of the DART + programme**
- **To support electrification of the rail line south of Greystones and the provision of high speed and high frequency services on the existing underutilised south east rail line to south Wicklow.**

CPO 12.23 To ensure the **continued and long term operation of and** ~~that possibilities for~~ improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and can facilitate future improvements. In particular:

- **to ensure coastal protection measures are put in place to protect the railway line from coastal erosion and to consider identifying corridor options for route continuity in the event of coastal land loss.**
- to resist any development within 20m of the railway line;
- to resist demolition or removal of any former train station structures or apparatus, other than for safety reasons;
- to require any development proposals in the vicinity of former train stations to be so designed to facilitate future access to the station and to reserve adequate space for future car parking;

~~**CPO 12.24** To support the undertaking of a study to assess the feasibility of extending regular rail services to south Wicklow.~~

Name	An Taisce	Sub ID: C2-244
Topic	Issues raised	
Overarching Comments	<p>The new Wicklow County Development Plan should represent a catalyst for positive change and facilitate the development of the county in a plan-led, sustainable manner. The CDP should strive to establish a coherent framework for the coordinated sustainable economic, social, cultural and environmental development of the county in line with the UN Sustainable Development Goals.</p> <p>An Taisce's key objectives in making this submission on the Draft Plan include:</p> <ul style="list-style-type: none"> - Ensuring that the climate and biodiversity loss emergencies are addressed at all levels of planning and development; - Ensuring that European, national, regional and local policy and guidelines are implemented; - Reducing Ireland's fossil fuel use and greenhouse gas emissions in accordance with EU law; - Protecting town centres, and counselling against unserviced development and sprawl; - Promoting compact development served by public transport; - Promoting rapid and extensive shifts toward walking and cycling and away from private car use; - Ensuring the implementation of EU environmental law and protecting habitats and biodiversity, particularly Natura 2000 sites; - Protecting our water bodies and water quality, including through the prevention of inappropriate development; - Conserving the quality of the Irish landscape, archaeological monuments and built heritage, particularly protected structures; - Promoting efficient investment in public infrastructure and services; and, - Promoting local self-reliance, public health and quality of life. <p>We are pleased that many of these goals already form key parts of the Draft CDP.</p>	
Addressing the Climate and Biodiversity Emergencies	<p>Climate Change</p> <p>Given that the global climate and biodiversity loss emergencies are the defining challenges of our time, and indeed formally recognised as emergencies by Wicklow County Council, An Taisce strongly supports the significantly increased emphasis on climate mitigation and adaptation in the Draft Plan, particularly the inclusion as one of the three overarching themes of the Plan.</p> <p>All climate mitigation provisions in the new CDP must be assessed against Ireland's fair share emissions reduction commitments in line with the Paris Agreement and the need to limit warming to 1.5C over pre-industrial levels. Similarly, the new Plan should ensure that development decisions are also assessed against these commitments. We also recommend that commitments be added to Chapter 7 (Community Development) to address the disproportionate impact of climate change on marginalised communities.</p> <p>Both the policies and the zoning in the new CDP should take account of up-to-date climate projections. This is of particular importance with regard to increased coastal, fluvial and pluvial flood risk. New development proposals should also be required to demonstrate consideration of this.</p> <p>As climate change both impacts and is impacted by all areas of planning and development, we welcome various policy objectives throughout the plan that address both climate mitigation and adaptation. However, we consider that the Draft CDP could improve its explicit integration of climate action throughout. We recommend that each chapter of the new plan be directly assessed against climate objectives and</p>	

targets, including those outlined in the Paris Agreement and EU policy. We note that Section 2.2.2 states that: “the plan will also include an appendix which audits the provisions of the plan, to show how and where climate considerations have indeed been fully and adequately incorporated into the plan provisions.” It does not appear that this appendix has been included in the Draft Plan materials.

We would highlight the recent Draft Longford Development Plan, which provides a useful example of strong climate integration throughout the plan. Each chapter contains a climate context section with climate-specific objectives relating to the theme of the chapter. We recommend that a similar approach be added to the Wicklow Plan. The aforementioned appendix would indeed be welcome, however, we consider that the audit to be contained in it would be more effective if it were contained within the chapters themselves.

We note that the Draft acknowledges that the Supreme Court ruling striking down the National Mitigation Plan (NMP). However, the NMP is then used as policy context in other sections, such as 16.1.4. We recommend that these be updated to reflect the ruling.

Just Transition

The equitable and united transition as a society towards decarbonisation is crucial, and ensuring a ‘Just Transition’ should be a guiding principle in forward planning. Our move away from away from fossil fuels and emissions-intensive industries must be equitable and support the viability and vibrancy of life in Wicklow. It is therefore imperative that workers and other stakeholders impacted by these changes are provided with the appropriate resources, compensation and training. A Just Transition model is needed to plan and deliver a package of complementary interventions to secure livelihoods while shifting rapidly to sustainable methods of energy and food production.

We therefore welcome the discussion of a Just Transition in Section 2.2.2. We consider, however, that the commitments are relatively vague and would benefit significantly from greater detail on what the Council considers to be the principles of a Just Transition and how development decisions in the county will be made in accordance with same.

Biodiversity Loss

As noted in the Draft, Wicklow County Council declared a Climate and Biodiversity in April 2019. While the Draft CDP has a strong focus on climate through its inclusion as a key theme, An Taisce considers that it does not yet sufficiently address the concurrent biodiversity loss emergency.

The 2018 “Living Planet Report” from the World Wildlife Fund¹ presented a very bleak picture of the state of global biodiversity. There has been an overall 60% decline in species population size in just over 40 years (1970-2014). This decline stands at 83% for freshwater species. We would also draw the Council’s attention to a recent paper² published by an international cohort of researchers highlighting the scale of the challenge posed by biodiversity loss, the implications for human society and the lack of adequate responses from policymakers.

We submit that the new CDP should directly and thoroughly address the gravity of the biodiversity crisis in a manner commensurate to the way it in which addresses the climate crisis. While there are many robust objectives in the Draft Plan aimed at ecological protection, especially in Chapter 17, we do not consider that the Draft Plan as a whole sufficiently considers the context or addresses the scale of the current biodiversity loss emergency. We recommend that this be included alongside climate as one of the pillars of the overall strategy.

<p>Sustainable Settlement</p>	<p>The defining pattern of settlement development in Wicklow, and indeed around Ireland, in recent decades has generally been of a sprawling, uncoordinated nature where land has been developed in a 'leapfrog', low-density pattern. This type of land use has diminished the liveability of areas, created places that lack adequate public facilities, and generated car dependency for long commutes.</p> <p>To achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for citizens, it is imperative that the new CDP addresses future population growth and continues to encourage a shift away from dispersed, car-orientated development patterns to walkable, cycleable, transit-orientated and consolidated urban forms. A crucial aspect of this will be the maintenance of and improvement in investment in public transport, walking and cycling to offer communities viable alternatives to private cars.</p> <p>The prioritisation of future development in Wicklow's towns towards efficient, compact, and serviced locations in accordance with the sequential approach and existing infrastructural capacity is critical. The CDP should be guided by the existing essential social infrastructure (schools, community facilities, etc.) and physical infrastructure (transport, water services, communications, etc.), including realistic prospects for addressing capacity constraints. Where services are not available, there should be a reasonable expectation of their provision within the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure within the plan period or within a reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development. The Council should engage with the providers of essential physical and social infrastructure and ensure that the town-specific policies are based on realistic assessments regarding the funding and timing of such infrastructure, recognising that some levels of strategic infrastructure may take a number of cycles to provide.</p> <p>An Taisce therefore welcomes the many commitments throughout the Draft Plan to, for example:</p> <ul style="list-style-type: none"> • Promote compact development; • Create walkable and cycleable places and support public transport provision; • Prioritise brownfield, infill and underutilised land in future development; • Encourage the renovation of vacant and/or derelict dwellings; • Facilitate inclusive placemaking; • Strengthen rural towns and settlement centres. <p>However, we consider that the policies directing new residential development to existing settlements and the criteria for limiting one-off housing to those with a demonstrated need should be as robust as possible as well as fully implemented and enforced.</p> <p>As an additional measure to address compact settlement creation and the issues discussed above, An Taisce recommends that the Council make the seven location test standards for new housing outlined in the now replaced National Spatial Strategy 2002 a mandatory CDP requirement for new housing development. Unlike sustainability and quality of life indicators, these should be strictly enforced threshold standards without which no development should be permitted. This requires that zoning and decisions for new housing be conditional on integration with existing communities, affordability and mix of housing types, walking and cycling access to local services and schools, public transport access to employment locations, and availability of recreation facilities.</p>
<p>Town and Village Centres</p>	<p>An Taisce welcomes the Policy Objectives in the Draft CDP, particularly in Chapter 5, that promote town centre vitality and regeneration. The integration of this into the</p>

	<p>overall objective of healthy placemaking is also welcome. These are also supported by the 2020 Programme for Government, which includes a mandate for implementing a Town Centres First policy to: <i>"implement a strategic approach to town centre regeneration by utilising existing buildings and unused lands for new development, and promote residential occupancy in our rural towns and villages. We will use the National Planning Framework as our template."</i></p>
Built Heritage	<p>Ireland's, and indeed Wicklow's, unique built and cultural heritage is increasingly threatened with destruction. Ireland is a signatory to UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage ratified by Ireland in 1991 and the Granada Convention ratified in Ireland in 1995. These conventions provide the basis for our national commitment to the protection of architectural heritage, the importance of <i>"handing down to future generations a system of cultural references"</i>. To be effective, it relies on its signatory countries implementing their own national protective regimes.</p> <p>The CDP should ensure the effective promotion of the Architectural Heritage provisions of Planning and Development Act 2000 (as amended) and therefore the protection of Wicklow's built heritage, including Architectural Conservation Areas (ACAs) and Protected Structures.</p> <p>Crucially, we also submit that Chapter 8 should be amended to include policies for monitoring buildings at risk and using the provision of Section 59 of the Planning Act to serve notices of endangerment to negligent property owners.</p> <p>We welcome the commitment to the integration and positive role of heritage into placemaking and town centre regeneration Section 5.3.1 and CPOs 5.17 and 5.18.</p> <p>We also welcome CPO 8.6 on protecting the integrity of the Baltinglass Hills archaeological landscape.</p>
Agriculture	<p>Current models of intensive agriculture in Ireland are resulting in an array of adverse impacts including to water quality, air and climate, and biodiversity.</p> <p>The EPA released the Water Quality in 2020 report³ on 14th July 2021, indicating that nearly half of our rivers (47%) and a third of lakes are failing to meet their environmental quality standards for nutrients, with serious consequences for the health of Irish waters. Rather than meeting our obligations under the Water Framework Directive to halt and reverse water pollution, it is actually on the rise: more than one third of river sites (38%) have increasing levels of nitrate pollution. Ireland has obligations under the EU Water Framework Directive to bring all water bodies into good status by 2027.</p> <p>We welcome CPO 9.39 on the protection of water. In light of the aforementioned ongoing problems with water quality, we recommend that it also require assessment of agricultural developments in relation to Water Framework Directive targets and the use of catchment sensitive farming practices. We therefore welcome CPO 13.6 <i>"To encourage and promote the use of catchment-sensitive farming practices, in order to meet Water Framework Directive targets and comply with the River Basin Management Plan"</i>.</p> <p>Ireland is also in ongoing breach of its 116kt per annum limit under the National Emissions Ceiling Directive (2016/2284/EU),⁴ 99% of which is caused by agriculture. This breach is currently subject to an EU legal infringement complaint. Ireland is legally obliged under the Directive to decrease its ammonia emissions to 107.5kt by 2030. While previous reporting indicated that Ireland's total ammonia emissions were already in breach of EU thresholds since 2016, this is now recognised as a serious undercount. Data released by the EPA in June 2021⁵ highlights that the State has been non-compliant for seven out of the last nine years, driven by growth of the agriculture sector.</p> <p>Agriculture is also a major emitter of greenhouse gases and is contributing</p>

	<p>significantly to Ireland’s ongoing failures to reach its legally binding Paris Agreement targets; GHGs from agriculture account for one third of Ireland’s total emissions.</p> <p>We submit that an objectives be added to ensure that permission for intensive agricultural developments is only granted when the direct, indirect and cumulative impacts of a proposal have been evaluated and mitigated if necessary. This includes impacts in the wider landholding (outside of the red line-bounded site) resulting from activities resulting from or facilitating the proposal (e.g. slurry spreading in relation to an application requiring slurry storage). Compliance with the Habitats, Birds, Water Framework and Nitrates Directives is also key.</p> <p>Diversification</p> <p>In the interest of making agriculture in Wicklow maximally sustainable, we welcome CPO 9.37 agricultural diversification. We recommend that it specifically promote the production of vegetables, grains, nuts, pulses, fruits, etc.</p> <p>Horticultural Peat</p> <p>We consider that a specific CPO is needed in relation to the need to rapidly move away from the use peat for horticulture, the extraction of which is highly ecologically damaging and causes the release of significant amounts of carbon.</p> <p>New European Strategies</p> <p>In May 2020, in furtherance of the European Green Deal, the EU Commission published in parallel “A Farm to Fork Strategy” and the “EU Biodiversity Strategy for 2030 - Bringing nature back into our lives”. The Biodiversity Strategy includes 14 key targets, the majority of which are relevant to agriculture (see Section 13 below on biodiversity for the full list).</p> <p>We submit that the policies, objectives and targets of these two strategies should be incorporated into the new CDP. We therefore recommend the inclusion of the following policy objective:</p> <p><i>“Wicklow County Council will implement the objectives and targets at county level of the EU ‘A Farm to Fork strategy’, published in May 2020. The Council will also implement the targets of the 14-point EU Nature Restoration Plan in the ‘EU Biodiversity Strategy for 2030 - Bringing nature back into our lives’. Agricultural development proposals must demonstrate compliance with the targets and policies of both strategies.”</i></p>
<p>Forestry</p>	<p>An Taisce considers that the objectives around forestry should better differentiate between the planting of native woodland and the planting of other species such as sitka spruce, which create what are essentially ecological dead zones. While CPO 9.46 is welcome, we suggest that much greater emphasis should be placed on facilitating the planting of native broadleaf woodlands.</p> <p>Historically the valleys of County Wicklow contained some of Ireland’s greatest ancient native woodlands, the last being the Upper Derry River valley where the extensive Coolattin-Shillelagh woods were largely destroyed in the late 80s and early 90s. Support is needed for large-scale oak, native scots pine and other native woodland restoration in the Glen of Imaal, Glenmalure, Glendalough, Glencullen, etc.</p> <p>With regard to CPO 9.48 on the development of forestry for timber biomass, we submit that this should be strongly caveated with the need for any such proposals to undergo a rigorous sustainability assessment.</p>
<p>Extractive Industry</p>	<p>We submit that an additional policy objective be included to require strict enforcement against unauthorised development and of conditions applied to permitted quarry development. We also consider that Section 35 of the Planning and Development Act 2000 (as amended) regarding past failures to comply should be rigorously applied to proposals for continued or expanding quarrying operations.</p>

Remote Working	We welcome the various objectives to support remote working as this has the potential to contribute significantly to the vitality and long-term viability of Wicklow’s rural areas and small towns.
Tourism and Recreation	<p>It is a particular objective of An Taisce that future tourism and recreational visitor promotion nationally should be as car-free as possible. A new tourist model is required based on longer area-based stays accommodated in locations to a level commensurate with the capacity of the host environment rather than high volume car trips and drive-through tourism. It would prioritise the enhanced promotion and development of safe greenway cycling routes, and attractive walking and hiking routes and other outdoor activities for all ages and abilities. It is noted that the 2020 Programme for Government sets out a range of policies on tourism including to: “Develop Ireland as a long stay tourism destination to spread tourism more evenly across the country. This will help reduce emissions and maximise economic return” (emphasis added).</p> <p>The overarching consideration of any tourism project needs to:</p> <p>A. Assess the suitability of its nature, scale and location impact; and</p> <p>B. Ensure that there will be no direct, indirect or cumulative adverse impacts on the quality and character of the host location and wider area (for example, causing traffic congestion and damaging nature conservation sites).</p> <p>Projects seeking to attract larger visitor numbers, and consequently causing traffic generation and physical impacts, should not be located in areas of ecological or landscape sensitivity and which do not have the carrying capacity for the impact and service demand generated.</p> <p>CPO 11.3 and others to direct tourism development to existing settlements as well as CPO 11.4 to ensure that development protects the environmental quality, amenity and character of sites, are noted and welcome.</p> <p>However, there is an overall need to better integrate sustainable transport integration with tourism. We recommend the inclusion of additional explicit objectives to:</p> <ul style="list-style-type: none"> • Increase the access to public transport, walking and cycling options from key tourist destinations and accommodation hubs; • Increase car-free, long-stay trips; and • Provide for additional tourist accommodation in appropriate locations, particularly in areas with existing services and infrastructure. <p>We would strongly recommend against the promotion of “driving trails”, for example in CPO 11.27, as this conflicts with the overarching objective of the plan to move away from dependence on private car use.</p> <p>We also welcome the Policy Objectives to continue promoting the development of walking and cycling routes greenways.</p> <p>We submit that CPOs 11.35, 11.37, 11.41, 11.42 could be amended to specifically commit to avoiding conflicts with sensitive ecological sites and ensuring compliance with the Habitats and Birds Directives. The environmental protection measures in CPOs 11.47-11.49 are welcome.</p>
Sustainable Transportation	To achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for people in Wicklow, it is imperative that the CDP comprehensively addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated urban forms. A crucial aspect of this is that investment in public transport, walking and cycling is maintained and improved across the county in order to offer communities viable alternatives to private

cars.

The data presented in a recent Government review of sustainable mobility policy make it unequivocally clear that Ireland has failed to achieve the modal shift in transport that was envisioned in the Smarter Travel policy (2009) and a suite of other transport-related policies. This presents a significant climate mitigation challenge as well, since EPA data indicate that transport accounted for 20.4% of Ireland's overall greenhouse gas emissions in 2019.

CSO data show that private car dependence is extremely high across Ireland - 74.3% of all journeys are made by car. 15% are made on foot while only 5.5% are by public transport and 2% by bicycle (see chart below). We note that the National Cycling Strategy, which ran in parallel to Smarter Travel, provided that 10% of all journeys would be made by bike by 2020. Notably, public transport use and accessibility in smaller towns and rural areas is also particularly poor.

Similarly, a cornerstone target of the Smarter Travel policy was that commuting journeys made by car should drop from 65% to 45% by 2020 while commuter journeys by walking, cycling and public transport should increase to account for 55%. As the 2016 census data below shows, we have completely failed to achieve that. In fact, the share of car journeys to work has risen since 1996 and actually surpassed the Smarter Travel baseline of 65%. The percentage of commutes made by cycling, walking or taking the bus has decreased and is nowhere near the 55% share stipulated by Smarter Travel.

According to the data presented in the Draft CDP, almost 40% of the County's working population are travelling outside the County for work, the majority of which making that journey by car.

An Taisce therefore welcomes the many transport and mobility provisions which aim to support the objectives of compact development, integrate land use and transport planning, facilitate a modal shift away from car dependency, and support the provision of public transport as well as high quality pedestrian and cycling infrastructure.

For instance, we welcome CPO 12.5 on the requirement for Accessibility Reports and remedial action where necessary, as increased sustainable transport infrastructure and capacity provision needs to come before expanded residential development, particularly in larger towns and their catchment areas. This CPO would be significantly strengthened by the insertion of criteria on what constitutes a deficiency and guidelines for phasing and/or restricting development in response to deficiencies. We also recommend that this CPO be amended so that the Accessibility Report must assess exiting public transport capacity in addition to access.

Crucially, we submit that strong implementation measures, namely robust targeted and timelined plans, should be included throughout the CDP's transport objectives so that the new Development Plan can actually deliver on its sustainable transport objectives. We recommend that specific modal shift targets for 2027, (settlement-specific targets and an overall county target) be set in line with the Smarter Travel policy.

Wicklow County Council should undertake a transport strategy with the other Eastern and Midlands Region counties and with the Southern Region (particularly Wexford). This requires supporting a substantial modal shift from private car to bus and train use and the linking of any future expansion of Rosslare Port to rail freight, including through Wicklow.

Programme for Government

The 2020 Programme for Government sets out as an overarching mission: "A Better Quality of Life for All" with "A national clean air strategy," "Better work life balance" and "a fundamental change in the nature of transport in Ireland" as key objectives. It

	<p>sets out as immediate priority actions:</p> <p><i>"Necessary improvements in climate impact, quality of life, air quality and physical and mental health demand that every effort is made by the Government to make active travel and public transport better and more accessible."</i></p> <p><i>"Each local authority will be immediately mandated to carry out an assessment of the road network, to see what space can be allocated for pedestrians and cyclists. This should be done immediately."</i></p> <p>In light of the Programme for Government mandate and the aforementioned transport data, we cannot overstate the urgency with which the Council needs to address the current unsustainability of transport in the county and the ongoing failure to achieve meaningful progress toward a modal shift away from private car use. We therefore recommend that provision for the immediate review called for in the Programme for Government be included in the CDP.</p> <p>Road Investment</p> <p>We submit that transport policy and investment in Wicklow should be reprioritised away from new major road infrastructure, of course with the exception of necessary maintenance and small town bypasses. We recommend that it instead be directed to support public and active transport projects and cycling infrastructure. This should align with the Programme for Government commitment to a 2:1 ratio of expenditure between new public transport infrastructure and new roads. We consider that any future investment in motorway or dual carriageway schemes, other than small-scale bypasses to relieve urban congestion points, would be a misdirection and misspending of limited public money.</p> <p>Current levels of traffic, in particular private cars, on the N11 are unsustainable in generating traffic around the M50, through Wicklow and into Wexford. The current proposal to increase the capacity of the N11 cannot be justified. There is no capacity to widen the current road alignment in the Glen of the Downs. Alternative routes would have adverse impacts and be unjustified in terms of cost implications.</p> <p>Significant amounts of existing road space also needs to be reallocated for high quality segregated cycle lanes and footpaths.</p>
<p>Water Services</p>	<p>The management of surface and ground water in accordance with the provisions of the EU Water Framework Directive (WFD) and Groundwater Directive will be one of the most crucial challenges in this new CDP. While Wicklow has seen a 9% increase in good and high status waterbodies, the county nevertheless faces an immense challenge in achieving 'good' status in all water bodies by 2027 as required by the WFD. The Plan should include a requirement for all development proposals to demonstrate full compliance with the WFD, Groundwater Directive and River Basin Management Plans.</p> <p>Wastewater</p> <p>While connection to public wastewater infrastructure is preferable to further proliferation of private systems, planning permission for developments that require additional public wastewater treatment capacity must be deemed premature until such capacity is in place.</p> <p>CPO 13.15 therefore must be rigorously enforced with regard to ensuring that all lands zoned for development are served by adequate treatment systems and that regional and strategic wastewater scheme are delivered. We also recommend that the list of areas needing new or improved treatment plants be amended with targets for the</p>

	<p>delivery of those projects.</p> <p>Private Treatment Systems</p> <p>The ongoing proliferation of private wastewater treatment systems will present significant challenges for the achievement of Ireland’s legally binding water quality targets under the WFD. The CDP should also ensure the adequate provision of serviced sites within close proximity to established water/wastewater infrastructure, where a connection to services can be readily facilitated, and where there is sufficient cumulative capacity within the wastewater treatment plant.</p> <p>We also recommend the insertion of a policy objective to promote changeover from septic tanks to public collection networks in all cases where this is feasible.</p> <p>Unassigned Waterbodies</p> <p>We would highlight the recent court ruling by Justice Hyland (2018 740 JR), which clarifies how unassigned waterbodies must be treated when assessing planning applications against WFD requirements, with implications for projects in proximity to unassigned waterbodies:</p> <p><i>“The WFD, as interpreted by the CJEU, requires a Member State to ensure that the requirements of Article 4 are met before permission is granted. It cannot be so satisfied in respect of development affecting a water body whose status has (in breach of the WFD and the implementing regulations in Ireland) not been assigned by the EPA.”</i> [para 130 2018 740 JR]. It is submitted that the new CDP should take account of this ruling and its implications for granting planning permissions.</p>
Flooding	<p>An Taisce submits a CPO is needed to ensure that all assessments of flood risk and all plans for flood defence measures are based on the most up-to-date climate projections. We would also submit that where flood mitigation measures are necessary, soft engineering solutions should preferentially be employed over hard engineering solutions where possible.</p>
Waste and Environmental Emissions	<p>Air Quality – Ammonia: See Section 6.1 of this submission on Ireland’s ongoing breach of legally binding ammonia limits. We recommend the inclusion of a specific objective on the mitigation of ammonia emissions.</p>
Energy and Information Infrastructure	<p>We welcome the Draft Plan’s robust consideration of renewable energy development of various types and scales across Wicklow and well as the many policy objectives supporting and facilitating this. We also welcome the recognition that the development of renewables must be done with regard to ecological constraints, Habitats Directive requirements, heritage considerations, landscape, local amenity, etc. There is no capacity for further expansion of the fossil gas network under national, EU and international climate policy. Fossil gas must be phased out of our energy mix as rapidly as possible if we are to reach our Paris Agreement targets to keep warming under 1.5C. Further expansion of gas networks also risks that infrastructure becoming “stranded assets” as Ireland makes the required transition away from fossil fuels. We therefore recommend the insertion of a CPO prohibiting further development of fossil fuel infrastructure.</p> <p>Bioenergy</p> <p>We submit that CPO 16.9 (to facilitate the development of projects that convert biomass to gas or electricity) requires a caveat that all such projects will undergo rigorous sustainability assessments.</p> <p>For instance, the development of bioenergy through anaerobic digestion is welcome in principle but only where the sustainability of this resource is justified. In order for bioenergy to be deemed renewable and to contribute to overall emissions reduction, the feedstock sources and the supply chain of these feedstocks must be assessed to</p>

be sustainable.

For example, while the burning of biogas generated from biomass, slurry, etc. might be deemed 'carbon neutral', the emissions that contribute to the growth, harvesting and transport of the feedstock must also be considered, and can negatively impact bioenergy's overall contribution to climate mitigation. The fertiliser used to accelerate the growth of energy crops and feed cattle, which eventually produce slurry, not only produce emissions but also contribute to water pollution. In the worst cases, the emissions mitigation potential of biogas may be negligible.

Anaerobic digestion predicated on increased grass/energy crop production should not be permitted in light of the increased levels of fertiliser input needed to grow the grass and the associated water quality and climate impacts. The use of existing waste streams for energy provision are often a more sustainable option as they do not promote an increase in production of energy crops, which can increase NO₂ soil emissions and water quality impacts through higher requirements of fertiliser.

However, with regard to the use of slurry, intensive cattle farming is also a major emitter of greenhouse gases and is contributing significantly to Ireland's ongoing failures to reach its legally binding Paris Agreement targets. Any use of slurry for bioenergy production should not be reliant upon or drive further bovine agriculture intensification.

To ensure the sustainability of biogas production, the sustainability of the biogas's end use must also be fully assessed. Permission for biogas facilities should only be granted where the biomethane will not be mixed with fossil gas, as this would exacerbate lock-in to fossil fuel use and contribute negatively to Ireland's potential to reach its 2030 emissions reduction targets. Supplying biogas to off-grid industrial users would be a potentially sustainable option, provided it is used for electricity generation and is not mixed with fossil gas. Biogas can also be sustainably used to power buses and delivery vehicles in urban areas, which will have the parallel benefit of reducing air pollution.

The CDP should therefore ensure that any provision of bioenergy is accomplished in a sustainable manner. With regard to biogas specifically, we submit that a CPO is needed to specify that biogas development will only be supported where it can be demonstrated that the feedstock source is sustainable and where the end product will not be mixed with fossil gas.

Data Centres and Energy Use

The Draft Plan Written Statement does not explicitly address data centre development in Wicklow, however, An Taisce considers that policies on the standard of assessment necessary for such proposals are needed.

Ireland has been called the "data centre capital of Europe" due to its mild climate and openness to Foreign Direct Investment (FDI). The proliferation of data infrastructure here has largely gone unchecked, and data centres now consume 11% of Ireland's total grid-generated electricity. The Irish Academy of Engineers has projected that this will increase to 31% by 2027, and adding between 1.5 and 3 million tonnes of CO₂ to Ireland's overall greenhouse gas emissions by 20286. By increasing overall energy demand in Ireland through the relatively uninhibited development of data centres, we are actively diluting the end benefit of renewable energy penetration that has been created and added to the grid over the past 20-30 years. Any new data centre should not jeopardise Ireland's existing national climate/renewable energy targets.

We therefore recommend the inclusion of the following objectives:

- Any new data centre proposal must fully comply with the requirements of the Environmental Impact Assessment Directive and assess the cumulative impacts of

	<p>the energy demand and associated emissions in conjunction with the data centre sector as a whole.</p> <ul style="list-style-type: none"> • Any new data centre proposal must evaluate its energy demand in relation to rapidly increasing electricity grid constraints. • Any new data centre development should only be considered if it provides a new, directly linked supply of renewable energy or matches its energy consumption with a new commensurate or greater contribution to Ireland’s renewable’s supply.
<p>Natural Heritage and Biodiversity</p>	<p>Ireland has a poor record when it comes to protecting the natural environment. The sprawling nature of development is a driving force for habitat fragmentation, biodiversity loss and agriculture-related land loss and is contributing to climate change.</p> <p>The 2019 report on “The Status of EU Protected Habitats and Species in Ireland” (prepared every six years as required by Article 17 of the EU Habitats Directive)⁷ illustrates the poor condition of Ireland’s biodiversity. Out of Ireland’s 59 European protected habitats, 85% were assessed as being in an unfavourable conservation status and 46% suffering from ongoing declines. The report highlighted agriculture and development (housing, commercial, industrial, and recreational) as two of the primary threats facing these habitats.</p> <p>In light of the above, the urgency with which we need to address the biodiversity loss emergency must be reflected in the CDP. As such, we are pleased to see the suite of policies aimed at biodiversity protection and enhancement, including for Wicklow’s many Special Areas of Conservation, Special Protection Areas, Natural Heritage Areas (existing and proposed), other protected sites and non-designated areas.</p> <p>However, the implementation and enforcement of these policies, whether in relation to protected sites or biodiversity and ecology more broadly, must be upheld in the planning process at all levels. In An Taisce’s experience, this is frequently not the case.</p> <p>Habitats Directive Requirements</p> <p>In light of the aforementioned poor state of many of Ireland’s protected habitats and species, we would highlight the strict legal requirements of the Habitat’s Directive with regard to the granting of planning permission where the proposal could impact Natura 2000 sites.</p> <p>It is now well established in law that approval can only be granted for plans and projects when it has been established beyond all reasonable scientific doubt that the subject proposal will not adversely impact any Natura 2000 sites.</p> <p>In Case C-258/11, <i>Sweetman & Others v An Bord Pleanála & Others</i>, it was held that the provisions of Articles 6(2)–(4) of the Habitats Directive must be interpreted together “<i>as a coherent whole in the light of the conservation objectives pursued by the directive</i>” and that they impose a series of specific obligations necessary to achieve and maintain favourable conservation status. A plan or project will negatively impact upon a site if it prevented the “<i>lasting preservation of the constitutive characteristics</i>” of the site for which it was designated, with reference to the site’s conservation objectives. Significantly it was determined that “<i>authorisation for a plan or projectmay therefore be given only on condition that the competent authorities are certain that the plan or project will not have lasting adverse effects on the integrity of the site. That is so where no reasonable scientific doubt remains as to the absence of such effects</i>”.</p> <p>The competent authority must therefore refuse authorisation for any plans or projects where there is uncertainty as to whether the plan or project will have adverse effects on the integrity of the site. It was also held in paragraph 44 that:</p> <p>“<i>So far as concerns the assessment carried out under Article 6(3) of the Habitats</i></p>

Directive, it should be pointed out that it cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned (see, to this effect, Case C 404/09 Commission v Spain, paragraph 100 and the case-law cited) ”.

In Kelly v An Bord Pleanála & Others, [2013 No 802 J.R.] with reference to Commission v Spain c-404/09, the High Court held in paragraph 36 that the competent authority must carry out an Appropriate Assessment for a plan or project in light of the best scientific knowledge in the field. It was also held that the competent authority must lay out the rational and reasoning which was used to arrive at the determination.

The case repeated the conclusion of the CJEU at paragraph 44 in the aforementioned Case C-258/11, namely that an AA “cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt.” Consequently, it was held that an AA must include “examination, analysis, evaluation, findings, conclusions and a final determination.”

The Kelly Judgement has provided a very helpful clarification of the requirements of an AA and in particular in paragraph 40, a summary of what must be delivered by the process in order to be lawfully conducted:

“(i) Must identify, in the light of the best scientific knowledge in the field, all aspects of the development project which can, by itself or in combination with other plans or projects, affect the European site in the light of its conservation objectives. This clearly requires both examination and analysis.

(ii) Must contain complete, precise and definitive findings and conclusions and may not have lacunae or gaps. The requirement for precise and definitive findings and conclusions appears to require analysis, evaluation and decisions. Further, the reference to findings and conclusions in a scientific context requires both findings following analysis and conclusions following an evaluation each in the light of the best scientific knowledge in the field.

(iii) May only include a determination that the proposed development will not adversely affect the integrity of any relevant European site where upon the basis of complete, precise and definitive findings and conclusions made the Board decides that no reasonable scientific doubt remains as to the absence of the identified potential effects.”

If uncertainty exists regarding the potential impact of any proposed development full account should be taken of the precautionary principle, and the development should be refused.

These points of law regarding Appropriate Assessment must be upheld in the planning process in Wicklow and provided for in the CDP.

In this regard, we recommend that CPO 17.4 be strengthened to read “to ensure” the protection of designated sites and compliance with relevant EU Directives (in as far as is possible in the carrying out of the Council’s functions), rather than “to contribute to”.

EU Biodiversity Strategy

We recommend that the implementation of the 14 points in the EU Biodiversity Strategy 2030 should be included as a specific biodiversity objective:

1. *Legally-binding EU nature restoration targets will be proposed in 2021, subject to*

	<p><i>an environmental impact assessment. By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30% reach favourable conservation status or at least show a positive trend.</i></p> <ol style="list-style-type: none"> <i>2. The decline in pollinators is reversed.</i> <i>3. The risk and use of chemical pesticides is reduced by 50% and the use of more hazardous pesticides is reduced by 50%.</i> <i>4. At least 10% of agricultural area is under high-diversity landscape features.</i> <i>5. At least 25% of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.</i> <i>6. Three billion new trees are planted in the EU, in full respect of ecological principles.</i> <i>7. Significant progress has been made in the remediation of contaminated soil sites.</i> <i>8. At least 25,000 km of free-flowing rivers are restored.</i> <i>9. There is a 50% reduction in the number of Red List species threatened by invasive alien species.</i> <i>10. The losses of nutrients from fertilisers are reduced by 50%, resulting in the reduction of the use of fertilisers by at least 20%.</i> <i>11. Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.</i> <i>12. No chemical pesticides are used in sensitive areas such as EU urban green areas.</i> <i>13. The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.</i> <i>14. The by-catch of species is eliminated or reduced to a level that allows species recovery and conservation.</i>
<p>Green Infrastructure</p>	<p>We welcome the Draft Plan’s approach to green infrastructure and the recognition of the benefits to both environment and communities.</p> <p>Greenways</p> <p>We welcome the progress made to date on the development of a network of greenways in Wicklow. We recommend that specific targets for further progress during the lifetime of the new CDP be set in the Draft Plan, particularly those discussed in CPO 18.11. The inclusion of the recreational train along the redundant Woodenbridge to Shillelagh rail line, part of which is already restored, is welcome. We also recommend the development of an integrated coastal walking route spanning the length of the county. The coastal trail recently completed in Wales provides a useful model.</p> <p>Urban Greening</p> <p>We would highlight Point 11 of the aforementioned EU Biodiversity Strategy that: “Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.” With regard to greening urban and peri-urban areas, Section 2.2.8 of the EU Biodiversity Strategy states:</p> <p><i>“Green urban spaces, from parks and gardens to green roofs and urban farms, provide a wide range of benefits for people. They also provide opportunities for businesses and a refuge for nature. They reduce air, water and noise pollution, provide protection from flooding, droughts and heat waves, and maintain a connection between humans and nature.</i></p> <p><i>The recent lockdowns due to the COVID-19 pandemic have shown us the value of green urban spaces for our physical and mental wellbeing. While protection of some urban green spaces has increased, green spaces often lose out in the competition for land as the share of the population living in urban areas continues to rise.</i></p> <p><i>This strategy aims to reverse these trends and stop the loss of green urban ecosystems.</i></p>

	<p><i>The promotion of healthy ecosystems, green infrastructure and nature- based solutions should be systematically integrated into urban planning, including in public spaces, infrastructure, and the design of buildings and their surroundings.</i></p> <p><i>To bring nature back to cities and reward community action, the Commission calls on European cities of at least 20,000 inhabitants to develop ambitious Urban Greening Plans by the end of 2021. These should include measures to create biodiverse and accessible urban forests, parks and gardens; urban farms; green roofs and walls; treelined streets; urban meadows; and urban hedges. They should also help improve connections between green spaces, eliminate the use of pesticides, limit excessive mowing of urban green spaces and other biodiversity harmful practices. Such plans could mobilise policy, regulatory and financial tools.</i></p> <p><i>To facilitate this work, the Commission will in 2021 set up an EU Urban Greening Platform, under a new 'Green City Accord' with cities and mayors. This will be done in close coordination with the European Covenant of Mayors. The Urban Greening Plans will have a central role in choosing the European Green Capital 2023 and European Green Leaf 2022.</i></p> <p><i>The Commission will support Member States and local and regional authorities through technical guidance and help to mobilise funding and capacity building. It will also reflect these objectives in the European Climate Pact."</i></p> <p>While only Bray currently has a population of over 20,000, we would nevertheless recommend that the new Development Plan should provide for the development of Urban Greening Plans for the county's larger towns, particularly those which are targeted for significant growth by 2030 such as Wicklow, Arklow, and Greystones. We would also encourage the development of urban greening plans in smaller towns as well. Specific timelined and targeted policies for achieving urban greening objectives during the plan period should be developed.</p>
<p>Marine Planning and Coastal Zone Management</p>	<p>A healthy ocean ecosystem is absolutely fundamental for the realisation of any economic or social benefits of coastal and marine activities. The objectives for the marine area should therefore directly address the trade-offs that may arise between economic interests and the pressing need to address declining marine biodiversity.</p> <p>We recommend that an ecosystem approach be adopted in the CDP's marine-related policy involving basing all decisions on the proper functioning of the ecosystems upon which human activities in the marine area depend. This would better ensure that the ecological health of the marine area takes precedence over human pressures such as fishing and aquaculture. Indeed, such an approach will have long-term economic benefits, particularly for coastal communities, as our seas return to a healthier ecological state. We consider that an objective to apply this approach for marine planning and policy should be explicitly stated. This is particularly important in light of the imminent commencement of the new marine planning regime.</p> <p>It is also important that the final plan includes a CPO to ensure that any activity that utilises the coastal and marine areas in Wicklow complies with the Marine Strategy Framework Directive and achieve the legally binding target for reaching Good Environmental Status in coastal and marine waters.</p> <p>We also consider that a commitment to ecological protection and an ecosystems approach is required in CPO 19.3 relating to aquaculture and fisheries. We also consider that an explicit statement relating to compliance with Habitats Directives requirements is needed here.</p> <p>The objectives around controls on development in areas prone to coastal erosion are welcome and should be rigorously enforced given the risks posed by climate change.</p>
<p>Strategic Environmental</p>	<p>The Council has a legal obligation to ensure that the SEA process is robust, effective, and identifies all likely significant effects on the environment under the range of</p>

<p>Assessment</p>	<p>considerations set out in the Annexes to the SEA Directive. To ensure integration of environmental considerations into the plan, a general policy or land use zoning should not be maintained where likely significant effects on the environment are identified.</p> <p>An Taisce highlights Article 10, which sets out the provisions for the monitoring of a programme subject to SEA and the obligation for remedial action where unforeseen adverse effects arise:</p> <ol style="list-style-type: none"> 1. <i>Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.</i> 2. <i>In order to comply with paragraph 1, existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring.</i> <p>The provisions of Article 10 are not just for monitoring but, notably, for the remediation of unforeseen adverse effects. Section 8.12 of the 2001 European Commission guidance states that:</p> <p><i>"Unforeseen adverse effects is better interpreted as referring to shortcomings of the prognostic statements in the environmental report (e.g. regarding the predicted intensity of the environmental effect) or unforeseen effects resulting from change of circumstances."</i></p> <p>The Council should ensure that monitoring of significant environmental effects is carried out and that any unforeseen adverse impacts that arise are remediated.</p>
<p>Implementation and Monitoring</p>	<p>In the absence of rigorous application of policy, the divergence between policy and practice results in unsustainable, economically inefficient, structurally weak and spatially dispersed development patterns. Therefore, it is of paramount importance that the new CDP moves beyond objectives within the text and towards robust targets, actions and measures to achieve the tangible implementation of the plan's objectives and policies. The success or otherwise of the forthcoming CDP can only be judged against quantifiable and implementable criteria which are subject to ongoing monitoring. This will be fundamental in creating a sustainable and healthy future for Wicklow that supports the wellbeing of both people and planet.</p>
<p>Chief Executive's Response</p>	
<p>Overarching Comments</p> <p>Comments noted – no changes requested or recommended on foot of same.</p> <p>Addressing the Climate and Biodiversity Emergencies</p> <ol style="list-style-type: none"> (a) Climate change commitments set out in Chapter 2 do not require repetition in Chapter 7 (Community Development) as suggested as they apply for all development sectors. Chapter 2 addresses the issue of the 'fair' application of climate action, including on those community least able to mitigate and adapt. No change recommended on foot of this suggestion. (b) It is considered it would render the plan excessively long and cumbersome to include climate objectives and targets in each and every chapter of the plans, showing compliance with Paris Agreement and EU policy. In addition, climate action is only one of three pillars underpinning the plan, and all three are considered in the crafting of all objectives and climate consideration do not override all objectives. While the Longford example is noted, having reviewed same it takes a similar approach to Wicklow in the integration of climate consideration through the plan. No change recommended on foot of this suggestion. (c) In the drafting of the plan, it became apparent that climate change was relevant to all aspects of the plan and was a constant theme, and therefore that would no longer be a need for a separate climate change appendix in the plan, as in the previous plan. However, in error it is stated in Section 2.2.2 of 	

the draft plan that this would be provided – this an error which is recommended be removed from the final plan.

- (d) The fact the National Mitigation Plan was struck down is referenced in Chapter 16. No change recommended on foot of this suggestion.
- (e) It is not considered appropriate to include more detail in the plan regarding the components /elements of 'Just transition' – this is not the Council's climate action plan, and such matters are more appropriate to other plans and strategies. No change recommended on foot of this suggestion.
- (f) While the concerns raised about biodiversity are noted, it is refuted that the draft plan does not robustly address this issue. In addition, again it should be borne in mind that this is not the Council biodiversity plan, which would address biodiversity and biodiversity loss in a more comprehensive manner than this land-use framework. No change recommended on foot of this suggestion.

Sustainable Settlement

It is considered that all of the issues raised are already fully and robustly addressed in the Draft Plan. Therefore no changes are recommended under this heading.

Town and Village Centres

It is considered that all of the issues raised are already fully and robustly addressed in the Draft Plan. Therefore no changes are recommended under this heading.

Built Heritage

It is not considered appropriate include provisions in the Development plan regarding operational matters such as building monitoring and issuing of notices under the Planning Act regarding the endangerment of protected structure. The Local Authority is obliged under statute to carry out its heritage function and it is not necessary to state in the Development Plan that a Council will fulfil its statutory functions. Therefore no changes are recommended under this heading.

Economic Development

- (a) The Draft Plan includes robust environmental protection objectives with respect to agriculture specifically (9.36, 9.39, 13.6) and a wide range of additional objectives that that apply to all development types to ensure that direct, indirect and cumulative impacts are evaluated and addressed as appropriate (e.g. 13.1, 13.2, 13.4, 13.5, 17.1, 17.2, 17.4, 167.5, 17.7, 17.8, 17.12, 17.14, 17.15, 17.24, 17.25, 17.26). No change recommended on foot of this suggestion.
- (b) It is not considered appropriate for Development Plan to promote certain crops over another; nor to address in detail practices such as the use of peat for horticulture. It is not the role of the development plan to be a catalogue of all and any strategies or policies of the EU, the State or various Government Departments relating to agriculture (such as the 'A Farm to Fork Strategy'). These would be more matters for an agriculture / horticulture sector strategy / plan, which would be under the remit of the Dept of Agriculture and Food. Therefore no changes are recommended on foot of these suggestions. No change recommended on foot of this suggestion.
- (c) With respect to Biodiversity, it is considered that the Draft Plan robustly addresses this area, even if it doesn't quote from each and every EU or national biodiversity strategy that might be exists. No change recommended on foot of this suggestion.
- (d) It is considered that the Draft Plan provision with respect to forestry (in particular objectives 9.42, 9.43, 9.46) fully address the issues raised with respect to woodland / planting species and the promotion of native species. In addition, it is not considered necessary to 'caveat' objective 9.48 as it is considered that there are a sufficient wide range and number of environmental protection policies already included in the Draft Plan that would allow for any adverse environmental affects for the development of timber biomass projects to be properly evaluated. No change recommended on foot of this suggestion.
- (e) With respect to the extractive industry, it is not appropriate or necessary to include an objective in a

Development Plan that the Council will fulfil its compliance and enforcement functions (as required by statute under the Act). No change recommended on foot of this suggestion.

Tourism and Recreation

It is considered that the issues raised under this heading are already addressed in the Draft Plan; for example issues around sustainable transport are addressed in Chapter 12, and environmental protection is addressed extensively in the Draft Plan, for example in the following objectives: 11.47, 11.48, 11.49, 17.4, 17.5, 17.6, 17.7, 17.8 and therefore it is not necessary to re-state same in this 'tourism' chapter. No change recommended on foot of this suggestion.

Sustainable Transportation

- (a) With respect to Objective 12.5, it is considered that this objective as worded is adequately clear and robust as to what is required in terms of accessibility audits and action require to addressed deficiencies (such as the rectification of the deficiency or the restricting or phasing development). This is new provision, and it is considered that it should not be overly prescriptive to allow for the format of report and response that flow from same to be developed iteratively as such assessment are carried out. No change recommended on foot of this suggestion.
- (b) With respect to Modal Split targets, the current (2016) modal split for the County could be provided in the plan, however having consulted with the NTA, the crafting of future modal split targets for each settlement is a complex exercise which entails detailed analysis of travel patterns in each location, and a general one-size-fits-all approach for setting targets is not optimal. Therefore it is considered most appropriate for modal split target to be developed as part of the Area Based Transport Assessments that are or will be carried out in the short term for the largest towns in the County (Levels 1-3 in the hierarchy) and thereafter for the medium sized towns (Level 4). It is considered sufficient for the Development Plan to state the baseline as a benchmark against which strategies and programmes set out in this plan can be assessed in the year 2 year plan implementation report in 2024, as updated data for modal split should be available at that stage from the 2022 Census.
- (c) The responsibility for providing a Transport Strategy for the region lies with the NTA, with a new strategy about to be produced, and it is not appropriate therefore for Wicklow and other counties in the region to prepare separate transport strategies, unless under the direction of the NTA as a subset of the GDA Strategy. No change recommended on foot of this suggestion.
- (d) The review of the road network called for in the Programme for Government quoted is a matter for the Councils' Roads and Transportation Dept and their various studies and strategies and not a matter for the County Development Plan.
- (e) The issues raised with respect to road investment are addressed in the Draft Plan; the planned strategic investment in the N11 is a matter for the TII rather than the CDP.

Water Services

The Draft Plan already includes the provisions requested. No change recommended on foot of this suggestion.

Flooding

The Draft Plan already includes the provisions requested. No change recommended on foot of this suggestion.

Waste and Environmental Emissions

The Draft Plan already includes provisions relating to the control and management of emissions to the air. No change recommended on foot of this suggestion.

Energy and Information Infrastructure

- (a) The Draft Plan does not provide policy support for the development non-renewable energy resources / systems (such as gas) but it is not considered necessary to include objectives to preclude same, as it

is not clear whether such resources / systems will be required to remain in situ and further developed given energy system uncertainty currently arising; the submission from the ESB should be noted wherein it is actually requested that positive policy support be provided for traditional energy sources that provide 'back up' to renewables. Therefore no change is recommended at this time, but this could be a matter for a future Development Plan. ,

- (b) It is agreed that a 'caveat' to objective 16.9 (biomass) is considered necessary – see recommendation below. .
- (c) While the concerns raised with respect to data centres are noted, it is not considered appropriate at this time to include new policies / objectives with regard to data centres generally, as this is an evolving area that appears may be subject to future Government policy, and it is considered premature to develop a Wicklow-only position with regard to this development type. No change therefore recommended.

Natural Heritage and Biodiversity

- (a) With respect to the Habitats Directive and the law, it is considered that the provisions of the Draft Plan, fully meet the requirements of the statutes; no issues with the wording of any objectives have been identified by the environmental authorities. Therefore no changes are recommended.
- (b) With respect to Biodiversity, it is considered that the Draft Plan robustly addresses this area, even if it doesn't quote from each and every EU or national biodiversity strategy that might be exits. No change recommended on foot of this suggestion.

Green Infrastructure

- (a) It is not considered appropriate and realistic to include specific targets for the delivery of the desired greenways set out in the Draft Plan; the Local Authority will utilise the resources available to it to delivery on the objectives of the plan which will be monitored and reported ion at 2 years interval. In addition, greenway projects are particularly complex with route identification, land ownership, environmental matters and funding all impacting significantly on the deliverability of such projects.
- (b) The suggestion made with respect to 'urban greening plans' will be considered in the development of future LAPs for the larger towns in the county. 'Urban Greening' elsewhere can be driven through more localised separate heritage / Biodiversity plans. No change is however recommended at this time to the CDP in this regard.

Marine Planning and Coastal Zone Management

With respect to Marine Planning and Coastal Zone Management, it is considered that the Draft Plan robustly addresses this points raised under this heading. No changes therefore recommended.

Strategic Environmental Assessment

The issue raised under this heading relates to monitoring which is addressed in the Draft Plana and SEA. No changes therefore recommended.

Implementation and Monitoring

Points raised noted; no changes are necessitated the Draft Plan on foot of same.

Chief Executive's Recommendations

Amend the Draft Plan as follows:

Volume 1

Chapter 2

Section 2.2.2

Omit phrase *'In order to ensure that this is done in a comprehensive manner, the plan will also include an*

appendix which audits the provisions of the plan, to show how and where climate considerations have indeed been fully and adequately incorporated into the plan provisions’.

Chapter 12

Include the following table:

Modal Split (trips to work and school)	Active		Public Transport		Private vehicles	
	2011	2016	2011	2016	2011	2016
Bray	21%	20%	21%	21%	58%	57%
Wicklow - Rathnew	18%	15%	8%	10%	74%	75%
Greystones- Delgany	10%	11%	22%	22%	68%	67%
Arklow	22%	24%	5%	5%	72%	71%
Blessington	19%	19%	9%	10%	72%	71%
Baltinglass	28%	34%	4%	4%	68%	62%
Enniskerry	6%	5%	18%	17%	76%	78%
Kilcoole	17%	17%	15%	16%	68%	67%
Newtown	12%	10%	17%	18%	71%	72%
Rathdrum	22%	24%	7%	6%	72%	70%

Chapter 16

Amend Objective 16.9 as follows:

CPO 16.9 To facilitate the development of projects that convert biomass to gas or electricity, subject to demonstration that such projects are resource efficient having regard to carbon emissions resulting from the growth, harvesting and transport of inputs, and do not result in unsustainable climate damaging agricultural intensification.

Name	Department of Education	Sub ID: C2-256
Topic	Issues raised	
Core Strategy	<p>The Department notes that while the development plan is for the period 2022-2028 that the population and housing targets are provided up to 2031 in order to provide a robust and responsive long-term framework. The longer-term framework is of assistance to the Department in considering school requirements. The Department notes that the plan has to sit within the framework of the ESRI's 50:50 scenario which aligns with the NPF's 2040 population targets and settlement pattern. Population and housing targets are a key driver of school place requirements. The plan projects a population of 173,505 people in 2031.</p> <p>This represents an increase of 31,082 people over the 2016 population of 142,423. It is noted that over half of the increase is to be in the two key towns of Bray and Wicklow/Rathnew. A quarter of the increase is to take place in the self-sustaining growth towns of Arklow, Greystones/Delgany and Blessington. The remaining quarter is to be distributed across the self-sustaining towns and smaller settlements. Bray, as part of the Dublin MASP is to have a minimum population increase of 9,500 people in the period.</p> <p>In considering the implications of the Draft Plan for school accommodation requirements, the Department is cognisant of potentially differing scenarios where variances in factors such as household sizes, demographic profiles and housing delivery rates could significantly alter the future school accommodation requirements. The Department also took into account planned school capacity increases in considering the plan, as well as underlying demographic trends at both primary and post-primary levels which will serve to mitigate additional school place demand arising from the population increases that are envisaged in the Draft Plan. Based on all factors, a view has been formed concerning projected future requirements and how they can best be met at each settlement and commentary is provided in this regard. In the context of Table 3.6 (Settlement populations 2016-2031) it is also worth noting that in its assessment of population trends, the Department uses a number of parameters to determine future needs. Requirements at primary level are currently assessed on 11.5% of population and 25 students per classroom. Post-primary requirements are assessed 7.5% of population numbers.</p> <p>Based on its analysis, the Department anticipates that some requirements for additional educational accommodation may emerge over the lifetime of the Plan, should the projected population increases materialize. In respect of the settlements identified in the Core Strategy Table 3.6, this Department set out the following observations.</p>	
Bray	<p>The population of Bray was 29,646 people in the 2016 Census. Bray is a key town in the metropolitan area and part of Bray extends into the administrative boundary of Dun Laoghaire Rathdown (DLR). The Co. Wicklow draft plan projects a population increase for Bray of some 10,779 people to a total of 40,425 by 2031 (an increase of c.36%). On the DLR side, the DLR plan anticipates that 50 ha of zoned residential lands in the Old Connaught area will deliver, on a phased basis and over a period of time, c. 2,000 residential units which, at an average household size, could yield a new population of 5,000 people in this area. The land in question is Tier 2, (not sufficiently serviced to support new development but has the potential to become fully serviced within the lifetime of the DRL plan, i.e. by 2028). From the Dept of Education's viewpoint in planning school provision, it is necessary to consider Bray as a whole. In this regard, it is understood that a joint urban plan is to be prepared</p>	

	<p>for Bray and this would be necessary and welcome.</p> <p>Bray is served by nine mainstream primary schools and seven (non-fee paying) post- primary schools. In addition, there are two special schools in Bray.</p> <p>At primary level, taking into account the underlying demographic trends and the level of potential increase in school place requirements arising from the increased population, the Department anticipates a future requirement for at least one new primary school; that school to be located in the main area of future development, Fassaroe. There may also be increased requirements at some of the existing schools, depending on how population increase is distributed and on expansion capacity of existing schools.</p> <p>At post-primary level, taking into account the current plans to increase capacity, it is anticipated that additional potential requirement arising from the projected population increase could be met by existing and planned facilities. Key in the current plans is the provision of a permanent building for a post-primary school established in 2016 and currently in interim accommodation. The Department is actively seeking a site for this school in order to cater for a 1,000 pupil school building. The site identification process is proving challenging. The assistance of Wicklow County Council would be much appreciated in identifying a suitable site within its administrative boundary (rather than the DLR boundary which is not as well located for the majority of the students that the school will serve).</p>
Wicklow – Rathnew	<p>The population of Wicklow/Rathnew was 14,114 people in the 2016 Census. The draft plan projects that it will have increased by 5,356 people to a total of 19,470 by 2031 (an increase of c.38%).</p> <p>Wicklow/Rathnew is served by six mainstream primary schools and four post-primary schools.</p> <p>At primary level, taking into account the underlying demographic trends, it is anticipated that the existing schools (or expansion thereof) could meet the requirements arising from the increased population.</p> <p>Key in the current plans is the provision of a permanent building for a post-primary school established in 2019 and currently in interim accommodation. Taking into account the planned provision of this school, it is anticipated that the requirements arising from the increased population in the draft plan can be met. The assistance of Wicklow County Council would be much appreciated in identifying a suitable site.</p>
Arklow	<p>The population of Arklow was 13,224 people in the 2016 Census. The draft plan projects that it will have increased by 3,216 people to a total of 16,440 by 2031 (an increase of c. 24%).</p> <p>Arklow is served by five mainstream primary schools and four post-primary schools.</p> <p>Taking into account the underlying demographic trends, the Department anticipates that the level of potential increase in school place requirements arising from the increased population can be met by existing facilities (or expansion thereof)</p>
Greystones/Delgany	<p>The population of Greystones/Delgany was 18,021 people in the 2016 Census. The draft plan projects that it will have increased by 3,609 people to a total of 21,630 by 2031 (an increase of approx. 20%).</p> <p>Greystones/Delgany is served by eight mainstream primary schools and three post- primary schools. One of the post-primary schools was established recently (in 2020) and currently is in interim accommodation. The Department is engaged in a site acquisition process for a permanent building for this school.</p>

	<p>Taking into account underlying demographic trends, the Department anticipates that the level of potential increase in school place requirements arising from the increased population can be met by existing facilities or expansion thereof or by the development of educational property in the ownership of the Minister in addition to planned new school development.</p>
Blessington	<p>The population of Blessington was 5,234 people in the 2016 Census. The draft plan projects that it will have increased by 801 people to a total of 6,035 by 2031 (an increase of c. 15%). Given Blessington's location on the Wicklow/Kildare county boundary, the Department welcomes the commitment to ensure that any plans prepared for the town are undertaken in consultation with Kildare County Council to provide a strategy for the sustainable development of the town and its hinterland as a whole, irrespective of County borders.</p> <p>Blessington is served by five mainstream primary schools and one post-primary school. At primary level, taking into account underlying demographic trends, the Department anticipates that the level of potential increase in school place requirements arising from the increased population will be met by existing facilities.</p> <p>At post-primary level, a relatively modest increase is anticipated in enrolment levels which could be met at the existing facility.</p>
Baltinglass	<p>The population of Baltinglass was 2,251 people in the 2016 Census. The draft plan projects that it will have increased by 474 people to a total of 2,725 by 2031 (an increase of c. 21%).</p> <p>The town is served by two mainstream primary schools and one post-primary school.</p> <p>Taking into account underlying demographic trends, the Department anticipates that the level of potential increase in school place requirements arising from the increased population can be met by existing facilities.</p>
Kilcoole	<p>The population of Kilcoole was 4,244 people in the 2016 Census. The draft plan projects no substantive increase in population to 2031.</p> <p>The town is served by one mainstream primary school and one post-primary school. Taking into account underlying demographic trends and capital projects in the pipeline, the Department anticipates that the level of potential increase in school place requirements arising from the increased population can be met by existing facilities.</p> <p>It also is planned (subject to planning permission) to re-locate St. Catherine's Special School from Newcastle to Kilcoole.</p>
Enniskerry	<p>The population of Enniskerry was 1,877 people in the 2016 Census. The draft plan projects no substantive population change up to 2031.</p> <p>The town is served by two mainstream primary schools. At post-primary level, Enniskerry is served by the schools in Bray.</p> <p>The Department anticipates no increase in school place requirements for Enniskerry</p>
Newtownmountkennedy	<p>The population of Newtownmountkennedy was 3,552 people in the 2016 Census. The draft plan projects that it will have increased by 1,668 people to a total of 5,220 by 2031 (an increase of 46%).</p> <p>The town is served by two mainstream primary schools.</p> <p>At primary level, taking into account planned capital projects, it is anticipated that the existing schools will meet the requirements arising from the increased population.</p> <p>At post-primary level, Newtownmountkennedy is located in the Kilcoole School Planning Area. An approved planned capacity increase is in the pipeline for this area and the Department anticipates that this will meet the requirements</p>

	<p>arising from the increased population in Newtownmountkennedy in the short to medium term.</p>
Rathdrum	<p>The population of Rathdrum was 1,716 people in the 2016 Census. The draft plan projects that it will have increased by 764 people to a total of 2,480 by 2031 (an increase of 44%).</p> <p>The town is served by three mainstream primary schools and one post-primary school.</p> <p>At primary level, it is anticipated that the existing schools can meet requirements arising from the increased population.</p> <p>At post-primary level, taking into account a planned extension to the existing school, it is anticipated that it will be able to meet requirements arising from the increased population.</p>
Small towns and villages	<p>No other educational requirements have been identified at any other settlements in Co. Wicklow</p>
Objectives	<p>In terms of the overall education objectives, the Department welcomes the objectives to facilitate the provision of schools, namely: 7.10, 7.11, and 7.12. 7.14, 7.17, 7.18.</p> <p>With respect to Objective 7.14, the Department is of the view that where this approach can be adopted it increases the return from investment of public funds in community/education and open space facilities as it facilitates sharing of facilities. If a community pitch can be provided beside a school, that pitch could be available for both the school during school hours and the community outside of school hours. Therefore, to reflect that possibility, the Department requests that the final sentence of CPO 14 be re-worded to read <i>"in regard to provision of recreational facilities for schools, every effort should be made to co-ordinate the provision of these facilities with community facilities"</i>.</p> <p>The Department also requests the inclusion of an additional education objective concerning existing school sites and the capacity to extend them and/or intensify development of them. Given the NPF objectives around compact growth, the facility to expand existing schools and/or to otherwise maximise the use of existing school sites will be critical in the future, in order to meet emerging requirements in Co. Wicklow (and nationally). In that context, the Department suggests an additional education objective along the following line:</p> <p><i>To ensure that existing and new school sites are protected for educational use and that lands adjacent to existing schools are protected for future educational use In order to allow for expansion of these schools, if required, subject to site suitability.</i></p> <p>In order to strengthen the zoning provision on existing school sites and to aid future planning, the Department requests, if possible that all existing school sites are zoned and mapped on the Co Council's GIS system. In addition, if possible, could all future education sites be zoned and mapped. This would enable the Department to pick up the mapping and zoning on our own GIS system and aid us both in the school planning function.</p>
Conclusion	<p>This Department has not identified any significant requirement for additional mainstream school place provision at any other settlement in Co Wicklow based on this draft plan. In terms of special schools, we have no immediate need identified to provide an additional special school in Co. Wicklow at present, but if a need arises the Department will get in touch with the Council.</p>

School accommodation requirements across the county will continue to be kept under review. In that regard, the Department welcomes the ongoing engagement with Wicklow County Council and will continue to work closely with the Council in relation to the provision of new schools and the development of existing schools. The critical importance of the existing schools in meeting future needs is evidenced in the submission and therefore it is vital to protect their zoning and to have land buffers around them, wherever possible, in order to cater for future needs. The Department acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs. The Department wishes to thank Wicklow County Council for the consideration given to the Department's submission to the Issues Paper in January 2020.

Chief Executive's Response

Core Strategy

Noted

Bray

The anticipated need for a new primary school at Fassaroe is noted and provision is made for same in the Bray MD LAP. The difficulties in sourcing a site for the new secondary school established in 2016, currently in interim accommodation, are noted. Wicklow County Council has ongoing dialogue with the Department in such regards.

Wicklow – Rathnew

It is noted that it is considered that primary school needs can be met by existing schools or expansion thereof. Wicklow County Council has regular dialogue with the Department with respect to sourcing a new site for a secondary school in temporary accommodation.

Arklow

It is noted that it is considered that primary and secondary school needs can be met by existing schools or expansion thereof.

Greystones-Delgany

It is noted that it is considered that primary and secondary school needs can be met by existing schools or expansion thereof or by the development of educational property in the ownership of the Minister in addition to planned new school development.

Blessington, Baltinglass, Kilcoole, Rathdrum

It is noted that it is considered that primary and secondary school needs can be met by existing schools.

Enniskerry

It is noted that it is anticipated that no increase in school places will be needed in Enniskerry.

Newtownmountkennedy

It is noted that at primary levels, taking into account planned projects, it is anticipated that existing schools will meet the needs of the increased population. With respect to secondary education, it is noted that Newtownmountkennedy is in the Kilcoole school planning area, and with planned increases in pipeline in this area it is anticipated that the needs of the increase in population will be met. Nonetheless, it is recommended that adequate lands remain zoned in the Newtownmountkennedy plan for the possibility of a future secondary school.

Small towns and villages

Noted

Objectives

The suggested alteration is Objective 7.14 is noted; this objective encourages the clustering of educational, community, and recreational and open space facilities. The logic / necessity for the request is unclear but it may be a concern with the second half of the objective which states 'school shall continue to make provisions for the own recreational facilities' which would mean that schools cannot rely on the development and use of open spaces provided by others adjacent to schools in lieu of providing for open spaces within the school property. The CE is not supportive of such an outcome, and this would not appear to be consistent with Department's own standards with respect to the provision of open space / recreational facilities within school grounds. No change is therefore recommended.

Chief Executive's Recommendations

No change

Name	HSE	Sub ID: C2-262
Topic	Issues raised	
Strategic Context	<p>Nationally the HSE continues to work under the strategic direction of Slaintecare, Healthy Ireland and the HSE National Service Plan alongside a number of key strategic documents covering topics areas such as Healthy Ageing, Childhood Obesity and Mental Health to name but a few. The recently published "Slaintecare Implementation Strategy and Action Plan 2021-2023" sets out the priorities and actions to achieve the aim of delivering a universal health service that offers the right care, in the right place, at the right time, at low or no cost. Healthy Ireland takes a 'whole of Government' and 'whole of society' approach, reflecting the multiple factors that influence our ability to support our own health and wellbeing. The "Healthy Ireland Strategic Action Plan 2021-2025" provides a clear roadmap of how we can continue to work together to bring about good health, access to services, healthy environments, and the promotion of resilience and to ensure that everyone can enjoy physical and mental, health and wellbeing, to their full potential. At a local level (CHEast), our work across all services including Primary Care, Social Care, Mental Health and Health and Wellbeing is also underpinned by our local "Community Healthcare East Healthy Ireland Plan 2018-2023".</p>	
Enhanced Community Care	<p>Enhanced Community Care (ECC) is a major HSE reform programme in the structures and clinical models associated with enhancing community care and reflects key changes articulated by Slaintecare, the HSE Corporate Plan 2021- 2024, Pandemic and Winter Plans and is given expression in the HSE National Service Plan 2021. The ECC programme reflects on the changing needs of the population of Co. Wicklow and will ensure the Community Health Networks (CHNs) are supported with additional staff and funding necessary to integrate services at a local level to address the health and social care of the population. A range of services are provided by Primary Care, Social Care, Mental Health and Health and Wellbeing functions within each CHN. The inclusion of health and wellbeing priorities, programmes and interventions will ensure that prevention, early intervention and self-care support are embedded in the basic building blocks of health and social care delivery for our population in Wicklow. This will enable a shift away from acute centric care to make care more accessible for each person in our community. The ECCs will also provide for the implementation of Community Specialist Teams including Integrated Care Programmes for Older People and Integrated Care Programmes for Chronic Disease on a population basis to 50k people complemented by community specialist teams working across population of 150,000. In Co. Wicklow there will be 3 CHNs (2 aligned to CHEast, 1 (West-Wicklow) aligned to Community Healthcare Organisation. A shared local governance structure across Acute hospital and CHO ensures the development of a fully integrated service and end-to-end pathway. The networks provide structures that enable the professional staff and teams to work together in a more coordinated and consistent way, based on the assessed needs of the local population enabling integrated care across hospital and community services. A critical requirement of this investment programme is that it can clearly identify what the impact of the investment will be on activity levels within each of the Networks in Co. Wicklow. Reflecting on these measures within the networks will provide the framework for both future healthcare reform and expansion.</p>	
The Healthy Communities Initiative	<p>In Ireland, there is a strong link between poverty, socio-economic status and health. Data on demographics and health status indicate that 22.5% of the population are exposed to disadvantage and the prevalence of chronic illness is higher in more deprived areas, including stroke (2.2 times higher), coronary heart disease (2.5 times higher) and diabetes (1.4 times higher). The Programme for Government, Our Shared Future (2020) highlighted the major role of the State in promoting good health and supporting the healthy lifestyles that</p>	

	<p>provide one of the foundations of a better quality of life. The Programme for Government specifically targets a number of the key lifestyle factors, such as smoking, alcohol, obesity and exercise, identifies approaches to child health, immunisation, screening, mental health and ageing and proposes new developments to support better health, such as a DEIS-type programme for health, providing GP practices, community pharmacies and public health staff with dedicated additional resources to communities, focused on improved health outcomes and driven by strong data.</p> <p>In addition to health service developments, the Programme for Government also targets developments under a range of sectors that collectively will contribute to better health and wellbeing. These developments that will influence the wider determinants of health include, for example, air quality, water quality, regeneration of villages and towns, education (e.g. closer links between education and local communities, expansion of the DEIS model, hot schools meals programme), transport, cycling and walking, housing and retrofitting to provide warmer homes, local sport and physical activity participation, social inclusion and community development and sustainable energy solutions.</p> <p>The Healthy Communities Initiative (HCI) by the Department of Health (DoH) through the HSE is a recognition of the relevance of health inequalities and is investing €10.0m nationally to provide health services to support healthy communities. The aim of the HCI Initiative which is due to be launched in October 2021, is to identify specific areas in which high risk factors to the health and wellbeing of the population are particularly prevalent, with a view to implementing targeted initiatives to tackle these challenges from within these communities. In Wicklow, as nationally, this will be achieved through partnership with a range of stakeholders and through the provision of dedicated services to build sustainable improvements in the health and wellbeing of those of all ages living in these communities. These services include: the Making Every Contact Count Programme, Social Prescribing Programmes, Parenting Programmes, Stop Smoking Advisors, We Can Quit and Healthy Food Made easy. The HCI aims to target areas with greatest level of disadvantage combined with highest proportion of young families and aligned to existing SICAP (Social Inclusion & Community Activation Programme) areas.</p> <p>In Co. Wicklow the HCI for Phase 1 will be in the Bray area (Electoral districts- Rathmichael (Bray), Bray No. 1, Bray No. 2, Bray No. 3, Kilmacanoge). The implementation of the Healthy Communities Programme will build on current assets and structures already in place. At local level it is proposed that the HSE engage with and are supported by the Healthy Ireland Coordinators in the Local Authorities. The existing LCDC structure could be used as the basis to support local implementation of wider healthy community initiatives. Engaging with Local Community Development Company and other local voluntary and statutory providers will trigger greater capacity building at local level. Together they can drive change, ensure coordination of health and wellbeing activities, leverage existing good practice and identify local projects that could be supported through a coordination of funding sources thus supporting the health and wellbeing of the population within Wicklow.</p> <p>The HSE welcomes the commitment and energy of everyone across Co. Wicklow that support local communities to meet their health needs and works to build on and strengthen these relationships to continue to serve the people of Wicklow.</p>
Chief Executive's Response	
The content of this submission is noted. However no specific issues in relation to the Draft Plan are raised and therefore no changes are recommended on foot of same.	
Chief Executive's Recommendations	
No change	

Section 3.2	Public Representatives	
Name	Cllr Mary Kavanagh https://consult.wicklow.ie/en/submission/ww-c2-157	Sub ID: C2-157
Topic	Issue raised	
Tree protection	It is suggested that the draft plan be amended to include an objective that requires Councillors to be notified if it is proposed to remove any urban or public realm trees, including statement of the reasons for the removal.	
Chief Executive's Response		
As this is an operational / management issue, it is not considered appropriate to include such a provision in the Development Plan. However, this is a matter that is being addressed separately in the Council's 'Tree Management Policy' which is currently under development.		
Chief Executive's Recommendation		
No change		

Name	John Brady TD https://consult.wicklow.ie/en/submission/ww-c2-210	Sub ID: C2-210
Topic	Issue raised	
Chapter 6 Housing	Propose the follow new objective: <i>All land banks currently owned by Wicklow County Council zoned residential will only be developed by Wicklow County Council and/or approved housing bodies for 100% public housing (social and affordable housing) and will not be sold to private developers</i>	
Chapter 7 Community Development	<p>Propose the following new objectives:</p> <ul style="list-style-type: none"> • <i>It is the policy of Wicklow County Council: To ensure that Wicklow has a supply of allotments and/or community gardens to meet the needs of the community. This includes supporting the identifying of potential sites on Council owned land for every urban area within the county for the development of public allotments and community gardens. Community gardens/allotments/local markets/pocket parks shall be provided where clear public demand exists, and in particular as temporary uses on vacant, under-utilised, or derelict sites in the county. Consideration should be given to the provision of community gardens and/or allotments in new developments.</i> • <i>Prioritisation be given to the provision of a swimming pool in the Baltinglass Municipal District in the Development Plan.</i> • <i>It is the policy of Wicklow County Council to design an initiative to make the beaches in Wicklow accessible to all. This could be achieved by the roll out a free rental scheme of Beach Wheelchairs at different beaches in Wicklow.</i> • <i>It is the policy of Wicklow County Council to frontload public facilities the development of community facilities including a sports campus on the Old Fassaroe site in Bray.</i> • <i>Open Water Swimming has increased substantially in recent years. It is the policy of Wicklow County Council to identify locations such as Bray Beach for the installation of Changing shelters. The installation of notice boards for safety information and marker buoys would add considerably to the development and safety aspect of the outdoor swimming.</i> • <i>To support and develop Naylor's Cove in Bray for waterborne activities</i> • <i>To support and develop a designated motocross track in Wicklow</i> • <i>To support and develop a community hub in Greystones which would incorporate the Greystones Family Resource Centre</i> • <i>It is the policy of Wicklow County Council to support the development of Community Centres in Carnew and Wicklow Town.</i> <p>Arts & Culture</p> <ul style="list-style-type: none"> • <i>To support and promote the development of new Theatres in Arklow and Wicklow Town</i> 	
Chapter 11 Tourism and Recreation	<p>Propose the following new objectives:</p> <ul style="list-style-type: none"> • <i>To identify locations in Wicklow and provide the infrastructure for overnight motorhome stopovers.</i> • <i>To promote, encourage and facilitate the development of a TV and Movie Museum/Visitor Centre in Wicklow</i> • <i>To ensure that beaches in Wicklow such as Magheramore and North Beach, Arklow are fully and freely assessable to the public.</i> • <i>To develop Bray Harbour as a centre of excellence for waterborne activities.</i> • <i>To protect public access on the established walk from the Southern cross in Bray to Little Sugarloaf via Killruddery.</i> 	
Chapter 12 Sustainable Transportation	<p>Propose the following new objectives:</p> <p>12.2 Sustainable Modes of Transport Public Transport</p> <p><i>Wicklow County Council will actively support the extension of the DART to Wicklow Town. Irish</i></p>	

Rail have also made a commitment to purchase 600 battery electric trains. The trains could run on electricity to Greystones and then they operate on a battery to Wicklow town and back. Wicklow County Council will actively support the introduction of these between Greystones and Wicklow Town while also supporting the DART extension.

12.3 Public Roads

It is the policy of Wicklow County Council to support the construction of a new slip road onto and off the M11 to the Vale Road in Arklow

Climate Action & Environmental Protection Objectives

That Wicklow County Council would install at least 1 Electric Vehicle recharging point for every 10 car parking spaces in all public car parks in Wicklow.

Ports, Harbours, Marinas & Freight Transport Objectives

To develop Bray Harbour as a centre of excellence for waterborne activities

Chief Executive's Response

Chapter 6 Housing: The objective proposed was already considered by the members of Wicklow County Council the making of the draft plan and was not approved by a majority of the members. In addition, the CE is not supportive of the proposed objective as it is considered to be outside the scope of the CDP, and would be an issue for the Council's Housing Delivery Strategy. Therefore no change is recommended.

Allotments: The Draft Plan clearly set out policy support and criteria for the development of allotments. The delivery of allotments by the Council on publicly owned land would be an operational and funding matter, and would not be matter for the CDP and therefore no change is recommended. With respect to the delivery of allotments in the public open space in new developments, this is not considered appropriate as this would essentially 'privatise' said space for certain users (allotments users), when such space is intended to be accessible by all for recreational purposes.

Swimming pool in West Wicklow: The Draft Plan already sets out support for same (CPO 7.43).

Beach accessibility/ swimming facilities: The Draft Plan sets out a significant number of policies and objectives that would support the delivery of beach accessibility improvements as well as enhanced swimming and safety infrastructure (7.3, 7.4, 7.8, 7.31, 7.32, 7.39). The delivery / running of facilities / schemes as suggested would be an operational and funding matter and not a matter for the CDP. Therefore no change is recommended.

Frontloading: The Draft Plan includes a significant number of objectives and development standards that require the delivery of community facilities as part of major new developments, and the timing of the delivery of such facilities is either set out in the local plan, or determined at the application stage. With respect to Fassaroe, the phasing requirements set out in the Bray MD LAP require the delivery of major open space / sports grounds as part of Phase 1.

Naylor's Cove: Policy support for improvement of Naylor's Cove in Bray already provided in the Bray MD LAP (Section 7.1).

Motocross: While specific policy support for a motocross track is not provided in the Draft Plan, it is not considered appropriate to identify one particular type of outdoor activity and highlight it above any other – the Draft Plan explicitly supports the appropriate outdoor sports and recreation facilities (CPO 18.9) Therefore no change is recommended.

Community hub Greystones / Community Centres Carnew and Wicklow Town: The provisions of the Draft Plan, as well as those of the current LAPs / Town Development Plans for Greystones and Wicklow Town, support the development of community facilities / centres. The actual delivery of new buildings would be a funding and

operational matter.

Theatres in Arklow and Wicklow Town: The provisions of the Draft Plan, as well as those of the current LAPs / Town Development Plans for Arklow and Wicklow Town, support the development of arts and cultural venues, such as theatres. The actual delivery of new buildings would be a funding and operational matter.

Tourism and Recreation

- It would not be possible to identify specific locations for motorhome stopovers in the Development Plan without first having carried out detailed survey and assessment, in consultation with Tourism Agencies and stakeholders, regarding the criteria for such sites and the optimal locations. Rather, the Development Plan provides planning policy support for such development as set out in CPO 11.24, and 11.25. No change is therefore recommended
- The Draft Plan already includes an objective supporting film related tourism (CPO 11.9); therefore no change is recommended.
- It is not the role of the CDP to 'ensure' access is available to certain beaches or along certain routes, such as Bray SCR to the Little Sugarloaf; the CDP is a land use and development framework and has no role in the creation of access routes, or public rights of way where they are not in situ already, or are in dispute. The CDP can support the development of new / improved routes, and support for a route from Bray Head via the Sugarloaf Mountains, joining up to the Wicklow Way is already an objective of the Draft Plan (CPO 18.11). In addition, the Draft Plan already contains objectives to support greater public access to the coast, such as CPO 18.6 and 18.13. No change therefore recommended.
- Support for the development of Bray harbour is already provided for in the Draft Plan (Objective 12.62) and the Bray MD LAP (Section 7.2); therefore no change is recommended.

Sustainable Modes of Transport Public Transport: the Draft Plan provides clear policy support for the delivery of significant improvements to rail services to Wicklow Town (Objectives 12.20, 12.22, 12.24).

M11 – Vale Road: This objective is already set out in the Draft Plan (Objective 12.36)

Climate Action & Environmental Protection Objectives: Electric vehicles car charging standards for new car parks are clearly set out in the Draft Plan. The retrofitting of existing Council car parks would be a funding and operational matter.

Ports, Harbours, Marinas & Freight Transport Objectives: Support for the development of Bray harbour is already provided for in the Draft Plan (Objective 12.62) and the Bray MD LAP (Section 7.2); therefore no change is recommended.

Chief Executive’s Recommendation

No change

Name	Senator Pat Casey https://consult.wicklow.ie/en/submission/ww-c2-270	Sub ID: 270
Topic	Issue raised	
<p><i>Note: This is a lengthy and very detailed submission, which contains numerous tables and sets of data. It will not be possible to insert all of this information into this summary and it is therefore recommended that the reader review the full original submission. In addition, a significant part of this submission is a critique / analysis of the NPF, RSES and other Government policies, and as these are issues that cannot be addressed through the CDP process, any points raised in relation to same are not detailed to follow. Only points relating to the application of such higher level policies/strategies to Wicklow are addressed.</i></p>		
Chapter 3 Core Strategy	<ul style="list-style-type: none"> - The submission sets out in detail how the application of the NPF population / housing targets will result in the failure to deliver adequate housing in Co. Wicklow over the plan period and up to 2031 and will result in a premium price being placed on the remaining zoned land, making it harder to deliver affordable homes. - Significant data and analysis is set out in the submission showing how the proposed population and housing growth targets in Draft Plan compare to the same targets set out in the previous 2016 CDP, and emphasising the reduction in growth across almost all settlement tiers as a result of the application of the new NPF targets. Concerns are raised that such reductions will impact on the survival and sustainability of many settlements and will impact on the viability of local facilities such as schools, retail, sports clubs etc. - Concerns are raised that the availability of infrastructure is not being used a key metric in the setting of housing growth targets. - Concern raised regarding the compact growth targets, and how this will impact on delivery of greenfield type development, even where land is serviced. - Suggested that having regard to the number of units under construction, 15 settlements in County Wicklow have already exceeded the 2028 growth targets and therefore no more houses can be built, even before the development plan is adopted. - Issues raised around the ability to deliver the target number of homes in Bray during the lifetime of the plan given the timeframe for the delivery of M/N11 upgrade. In comparison, it is pointed out that Wicklow Town has all necessary infrastructure in place and has the infrastructural capacity to growth significantly higher than the target set out in the Draft Plan. Attention is also drawn to the committed investment in Arklow WWTP. - Attention is drawn to the dezoning provisions set out in the Draft Plan, and concerns raised about the dezoning of serviced lands where there would be no impediments to immediate housing delivery <p>The following amendment is therefore suggested for Chapter 3, Section 3.5, under 'Principle 2: Delivery of Population and Housing Targets':</p> <p><i>"Where the targets set out in the tables above can't be fulfilled within the quantum of land identified due the lack of infrastructure as set out in (appendix 9), consideration will be given to fulfilling the targets set out in the tables above, on land identified within Local Area Plan and Small-Town Plan where infrastructure is or will be available and based on the sequential approach set out in Principle 4".</i></p>	
Chapter 4 Settlement Strategy	<p>It is suggested that Arklow be identified as a 'Key Town Level 2' for the following reasons:</p> <p>Population: Arklow has a population of over 13,000 similar to the combined population of Wicklow-Rathnew</p> <p>Employment: Has the highest level of local jobs as a % of its population 3,040 or 23%</p> <p>Has the highest level of working persons within its residential settlement, (Arklow 42%,</p>	

Wicklow-Rathnew 35%, Bray 30%, Greystones-Delgany 12%)
 Arklow is in the strongest place to provide employment opportunities of all the Towns in Wicklow including Tier 1 and 2 (SSEI Airtricity, Echelon 2 Data Centres, LMH engineering further expansion, Primary Care Unit, Expansion of Harmony Timbers, Arklow Shipping New Head Quarters)
Connectivity: Served by M/N11, Rail Corridor same as Wicklow, Bus Up to 34 daily / arrivals from Dublin
Infrastructure: Water Supply spare capacity available, Waste Water currently at tender stage to be delivered by 2024 to serve population of 32,000
Regeneration: Arklow has some key regeneration sites currently being developed (Castle Park site, Primary Care Centre, Wallbord Site, location for new Waste water treatment Plant, Other brown field sites available to achieve NPO 9, Alps Site Main Street, Arklow Harbour).

It is also put forward that it is not the sole remit of the Regional Spatial and Economic Strategy to confer “Key Town” status and that the County Development Plans process can propose same through the members of the Local Authority (various extracts from the RSES accompany this submission).

Chief Executive’s Response

Chapter 3 Core Strategy

Considerable analysis has been undertaken in this submission which Senator Casey considers shows how the application of the NPF population and housing targets, including compact growth targets, will restrict the delivery of homes in the middle of the housing crisis, even on serviced land. While this is all very cogently put, unfortunately it is not within the scope of the CDP to alter the targets or principles provided by the Government through the NPF (and associated circulars, guidelines etc) and there is an obligation on the Planning Authority to craft a Development Plan that is ‘consistent’ with the NPF (and other higher order strategies such as the RSES), even if there were concerns regarding the content, applicability or reasonableness of these higher order strategies.

It is considered that the provisions and standards with respect to targets and zoning set out in the NPF and RSES have been correctly applied as required in the Draft Plan, and this has been confirmed by the OPR in their submission (subject to some changes / clarification). Indeed the OPR is requesting some further de-zoning in order to ensure consistency with the NPF, which is clearly contrary to the position put forward in Senator Casey’s submission.

While no changes are recommended to the Draft Plan on foot of this submission, changes to the proposed Core Strategy on foot of other submissions are recommended, as set out in the documents appended to this report.

Chapter 4 Settlement Strategy

Notwithstanding the suggestion made in the submission, it is clear from the NPF that the identification of Key Towns is one which forms part of the process of determining settlement strategy and settlement typology for the region, as was done in the RSES. The outcome of this process, which entailed public consultation, interaction with Council officials, submissions on behalf of the Wicklow elected members (collectively and individually), and ultimately adoption by the elected members of the regional assembly, which is made up of elected members from constituent counties in the region, including Wicklow, was that only Bray and Wicklow - Rathnew were designated as Key Towns in the regional settlement hierarchy. It is considered that it is outside the scope of the County Development Plan to unilaterally designate town as a regional Key Town – the time for making the case for certain towns in this regard was during the making of the RSES which is now finalised.

In addition, at this time the CE would not agree that Arklow would fulfil the criteria to be identified as 'Key Town' having regard to the current deficiencies in wastewater services, which are only likely to be rectified in the latter half of the development plan period, and therefore it is considered that a 'key town' designation, which suggests the town is primed for significant growth now, is simply not correct.

In addition, Arklow is experiencing significant deficiencies in transport infrastructure, both in terms of significant congestion which requires addressing, but also the lack of public transportation services. The Council is currently working with the NTA to prepare a Local Transport Plan for Arklow and once finalised, will set out a pathway for the remedying of these deficiencies. This will however take some time as detailed design work will need to be carried out and funding sourced for project delivery. In this regard also it is not considered that Arklow is as yet 'ready' for very significant growth.

It is not clear from the submission why this 'Key Town' designation is being sought, or what benefits it is considered that such a designation would bring to the town.

Therefore no change is recommended.

Chief Executive's Recommendation

No change

Name	Steven Matthews TD https://consult.wicklow.ie/en/submission/ww-c2-303	Sub ID: C2-303
Topic	Issue raised	
Compact Growth	<p>Compact Growth must be achieved through identification and zoning of residential lands with high densities which are served by well-designed community spaces and high-quality public realm through towns and villages and serving the higher density residential developments. Support and encouragement must be provided for the development of infill sites, change of use and conversion of vacant or upper floor commercial units to good quality residential units to bring life and vitality back into rural towns. The objective is to halt the population decline in rural towns by providing attractive town centre living at population densities that can support local traders and the local economy. This may also be achieved by provision of serviced sites.</p> <p>Suggested Objectives:</p> <p>Objective 1: The Local Authority shall identify sites in towns which fail to meet the criteria for the Vacant Site Levy (2015 Act) but which are not impeded by lack of infrastructure or services for development. Although such sites would not currently incur a VSL, the identification of such sites in a CDP/LAP will be beneficial as further progress is made on Town Centres First national policy, the development of serviced sites initiatives and other government policies that may support restoration for residential use of derelict or vacant buildings</p> <p>Objective 2: The identification of infill sites and town centre re-use sites shall be accompanied by a design objective to provide high quality public realm and recreational open/green spaces.</p>	
Sustainable Mobility	<p>Sustainable Mobility must be achieved by the provision of good public transport links. The transport links must provide an attractive alternative to car dependency in an effort to reduce transport emissions and air pollution and provide for inter urban and as well as intra urban transport requirements for employment, education, recreation and socialising and access to health, community and public services. Transport must be improved for Wicklow by supporting the upgrade of the Rosslare rail line to an overhead electrified service extension from Greystones to Wicklow Town. This extension coupled with Irish Rails procurement of Battery Electric Trains could provide for an electrified rail service to Arklow. It is crucial to the development of a frequent and reliable electric train service to Wicklow that the National Transport Authority include the objective of an electrified service to Wicklow in the upcoming Greater Dublin Area Transport Strategy. To support such large-scale public investment in the rail line, development in Wicklow must be centred around public transport and access to rail and bus transport hubs must be provided and prioritised.</p> <p>Suggested Objectives:</p> <p>Objective 3: Transport Orientated Development (TOD) shall be a primary factor in future residential development and employment zones.</p> <p>Objective 4: Provided that the NTA includes electrification of the Wicklow rail line in the GDA Transport Strategy, land for Park and Ride facilities of an adequate size to serve the catchment, shall be identified at or in accessible proximity to rail stations at Arklow, Avoca, Rathdrum, Glenealy, Wicklow/Rathnew, Newcastle and Kilcoole.</p> <p>Objective 5: Land identified for Park and Ride facilities shall also include space for express bus use as NTA provides for such service on N11 improvements. Express bus services on the N11 should provide direct links from the rail centred Park and Ride locations to northbound destinations and avoid multiple stops at peak times to provide an attractive and timely service for commuters.</p> <p>Objective 6: Active travel routes shall be identified to provide safe, direct links to the identified Park and Ride land and Rail stations at Arklow, Avoca, Rathdrum, Glenealy, Wicklow/Rathnew, Newcastle and Kilcoole and delivered as public transport services are delivered in cooperation with the NTA. A new active travel link shall be identified to connect the Charlesland area to a potential rail stop south of Greystones station.</p>	

	<p>Objective 7: Land for Park and Ride facilities should be identified to serve the Baltinglass and Blessington district area to allow the NTA to provide an express bus service connection to DART+ West and rail connection at Sallins/Naas rail station for connection to city centre.</p> <p>The identification, facilitation and investment in active travel options is vital to cohesive planning and transport provision especially for intra-urban needs. The provision of high quality segregated and safer pedestrian and cycling infrastructure should be the highest transport priority for cross-town interconnectivity to connect employment, education, transport nodes and recreation and amenity sites. Wicklow County Council planning and transport services and the NTA need to prioritise active travel utilising staff resources to ensure that construction engineering designs contain and deliver the highest quality civic and public realm aspects to active mobility schemes. The provision of higher standards such as Dutch style cycling standards should be encouraged to create safer and more attractive cycling routes especially in relation to Safe Routes to School and to facilitate successful funding applications. A network of safe, segregated cycling routes to school would improve the health of children and parents, improve air quality for all and reduce traffic congestion and parking hazards at 'drop off/pick up times'</p> <p>Objective 8: All zoned residential land should provide indicative routes for safe cycling, walking and safe routes to school. The indicative routes should connect to and through existing developed areas, providing as direct routes as possible and utilising passive surveillance to desired locations for school, shops, employment, recreation etc. The provision of infrastructure to create the indicative routes should be a condition for planning permission</p> <p>Objective 9: All town plans contained in the CDP & LAPs should contain a map which shows the current cycling and walking routes to desired locations. The maps should also show the missing links that would facilitate, improve or complete cycling and walking links to desired locations and Safe Routes to School (Local Authority requirement). All planning applications should be required to show how the proposed development connects to the existing cycling/pedestrian/safe routes to school map. All planning applications should be required to indicate how the proposed site might connect active travel links to contiguous zoned land (applicant requirement).</p> <p>Objective 10: Identify and facilitate the development of a segregated cycling route between Newtownmountkennedy and Kilcoole to connect NTMK to improved rail service. This route will also form the final leg of the 'mountains to the sea' route proposed by Newtown 2050 and will serve both recreational and inter urban use.</p> <p>Bus Services</p> <p>Objective 11: Identify rural towns and clusters where the provision of increased NTA rural (local link) services would meet the requirement of transport orientated development, facilitating future residential development through the provision of regular bus services. This may include the extension of Dublin Bus No 65 service at peak times to beyond Blessington.</p>
<p>Education and provision of school places</p>	<p>Suggested Objective:</p> <p>Objective 12: It should be a requirement of a planning application for +100 houses that proof be provided if capacity exists in the local schools to accommodate the likely increase in demand for school places. Currently it appears that an applicant just states that there is a sufficient quantity of schools in proximity to a proposed development but is not required to provide detail or proof to planners on the capacity of those schools to accommodate demand from the proposed development. It would appear to be a simple exercise for an applicant, having determined the number of schools in an area, to furnish planners with the excess capacity that exists in those schools.</p>
<p>Sports facilities and the planning</p>	<p>Planning services, municipal districts and the CCSD Department are the main drivers for the provision of sports and recreational facilities and for applying for funding for large scale sports</p>

<p>system</p>	<p>provision. To support applications and requests for sports facilities an audit should be carried out in each district to support planning objectives on sports and recreation objectives.</p> <p>Objective 13: To support planning objectives and the development contributions scheme, each Municipal District should carry out a sports and recreation audit of their district. The audit should identify the sports and recreational assets and facilities that exist in the district, the capacity that exists in current provision of facilities, the likely increase in demand on existing facilities as development occurs in the district, the desire for or gap in provision of other sporting facilities (e.g. West Wicklow Pool campaign). The audit should identify the location of current facilities, scope for increasing the scale of each facility and sites for development of new sports facilities (e.g. proposed large scale sporting facility at Bray, Fassaroe lands). The outcome of the sports audit should inform forward planning for site identification, the development contribution scheme and council investment objectives over the course of this CDP and future LAPs and CDPs. The overall objective should be the creation of a large-scale community sports facility with multiple sporting facilities shared amongst the sports clubs as this presents the best opportunity to secure central funding</p>
<p>Town Centres First and placemaking</p>	<p>The Town Centres First, Government policy objective seeks to support towns and villages and the creation sustainable communities by implementing a strategic approach to town centre regeneration. The utilisation of existing buildings and unused lands for new development will promote and provide residential occupancy in our rural towns and villages. The identification of suitable sites and buildings needs to be carried out in a strategic manner through Town Centre Health Checks. A TCHC, with public participation can identify many opportunities for public realm, active transport links and community services investment to support town centre living. It can also open new infill or opportunity sites for higher density development. A TCHC may also support funding applications for Town and Village Renewal grants.</p> <p>Suggested Objective:</p> <p>Objective 14: In conjunction with each Municipal District, Town Centre Health Checks should be carried out to identify opportunities for residential development within towns and villages. Identification of suitable towns should include transport objectives as described in Objective 11 (I accept that the carrying out of TCHC is not a planning services function, however planning services could liaise with each Municipal District to encourage the MD to carry out a TCHC. Where a TCHC identifies opportunities there should be scope to amend population figures for a town where sustainable town centre res development and proper public transport services would support such an amendment.</p>
<p>Previously zoned land</p>	<p>The CDP should clearly identify land, which has been previously zoned for residential development in the preceding CDP but has not been developed.</p> <p>Suggested Objective:</p> <p>Objective 15: Except in circumstances where a lack of services has impeded development, these sites should be clearly identified in the CDP and LAPs. This will assist in assessing potential land hoarding or other matters to provide that in the eventuality that CPO or other housing provision or Planning measures become available to activate that land for the provision of affordable or cost rental housing opportunities that these sites have been identified and owners are aware of their identification as such sites.</p>
<p>Suggested Amendments</p>	<p><u>Section 12.1 Active Modes of Transport - Cycling and Walking:</u> suggest that 'factors that will influence whether one will walk or cycle ...distance' also incorporates and acknowledges that the increase in popularity of e-bikes and e-scooters which provide greater ranges and accessibility for a wider cohort of users enables greater distances to be achieved.</p> <p><u>Section 12.5 Ports, Harbours, Marinas & Freight Transport</u> suggest addition 'that we will actively engage with the Offshore Renewable Energy industry to identify the current and future requirements for Wicklow and Arklow ports to serve the design, build, operate, maintain, re-</p>

power and decommissioning phases of ORE developments'

Section 12.6 Strategic Sites in Bray- Fassaroe- add to 2nd bullet point N11 Cycle Pedestrian Bridge ...'linked to direct, segregated safe cycling route to Bray Town Centre'

Section 12.8 Sustainable Transportation Objectives

CPO12.8 - the requirement for installation of ducting infrastructure - design and as built drawings should be provided on completion of development.

CPO 12.52 add 'segregated' before 'cycling lanes/tracks'

CPO12.66 add '*to facilitate the delivery an active travel link between Bray Harbour and Woodbrook/Shanganagh in cooperation with DLRCoCo and the NTA and adjoining landowners*'.

Core Strategy

Suggest a re-designation of Greystones as a 'Self Sustaining Town' in recognition of the large-scale residential growth over the past years and to allow for Greystones/Delgany to 'catch up' in terms of employment, services and transport.

Chief Executive's Response

Compact Growth

The CE concurs with the views expressed with regard to compact growth, the re-development of infill sites and upper floors, the need for high quality public realm and community facilities, and the revitalisation of towns and villages. It is considered that the Draft Plan addresses all of these issues, and the activities and operations of all of the Directorates of the Local Authority are focused on achieving these goals and securing funding for new projects.

However it is not considered feasible or realistic given the scope and resources available to utilise the CDP process to carry out the level of detailed town / building survey and assessment suggested. This type of work is more suited to the development of town programmes and projects at MD level for example in the development of URDF / RRDF applications, or in the application of new provisions proposed by Government for vacant properties in 'Housing For All'; therefore no change is recommended on foot of Suggested Objective 1.

Similarly, it would not be feasible to prepare a design statement for each and every possible re-development / infill sites across the 21 towns and over 50 villages in the County and therefore no change is recommended on foot of suggested Objective 2.

Sustainable Mobility

The CE concurs with the views expressed with regard to sustainable mobility and active travel. The objectives set out in the Draft Plan support the delivery of transport system improvement by the various transport providers and agencies. On foot of a number of submissions, some amendments are recommended to the transport objectives set out in the Draft Plan (detailed to follow) which address some of the concerns outlined in this submissions.

With respect to suggested Objective 3, at this time it is not recommended that 'Transport Oriented Development' should be identified as the *primary* factor for future residential and employment zones, as this would significantly stymie development in many locations in the County, particularly those in more rural areas, where no or very limited public transport services are available. It is considered more appropriate to ensure that new development is located in the core of towns, where the possibilities for availing of public transport services (where and when they are present) as well as walking / cycling are maximised. No change therefore recommended.

With regard to suggested Objectives 4 and 5, it is not possible to require the NTA to provide for something via the CDP process. The draft NTA Strategy for the GDA, which will also address park-and-ride, is due to be published in Q4 2021, and there will be opportunities for input into that strategy at that time. The objectives of the Draft Plan support the delivery of transport improvements as set out in the current and future NTA strategies. No change therefore recommended.

With respect to active travel and identification of routes (suggested Objectives 6, 8), a significant programme of measures is due to start in this regard, with the establishment of an NTA funded Active Travel team in Wicklow County Council, and it would be premature to include identification of routes, specific accessibility measures or design standards that will be utilised in advance of the survey, analysis and recommendations of this programme

being carried out. No change therefore recommended.

The Draft Plan fully supports the development of improved services including park-and-ride in West Wicklow with connection to rails services at Sallins / Naas, and enhanced text is recommended (as below) to identify this (suggested Objective 7).

With respect to new residential development (suggested Objective 8, 9), the Draft Plan already makes provision (CPO 12.5) for larger scale residential applications to include an 'accessibility report' that demonstrates how residents will be able to access key services and public transport routes by means other than the private car. No change therefore recommended.

It would not be possible as part of this plan to show all existing footpath and cycleways in all of the towns in the County, as this data is not currently collected and resources would not be available to collect this at this stage of plan making. This type of data will however be collected and detailed as part of the Active Travel programme and local ABTAs / LTPs to be prepared for all of the larger towns and any other town where deemed necessary (as required under Objective CPO 12.3). No change therefore recommended.

Rather than identify specific inter-urban cycling routes between towns (as is suggested under Objective 10 in this submission between Newtown and Kilcoole), the Draft Plan makes reference to the County Sustainable Transport Plan, and the various ABTAs / LTPs that are to be prepared, which will evaluate such links and identify routes where found to be necessary and feasible. The Draft Plan supports the development of the 'Mountains to the Sea' amenity route 9CPO 11.37). No change therefore recommended.

With regard to proposed objective 11, it is not the role of the Development Plan, not being a transport services delivery plan, to identify rural towns / areas where local link bus serves might be feasible. This is a matter for the NTA. No change therefore recommended.

Education and provision of school places

It is already a requirement of the Draft Plan (CPO 7.5 and appendix 1, Section 7) that developments in excess of 50 units in larger towns and 25 units in smaller settlements carried out a Social Infrastructure Audit, to evaluate school capacity in the area. No change is therefore recommended.

Sports facilities and the planning system

The carrying out of a sports facilities audit in each area would be matters for the CCSD Directorate, which is tasked with the delivery of services in this area. The CDP supports the delivery of projects identified by such audits through the zoning of land for community and open space uses and the provision of a wide range of objectives as set out in Chapter 7 particularly of the Draft Plan. Therefore no change is recommended.

Town Centres First and placemaking

The CE supports the carrying out of town centre health checks and many of these have already been completed or are in train by the CCSD Directorate and Municipal Districts. The Draft Plan provides significant planning policy support for the regeneration of town centres, including the entirety of Chapter 5. No changes are recommended.

Previously zoned land

The suggestion here is not clear; it appears to be being suggested that any land previously zoned and serviced (even if said zoning is not being carried forward) should be identified to show who might be 'land hoarding'. It is not clear what this would achieve. In addition, while not clear it appears to be suggested that such land might be useful to identify if funding becomes available to acquire land for affordable or cost rental housing. Again it is not clear what this would achieve as if the land are de-zoned, it would be contrary to the objectives of the plan and the requirements of various guideline to allow for in-depth housing thereon, even if affordable. Therefore no change is recommended in this regard.

Suggested Objectives

Section 12.1 Active Modes of Transport – it is not considered necessary to alter the text to reference scooters and e-bikes as the factors that influence whether one walks, cycles, (by push or electric bike) 'scooters' or otherwise to a destination are the same.

Section 12.5 Ports, Harbours, Marinas & Freight Transport – this suggestion is an operational one, not a planning policy matter (which is already addressed in CPO 12.63); therefore no change is recommended. The Council’s economic development and harbours teams are already actively engaged with off shore wind providers with respect to on-shore infrastructure.

Section 12.6 Strategic Sites in Bray- Fassaroe: The design detail regarding the various pedestrian, cycling and public transport links needed to support the development of Fassaroe is set out either in the Bray and Environs Transport Study or in the various implementation programmes in development with the TII / NTA and the developer. It is not considered therefore appropriate to specify further details at this stage of plan making. No change is recommended.

Section 12.8 Sustainable Transportation Objectives

CPO12.8 – the requirement for ‘as built’ drawings is a matter for the Council’s ‘Taking in Charge’ policy and the Building Regulations. Therefore no change is recommended.

CPO 12.52 – it is not considered appropriate to include the word ‘segregated’ as this may be an overly onerous requirement on all roads. The design of any new or improved cycleways will be determined by the standards applicable at the time and local conditions. No change is therefore recommended.

CPO12.66 – the provision of an active travel route from Bray harbour towards Woodbrook DART is already an objective of the Draft Plan (CPO 11.37). This can be added to Chapter 12.

Core Strategy: The issue raised with respect to Greystones – Delgany is noted; however it is considered that ‘Self-Sustaining Growth Town’ is the appropriate categorisation for this settlement, having regard to the considerable growth on the settlement since 2016 which is still ongoing with over 1,000 units currently under construction, likely to be delivered in the next 5 years. It would be a misnomer to not identify Greystones-Delgany as a growing town. However, in the approach to future growth, in particular additional residential development, it is the goal to moderate housing growth, to initiate a programme of reviewing the appropriateness of peripheral zoned greenfield sites, and to renew focus on the development of infill and town centre / brownfield sites. This approach is not considered to be inconsistent with the Self-Sustaining Growth Town typology.

Chief Executive’s Recommendation

Amend the Draft Plan as follows:

Volume 1, Chapter 12

- CPO 12.21** To promote the development of transport interchanges and ‘nodes’ where a number of transport types can interchange with ease. In particular:
- to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and /or Regional Authority ;
 - to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;
 - to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Rathdrum, Wicklow and Arklow;
 - to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;
 - to promote car sharing parking spaces at premium locations in car parks;
 - to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;
 - ~~to promote the Luas extension from City West/ Tallaght to Blessington;~~ to support the

enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus services / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;

- to encourage the improvement of bicycle parking facilities at all transport interchanges;
- to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and
- to support the development of bus shelters, ~~that shall incorporate disabled access~~ and bicycle parking facilities where possible
- to promote and support the development of fully accessible public transport services and infrastructure, that can be used by all people, regardless of their age, size, disability or ability.

CPO 12.22 To continue to work with Iarnrod Eireann and the NTA on the improvement of mainline train and DART services into Wicklow and in particular,

- To facilitate all options available to increase capacity through Bray Head ~~and along the coastal route south of Greystones.~~
- To support the delivery of the DART + programme
- To support electrification of the rail line south of Greystones and the provision of high speed and high frequency services on the existing underutilised south east rail line to south Wicklow.

~~CPO 12.24 To support the undertaking of a study to assess the feasibility of extending regular rail services to south Wicklow.~~

CPO 12.27 To promote the delivery of improved and new bus services both in and out of the County but also within the County by:

- supporting the development and delivery of bus service enhancement projects, including BusConnects **and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate;**
- facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);
- requiring the developers of large-scale new employment and residential developments in the designated key towns in the County that are distant (more than 2km) from train / Luas stations to fund / provide feeder bus services for an initial period of at least 3 years;
- promoting the growth of designated settlements to a critical mass to make bus services viable and more likely to continue;
- provision of bus lanes on M11 / N11;
- to work with Bus Eireann and the NTA to improve services in south and west Wicklow.

CPO 12.66 To continue to work with Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key enabling infrastructure required to develop the two strategic sites, especially for the westward extension of the town to Fassaroe, including Bray-Fassaroe public transport links and road improvements.; **and the development of an amenity and active travel walking and cycling route between the Bray Harbour area northwards to the Dun Laoghaire Rathdown administrative area to provide for future connection to the proposed Woodbrook DART station.**

Section 3.3	Volume 1
Section 3.3.1	Chapter 1

Topic	Plan Process	
ID	Name	Issue raised
C2-128 https://consult.wicklow.ie/en/s/ubmission/ww-c2-128	Cairn Plc	Suggest that Wicklow County Council extend the timeframe to prepare the County Plan to ensure plan is consistent with the 'Housing Supply Target Methodology for Development Planning Guidelines', to allow time to prepare a Housing Need Demand Assessment (HNDA) as required by NPO 37 of the NPF and RPO 9.5 of the RSES, the publication of the Draft Development Plan Guidelines August 2021, and the new Census 2022 and resulting up to date population figures.
C2-135 https://consult.wicklow.ie/en/s/ubmission/ww-c2-135	Capami Ltd	Submit that it would be appropriate that Wicklow County Council use additional time allowed to prepare the Development Plan to take into account the publication of new guidelines, in order to avoid undertaking a variation to the Development Plan shortly after its adoption.
C-204 https://consult.wicklow.ie/en/s/ubmission/ww-c2-204	Ronan Group Real Estate	Submit that the additional timeline for the preparation of the Draft Plan is utilised to reflect the DDPGs in their adopted form and the HNDA Guidance provided in April 2021.
C2-205 https://consult.wicklow.ie/en/s/ubmission/ww-c2-205	Cairn Homes Properties Ltd	Request that Wicklow County Council pauses the County Development Plan review due to (a) impact of COVID on the resources of the planning authority but also the capacity of all other parties to the process, including prescribed bodies and members of the public, (b) the delay of the 2021 Census, (c) to address recently issued Consultation Draft Development Plans - Guidelines for Planning Authorities, (d) there will be greater clarity in relation to the delivery of housing once the transition arrangements for the end of the SHD system are in place.

Chief Executive's Response

Plan timeframe

There is no provision in law that allows for the Development Plan process to be 'paused'; there is no provision in law that allows the Council to extend the timeframe of the plan making process to allow for a HNDA to be prepared, the Draft Guidelines to be adopted or the next Census to be carried out (for which results would not be available in 2023-2024). The Act provides for an extension of the plan making process from 2 years to 3 years in certain circumstances but only due to COVID related delays. In this regard, it has already been agreed to extend the plan process by a maximum of 1 year.

It should be noted that the Draft Development Plan has been drafted to be consistent with the 'Housing Supply Target Methodology for Development Planning', published in December 2020.

It should also be noted that in accordance with Ministerial guidance, it is not necessary for the Wicklow CDP (having regard to the stage in the process) to include a HNDA, but rather it can be done after the plan adoption process is completed.

Chief Executive's Recommendations

No change

Topic	Plan Content	
ID	Name	Issue raised
C2-128 https://consult.wicklow.ie/en/s/ubmission/ww-c2-128	Cairn Plc	It is suggested that specific objectives need to be framed in a manner that it consistent with the Draft Development Plan Guidelines. Suggest amendments to objectives on housing occupancy, Part V, community facilities and sustainable transport, as detailed in the submission.
C-135 https://consult.wicklow.ie/en/s/ubmission/ww-c2-135	Capami Ltd	It is suggested that the Draft CDP be updated to comply with the Draft Development Plan Guidelines, in particular those sections that address zoning baseline, zoning requirements, additional provision.
C-204 https://consult.wicklow.ie/en/s/ubmission/ww-c2-204	Ronan Group Real Estate	It is suggested that the Draft CDP be updated to comply with the Draft Development Plan Guidelines
C2-205 https://consult.wicklow.ie/en/s/ubmission/ww-c2-205	Cairn Homes Properties Ltd	Concerned that failure to appropriately consider and incorporate the Draft Development Plan Guidelines in the review of the CDP will result in an almost imminent variation to the CDP.
C2-264 https://consult.wicklow.ie/en/s/ubmission/ww-c2-264	Justin Ivory	<ul style="list-style-type: none"> - The climate and biodiversity emergency are not adequately reflected in the draft Plan. - The Plan should contain strong, clear and independent policy advice. The phrase “as far as practicable” and similar phrases. It affords planners flexibility as they attempt to steer the development of the county in future but it illustrates a serious misunderstanding of the balance of risks that lie ahead. The risk of not doing all that is possible to protect the citizens against Climate Change and Biodiversity Loss far exceeds all other challenges. - Plan needs clear concise unambiguous language.
C2-300 https://consult.wicklow.ie/en/s/ubmission/ww-c2-300	Wicklow Planning Alliance	<ul style="list-style-type: none"> - Recommends that the Plan should contain strong, clear and independent policy advice. The phrase “as far as practicable” and similar phrases occur again and again throughout the plan. It may afford planners flexibility as they attempt to steer the development of the county in future but it illustrates a serious misunderstanding of the balance of risks that lie ahead. The risk of not doing all that is possible to protect the citizens against Climate Change and Biodiversity Loss far exceeds all other challenges. - The Plan suffers from a lack of specificity and vagueness. Vagueness prevents the citizens from holding those in office to account. Vagueness prevents effective planning enforcement. Vagueness renders the local authority afraid of defending legal challenges from developers.
Chief Executive’s Response		
<p>Draft Development Plan Guidelines</p> <p>The new Development Plan Guidelines are only at draft stage, and it would be premature to amend the Draft Plan to align with same, as they are still open to change. In addition, it is not known when such guidelines will be made by the Minister, and the plan process cannot be put on hold until this happens. With respect to the specific areas</p>		

mentioned in C2-128, they are dealt with in the relevant parts of this report. With respect to zoning requirements, additional provision etc mentioned, they are dealt with in Section 3.3.3 (Chapter 3 Core Strategy) of this report.

Plan language

It is considered that the format and language used in the plan is appropriate and is compliance with the requirements for Development Plans set out in legislation and guidelines. Development Plans cannot foresee every possible development type that might be put forward during the lifetime of the plan, and therefore must provide overall policies, objectives and standards that would be applicable to many development types; it is not agreed that this constitutes 'vagueness' but rather a suitably balanced and flexible approach. An overly prescriptive approach would be likely to result in as many difficulties, as unforeseen obstacles might be put in place to otherwise environmentally sustainable and desirable development.

Climate – Biodiversity Action

It is not accepted that the Draft Plan does not adequately address the climate and biodiversity challenge, and this is addressed from the very outset as one of three pillars set out in the 'Overall Strategy' and throughout almost every chapter of the plan. Therefore no change is recommended.

Chief Executive's Recommendations

No change

Topic		Planning Act
ID	Name	Issue raised
C2-135 https://consult.wicklow.ie/en/submission/ww-c2-135	Capami Ltd	<p>With reference to the Core Strategy Section 10 (1a) of the Planning and Development Acts (2000 as amended), the following is outlined:</p> <p><i>“(1A) The written statement referred to in subsection (1) shall include a core strategy which shows that the development objectives in the development plan are consistent, <u>as far as practicable</u>, with national and regional development objectives set out in the National Planning Framework and the regional spatial and economic strategy and with specific planning policy requirements specified in guidelines under subsection (1) of section 28.” (emphasis added).</i></p> <p>It is put forward that the wording of the Act (as set out in the highlighted text) doesn’t confer an absolutist approach to the consistency between the core strategy and the regional development objectives set out in the National Planning Framework and the Regional Spatial and Economic Strategy. It is respectfully submitted that the adopted Plan and core strategy would be consistent “as far as practicable”, by allocating increased growth to the towns in the settlement hierarchy. Suggest that the common good requires the prioritisation of the delivery of housing and a sufficient supply of zoned land, within Wicklow.</p>
C2-195 https://consult.wicklow.ie/en/submission/ww-c2-195	Roger Garland	<ul style="list-style-type: none"> - The Planning and Development Act 2000 Sec 9(4) requires that the Plan must have regard to plans in adjoining counties. This Plan shall co-ordinate the objectives in this plan with those in the adjoining counties, except where it is considered to be in appropriate or unfeasible and shall take into account any significant likely effects the implementation of the plan may have on the area of any adjoining county. - This Plan must conform to the RSES for the Eastern and Midland Region - Required to ensure that the development plan is consistent with the strategy of the NTA.
Chief Executive’s Response		
<p>C2-135</p> <p>While the wording of the Act is noted, it is not considered that the terms ‘as far as practicable’ gives a <i>carte blanche</i> to each Local Authority to be inconsistent with or blatantly disregard the higher order strategies and Government policies. There will always be slight variations in how consistency with the higher order plans is achieved, and insofar as is possible, the provisions of higher order plans have been adapted to County Wicklow circumstances.</p> <p>It is not considered that the wording of the Act provides scope for the Plan to allocate increased growth indiscriminately to all towns in the County; to do so would perpetuate without management or control the unsustainable and environmentally damaging growth patterns in the region that have been experienced in the last few decades and resulted in the poor, car based settlement patterns that exist today.</p> <p>C2-195</p> <p>In the drafting of this plan, regard has indeed been taken of the development plans of adjoining counties but a significant challenge has arisen due to the fact that all development plans are currently under review. The CE is happy to address any specific conflicts that might arise, but none have been pointed out.</p>		

The Plan has been drafted to accord with the RSES, as is clearly set out in many parts of the plan, including but not limited to: Chapter 2 'Overall Strategy; Chapter 3 'Core Strategy', Chapter 4 'Settlement Strategy'.
As set out in detail in Chapters 2, 3 and 12 in particular, the Plan has been drafted to be consistent with the NTA strategy.

Chief Executive's Recommendations

No change

Topic	General	
ID	Name	Issue raised
C2-195 https://consult.wicklow.ie/en/submitmission/ww-c2-195	Roger Garland	<ul style="list-style-type: none"> - Submit that as well as the main chapters should include Sub Sections - Should provide an Index, as recommended in the Development Plan Guidelines (5.15), and that the page numbers where topics are primarily dealt with should be bolded. - Submit layout can be improved by sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties when referring to particular points. - Note that some provisions are prefixed with 'Contribute to..' As this could be interpreted as meaning that somehow the provisions aren't the primary responsibility of Councils which, of course is not the case. Submit that this prefix should be deleted. - Plan should '<i>strive to secure the financial resources to implement the policies and objects of the Plan</i>'. Note that a rider on the lines of "<i>subject to the availability of financial resources</i>" is added to some objectives. Submit that where this appears in the Draft it should be deleted as many objectives have financial implications, and it is invidious to single out particular ones.
C2-235 https://consult.wicklow.ie/en/submitmission/ww-c2-235	Wicklow Greens	<p><i>Note: This is a lengthy and very detailed submission, which includes a number of changes to the text of the plan. It will not be possible to insert all of this information into this summary and it is therefore recommended that the reader review the full original submission.</i></p> <p>Below are the main changes that have been suggested in Chapter 1.</p> <ol style="list-style-type: none"> 1. Delete '<i>as far as practicable</i>' from following paragraph: '<i>The written statement shall include a separate report which shows that the development objectives in the development plan are consistent, as far as practicable, with the conservation and protection of the environment. The Environmental Report (included as part of the draft development plan) forms part of the development plan process. It is considered that this report satisfies the statutory requirements in this regard.</i>' 2. Climate Action Plan: Line 1 delete the word 'challenge' and insert 'emergency'. 3. Line 4, after the end of the paragraph, insert '<i>Bearing in mind the nature of the emergency, action in line with the CAP must be considered the least possible that can be done, and more must be achieved.</i>' 4. Allowing development to take out hedgerows on zoned sites does not conform to the key action of the 'Local Authority Climate Action Charter (2019). Mitigation measures including TPOs and hedgerow protections should be included. Mitigation measures should also include regulations against paving over new and existing lawns without making them into permeable surfaces and maximising permeability in upstream flood protection. 5. Local Authority Climate Action Charter (2019) amend as follows (new text in red) '<i>The Local Authority Climate Action Charter is a key action in the Climate Action Plan and will ensure every local authority embeds decarbonisation, sustainable development and climate resilience, prioritising nature-based solutions and the conservation of trees, hedgerows, other vegetation and regeneration of degraded</i>

		<p><i>ecosystems, into every aspect of the work they do.</i></p> <ol style="list-style-type: none"> 6. Line 7, p.5. (second bullet point) insert after 'deliver a' and before '50% improvement', 'minimum of'. The bullet point will read: deliver a minimum of 50% improvement in energy efficiency by 2030 (on the 2009 baseline); 7. Line 8 (third bullet point) delete: 'low' and insert 'zero'. 8. Line 11 (third bullet point) delete: 'near'. 9. Line 13 (fourth bullet point) delete: 'd' at the end of the word 'evidenced', to read 'evidence'. 10. Line 14 (fourth bullet point) insert after 'through' and before 'appropriate' the word 'proportionate'. 11. Line 17, bullet point 9, insert after 'heritage', 'prioritising the conservation and regeneration of natural heritage'. 12. NPF: Line 14 insert after 'climate change objectives', 'and nature-based solutions that protect trees and hedgerows and that also conserve and regenerate degraded ecosystems'. 13. NPF: Line 24, insert after 'footprint of settlements.' '30% is not enough and should be the absolute minimum, with underutilised land, infill, brownfield sites, and refurbishment and repurposing within town centres being the main focus of new development and greenfield sites being a rare exception.' 14. Section 1.4 Line 7, p.9 delete from 'It is considered' to end of paragraph. Insert: 'It will be ensured that development objectives in the plan prioritise conservation and protection of the environment. Where it is found they are not, changes will be made as a matter of urgency.' 15. Section 1.4.1 Line 12 delete 'consider' and insert 'abide by'. 16. Section 1.4.1 Line 13, insert after 'accompanies the development plan.' 'Where the SEA is not found to be sufficiently protective, lower level decision making must go beyond the SEA in order to conserve and regenerate degraded ecosystems as part of all planning and development.' <p>The submission also states its support for the Newtown 2050 model for decarbonisation and the Wicklow Planning Alliance submission. The submission requests that a Biodiversity Restoration Officer is appointed. Proposed changes in wording to the Biodiversity Action Plan 2010-2015</p>
<p>C2-265 https://consult.wicklow.ie/en/submitmission/ww-c2-265</p>	<p>Luggala Estate Limited</p>	<p>The following wording changes are suggested: Suggest amending the title from WCDP to WCSDP- Wicklow County Sustainable Development Plan (2021-2027).</p> <p>Climate action 1.3.2: page 4, Line 1: Use the word emergency or a synonym of, instead of 'challenge'. page 4, Line 2: add the word 'change mitigation and' between climate and resilience in 'climate resilience'. This sentence will read: The Local Authority Climate Action Charter is a key action in the Climate Action Plan and will ensure every local authority embeds decarbonisation, sustainable development and climate change mitigation & resilience, prioritising nature-based solutions and</p>

		<p>the conservation and regeneration of degraded or degrading ecosystems, into every aspect of its planning policy and strategy. Page 5, line 7 second bullet point: deliver a minimum of 50% improvement in energy efficiency by 2030 (on the 2009 baseline); Line 8 bullet point 3: remove: 'low' and insert 'zero'. Line 11 bullet point 3: delete: 'near'. Line 13 bullet point 4: delete: 'd' at the end of the word 'evidenced', to read 'evidence'.</p> <p>1.3.3 Our Rural Future: Rural Development Policy 2021-2025: 'Environmental, social and economic' should be inserted before every incidence of the words sustainable or sustainability to ensure the 3 pillars of sustainability are considered equally and mutually. Line 17 bullet point 9: Insert after 'heritage', 'prioritising the conservation and regeneration of natural heritage'.</p> <p>1.3.4 Project Ireland 2040: National Planning Framework (NPF) References to 'growth' must be replaced with 'sustainable development' where economic growth does not maintain its primacy over action to mitigate and adapt to environmental breakdown. Language in the CDP must then be adjusted accordingly.</p> <p>Line 14: insert after 'climate change objectives', 'and nature-based solutions that also conserve and regenerate degraded ecosystems'.</p>
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Chief Executive's Response

A more detailed table of contents can be provided on the adoption of the final plan. It is not considered that an 'index' is necessary where it is clear where each topic is addressed in the table of contents.

Within each chapter, sub-sections are clearly labelled and sections numbered and it is not agreed that there should be additional numbering within the chapter thereafter.

There *are* many goals and objectives set out in the Draft Plan that are not only or solely the responsibility of the Council or of the Development Plan; it is considered appropriate therefore to maintain wording such as 'contribute to...'. As set out in Chapter 20 of the Draft Plan, the Council has a statutory obligation and fully committed to securing the implementation of the plan. However, it is also acknowledged that the implementation of the Plan is dependent on a number of factors including cooperation and participation of all stakeholders, Council funding and the availability of capital from other sources. Where there is uncertainty about the financial ability to deliver an objective, the plan objective may include the phrase '*subject to availability of funding*' so as to not create false expectations.

C2-235 / C2-265

The changes suggested in these submissions have been carefully assessed.

A number of the wording changes proposed relate to wording taken directly from statutes / guidelines, other plans and policy documents such as the Climate Action Plan, Local Authority Climate Action Charter, The County Wicklow Biodiversity Action Plan 2010 – 2015 and the NPF. It is not considered appropriate to make changes to

text that refers to or is a direct quote from another document.

A number of the changes suggested in this submission are also considered to be overly prescriptive and would not allow for sufficient flexibility in the implementation of the plan.

Therefore no changes are recommended.

Chief Executive's Recommendations

No change

Section 3.3	Volume 1
Section 3.3.2	Chapter 2 Overall Strategy

Topic		Strategies influencing the overall strategy
ID	Name	Summary of issues raised
C2-17 https://consult.wicklow.ie/en/submit/ww-c2-17	County Wicklow Children & Young People's Services Committee	It is requested that the County Wicklow Children & Young People's Plan 2020-2022 be referenced in the plan.
Chief Executive's Response		
<p>County Wicklow Children & Young People's Plan 2020-2022</p> <p>There is a wide range of national, regional and local strategies that may influence the County Development Plan overall strategy (as is set out in Chapter 2) and it would not be possible to include references and summaries of all of same in the plan; it would simply make it impenetrable and unreadable. In addition, it is not the function of the CDP, which is a land use and development framework, to be a list or repository of all other strategies / policies that might affect the future development of the County, particularly those that do not have a land use and development component. In addition, it is considered that the key aims / goals of the CYPP are reflected fully in the 10 'strategic outcomes' set out in Chapter 2 of the draft plan.</p> <p>It is agreed however that reference to the County Wicklow Children & Young People's Plan 2020-2022 can be included in Chapter 7 (Community Development) of the plan. Please see further details in Section 3.6.7 of this report.</p>		
Chief Executive's Recommendations		
No change to Chapter 2, see Section 3.6.7		

Healthy Placemaking		
Topic	Healthy Placemaking	
ID	Name	Issue raised
C2-101 https://consult.wicklow.ie/en/submitmission/ww-c2-101	Greystones Tidy Towns	It is suggested that in Section 2.1.2 (Built Environment) the wording should also call out better practices for biodiversity that integrate with the built environment. There should be less of a separation and sterilisation of the built environment with that of the natural environment.
C2-151 https://consult.wicklow.ie/en/submitmission/ww-c2-151	Community Pool for West Wicklow	It is suggested that in Section 2.1.2 (Built Environment) the wording be amended as follows: The quality of the built environment is a key element in healthy placemaking. Integrate health considerations into the design and layout of the built environment. Delivery of sustainable settlement patterns, with a focus on compact growth that facilitates and encourages active travel including walking and cycling. Regeneration of town and village centres including public realm improvements and the provision of high quality public space. Require that new housing is built to a high standard and incorporates adequate high quality amenity space. Create an environment that supports physical activity and encourages people to make healthy choices and live healthier lives. Work with communities to develop local sports facilities and amenities that are accessible for all.
C2-160 https://consult.wicklow.ie/en/submitmission/ww-c2-160	Labour Party, Ross Connolly Branch, Greystones Municipal Area	Welcome the development plan's aspiration to enhance placemaking for people when considering new developments
C2-218 https://consult.wicklow.ie/en/submitmission/ww-c2-218	Delgany Community Council	<ul style="list-style-type: none"> - Recognise the importance of this concept as well as the difficulty in outlining concrete actions to enable it to be fully realised. The Plan needs to set out objectives that are specific, timebound and attainable instead of being aspirational. - All future developments should be assessed in line with the United Nations Sustainable Development Goals
C2-231 https://consult.wicklow.ie/en/submitmission/ww-c2-231	GAP (Greystones Area Planning) Community	<ul style="list-style-type: none"> - Recognise the importance of this concept as well as the difficulty in outlining concrete actions to enable it to be fully realised. The County Development Plan needs to set out objectives that are - SMART - specific, measurable, achievable, realistic & timebound instead of being aspirational. - All future developments should be assessed in line with the United Nations Sustainable Development Goals
C2-229 https://consult.wicklow.ie/en/submitmission/ww-c2-229	Wicklow PPN	All development must be inclusive and accessible to all citizens. Every policy and decision should be accessibility proofed.
Chief Executive's Response		
<ul style="list-style-type: none"> - All of the objectives set out in Chapter 2 under the three pillars of 'healthy placemaking', 'climate action' and 'economic opportunity' are overlapping, and protection and enhancement of the natural environment and biodiversity as set out in Section 2.2.2 and in the 'Strategic County Outcomes' overlap with improved built environment goals. To cross reference each objective with any other possibly relevant objectives would make the plan excessively long and difficult to follow. Therefore no change is recommended in this regard. - The text suggested in submission C2-151 is not recommended as (a) the manner in which goals may be delivered including how the community is integrated into the process would be an operational one, rather than a planning policy issue and (b) the plan already, in numerous location makes it clear that new infrastructure is 		

required to be accessible by all. Therefore no change is recommended.

- It is agreed that goals and objectives should be specific, timebound and attainable and every effort is made to do this throughout the plan where feasible. However the reality that achievement of various objectives will be dependent often on factors outside the Council's control, such as the delivery of private development or the allocation of funding, must be borne in mind. Chapter 20 of the Draft Plan set out in more detail the goals with respect to implementation and monitoring.
- As set out in Chapter 2 of the Draft Plan, the 'United Nations Sustainable Development' is a key policy document informing the contents of the plan; having regard to the strategic and 'high level' nature of some of these goals, it would not be feasible to assess applications for new development directly against same where it is not adequately clear what might be expected; instead appropriate objectives and standards are developed considering these goals that are practically implementable.
- It is agreed that all development should be inclusive and accessible to all citizens. Compliance with the Building Regulations is the key legislation through which this is enforced and the Draft Plan also addresses this issue, through a significant number of objectives and development standards, including (but not limited to) CPO 5.16, 5.23, 6.4, 6.5, 6.8, 7.4, 7.8, 7.34 and Appendix 1, Section 1.6 'Universal Design & Accessibility'

Chief Executive's Recommendations

No change

Topic	Climate Action & Environment	
ID	Name	Issue raised
C2-218 https://consult.wicklow.ie/en/submitmission/ww-c2-218	Delgany Community Council	All planning applications should be assessed in terms of their carbon impact; Wicklow County Council took the lead in terms of Climate Action Plans, and was the first county to declare a climate emergency, and should also be a leader in terms of the implementation and taking of concrete actions.
C2-231 https://consult.wicklow.ie/en/submitmission/ww-c2-231	GAP (Greystones Area Planning) Community	All planning applications should be assessed in terms of their carbon impact. Wicklow County Council took the lead in terms of Climate Action Plan, and was the first county to declare a climate emergency, and should also be a leader in terms of the implementation and taking of concrete actions.
C2-300 https://consult.wicklow.ie/en/submitmission/ww-c2-300	Wicklow Planning Alliance	<ul style="list-style-type: none"> - This Plan is primarily a prescribed format, light-touch town development regulation plan. It hasn't worked so well to date and we are gradually destroying the County and the Country. We need different County Development Plans in which the aim of economic and housing growth is replaced by environmental 'growth'. - The plan lacks ambition and despite the stated intention, climate change and biodiversity collapse are not considered at every level. If this were so, the objective to plan an outer orbital road, for example, would be deleted, as would smaller details such as using wood biomass for burning. No further data centres would be permitted within the County to avoid unbalancing energy supply and the Plan would not contain objectives for driving trails as proposed in the tourism chapter. Nor does the Plan map those properties which may need relocating as sea levels rise and more flooding occurs around the coast and our rivers. - There is no evidence of ambition to lead and guide Wicklow residents through the changes required to address Climate Change and loss of Biodiversity. There is no acknowledgement that doing the right thing will bring with it new jobs, new industries, community well-being, healthier nature and better lifestyles. - WPA recommends that the Plan contain strong, clear and independent policy advice. The phrase "<i>as far as practicable</i>" and similar phrases occur again and again throughout the plan. It may afford planners flexibility as they attempt to steer the development of the county in future but it illustrates a serious misunderstanding of the balance of risks that lie ahead. The risk of not doing all that is possible to protect the citizens against Climate Change and Biodiversity Loss far exceeds all other challenges. - There are insufficient references to the climate action necessary other than committing to Wicklow's Climate Action Plan. It could do better. For example, in Wexford's CDP references in their Heritage section to: <ul style="list-style-type: none"> ▪ Promoting features which act as carbon sinks such as, retention and extension of forests and wetlands and protection and enhancement of green infrastructure, biodiversity, ecosystems and habitats. ▪ Encourage the retention and reuse of existing structures. Making use of existing buildings before building new structures reduces demolition waste which accounts for a large percentage of landfill and which is an environmental burden, while the

		<p>production and/or importation of new building materials accounts for a significant amount of energy use.</p> <ul style="list-style-type: none"> Support thermal upgrading of historic buildings (in line with recommended guidance and European Performance of Buildings Directive 2010 (as amended)) to enhance performance and reduce energy consumption.
C2-229 https://consult.wicklow.ie/en/submission/ww-c2-229	Wicklow PPN	Every policy and decision should be environmentally proofed.
Chief Executive's Response		
<p>Overall approach</p> <p>The County Development Plan is a spatial plan / land use framework, which endeavours to provide for, and control, the physical, economic and social development of the County, in the interests of the overall common good and in compliance with environmental controls. Its key purpose is to guide future development into the right locations, and ensure certain standards are met in new developments. The CDP is not the Council's Climate Action or Biodiversity Action Plan.</p> <p>It is not accepted that climate change and biodiversity loss has not been considered adequately in all aspects of the Draft Plan; however the climate change and biodiversity goals have had to be <i>balanced</i> against other objectives of the plan, particularly with respect to economic development, housing and placemaking. Issues around sustainable transportation, biomass, data centres, energy use and flood risk management, are addressed in the respective chapters of the plan, and objectives have been crafted to equally address the three pillars set out in the overall strategy.</p> <p>The Draft Plan, in chapters addressing built heritage, natural heritage and biodiversity, green infrastructure, energy efficiency, development standards etc address fully the issues raised with respect to retention of forests and woodlands, protection and enhancement of green infrastructure, biodiversity, ecosystems and habitats, the retention and reuse of existing structures and upgrading of energy efficiency.</p> <p>Carbon Impact</p> <p>At this time no consistent methodology has been as yet provided in regulations or guidance from the Department, the Regional Assembly or the Climate Action Regional Offices (CARO) with regard to 'measuring' climate / carbon impacts, and it is an evolving area. In its work in establishing a decarbonisation zone in Arklow, Wicklow County Council will be sourcing, collecting and analysing all available and relevant data to establish the 'carbon footprint' of the settlement and this project will be utilised as a learning exercise for establishing what data is available and necessary to assess climate / carbon impacts.</p> <p>Environmental 'proofing'</p> <p>Through the SEA and AA process which form an intrinsic part of the plan making process, all plan provisions have been assessed or proofed for potential environmental impacts. In addition, through the implementation of the objectives of the plan, all decisions will similarly be proofed to prevent adverse impacts on the environment.</p>		
Chief Executive's Recommendations		
No change		

Topic	Social Enterprise	
ID	Name	Issue raised
C2-22 https://consult.wicklow.ie/en/submit/ww-c2-22	Social Enterprise Republic of Ireland (SERI)	SERI request that the following items be included as key commitments in the County Development Plan: <ol style="list-style-type: none"> 1. A commitment to facilitate, enable and support the development of a vibrant Social Enterprise sector, as a valuable and important component of the overall Economic Development vision. It is an essential pillar in the regeneration of many communities with many people dependent on social enterprises for essential supports. 2. A commitment to work with Social Enterprises to access and develop appropriate fit for purpose land and buildings as spaces to enable development and growth of new services and products. 3. A commitment to include Social Clauses in Public Procurement. 4. A commitment to identify and disseminate best practice local examples of social enterprises and increase public understanding of their contribution to society and the economy.

Chief Executive's Response

The Planning Authority acknowledges the importance of social enterprise in achieving sustainable communities. The County Development Plan is a land-use framework and as such is limited in its scope to provide for social enterprise. However, a number of the Strategic County Outcomes reflect the principles of social enterprise:

SC03 *'Strengthen rural communities and support the sustainable development of rural areas. Encourage innovation and rural diversification in order to sustain vibrant rural communities. Leverage the potential of rural settlements to accommodate sustainable growth and a range of services including social and economic enterprise'.*

SC08 *'Strengthen and broaden the economic base, harness opportunities for economic growth to build economic resilience, strengthen enterprise ecosystems and create quality jobs that align with population growth, ensure a good standard of living and reduce the need for long-distance commuting. Support place making improvements that will generate economic confidence and in turn make settlements more attractive to employers and a skilled workforce. Support community wealth building as a transformative approach which is about creating a better and more sustainable economy that strengthens our communities through local job creation, sustainable development and local business networks'.*

The County Development plan includes policy to facilitate all types of enterprise in appropriate locations. These are set out in Chapter 7 'Community Development' and Chapter 9 'Economic Development' such as:

CPO 7.57 *To encourage and facilitate the development of social enterprise hubs that foster and support social enterprise¹, social entrepreneurship and social innovation in the community.*

The Local Economic and Community Plan (LECP), which is reviewed every 6 years, sets out the objectives and actions needed to promote and support the economic development and the local and community development of each local authority, both by itself directly and in partnership with other economic and community development stakeholders. Social enterprise will be an important consideration for the LECP. The current Wicklow LECP was adopted in 2016, and includes objectives and actions promoting and supporting economic development and the local and community development of the County. The LECP identifies 10 overarching goals for economic and community development within County Wicklow. **Goal 4** states *'Develop a vibrant and innovative Community and*

¹ *Social enterprises are businesses whose core objective is to achieve a social, societal or environmental impact. Like other businesses, social enterprises trade in goods or services on an ongoing basis. However, any surpluses generated by social enterprises are re-invested into achieving a social impact, rather than maximising profit for their owners (National Social Enterprise Policy for Ireland 2019 – 2022).*

Social Enterprise Section'.

The role of the County Development Plan is not to duplicate the LECP (which has a much wider remit in the area of economic development), but rather to provide the land-use framework that will support the achievements of the goals and objectives.

With regard to the Plan giving a commitment to include Social Clauses in Public Procurement, this is considered to be outside the remit of the County Development Plan.

Chief Executive's Recommendation

No change

Topic	Strategic County Outcomes	
ID	Name	Issue raised
C2-128 https://consult.wicklow.ie/en/submit/mission/ww-c2-128	Cairn Plc	It is suggested that SCO7 be amended as follows: Support the transition to low carbon clean energy by facilitating renewable energy use and generation at appropriate locations and supporting the development of off-shore renewable energy enabling infrastructure especially at ports and harbours. Encourage and incentivise businesses to adopt the low carbon pledge in development and operations and facilitate the sustainable management of waste including the circular economy. Restrict development in areas that are at risk of flooding and protect the natural landscape and biodiversity."
C2-151 https://consult.wicklow.ie/en/submit/mission/ww-c2-151	Community Pool for West Wicklow	It is suggested that in SCO4 be amended as follows: Places should facilitate a high quality of life for all regardless of age or ability. Access to quality housing, employment, childcare, education, health services, community facilities and a clean unpolluted, environment including clean air and water, are defining elements of healthy, attractive and successful places. Investment in a well-designed public realm which includes public spaces, parks, playgrounds, streets and recreational infrastructure including swimming and sports facilities to cater for all ages is essential.
C2-274 https://consult.wicklow.ie/en/submit/mission/ww-c2-274	West Wicklow Environmental Network	It is suggested that SCO3 be amended as follows: Strengthen rural communities and support the sustainable development of rural areas. Encourage home working , innovation and rural diversification in order to sustain vibrant rural communities. Leverage the potential of rural settlements to accommodate sustainable growth and a range of services including social and economic enterprise. It is suggested that SCO7 be amended as follows: Support the transition to low carbon clean energy by facilitating renewable energy use and generation at appropriate locations and supporting the development of off-shore renewable energy enabling infrastructure especially at ports and harbours. Facilitate the sustainable management of waste including the circular economy. Restrict development in areas that are at risk of flooding and protect the natural landscape and biodiversity. Support nature-based solutions in response to the climate emergency, including the restoration of peatlands. It is suggested that SCO9 be amended as follows: Capitalise on Make the most of Wicklow's location within Ireland's Ancient East and facilitate a year-round tourism industry that harnesses Wicklow's natural amenities and vast recreational opportunities. Ensure that tourism development respects and protects the natural, built and cultural heritage assets it depends upon.
C2-205 https://consult.wicklow.ie/en/submit/mission/ww-c2-205	Cairn Homes Properties Ltd	It is suggested that SCO7 be amended as follows: Support the transition to low carbon clean energy by facilitating renewable energy use and generation at appropriate locations and supporting the development of off-shore renewable energy enabling infrastructure especially at ports and harbours. Encourage and incentivise businesses to adopt the low carbon pledge in development and operations and facilitate the sustainable management of waste including the circular economy. Restrict development in areas that are at risk of flooding and protect the natural landscape and biodiversity."

Chief Executive's Response

SCO3

While home working has increased due to COVID, and there are obviously positive effects to this in terms of reduced commuting / car congestion / pollution, better work-life balance etc, there are also some draw backs in terms of activity levels and vibrancy in towns and villages where people previously worked, reduced collaboration etc. It is considered therefore that until more careful analysis of the pros and cons of home working is carried out, encouraging working from home should not be set out in the CDP as one its is highest level strategic objectives.

SCO4

It is recommended that the SCO4 be amended to include the word 'sports', and while the CE fully supports the desire of the submitter to highlight the need for a pool in West Wicklow, it is not agreed that 'swimming' should be picked out and highlighted above other sporting activities in the County for a County level strategic objective.

SCO7

The amendment suggested in submissions C2-128 / C2-205 is not considered appropriate for integration in the CDP as it is not within the gift of a CDP, which is a land use and development framework, to incentivise certain actions. The Draft Plan, in many of its requirements in terms of development, already requires a shift in development formats and activities to address climate goals; and so the suggested change is not necessary. This may be an area for future climate action plans of the Local Authority and it will be brought to the attention of the climate action team.

The amendment suggested in submission C2-274 is not considered appropriate as it is too specific and targeted for a high level strategic objective.

SCO9

It is considered that the wording already set out in the Draft Plan is sufficient clear that the development of tourism is be balanced with protection of the County's assets, and therefore the suggested amendments are not considered necessary.

Chief Executive's Recommendations

Amend the plan as follows:

Volume 1; Chapter 2

Section 2.4.3 Strategic County Outcomes

SCO4 Sustainable Healthy Communities

Places should facilitate a high quality of life for all regardless of age or ability. Access to quality housing, employment, childcare, education, health services, community facilities and a clean unpolluted, environment including clean air and water, are defining elements of healthy, attractive and successful places. Investment in a well-designed public realm which includes public spaces, parks, playgrounds, streets and recreational **and sport** infrastructure to cater for all ages is essential.

Section 3.3	Volume 1
Section 3.3.3	Chapter 3 - Core Strategy

Topic	Sections 3.1 – 3.2: Population & Housing Targets	
ID	Name	Issues raised
C2-114 https://consult.wicklow.ie/en/submitmission/ww-c2-114	Colin Acton – Charlotte Byrne	Having regard to the housing targets set out for Greystones- Delgany up to 2031, there will be no further housing needed having regard to development underway and permitted, even if only 5% of extant permission are constructed. There should be a policy objective that no new permission for significant residential development will be permitted within lifetime of CDP.
C2-125 https://consult.wicklow.ie/en/submitmission/ww-c2-125	Blessington District Forum	Blessington is designated a moderate growth town, and population growth should ensure to consider the location on the periphery of Co. Kildare and the possibilities of development within Co. Kildare adding to Blessington population growth. Currently housing development in the town has not been matched by adequate infrastructure and services being provided. This must be addressed, to ensure Blessington is not overpopulated, under resourced and turned into another Dublin commuter belt settlement.
C2-128 https://consult.wicklow.ie/en/submitmission/ww-c2-128	Cairn Plc.	Important that the Core Strategy and housing targets avoid an over-reliance on lands in Bray which are Tier 2 and require multi-agency co-operation and have existing acknowledged infrastructural deficiencies in the core strategy figures, which should ensure existing core strategy numbers are at least maintained or increased in other settlements in the hierarchy. It is suggested that the County Plan acknowledges that the significant majority of the delivery of housing in Bray will occur in the next Development Plan period (post 2027) and the focus should be on consolidating and expanding Tier 1 lands where appropriate in other settlements in the hierarchy other than Bray (such as Enniskerry, Greystones and Blessington) to ensure that much-needed housing is delivered in the county in the short to medium term over the lifetime of the new County Plan (2021-2027).
C2-135 https://consult.wicklow.ie/en/submitmission/ww-c2-135	Capami Ltd.	<ul style="list-style-type: none"> - Submits that the draft CDP needs to reflect the up to date position in relation to actual population growth and housing needs, including that caused by overcrowding and pent up demand, in 2021 that has occurred since the preparation of the NPF. Submit that it is vital that the draft CDP obtains accurate up to date data on current population and actual population growth and that the projected future housing needs are based on these current population growth levels, rather than the lower levels which have been predicted in preparation of the NPF and the RSES - The Core Strategy tables should be revised to 2028 instead of 2026 to reflect the lifetime of the Development Plan - Average household size is predicted to be below 2.25 in 2026 according to the long term trends. The 2.5 persons per household, as is utilised in the Draft Plan (and set out in the NPF for 2040) is not reflective of the long term trend; therefore, it is respectfully suggested that the household size utilised in the draft Plan is reduced to reflect this trend. - The Draft Plan Core strategy allocates just 64 residential units to Enniskerry up to 2031 within the 'compact growth boundary'. The

		<p>Draft Plan identifies that there are currently zoned lands which provide for 198 residential units, which therefore identifies a surplus of zoned lands, which is to be addressed in the subsequent reviews of the Local Area Plans. Enniskerry is served by public transport, with the 185 to bray and the 44 to Dublin City and is therefore in a position to accommodate growth. Additionally, Enniskerry wastewater treatment plant is operating well below capacity, allowing for growth.</p> <ul style="list-style-type: none"> - Based on the 2016 figures, Enniskerry accounts for 1.2% of the county housing stock, whilst the draft Development Plan only accounts for 0.7% of the growth. It is submitted that the Core Strategy should allocate a proportionate quantum of growth reflective of Enniskerry's current contribution to the housing stock. - Having regard to the provisions of the Draft Development Plan Guidelines the Plan should not constrain the delivery of housing by not providing for the zoning of sufficient land for residential and complementary development. The importance of the AA2 lands in the context of Enniskerry is the potential for delivery of a mixed use development to improve the employment, community and educational services in the town, as part of a viable wider residential development.
<p>C2-160 https://consult.wicklow.ie/en/submitmission/ww-c2-160 C2-165 https://consult.wicklow.ie/en/submitmission/ww-c2-165</p>	<p>Labour Party, Ross Connolly Branch Greystones Municipal Area</p>	<p>Note the estimated population growth in the Greystones-Delgany area and believe that a growth of 3,609 from 2016-2031 is seriously underestimated, given current growth. Trust that this and its implications will be amended in the completed plan.</p> <p>Several new estates have been developed with more in the planning stage for Greystones, Kilcoole and Newtownmountkennedy. These houses have been placed in the area without the appropriate infrastructure such as schooling, public transport and community facilities. Suggest that no more building is approved until an adequate assessment of infrastructure need is made in any given area. The development of infrastructure should then be planned alongside new estates.</p>
<p>C2-204 https://consult.wicklow.ie/en/submitmission/ww-c2-204</p>	<p>Ronan Group Real Estate</p>	<p>The draft DDPG set out that the existing residential zoned lands should form a baseline for facilitating future growth, and that additional provision of zoned lands may be provided to allow for competition of sites and recognizes that not all of the zoned lands will be developed in the lifetime of a Plan. It is respectfully submitted that the CDP should incorporate such provisions as guidance in preparing the subsequent Local Area Plans</p>
<p>C2-214 https://consult.wicklow.ie/en/submitmission/ww-c2-214</p>	<p>Paschal Bermingham & Tom Redmond</p>	<ul style="list-style-type: none"> - The Core Strategy indicates that the total growth target up to 2031 for the aggregate Level 6 statements is 172 units. However the CS also states that 46 units have been completed since 2016, that 30 units are under construction and there is extant permission for 109 units. This effectively means that if Wicklow County Council is to administer the plan as it is written that not a single new house can be permitted in any of the six Level 6 towns during the life the new Development Plan. - This is not how planning should work and it is considered that such policies will further add to the housing shortage and artificial house price rises in the county over the next few years. - The rigid population allocations in the NPF and RSES documents have taken away the ability of local authorities to plan properly over

		<p>long-term horizons as anything that is done that doesn't fit in with the mathematical formula set out in the more strategic levels of the national planning hierarchy means that the OPR make sure that any land deemed surplus will have to be de-zoned. This is considered to be a very short termism and poor form of forward planning and goes far beyond the level of control that was envisaged in the Mahon Tribunal.</p>
<p>C2-218 https://consult.wicklow.ie/en/s/ubmission/ww-c2-218</p>	<p>Delgany Community Council</p>	<ul style="list-style-type: none"> - More detail would be very welcome in this chapter, a table indicating population growth targets and breaking them into shorter timeframes. - Request that data on housing development / permission / completion in Greystones - Delgany be the most up to date. - Forecasting and econometric tools should be used to enhance the quality of the data - There is a need for further land to be designated for educational, industrial and recreational use before any additional planning permissions are granted. Welcome the social audit of Greystones-Delgany that is underway and hope that it will be used to inform future zoning proposals. Request that re-zoning of land in this area be limited to the areas that are close to infrastructure which has already been constructed.
<p>C2-249 https://consult.wicklow.ie/en/s/ubmission/ww-c2-249</p>	<p>Carina Harte Holmes</p>	<ul style="list-style-type: none"> - The CDP would benefit from more up-to-date information and data in relation to the population forecasts and projections as these are critical to enable all stakeholders, including local residents, to understand the future planning needs in the Greystones – Delgany area (the widespread use of the 2016 Census data in the draft CDP does not accurately reflect the current population in Greystones and Delgany). - While it can be difficult to get up-to-date data, the use of forecasting and econometric methods and tools would help to ensure that the most accurate projections are made so that all services, amenities and infrastructure (i.e. transport, utilities, etc) can be planned for in advance and brought on stream in a timely manner.
<p>C2-254 https://consult.wicklow.ie/en/s/ubmission/ww-c2-254</p>	<p>Glenveagh Properties</p>	<ul style="list-style-type: none"> - Since the publication of the NPF in 2018, recent population data published by the CSO has identified a higher level of inward migration and population growth than predicted in the NPF roadmap. The population and migration figures released show an increase in population from 4.857 million in April 2018 to 4.921 million in April 2019 which is an annual increase of 1.3% population growth. If this growth in population is applied up to 2040, it will result in an increase the population nationally up to c.6.472 million which is significantly greater than set out in the NPF (c.5.7 million based on ESRI projections at the time). Since the publication of the NPF in 2018, new research has been undertaken in relation to population projections and the amount of housing required to meet the needs of Wicklow County. - In April 2021, the Department published Guidance on the Preparation of Housing Need and Demand Assessment (HNDA) together the Housing Need and Demand Assessment (HNDA) Tool (2021) which contains the data required to undertake this analysis. The HNDA Tool indicates that 745 units will be required annually up

		<p>until 2030 to meet the projected housing need for County Wicklow. While this is broadly in line with the Planning Authorities projections, suggested that this projection be considered the minimum level of housing required to serve Wicklow during this timeframe given the location of the County, the availability of public transport and the proximity to Dublin. Submit that the recent shift in work practices due to the pandemic, which has resulted in an increase of people working from home will also result in an increase in the population of Counties in close proximity to Dublin. In this context, it is considered the 'High Migration' scenario should be applied to determine and ensure there is an adequate supply of housing.</p> <ul style="list-style-type: none"> - Suggest that there is a need for the Wicklow Development Plan to take account of this latest data in identifying opportunities to intensify development and housing provision within the County. Consideration should be given to the demographic trends, including an aging population, and how this will affect the average household size during the lifetime of the Plan. Suggest that the Core Strategy must accurately take account of recent population targets and residential unit allocations in line with spatial planning requirements for the County.
<p>C2-266 https://consult.wicklow.ie/en/submitmission/ww-c2-266</p>	<p>Christopher Weinmann</p>	<ul style="list-style-type: none"> - Requests that the target population for Newtownmountkennedy be increased to 6,000. - Requests that Greystones – Delgany and Kilcoole are combined as one unit in the CDP and given a combined population allocation, which should be the same as the current population allocated in the current CDP.
<p>C2-274 https://consult.wicklow.ie/en/submitmission/ww-c2-274</p>	<p>West Wicklow Environmental Network</p>	<p>Question the settlement targets in Table 3.6 which show a higher growth in open countryside than villages and small towns. This seems inconsistent with the commitment within the draft plan to sustainable growth, including CPO 4.11; there should be a greater focus on growth within villages and smaller settlements, rather than on facilitating additional one-off rural housing.</p>
<p>C2-231 https://consult.wicklow.ie/en/submitmission/ww-c2-231</p>	<p>GAP (Greystones Area Planning) Community</p>	<ul style="list-style-type: none"> - Having regard to the significant residential development occurring in Greystones - Delgany without necessary employment, public transport, social or cultural or community facilities, a significant "pause" is needed to allow facilities and infrastructure to catch-up and grow at the same pace. - With regard to the population and housing targets for Greystones-Delgany, it is not clear at what point the data was compiled. Construction is ongoing on many sites at present including two large Strategic Housing Developments (SHDs). Would ask for robust data to be compiled in this instance, and use of forecasting and econometric tools could greatly enhance the quality of the data which is crucial for proper future planning. It is also very clear that having up to date accurate information and data on population trends and acting on it would help with better planning. - The growth targets for Greystones-Delgany seem far in excess of what is required - Phasing of housing targets is welcomed

<p>C2-205 https://consult.wicklow.ie/en/submitmission/ww-c2-205</p>	<p>Cairn Homes Properties Ltd.</p>	<ul style="list-style-type: none"> - Object to dezoning of land and believe this could be damaging to the programme for Government and the need to deliver new homes in the current housing crisis. Removing zoned land will reduce the ability of the market to deliver homes when there is a need for up to 50,000 units per year to cater for existing and pent-up demand. Curtailing supply will potentially impact upon affordability. Will resist the dilution of the zoning of any Cairn lands as contrary to constitutional and property rights. - The Housing Supply Target Methodology Guidelines have not been correctly reflected in the Draft Plan. - Development at Bray is in large part dependent upon the delivery of Luas to Fassaroe, which is a long-term project and is unlikely to be delivered before 2028. Effectively, too much development is being allocated to Bray with little likelihood of it being delivered. Furthermore, the indicated significant targeted growth of Wicklow Town is unlikely to materialise within the timeframe indicated. The allocation for Arklow is likely to be correct given market demands. There is significant market demand for new homes in Greystones and Blessington. - The Draft Development Plan Guidelines highlight that in the preparation of a Plan, due consideration must be given to the likelihood of delivery and that some areas main remain undeveloped, notwithstanding the zoning. For example, the sewage treatment plant in Blessington has recently been upgraded to cater for new development and a new link road to the N11 in Greystones is a Development Plan objective. Without this capability to deliver, the Dublin region will continue to under provide for essential housing with a resultant increase in homelessness, increase in property prices and spiralling rents. A more effective distribution will ensure that there is a steady supply of sites and accelerated housing supply in line with Section 5.3 of the RSES, with particular reference to compact growth and housing delivery. Suggested that targets for Bray, Wicklow-Rathnew and Arklow be reduced, and target increased for Greystones and Blessington.
<p>C2-234 https://consult.wicklow.ie/en/submitmission/ww-c2-234</p>	<p>Beakonshaw Ltd</p>	<ul style="list-style-type: none"> - The Core Strategy allocates a housing units growth for Level 5 towns of 515 units up to 2031. - Having regard to mislabelling or omissions of data from this chapter, it is not clear how population projects have been calculated and converted to spatial areas.
<p>C2-268 https://consult.wicklow.ie/en/submitmission/ww-c2-268</p>	<p>Carl & Julia Strickland</p>	<p>The population growth target for Enniskerry is 1,877 – 1,920 in 2031; this is an increase of 43. Recent development has entailed the construction of 47 units and further lands are zoned for over 200 units. Therefore the area is currently over zoned given the population target.</p>
<p>C2-300 https://consult.wicklow.ie/en/submitmission/ww-c2-300</p>	<p>Wicklow Planning Alliance</p>	<ul style="list-style-type: none"> - The housing calculations used do not truly reflect the situation and are misleading for both developers and the public. The figures do not include houses currently under construction or with planning permission. Whilst it is undeniable that the future is uncertain and these homes may never be occupied, there needs to be some recognition that the capacity for even more people moving into the area will be limited and a way proposed to take account of actual numbers as new applications for development are received.

		<ul style="list-style-type: none"> - The potential populations of Wicklow Town and Newtownmountkennedy have already overshoot the population target allocated to that town having regard to developments underway and permissions granted.
C2-299 https://consult.wicklow.ie/en/submit/mission/ww-c2-299	Judy Osbourne	<ul style="list-style-type: none"> - The way of assessing how many new houses can be permitted in an area is not fit for purpose; houses under construction and extent permissions must be included. - Worked example is provided for Wicklow Town showing that that no additional houses would need to be permitted to meet 2030 target. Suggest therefore that the draft plan should be amended to reduce the hectares of land zoned in Wicklow Town.
C2-302 https://consult.wicklow.ie/en/submit/mission/ww-c2-302	Craig Bishop	<ul style="list-style-type: none"> - The growth target proposed in the Draft plan is significantly above that recommended by central and regional authorities. Existing planning consents in Newtownmountkennedy would allow for the population of the town to exceed the 2031 target; further development are in the pipeline which could result in a 100% increase in population. - Using an inappropriate 'household size' figure in the plan distorts / inflates the number of new houses needed. - The population targets for all level 4 towns should be recalculated and divided between the towns equally. - The targets for Level 4 towns should be recalculated using Census data rather than calculations in Minister's guidelines. - Greystones – Delgany should be redesignated as a 'self-sustaining town'.

Chief Executive's Response

Overall targets and NPF

The County Development Plan is required to be consistent with the population and housing targets of higher order strategies and policies such as the NPF, the RSES and various Ministerial circulars and guidelines. The population and housing targets set out in the Draft Plan are drawn up to accord with the data and methodology set out in the most recent guidelines on population and housing issued in December 2020 (*Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities*), and, subject to some amendments that are required to bring the figures more up to date and reflect the new plan timeframe (likely to be adopted in late 2022 rather than late 2021) are considered to properly accord with same.

With respect to household size, the Minister in his guidelines of December 2020, sets out the number of new housing units required given the NPF targets for each county, based on calculations and assumptions provided by the ESRI, which included assumptions on future household size. There is no scope for Wicklow County Council to assume a different household size, as the plan is required to be consistent with Ministerial guidelines.

In the event that new targets are provided by the Minister at some future stage, for example based on new national, regional or county analysis of more recent population / housing growth, the plan, even if adopted, can be varied to continue to accord with same.

It should also be noted that in accordance with the provisions of the NPF and December 2020 guidelines, population and housing growth in Wicklow is allowed to be 'front loaded' in the period up to 2026, i.e. growth is allowed to exceed targets by 25%, in order to reflect the current patterns of development, pent up demand, extant permissions etc at this time. Therefore even if the NPF projections are under-estimating national growth rates, the growth rate being permitted in County Wicklow during the course of this plan is in excess of national rates and therefore any increase in growth rates since the making of the NPF is already been accommodated in the plan

figures.

In addition, after the adoption of the CDP, a HNDA will commence preparation, which will where possible take into account the most up to date data available on population and housing.

Timeframe

It is agreed that the population targets should be recalibrated to reflect the plan period namely Q3 2022 – Q2 2028, and this amendment is detailed in the **Proposed Amendments to Chapter 3** and **Appendix 3 Housing Strategy Proposed Amendments** documents appended to this report.

Data

Data on population growth at the County / settlement level is only available via the Census. Therefore it is not possible to provide 'more' up to date data than the last Census. Every effort has been made however to include any up to date on housing completions (sourced from the CSO) but it is not possible with any certainty to translate those figures into population numbers.

In terms of future projections of population and housing need, the Draft Plan addresses 'targets' rather than 'projections'; projections are generally formulated looking at past trends and behaviours, and making assumptions about future trends. This exercise is not carried out at a County level but rather 'targets' are provided via the NPF / Ministerial guidelines. The NPF clearly aims to *alter* trends to refocus growth in the largest cities and towns in order to provide for a more sustainable and climate change resilient settlement patterns. To plan the future based on past trends would be contrary to the NPF principles and exacerbate the unsustainable, car dependent, suburban sprawl that has been occurring the wider Dublin region. Therefore this plan does not and cannot be framed around the past patterns of development in the County and region, but rather based on the planning principles and targets set out in the NPF.

It is considered that there are more than adequate number of tables setting out significant information on the population and housing targets for each settlement and in fact on foot of request from the OPR, the amount of data presented is proposed to be reduced to make it easier to understand.

With respect to developments under way and extant permissions, the methodology employed to take account of these units is as per the methodology set out in the 2020 guidelines, in particular an estimate must be made of how many units under construction are likely to be completed between the last CSO completion figures and the adoption of the plan (this can be found in the appended document 'Appendix 3 Housing Strategy – Proposed Amendments'). It is accepted however that in a small number of settlements, the targeted future housing growth during the lifetime of the plan could be accommodated within the extent of existing extant permissions. In those situations, the development plan objectives have been crafted to limit further development in such settlements other than compact / infill / brownfield type development in the town core.

Any mislabelling or typos with regard to tables will be corrected, as shown on the appended **Proposed Amendments to Chapter 3**.

Bray

The majority of the population and housing growth allocation for Bray is ring-fenced for this settlement (as per NPO68 of the NPF and RSES), and notwithstanding any possibility of delays in delivering the number of units targeted, it is not possible to 're-allocate' this growth to alternative settlements. Therefore no change is recommended, although changes to the Core Strategy, which will impact on the targets for Bray and other settlements, are recommended on foot of other submissions.

Wicklow Town – Rathnew

Having regard to the proposed revised Core Strategy as set out in the appended document, notwithstanding development under way and extant permission there will be scope to permit additional housing in Wicklow – Rathnew during the lifetime of the plan. There will however be a requirement in the preparation of the next Wicklow Town – Rathnew LAP to significantly reduce the amount of land zoned for new housing, particularly at the periphery of the settlement, in order to accord with the new targets. This will be addressed in the next LAP rather than via the CDP.

Greystones – Delgany

The overall housing growth target 2016-2031 in Greystones-Delgany of c. 29% is appropriate given the growth principles and limits set out in the NPF.

It is noted that developments underway and permitted but not yet commenced would fulfil the targets set out in the Draft Plan for Greystones – Delgany. However, it is not considered appropriate or in accordance with the provisions of the NPF / Ministerial Guidelines to therefore put a stay on any further permission being granted as the plan must continue to support the development of housing in appropriate locations, particularly infill / brownfield / regeneration sites having regard to (a) the ongoing need for new housing and (b) the need to regenerate / revitalise derelict and underutilised sites in order to create a stronger town centre. In this regard, as set out in the attached addendum to this report, it is recommended that an amendment be made to Section 3.5 that all applications for new residential development in locations such as Greystones – Delgany will be assessed against the population and housing targets of the adopted CDP. Zoning requirements for the settlement having regard to the new Core Strategy targets will be addressed in the next LAP review.

Blessington

The overall housing growth target 2016-2031 in Blessington of c. 27% is considered appropriate given the growth principles and limits set out in the NPF. This growth is targeted to occur in only that part of Blessington located in County Wicklow. The current Kildare CDP does not target significant growth in that part of Blessington in Co. Kildare (target is in the region of 60 units up to 2023 and 140 units up to 2026). It is hoped that it will be feasible in the future to prepare a combined LAP covering both jurisdictions.

Enniskerry

While Enniskerry experienced limited growth between 2006 and 2016, a number of developments completed, underway or permitted could result in a growth rate between 2020 and 2025 of 20%. This is very much at the 'upper end' of the growth parameters that should be considered for a settlement of scale / type of Enniskerry, particularly have regard to the 30% limit set out in the NPF for non-growth towns.

Having regard to level of growth already experienced / in train and the current deficiencies in the following infrastructure and facilities, Enniskerry is not determined to be well positioned to accommodate significant additional housing growth during the plan period, and focus should be on consolidation and investment in employment, and transport infrastructure / accessibility, in particular:

- the very low jobs ratio in Enniskerry, with very few employment opportunities in the locality, which results in significant commuting outflows from the town,
- the inadequacies in public transport services, as well as lack of opportunities to use active modes of transport within the town and to surrounding larger towns (such as Bray) having regard to inadequacies in footpaths and no designated cycleways,
- the significant environmental sensitivities in the area, particularly the Knocksink Wood SAC within the town centre, which is particularly susceptible to changes to the ground and surface water regime in the wider area.

As set out in the appended 'Chapter 3 – Proposed Amendments', the housing target for Enniskerry up to 2031, less units already completed, is 91. However, the development capacity of existing zoned land is in the order of 520 units. Therefore there is significant over provision, and this will require to be addressed in the review of the Bray MD LAP in due course. Therefore it is not considered that there is scope to increase the population target for Enniskerry as part of this Plan.

With respect to zoning requirements in Enniskerry, and AA2 in particular, these will be dealt with in the next review of the LAP for the settlement.

Newtownmountkennedy

In accordance with the NPF, where a settlement is not designated a growth town, population growth should not exceed 30%. Having regard to the 2016 population of Newtown of 3,552, this would allow for growth up to c. 4,620 by 2031.

However the housing / population growth resulting from completed / commenced developments in the town is already in breach of this NPF objective. The Core Strategy of the Draft Plan therefore provides for growth in exceedance of this (c. 70%) in order to reflect the reality on the ground.

It is likely that the growth rate could exceed even this rate, taking into account extant permissions as yet uncommenced and the fact that permission will need to be still considered on town centre infill sites, in order to achieve the goal of revitalising the town centre, in particular the promotion of new development on vacant sites along the main street. This outcome is acknowledged in the plan, and gives rise to the overall development strategy set out in the draft plan for the town, which is to de-zone / bank any previously zoned residential lands where no permission has been granted or no development has commenced, and to focus on regeneration of the town centre.

Any requests for the retention of zoning of residential lands with no permission / uncommenced development, or the zoning of new lands for housing are not recommended, and as set out in the appended document – 'Proposed Amendments to Volume 2' - it is recommended that further residential lands in Newtown be de-zoned or banked in an effort to address this problem.

Kilcoole

With regard to the population target for Kilcoole, the housing growth target set out in the Draft Plan of c. 20% is considered reasonable and appropriate for a town of this size, character, location and level / range of services available. The previous housing growth target in the current CDP was in the order of 50%, which would exceed NPF guidance. No change therefore proposed on foot of this submission.

Level 5 / 6

Aggregate growth targets are set out for these settlements as provided for under the Act (towns under 1,500). Level 5 and 6 settlements are identified for modest growth. The Core Strategy provides for an average growth rate of c. 25% between 2016 and 2031 for Level 5 settlements and 15% for Level 6 settlements, which is considered appropriate given their small size and infrastructure. The Draft Plan provides more than adequate zoned lands to meet these growth targets, even allowing for 'headroom' i.e. zoning over and above that needed to meet the target in the case of land not being brought forward for development or services issues arising at some locations.

Villages / Rural Areas

It is not correct that the Core Strategy provides for a 'higher' growth rate in the open countryside than in villages – the growth rate in both types of areas is targeted at 5-10% up to 2031. In absolute terms this could result in higher

growth in the open countryside as its population in 2016 was 33,327 compared to 5,672 living in villages. It is proposed on foot of other submissions made, particularly the submission from the OPR, to review the Core Strategy and to combine the targets for the smaller villages and open countryside, which may allow for enhanced scope for growth and strengthening of villages with the infrastructure necessary to support such growth.

Chief Executive's Recommendations

See Proposed Amendments to Chapter 3 (attached)

Topic		Section 3.3 Settlement Hierarchy
ID	Name	Issues raised
C2-25 https://consult.wicklow.ie/en/submit/ww-c2-25	Delgany Tidy Towns	Request that Greystones-Delgany be designated a 'self-sustaining' town to allow for a catch-up of services. The group agree with the comments made by the EMRA in their submission noting that the designation of Greystones-Delgany as a 'Self-Sustaining Town' would promote 'catch up' investment in local employment, services and sustainable transport options and enable Greystones-Delgany to become more self-sustaining.
C2-114 https://consult.wicklow.ie/en/submit/ww-c2-114	Colin Acton-Charlotte Byrne	Suggest Greystones - Delgany should be categorised as a 'self-sustaining town' rather than a 'self-sustaining growth town' as per the first CE report having regard to weak employment base and need for catch-up investment in roads and schools.
C2-117 https://consult.wicklow.ie/en/submit/ww-c2-117	Moffash Ltd	Suggested that Ashford be moved up the settlement hierarchy having regard to the growth since 2016 and extant permission in the settlement; it has outgrown its Level 5 designation and its form and characteristics are more akin to a 'self-sustaining town'.
C2-205 https://consult.wicklow.ie/en/submit/ww-c2-205	Cairn Homes Properties Ltd	<ul style="list-style-type: none"> - Greystones has incorrectly been identified as 'Core Region' settlement rather than a 'Metropolitan Area' settlement. - The housing allocations for both Greystones-Delgany and Blessington do not reflect their status as 'sustainable growth towns' - With respect to the designation of Greystones – Delgany as a 'self-sustaining growth town' the Draft Plan indicates that the designation reflects past growth and not future growth. This is at odds with the provisions of the RSES and the role allocated to 'sustainable growth towns'. <p>Request that the following text in Section 4.2 be amended as follows: WhileThe 'growth town' designation would suggest <i>indicates</i> that significant new population growth is planned for Greystones – Delgany for the duration of this development plan; in fact this designation is intended to reflect the growth that has already occurred in the 2016-2020 period and is likely to occur in 2020-2022⁸ period having regard to housing development already underway and due for completion within this timeframe. The focus during the period of this development plan therefore for the settlement will be on infill development and consolidation of the built up area, <i>completion of essential infrastructure (e.g. the N11 Link Road) and appropriate development outside the compact growth boundary in accordance with zoning principles of the Plan.</i></p>
C2-218 https://consult.wicklow.ie/en/submit/ww-c2-218	Delgany Community Council	Suggest Greystones - Delgany should be re-categorised as a 'self-sustaining town' rather than a 'self-sustaining growth town' as it does not meet the definition of a 'growth town'. The area has seen a very high level of development in residential housing in recent years and there are many more planning permissions granted which have yet to be built. The area does not have the public transport, social or cultural or community facilities needed to sustain the current population. It does not have a moderate level of jobs. A significant "pause" is needed to allow facilities and infrastructure to catch-up and grow at the same pace.

<p>C2-249 https://consult.wicklow.ie/en/submitmission/ww-c2-249</p>	<p>Carina Harte-Holmes</p>	<p>Delgany-Greystones should be identified as a Self-Sustaining Town in line with the EMRAs submission. Having regard to the increase in population in the area, there is now need to pause development in order to allow infrastructure and services to catch-up.</p>
<p>C2-266 https://consult.wicklow.ie/en/submitmission/ww-c2-266</p>	<p>Christopher Weinmann</p>	<ul style="list-style-type: none"> - Requests that Newtownmountkennedy be designated as 'Self Sustaining Growth Town'. - Requests that Greystones – Delgany and Kilcoole are combined as one unit in the CDP, designating it a 'Self Sustaining Growth Town' and part of the planned development of strategic areas in Greystones.
<p>C2-231 https://consult.wicklow.ie/en/submitmission/ww-c2-231</p>	<p>GAP (Greystones Area Planning) Community</p>	<p>Delgany-Greystones should be classified as a "Self-Sustaining Town". Self-Sustaining Growth Towns are defined as towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining. Consider that Greystones - Delgany does not meet this definition. Designation as a "Self-Sustaining Town" would seem to be far more appropriate. It would also allow for focus to be put on the development of Bray as a Metropolitan Key Town.</p>
<p>C2-293 https://consult.wicklow.ie/en/submitmission/ww-c2-293</p>	<p>Kilcoole Residents & Community Development Association</p>	<p>The designation of Kilcoole as a Level 4 towns is appropriate but the descriptor of the category 'weak employment base' is not accurate in the case of Kilcoole</p>
<p>C2-300 https://consult.wicklow.ie/en/submitmission/ww-c2-300</p>	<p>Wicklow Planning Alliance</p>	<p>Greystones-Delgany is mis-designated of as a Self-Sustaining Growth Town, which surrenders control to developers, creates expectations in landowners and ignores the fact that there will be no funding from the NDP for infrastructure to support a population higher than the allocated target.</p> <p>It is clear that all developments in Greystones-Delgany not yet started must cease until the SEA is re-evaluated by the relevant bodies and a new zoning of lands for nature put in place to rebalance the park lands already lost to development.</p>

Chief Executive's Response

Greystones – Delgany

It is considered that 'Self-Sustaining Growth Town' is the appropriate categorisation for this settlement, having regard to both the wide range of services available in the settlement; for example public transport including rail and number of frequent bus services, education (2 secondary schools, 8 primary schools), sports and recreation facilities (rugby, GAA, 3 football grounds, tennis, athletics, hockey, baseball, swimming pool, sailing, water sports) retail (5 supermarkets) and the considerable growth on the settlement since 2016 which is still ongoing with over 1,000 units currently under construction, likely to be delivered in the next 5 years. It would be a misnomer to not identify Greystones-Delgany as a growing town. However, in the approach to future growth, in particular additional residential development, it is the goal to manage housing growth, to initiate a programme of reviewing the appropriateness of peripheral zoned greenfield sites, and to renew focus on the development of infill and town centre / brownfield sites, and to devote resources to social / community facilities 'catch up' (Community and Recreation Audit recently completed to identify deficiencies). This approach is not considered to be inconsistent with the Self-Sustaining Growth Town typology.

The draft Plan provides a stronger focus on the need to deliver sustainable communities whereby employment and community facilities are delivered in tandem with residential development. This will also be reflected in the review

of the Greystones-Delgany and Kilcoole Local Area Plan.

The distinct character of Delgany is acknowledged in the Draft Plan, and further detailing of this character and measures to enhance same are more appropriate for the LAP, rather than the CDP.

The amended text suggested in submission C2-205 is not recommended as it seeks to emphasise a single road objective that has not been confirmed as a priority or essential piece of transport infrastructure for the area (though this will be examined as part of the ABTA commenced for the town) and seeks to explicitly support additional development outside the built up area which is clearly set out in the Core Strategy as the last priority in terms of new development. As set out in the appended 'Chapter 3 Core Strategy – Proposed Amendments' document, there may be limited justification for any further development outside the built up part of Greystones – Delgany in the future.

The housing growth rate targeted for Greystones – Delgany (at 29%) is considered to align with its designation.

Greystones – Delgany will be correctly identified as a 'Metropolitan Area' settlement – see appended document '**Proposed Amended Chapter 3**'.

Blessington

It is considered that 'Self-Sustaining Growth Town' is the appropriate categorisation for this settlement given its role and function in West Wicklow particularly with respect to social, retail and employment infrastructure, which aligns with the targeted housing growth rate (close to 30%).

Newtownmountkennedy

It is considered that 'Self-Sustaining Town' is the appropriate categorisation for this settlement, having regard to the shortfall in infrastructure available in the town which is not developed in tandem with the significant residential development being experienced in the last 10 years. Of particular concern in Newtown are the deficits in education (one of the two primary schools being in temporary accommodation, no secondary school), sports grounds / playing pitches, employment and public transport. Newtownmountkennedy, being located on the N11 and not serviced by rail, is a particularly car dominated and commuter driven settlement, which is no longer an acceptable development strategy.

Development already permitted in Newtownmountkennedy, likely delivered over the next 5 years, will significantly enlarge the town, and it is considered necessary at this stage to moderate any similar greenfield type development and to focus on regeneration of the town centre and underutilised sites. No change to designation is therefore recommended.

Kilcoole

While there is an existing LAP that covers Greystones – Delgany and Kilcoole, this was always intended to be read as two LAPs in one, given the proximity of the settlements and their synergies, and not a 'merging' of the settlements. Kilcoole is its own settlement, as defined by the CSO, with its own identity, is outside the boundary of the Metropolitan Area (as defined by the RSES) and therefore it is not considered appropriate to join the two towns for Core Strategy purposes.

The description of 'self-sustaining towns' is taken directly from the RSES and it is accepted that it may not neatly fit the characteristics of each and every town that fits in that general category. While the employment function of Kilcoole is noted, it is also noted that Kilcoole does have dependency on 'services' (which is also included in the description) of neighbouring larger towns, such as Greystones.

Ashford

Having regard to Ashford's population as of the last Census (under 1,500) and the considerable development recently completed or underway in Ashford, as well as the infrastructure / services deficiencies across a range of areas being experienced due to this pressure including (but not limited) to employment, education and community facilities, it is not considered that Ashford is suitable to accommodate a higher share of growth than already being experienced, and in fact requires a moderation in housing growth to allow for services to catch up. Therefore there is no justification for raising the status of Ashford in the settlement hierarchy.

Chief Executive's Recommendations

See Proposed Amendments to Chapter 3 (attached)

Topic	Section 3.5 Zoning	
ID	Name	Issue raised
C2-135 https://consult.wicklow.ie/en/submit/mission/ww-c2-135	Capami Ltd	It is suggested that 'headroom' should be incorporated in the zoning provisions to ensure adequate land supply, having regard to the underestimation of population growth currently taking place.
C2-204 https://consult.wicklow.ie/en/submit/mission/ww-c2-204	Ronan Group Real Estate	The draft DDPG set out that the existing residential zoned lands should form a baseline for facilitating future growth, and that 'additional provision' of zoned lands may be provided to allow for competition of sites and recognises that not all of the zoned lands will be developed in the lifetime of a Plan. It is respectfully submitted that the CDP should incorporate such provisions as guidance in preparing the subsequent Local Area Plans
C2-214 https://consult.wicklow.ie/en/submit/mission/ww-c2-214	Paschal Bermingham & Tom Redmond	In accordance with the draft DDPG, the Wicklow CDP should include 'additional provision' as set out in Section 4.4.3 of the draft guidelines. Newcastle is considered to be an appropriate example of a settlement where additional land needs to be zoned to facilitate hypothetical choice and the actual delivery of needed new homes.
C2-234 https://consult.wicklow.ie/en/submit/mission/ww-c2-234	Beakonshaw Ltd	The developability of lands at any given time are a function of demand versus their zoning, serviceability, topography, geology, environmental sensitivities, funding, construction crew and product availability, and owners' willingness to give over lands for new development use. The zoning of land strictly to a level that matches envisaged population projection only is deaf to these other realities and ignores the role of active development management outside of the Plan making process. Lands capable of being developed being recognised as such via appropriate land use zoning will generally facilitate the growth of urban areas, protection of agricultural and amenity areas and should be encouraged within the context of the development management system to avoid developer monopolies and increases in prices of built developments.
C2-254 https://consult.wicklow.ie/en/submit/mission/ww-c2-254	Glenveagh Properties	<p>The Draft Development Plan states in "Section 3.5 Zoning" that, "<i>Until such a time as new LAPs are adopted, the current plans for these towns are herewith subsumed into this County Development Plan</i>".</p> <p>Submit that this statement is ambiguous and does not accurately capture the complexity of having policies and objectives in Local Area Plan that are not aligned with the Development Plan. Suggest this statement requires further elaboration, particularly in relation to the following:</p> <ul style="list-style-type: none"> - Will the new County Development Plan take precedence over any conflicting, policies and objectives within the Local Area Plans including land use zoning and density? - Where such conflicts arise, will the LAPs be amended by the relevant planning authority through a variation to reflect the content of the CDP and properly inform the public of the relevant policy requirements? - Is a material contravention required where conflicts arise between the LAP and CDP? <p>In light of the foregoing, consider that the Development Plan requires a detailed statement outlining how the new Development Plan</p>

		supersedes the current LAPs and the potential impacts that this may have on issues such as land use zoning and density.
C2-266 https://consult.wicklow.ie/en/submit/mission/ww-c2-266	Christopher Weinmann	Requests that consideration be given using the lower rate of density as required by The Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) when computing the gross amount of zoned land for Newtown and Kilcoole. 25% headroom is a vast underestimate of what is required. Many landowners are happy to sit on what is generally an appreciating asset, denying supply of land that is desperately needed to address not only the current housing deficit, but also the extremely high price of development land in Wicklow, that rivals the price of development land much closer to Dublin, and well in excess of the other counties that surround the Dublin metropolitan area. This in turn factors in to the price of houses in Wicklow that is verging on the unaffordable for middle income earners. Only by having a greater choice of land for development will houses be delivered and at a lower price. Requests that the Plan preserves the greatest amount of flexibility for when the Local Area Plan process begins, in decisions that are cemented in the CDP.
C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231	GAP (Greystones Area Planning) Community	There is a need for further land to be designated for educational, industrial and recreational use before any additional planning permissions are granted in Greystones - Delgany. Request that re-zoning of land in this area be limited to the areas that are close to infrastructure which has already been constructed.
C2-205 https://consult.wicklow.ie/en/submit/mission/ww-c2-205	Cairn Homes Properties Ltd.	<ul style="list-style-type: none"> - Object to de-zoning of land and believe this could be damaging to the Programme for Government and the need to deliver new homes in the current housing crisis. Removing zoned land will reduce the ability of the market to deliver homes when there is a need for up to 50,000 units per year to cater for existing and pent-up demand. Curtailing supply will potentially impact upon affordability. Will resist the dilution of the zoning of any Cairn lands as contrary to constitutional and property rights. - Request that Section 3.5 be amended as follows to avoid uncertainty: <i>"...Prior to the adoption of new LAPs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) the Council will have regard strictly adhere to the compact growth, sequential development and phasing principles set out in this plan....."</i> - Requests the plan includes a definition of 'compact growth boundary' and method of calculating capacity in Table 3.10 be confirmed.

Chief Executive's Response

Zoning

In accordance with the Planning Act, the NPF and RSES, and Ministerial guidelines (existing and emerging), the zoning of land requires to accord with the population and housing targets set out in the Core Strategy. This may require alterations to zoning provisions, including (but not limited to) the de-zoning or 'banking' of lands that were previously zoned for new residential development. In accordance with Section 10 (8) of the Planning Act:

(8) There shall be no presumption in law that any land zoned in a particular development plan (including a

development plan that has been varied) shall remain so zoned in any subsequent development plan.

The principles to be utilised in the zoning of land are set out in detail in Chapter 3, and clearly set out that serviced land is the priority for zoning. As a normal part of the plan making process, land is zoned for a range of other uses in addition to residential development, commensurate with the needs of the existing and future population, including lands for employment, open space, recreation, community use etc. With respect to Greystones – Delgany specifically mentioned in submission C2-231, there are considerable areas of zoned and undeveloped lands for all of these additional uses in this area and there is no evidence that there is a paucity of zoned land for employment, education, recreation etc relative to the amount of land zoned for housing. However, this can be analysed and addressed in more detail in the next LAP.

Headroom – Additional Provision

The NPF and associated 'Roadmap' are clear that additional zoning headroom should not be applied in CDPs as this has already been factored into NPF targets. However the Draft Development Plan Guidelines do propose an allowance for up to 25% 'additional provision' which is the equivalent of headroom, subject to justification.

Such headroom is considered to have been already built into the town plans that form part of the Draft Plan, having regard to the assumptions made about the capacity on infill on town centre sites, and density that might be achieved. With respect to future LAPs, consideration will also be given to whether such 'additional provision' is justified.

It should also be borne in mind that headroom was commonly applied in the past to accommodate for the fact that some land might not be developed / come to the market, or lands may not deliver the densities desired due to unforeseen constraints. However, new mechanisms are now in place, in particular the Vacant Site Levy (which is to be replaced with a new tax in due course) which will stimulate through the risk of penalty the holding back of zoned land. In these circumstances, significant headroom can no longer be justified.

Compact Growth / Calculating Capacity

The Draft Plan sets out that the 'built envelope' of a settlement is taken to be the CSO Town boundary, which accords with the NPF Roadmap. Further guidelines do not prescribe that this must be the 'compact growth' boundary, but for the time being, this is what is being used. It is intended that future LAPs will identify an appropriate town specific compact growth boundary, which may not necessarily be aligned with the CSO town boundary.

Having regard to the suggestions set out in the Draft Development Plan Guidelines, it is recommended that the Core Strategy table be enhanced as is set out in the appended document '**Chapter 3 Core Strategy – Proposed Amendments**'. This table set out the development capacity of towns in more detail, which allows for a clearer expression of the zoning needs for LAP towns to be revised after the adoption of the CDP. Capacity has been calculated by evaluating the development capacity for all and any development sites that can be identified in towns, that have capacity for residential development, including a 'discount' for town centre / mixed use sites where a mix of commercial / residential uses, or all commercial use may come about. Assumptions are made about average density, based on the provisions of existing LAPs, emerging higher density standards, and the development pattern / characteristics of each settlement.

LAPs / Density

In order to provide clarity regarding any possible conflict between population / housing targets in LAPs and the new CDP, it is recommended that text in Section 3.5 be amended as follow:

"This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031

targets set out in the NPF Roadmap and the RSES for the EMRA. Prior to the adoption of new LAPs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) *shall be assessed against the population and housing targets set out in the Core Strategy of this County Development Plan and the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan.*

~~Until such a time as the new LAPs are adopted the current plans for these towns are herewith subsumed into this County Development Plan."~~

With regard to any possible 'conflict' between the emerging CDP and existing LAPs with respect to density, all LAPs will be reviewed after the adoption of the CDP to determine if any changes in density standards are appropriate. In the intervening period before new LAPs are adopted, a practical and agreed approach will have to be taken on a case-by-case basis as to whether LAPs densities should be strictly adhered to. In cases where the density attached to a particular zoning in a LAP has an expressed reason, such as protecting heritage/landscape, limitations in services etc very strong grounds would need to be provided for exceedance of the LAP density objective until the next LAP review takes place.

In addition, as set out in Departmental Circular NRUP 02/2021 (April 2021) notwithstanding the need to increase densities at suitable locations, *'The NPF also acknowledges that there is a need for more proportionate and tailored approaches to residential development. This means that it is necessary to adapt the scale, design and layout of housing in towns and villages, to ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village'*. In light of this guidance, there is still scope for local plans to provide for lands zoned at 'lower' densities having regard to the type of town, the location of the site, and the services available.

Chief Executive's Recommendations

See appended document '**Chapter 3 Core Strategy – Proposed Amendments**'

Section 3.6 Transport & Accessibility		
Topic	Section 3.6 Transport & Accessibility	
ID	Name	Issue raised
C2-114 https://consult.wicklow.ie/en/submition/ww-c2-114	Colin Acton – Charlotte Byrne	<p>It is suggested the M/N11 project is incorrectly described and characterised; that the improvements are only as far as Kilmacanogue and the M50 / M11 does not have capacity issue but rather the problem lies in the junctions south of the merge.</p> <p>It is suggested there should be more emphasis on bus services, and services from Greystones to the N11 and major employment areas in Dublin should be identified, as well as increased services serving Bray.</p>
Chief Executive's Response		
<p>N/M11 project description</p> <p>While the 2018 NDP and 2020 RSES identify the priority as '<i>M11 from Jn4 M50 to Kilmacanogue</i>', the updated 2021 NDP identifies the priority as '<i>N/M11 Capacity Enhancement</i>' and the current scheme under assessment / design by the TII and WCC is the '<i>N11 / M11 Junction 4 to Junction 14 Improvement Scheme</i>', which is from the M50 merge as far as Coyne's Cross in Ashford. Having regard to the detailed survey and assessment carried out for the current project, it has been identified that major interventions are required as far as Kilpedder. Therefore the Draft Plan has identified the Jn 4 – Kilpedder element of the overall project as the priority for this Plan period. With respect to the M50/M11 merge, it is considered it would be more accurate to omit reference to same. See attached document.</p> <p>Bus Services</p> <p>Bus services are identified as a key priority in Chapter 3, and significant additional detail on the objectives in this regard as set out in Chapter 12; Chapter 3 deals with strategic objectives only, not localised specific projects. Therefore no change is recommended.</p>		
Chief Executive's Recommendations		
See Proposed Amendments to Chapter 3 (attached)		

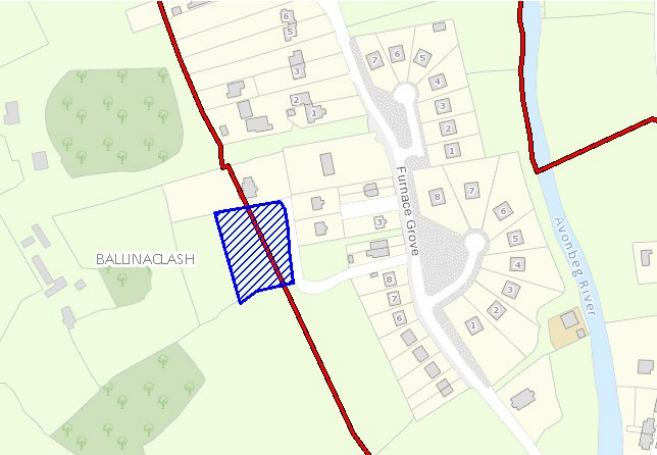
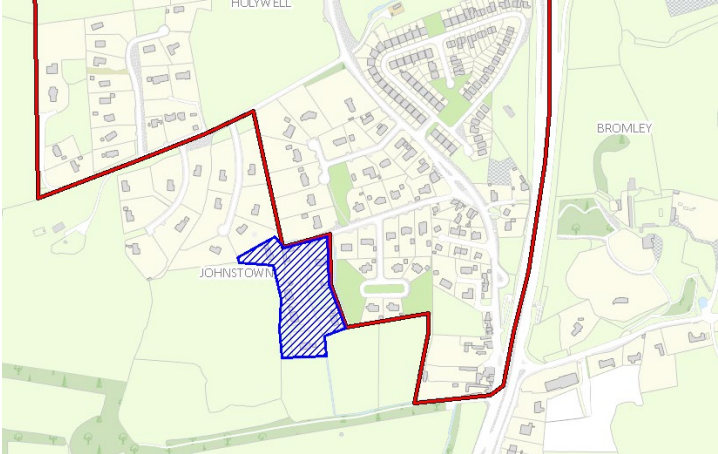
Section 3.3	Volume 1
Section 3.3.4	Chapter 4

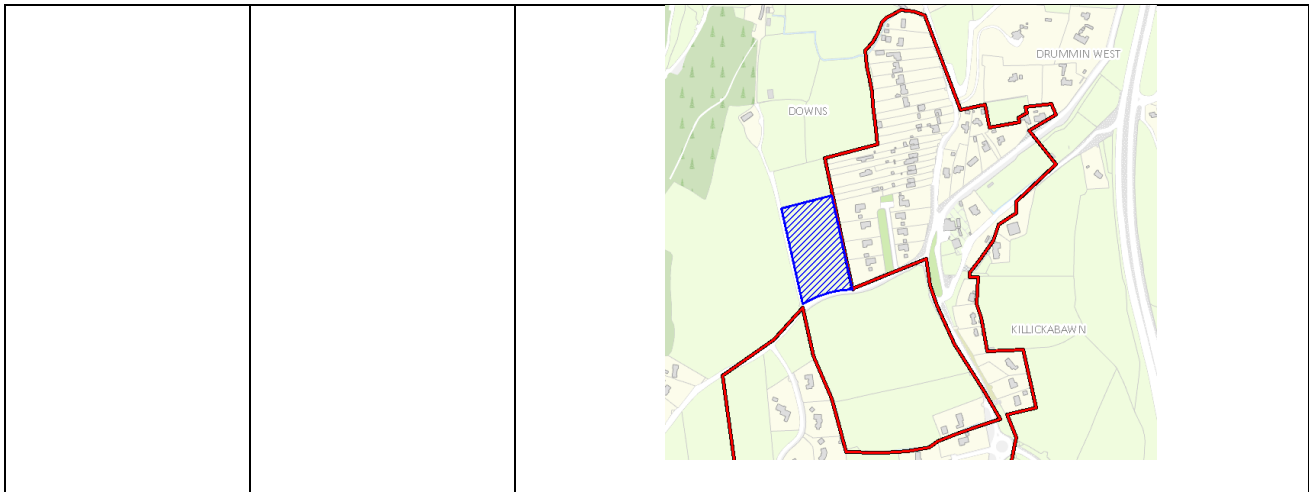
Please note: Any submissions relating to the position of any settlement in the settlement hierarchy, or its growth parameters, are dealt with in Section 3.3.3 of this report (Core Strategy). Other issues are dealt with below.

Section 4.2 Settlement Hierarchy Level 1		
Topic ID	Name	Issue raised
C2-235 https://consult.wicklow.ie/en/submission/ww-c2-235 C2-268 https://consult.wicklow.ie/en/submission/ww-c2-268	Wicklow Greens (Tina Roche) Carl & Julia Strickland	The Fassaroe development is the correct and proper planning strategy for north Wicklow. However the CDP makes no mention to the best in class development plan at Cherrywood in the Dun Laoghaire Rathdown district. The Cherrywood development builds parkland and other social infrastructures first before building housing units. This strategic type of large development practice should be copied for the Fassaroe development as it will share Cherrywood transport infrastructure investment.
Chief Executive's Response		
The Cherrywood model unfortunately would not be directly applicable for Fassaroe, being a Minister designated SDZ. However, the Bray MD Local Area Plan, in particular the development and phasing objectives relating to Fassaroe, clearly set out the required sequence of development, including the delivery of parks, sports facilities and community infrastructure in Phase 1.		
Chief Executive's Recommendations		
No change		

Topic		Section 4.2 Settlement Hierarchy Level 3	
ID	Name	Issue raised	
C2-114 https://consult.wicklow.ie/en/submitmission/ww-c2-114	Colin Acton – Charlotte Byrne	<p>Queries the description and characterisation of the bus services as ‘good’ in the Greystones-Delgany area.</p> <p>Request made that text be altered to emphasise further, and support and enhance, the distinct identity of Delgany.</p>	
Chief Executive’s Response			
<p>It is considered that the description of the bus services in Greystones - Delgany as ‘good’ is an accurate descriptor, there are a number of routes serving the Greystones-Delgany-Kilcoole area (84, 84X, 184) with regular services (about 2 per hour at most stops during the day); connecting to Dublin city centre, Blackrock, Bray, Newcastle and Newtownmountkennedy.</p> <p>The distinct character of Delgany is acknowledged in the Draft Plan, and further detailing of this character and measures to enhance same are more appropriate for the LAP, rather than the CDP.</p>			
Chief Executive’s Recommendations			
No change			

Section 4.2 Settlement Hierarchy Villages		
Topic		
ID	Name	Issue raised
C2-136 https://consult.wicklow.ie/en/submission/ww-c2-136	Kinsella & Transport Logistics Ltd.	Request that Glenealy is moved from Level 7 Large Village on the settlement hierarchy to Level 5 Small Growth Town. It is put forward that there is significant potential to expand the village. In 2014, a conceptual masterplan was prepared showing the possibilities for development. Irish Water have agreed in principle that both water and foul sewer connections could be upgraded and extended if a developer is willing to make a contribution to the scheme.
Chief Executive's Response		
<p>The County Development Plan is required to include a sustainable settlement strategy that is consistent with the settlement hierarchy identified in the RSES. A detailed analysis of the existing settlement structure was carried out to determine the best approach for guiding the future development of the County. This involved looking at a range of factors, including (but not limited to) the existing size of each settlement, the scale of development that has occurred in the last 20 years, the availability / capacity of existing services, social / community facilities and employment, consideration of the carrying capacity of the local environment as well as the patterns of planning decisions in the area. Where services were not available, due consideration was given to the cost – benefit ratio of the investment that might be required to bring services up to a standard to allow for additional development, and whether there was any funding already committed by service delivery agencies for such upgrades.</p> <p>Following this assessment, it is considered that Glenealy is appropriately identified as a village and not a 'growth town' (note: there is no such typology in the Draft Plan); it is not well serviced by public transport; water infrastructure would require significant public investment (even allowing for developer contribution) which is not currently available, employment is limited, as are social / community facilities.</p>		
Chief Executive's Recommendations		
No change		

Level 7 Settlement Boundaries		
ID	Name	Issue raised
<p>C2-31 https://consult.wicklow.ie/en/submitmission/ww-c2-31</p> <p>C2-33 https://consult.wicklow.ie/en/submitmission/ww-c2-33</p> <p>C2-46 https://consult.wicklow.ie/en/submitmission/ww-c2-46</p>	<p>Ronan Phelan</p> <p>Ciaran Phelan</p> <p>Laura Phelan</p>	<p>Request to amend the Ballinaclash boundary to include three sites on the land shown indicatively on the map below.</p> 
<p>C2-39 https://consult.wicklow.ie/en/submitmission/ww-c2-39</p>	<p>M. Doyle</p>	<p>Request to amend the village boundary to include the land shown indicatively below (c. 2ha, occupied by 8 dwellings). It is put forward that these are the only dwellings on Johnstown Avenue that are not currently located in the settlement boundary.</p> 
<p>C2-95 https://consult.wicklow.ie/en/submitmission/ww-c2-95</p>	<p>John Fox</p>	<p>Request to amend the Kilpedder boundary to include the lands as shown indicatively (c 1.6ha) on the map below for residential use (3 houses only). In support of same it is put forward that:</p> <ul style="list-style-type: none"> - lands are adjacent to developed areas, would provide infill development; - dwellings would be for family members who would qualify for rural housing but would prefer to build adjoining the village.



Chief Executive's Response

In accordance with national and regional policy, the Draft County Development Plan is pursuing a compact growth policy whereby settlement boundaries are deliberately defined to manage unnecessary 'sprawl' into the open countryside.

Ballinaclesh

The boundary extension as proposed to make provision for the development of 3 sites for single houses. These lands are located at an elevated position above the road, and behind two existing rows of houses (formed by infill backland development). The development of these lands would form an unacceptable intensification of the haphazard backland layout, which is not considered suitable for such a small settlement and would result in visually intrusive development, in a scenic valley landscape, particularly when viewed from across the valley. No change therefore recommended.

Kilpedder

Kilpedder – Willowgrove is a small settlement with limited services. There is no school and very limited local amenities serving existing residents, which has been highlighted in previous submissions. The boundary identified in the draft plan includes adequate land to accommodate a moderate level of development.

The extension proposed in C2-9, given the reasons outlined in the submission, is not necessary to facilitate family homes for those that qualify anyway for rural housing. If this is their desired site for the family homes, they may be considered under the rural housing criteria. Therefore no change is warranted or recommended.

With regard to C2-39, it is unclear why the plan boundary extension is desired when the lands are already developed, but it is perhaps to facilitate one infill house, under the 'village' development criteria, rather than 'rural' criteria. This is considered reasonable given the pattern of development in the area.

In addition, there is another developed area just to the north-west of these lands, and it is recommended these also be included. Finally, it is recommended that lands north of this block be omitted from the village boundary, having regard to the presence of a high voltage electricity line in the area, which would present development difficulties having regard to set back requirements.

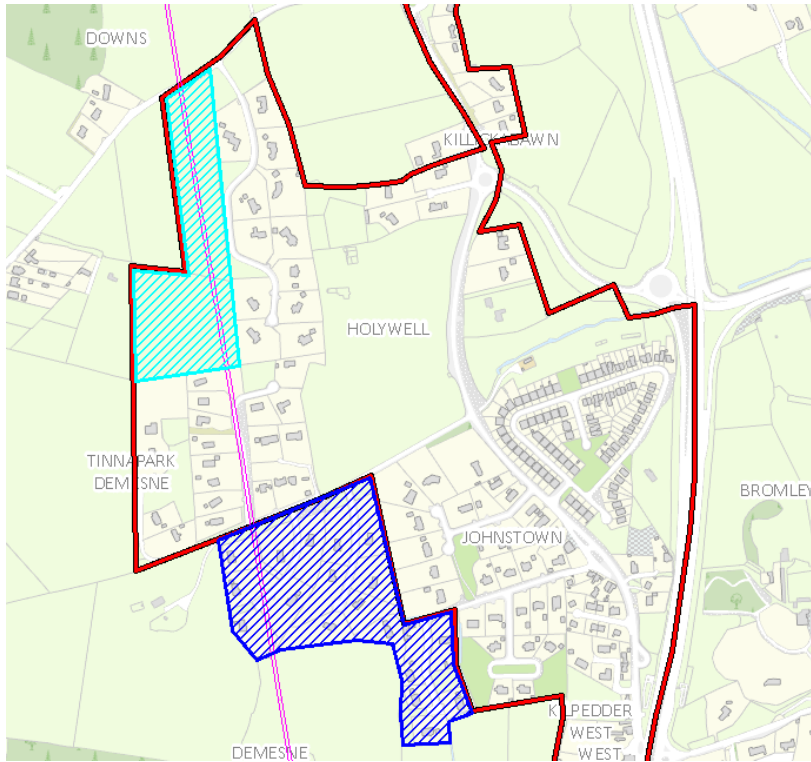
Chief Executive's Recommendations

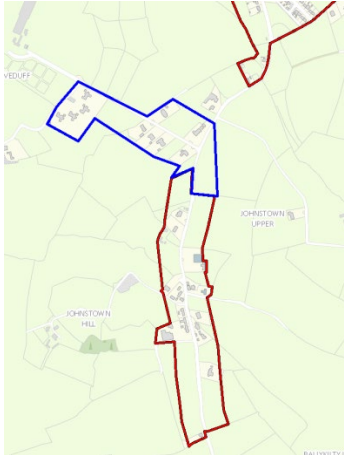
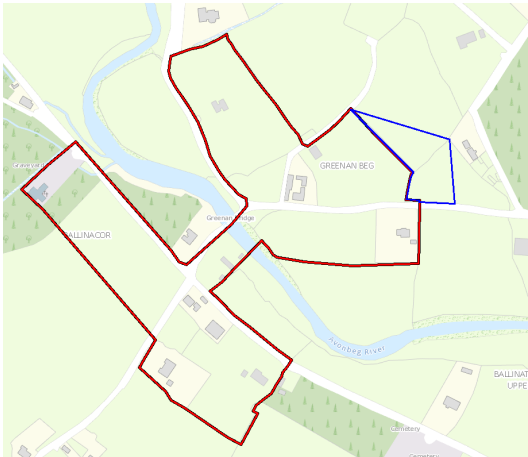
Ballinaclash


No change to plan

Kilpedder

Amend the village boundary by including the area shown in dark blue and omitted the area shown in light blue on the map below (high voltage line shown in pink).



Level 8 Settlement Boundaries		
Topic	Level 8 Settlement Boundaries	
ID	Name	Issue raised
C2-82 https://consult.wicklow.ie/en/s/ubmission/ww-c2-82	Phyllis Byrne	Request to extend the boundary of Johnstown (Arklow MD) to include Slieveduff. 
C2-237 https://consult.wicklow.ie/en/s/ubmission/ww-c2-237	Helena Kennedy	Request to extend the boundary of Greenane (Arklow MD) 
Chief Executive's Response		
<p>In accordance with national and regional policy, the Draft County Development Plan is pursuing a compact growth policy whereby settlement boundaries are deliberately defined to control excessive growth and limit sprawl into the open countryside.</p> <p>These are both is a small settlements with very limited or no services and are not suitable for significant or even moderate growth. The boundaries identified in the draft plan include adequate land to accommodate the limited level of development targeted for villages of this scale. The proposed extensions would result in an increase in land within the settlement boundary which would be contrary to the Plan's compact growth policy and would be unnecessary to meet growth targets. It is also noted that in both villages the landowner / majority landowner of the extended area owns other undeveloped lands within the existing boundary (in the case of Johnstown that is not the submitter). Therefore there is no justification to extend the boundary.</p>		
Chief Executive's Recommendations		
No change		

Topic	Kilquade	
ID	Name	Issue raised
<p>C2-118 https://consult.wicklow.ie/en/submit/ww-c2-118</p>	<p>Fergal Doyle</p>	<p>The area of Kilquade which has a number of houses, the Arboretum and a church supports the population equivalent of a Level 7 or 8 village and should be recognised within the County Development Plan with an objective such as:</p> <p>CPO 4.XX: <i>To recognise the unique characteristics of existing clusters of development in areas outside the settlement hierarchy and to allow for suitable developments of appropriate scale to be considered in such areas, subject to principles of sustainability and compact growth as outlined in National and Local Policies.</i></p>  <p>The submission refers in particular to the lands outlined in blue above and suggests that a small scale residential development of 4-5 houses would be a logical extension of Kilquade/Russian Village.</p>
<p>Chief Executive's Response</p>		
<p>Kilquade/Russian Village is not connected to mains sewer, has poor road infrastructure including a lack of footpaths, cycle lanes and public lighting, and has extremely limited community services, comprising only Kilquade Church. While there is a Garden Centre in Kilquade, this does not provide 'infrastructure' support for further development in this area.</p> <p>In addition, given the location of this area in close proximity to the settlements of Greystones, Delgany and Kilcoole and the substantial availability of zoned serviced lands in these towns, it is considered that the proposed recognition of a settlement and development of housing in this rural area would be contrary to the Plan's compact growth policy and would be unnecessary to meet growth targets.</p>		
<p>Chief Executive's Recommendations</p>		
<p>No change</p>		

Section 3.3	Volume 1
Section 3.3.5	Chapter 5 – Town & Village Centres – Placemaking & Regeneration

Topic	General	
ID	Name	Issue raised
C2-114 https://consult.wicklow.ie/en/s/ubmission/ww-c2-114	Colin Acton – Charlotte Byrne	It is requested that any references to Delgany emphasise that Delgany is a village rather than a town
C2-125 https://consult.wicklow.ie/en/s/ubmission/ww-c2-125	Blessington District Forum	<p>The following suggestions are made with respect to town centres:</p> <ul style="list-style-type: none"> - Invest in better public realms and works that improve rather than simply maintain and patch what exists. - The enforcement of dereliction orders and increased vacant site levies to minimize the impact of these empty sites, many of which may never be developed. - Consider the introductions of shop front improvement schemes as a directive from WCC to all districts. - Encourage the provision of pedestrian areas and open spaces in town centres, such an example would be the pedestrianisation of the Market Square in Blessington as opposed to its status as a car park. - Prioritize and encourage the delivery and maintenance of town centre retail units to ensure communities remain resilient, active, and alive. - Consideration should be made to encourage residents back into the centre of our towns and villages; maybe this can be achieved by using grants to encourage shop owners to rent upper floors as residential units - Seek community consultation particularly with our young people in regards to developing town centres and retail units

Chief Executive’s Response
<p>The CE is committed to both implementing smaller scale public realm improvements in town and village centres on an ongoing basis <i>and</i> delivering significant new transformative schemes that will address physical, social and economic deficiencies in a more significant way for key locations. In this regard, the Council has been very active seeking and securing funding under the Town & Village Renewal Scheme, RRDF and URDF programmes for major projects in Bray, Wicklow Town, Arklow, Baltinglass, Newtownmountkennedy and number of other locations. Further / revised applications are in preparation for Blessington, Rathdrum and other settlements for 2022. In addition, the Council has supported communities in Leader applications for funding for Public Realm Strategies.</p> <p>With respect to dereliction and vacancy, the Council utilises all of the powers available to address these areas, but there are limitations to the tools available with many exemption available (for example the Vacant Site Levy does not apply to dwellings or to sites of less than 0.05ha). It is not within the power of the Council to increase levies, as these are set by statute. However, new provisions (tax) are due to be brought in in 2022 which may have a more significant impact and the Council will continue to devote resources to this area.</p> <p>The CE is committed to supporting shop front improvements and in this regard, six towns/villages in County Wicklow have been selected to participate in the Streetscape and Shopfront Enhancement scheme (Arklow, Baltinglass, Blessington, Enniskerry, Kilcoole and Wicklow Town). This initiative is a key part of the Government’s ‘Our Rural Future’ and is designed to make our rural towns and villages more attractive places to live, work and</p>

visit. Projects will include upgrades to building facades, artwork, murals, lighting, street furniture and canopies; Under the scheme, property owners will be provided with funding to improve the facades of their buildings, carry out artwork and install features such as canopies and street furniture.

The CE is committed to developing more pedestrian friendly environments where possible and with respect to Blessington in particular, URDF funding is being sought to provide for major improvements to Market Square including pedestrianisation.

With respect to town centre retail units, having regard to the changing nature of retail, keeping these units open and flourishing is a real challenge. The draft plan provisions fully support this ongoing use but acknowledge that alternative uses may need to be considered to keep these units occupied, even if for non-retail uses. The provisions of the draft plan seek to resist new retail developments at the edge or outside of the town centres that would draw trade away from main streets.

In addition, the plan provisions support and promote continue occupation of town centres, including but not limited to upper floors of shops. The CDP has no role in the administration of grants for such schemes, but such support is available in the Council's Housing Directorate. It is expected that further supports will be forthcoming under the Government's recent Housing For All programme.

The CDP is a land use and spatial framework so it cannot direct that consultation is held with any particular group in society regarding any particular project; where a development project is proposed, either by the Council or other agency / private developer, the public have the right to give their observations on the proposals. The manner in which the Council engages with the community on community related projects would be more a matter for the LECP, which is the Council's community development plan.

Delgany

The 'town' of Greystones – Delgany has been deemed a 'Census town' by the CSO for many decades. The entire settlement is considered one unit from a demographic and planning perspective. That said, Delgany is recognised as having a distinct identity within the larger settlement, as have Killincarrig and Blacklion, but it is not correct to identify it as a 'village' as this would suggest it is not a settlement of 1,500 or more (which is the definition in the Census of an urban area). The Draft Plan where relevant does identify that Delgany has a distinct identity, but the CDP is not the appropriate level of plan to outline in more detail exactly what the approach to planning and development will be in Delgany – this is a matter for the next Local Area Plan.

Chief Executive's Recommendations

No change

Topic	Healthy Town Centres – Vitality & viability	
ID	Name	Issue raised
C2-229 https://consult.wicklow.ie/en/submission/ww-c2-229	Wicklow PPN	Need to bring more people back into towns and villages to live, work, learn and play locally. Towns and villages must be more self autonomous. Need enhanced placemaking, keeping it local, nurturing communities.
C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125	Blessington District Forum	Need a focus on road developments that allow us to reclaim town centres, develop town centres, to create vibrant main streets and reduce congestion and pollution in towns.
Chief Executive's Response		
<p>A priority objective of the Draft Plan is to regenerate and reinvigorate towns and village centres, and the communities therein, and to the greatest extent possible to direct development into these locations, to make them more attractive and vibrant places to live, work and socialise. The Draft Plan set out a very wide range of objectives and development standards in this regard to support this goal, with a key focus on placemaking improvements and initiatives, in particular:</p> <p>CPO 5.1 <i>To protect and maintain the viability of town and village centres, target the reversal of decline and deliver sustainable reuse and regeneration outcomes.</i></p> <p>CPO 5.2 <i>To protect and increase the quality, vibrancy and vitality of town and villages centres by promoting and facilitating an appropriate mix of day and night time uses, including commercial, recreational, civic, cultural, leisure and residential uses and to control uses that may have a detrimental impact on the vitality of the streetscape and the public realm.</i></p> <p>CPO 5.3 <i>To particularly promote and facilitate residential development in town and village centres:</i></p> <ul style="list-style-type: none"> ▪ <i>Promote the 'active' use of above ground floor levels, and in particular to promote the concept of 'living over the shop' in centres. Where a 'living over the shop' use is proposed, a relaxation in density, car parking and open space standards will be considered, where the development meets very high quality of design and accommodation.</i> ▪ <i>Other than in the retail core area, residential development shall be the primary development objective for lands zoned town centre or village centre. This shall not preclude commercial development on lands zoned town centre or village centre when suitable sites are not available in the core retail area.</i> ▪ <i>For smaller towns that do not have a defined core retail area the priority will be to facilitate uses which are consistent with maintaining activity and vitality in the town centre and addressing vacancy. While this may allow for the development of residential only developments in the town centre, any such proposals shall fully justify how such use will not diminish vibrancy in the town centre, or result in the town not being able to meet the retail / services needs of the local population.</i> <p>CPO 5.6 <i>To seek funding and focus new investment into the core of towns and villages in order to reverse decline, foster resilience and encourage new roles and functions for streets, buildings and sites within towns and villages.</i></p> <p>CPO 5.7 <i>To identify and pursue transformational regeneration and renewal proposals and public realm initiatives that revitalise town and villages centres, encourage more people to live in town and village centres, facilitate and incentivise new economic activity and provide for enhanced recreational spaces.</i></p>		

CPO 5.8 *To target development that will regenerate and revive town and village centres, address dereliction and vacancy and deliver sustainable reuse and quality placemaking outcomes.*

CPO 5.9 *To facilitate and support well-designed development that will contribute to regeneration and renewal, consolidation of the built environment and include interventions in the public realm and the provision of amenities.*

Chief Executive's Recommendations

No change

Topic	Regeneration & Renewal	
ID	Name	Issue raised
C2-160 https://consult.wicklow.ie/en/submission/ww-c2-160	Labour Party, Ross Connolly Branch, Greystones Municipal Area	Support the Council's plan to use the Derelict Sites Act 1990, to eliminate derelict sites in communities and hopefully to create more useable space for communities. The commercial vacancy rate in 2000 saw Greystones Municipal Area with a low rate, however Arklow was well above the national average.
C2-203 https://consult.wicklow.ie/en/submission/ww-c2-203	Alan Richardson	The submission poses and number of question as follows: 1. When is the database of strategic brownfield and infill sites and how will this managed and delivered to the public? 2. Are there specific proposals relating to the types of development - residential, retail, local/other ownership? 3. How is this type of development to be found in the urban renewal regeneration and development funds (URDF- RRDF)? 4. What are the regeneration projects for the Bray, Wicklow and Arklow harbours? 5. There should be a substantial incentive to re-develop vacant buildings through punitive taxation measures on long term vacant buildings 6. Bray - The Luas should be extended to Bray (either to the station or to lands at Bray Wanderers' grounds (having moved them to better grounds elsewhere). 7. Greystones/Delgany - The sites surrounding the Council's offices in Greystones should include: - Increased Park & Ride facilities - Provision for housing on the IDA site. 8. Arklow - Will the Arklow Transport Study enable a regular, frequent and cost friendly train service to all centres southbound to Gorey and to Greystones northbound to include a half hourly service with good cycle provision on the trains?

Chief Executive's Response

1. A comprehensive database of strategic brownfield and infill sites has not yet been established, and how this will be done will have to be examined as an implementation measure upon adoption of the plan. Having regard to new taxation provisions recently announced by the Government with regard to vacant lands and buildings, it is likely that a programme and team will need to be established and resourced to collect this data. It is likely that this data will be published by the local authority.
2. Where vacant / brownfield / infill sites are identified, the types of uses they may be put to or developed for are those set out in the local plan as being acceptable in that land-use zone. The Plan does not prescribe a particular use for any particular site and that would be a matter for the developer to determine what is permissible in the local plan and what is viable in that area given the local market demands.
3. The URDF and RRDF funds projects that have as their goal the regeneration of a particular area / town. This normally (but not exclusively) includes projects that will address vacancy and dereliction, assist in the repurposing vacant or underutilised lands or buildings and the construction of the new buildings or infrastructure that will act as catalysts for further investment and regeneration.
4. The desired regeneration projects for Bray, Wicklow and Arklow harbours are detailed in CPO 5.6 of the Draft Plan, with further detail provided in the relevant LAPs.
5. The Vacant Sites Levy applies to vacant sites / buildings that fulfil certain criteria, and it is levied at a rate of 7% per annum of the site value. New taxation measures have recently been announced that will cover a wider range of sites / structures and it is understood it is to be set out as 3% per annum.

6. The extension of the Luas to Bray station is an objective of this plan, and is an objective of the NTA's Greater Dublin Area Transport Strategy.
7. With respect to Greystones, the development objectives for the lands around the Council's offices are set out in the LAP. This provides for maintenance / enhanced parking facilities. The IDA lands are zoned for employment purposes, where housing is not open for consideration. Any desire or suggestion that this zoning be changed would be a matter for the next review of the LAP
8. The Arklow Area Based Transport Assessment will examine existing transport issues in Arklow and make recommendations for addressing deficiencies. It is the role of the transport agencies, particularly the NTA (which is funding the study) to determine thereafter a programme for delivering improvements. The new NTA Greater Dublin Area Transport Strategy (published November 2021) addresses the issue of rail services to Arklow and Greystones.

Chief Executive's Recommendations

No change

Section 3.3	Volume 1
Section 3.3.6	Chapter 6

Topic	General	
ID	Name	Issue raised
C2-114 https://consult.wicklowlow.ie/en/submitmission/ww-c2-114	Colin Acton – Charlotte Byrne	<ul style="list-style-type: none"> - There are inadequate references to the principles of 'sustainable development' in this chapter; it should be renamed 'sustainable housing'. - The housing objectives do not emphasise that new development should minimise impacts on the environment and that densities may not be achievable on all sites where environmental issues exist; - There should be an objective that all new developments shall comply with 'Inland Fisheries Ireland 2000 Guidelines: Planning for Watercourses in the Urban Environment'.
C2-125 https://consult.wicklowlow.ie/en/submitmission/ww-c2-125	Blessington District Forum	<ul style="list-style-type: none"> - The provision of specific policies for the increase in over 55s must be catered for in the new CDP. Considerations should be given to the inclusion of housing for older persons. To meet demand 10-15% of all residential land use should be set aside for this age group; - The timeline between estate completion and taking in charge by WCC should be lessened, the current process is not fit for purpose, and estates are completed 5-10-15-20 years yet still not taken in charge.
C2-218 https://consult.wicklowlow.ie/en/submitmission/ww-c2-218	Delgany Community Council	Giving permission for housing and residential units alone does not constitute planning; a more holistic approach is urgently needed. Planning needs to be joined-up and integrated and the draft County Development Plan would benefit hugely from the evidence of joint plans with the Departments of Education, Health, Transport, Environment, Climate and Communications and Housing, Local Government and Heritage.
C2-229 https://consult.wicklowlow.ie/en/submitmission/ww-c2-229	Wicklow PPN	A holistic housing for life approach must be implemented with more sheltered / supported housing facilities being available to support independent living.
C2-231 https://consult.wicklowlow.ie/en/submitmission/ww-c2-231	GAP (Greystones Area Planning) Community	<ul style="list-style-type: none"> - Giving permission for housing and residential units alone does not constitute proper planning, a more holistic approach is urgently needed. Planning needs to be joined-up and integrated and the draft County Development Plan would benefit hugely from the evidence of joint plans with the Departments of Education, Health, Transport, Environment, Climate and Communications and Housing, Local Government and Heritage; - Support the principles outlined in section 6.3.1 Sustainable Communities. A social audit with subsequent action can have the potential to transform how we build housing in Wicklow. Support the provision of housing for our older citizens as well as others who might require supported living.
C2-235 https://consult.wicklowlow.ie/en/submitmission/ww-c2-235	Wicklow Greens	<i>Note: This is a lengthy and very detailed submission, which includes a number of changes to the text of the plan. It will not be possible to insert</i>

www.cklow.ie/en/submission/ww-c2-235		<p><i>all of this information into this summary and it is therefore recommended that the reader review the full original submission.</i></p> <p>A total of 38 very specific wording changes have been proposed in Chapter 6 which can be read in the original submission as they cannot be summarised.</p> <p>The submission also states that the trees and hedgerows are not adequately protected in SHDs and also requests that a Biodiversity Restoration Officer is appointed. The inclusion of walking trails within future housing developments on greenfield sites should be integrated.</p>
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Chief Executive’s Response

1. It is not considered appropriate to change the name of the chapter or litter the text with the word ‘sustainable’ wherever possible. The whole purpose of the plan is to provide for the most sustainable form of development possible, while meeting the needs of existing and future generations, which is clear when one considers the plan as a whole. No change is therefore recommended.
2. It is consider that the many objectives of the Draft Plan, set out in both the Housing and a range of other chapter, clearly require new development to minimise impacts on the environment, for example CPO 6.4, 6.5, 17.1 – 17.23, Appendix 1, Section 1.3, 1.4, Section 3.
3. The Draft Plan requires new development to have regard to the Inland Fisheries guidelines quoted – CPO 13.3, 17.26, Appendix 1 Section 1.4.
4. While the Council can require 10%/20% of units be devoted to social / affordable housing under Part V of the Planning Act, it has no powers under statute to *compel* developers to reserve a proportion of the ‘private’ housing for over 55s; the Draft Plan does support and encourage the development of units that may be more suited for older people, for example CPO 6.32 which states:

CPO 6.32 *To support independent living and facilitate the provision of supported housing (specific purpose built accommodation) for older people and people with disabilities towns and villages.*

In addition, the Development & Design Standards of the Plan set out:

1.6 Universal Design & Accessibility

‘Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability’ (National Disability Authority)¹. This includes streets, parks and public spaces. The design of the built environment can significantly influence a person’s ability to have a healthy and active lifestyle or one characterised by limited mobility and high levels of social isolation². Universal Design therefore requires an appreciation of the varied abilities of every person to ensure that places and buildings are designed to meet the needs of all users.

In considering access for those with a disability, the Planning Authority will adhere to the criteria set out in the Building Regulations, 1997, (or as subsequently amended), and other relevant documents, such as:

- *“Building for Everyone”, National Disability Authority*
- *“Best Practice Access Guidelines, Designing Accessible Environments”, Irish Wheelchair Association 2014*
- *“Universal Design Guidelines for homes in Ireland”, National Disability Authority 2015*

¹ National Disability Authority, an independent statutory body that provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities.
² How walkable is your Town? (Age Friendly Ireland, 2015)

'Building for Everyone – A Universal Design Approach', provides practical guidance on the universal design of buildings, places and facilities and advocate that designing for one group can result in solutions that address the needs of many others. For example:

- *'level entry (step-free) entrances facilitate not just wheelchair users but also people with buggies, people with suitcases or shopping trolleys, people using walking or mobility aids, and people with visual difficulties;*
- *larger toilet compartments provide easier access to wheelchair users; those with luggage or parcels; parents with pushchairs or accompanying small children; those using walking or mobility aids; and larger-sized people*
- *clear, well-placed signage that uses recognised symbols or pictograms helps people with reading or cognitive difficulties, and those whose first language is neither English nor Irish'.*

In order to overcome challenges posed by topography or existing built environment constraints, universal design should be considered at the earliest design stages. The design of the built environment should be easy to understand.

Having regard to the current and future demographic trends, proposed developments should be future proofed for an ageing population; the Planning Authority will advocate age-friendly thinking with respect to new developments in the County in particular at pre-planning stage. Developers should consider an Age-Friendly approach, with facilities and materials inclusive of an age-friendly community/society.

The provisions of the Draft Plan explicitly support the development of sheltered / supported housing (in particular Objectives CPO 6.8, 6.27 and 6.32). The delivery of such a form of social housing by the Local Authority would be a matter for the Council's Housing Directorate's Housing Delivery Programme.

5. With respect to 'Taking in Charge', the CE is committed to doing so as soon as is feasible. As set out in the Council's 'Taking in Charge' policy document, consideration will be given to taking a development in charge subject to the following:
 - *The development is an authorised development.*
 - *The development has been constructed in accordance with the planning permission granted and Recommendations for site development works for Housing Areas (published by the DOEHLG).*
 - *The planning permission has expired or the housing development has been substantially completed for a minimum of 12 months.*

Developments are required to be completed to the satisfaction of the Council and this often takes time as normally there are issues to be remedied before the Council can do so. It would clearly not be in the public interest for the Council to take on the financial burden of remedying matters that are the responsibility of developers.

6. Higher residential densities are generally expected on lands that are zoned for new residential development in settlement. Lands with environmental sensitivities that render them undevelopable or generally avoided for such zoning and these are identified through the SEA process. It is accepted that there may be instances where higher densities are not feasible due to unforeseen limitations and these can be dealt with on a case by case basis through the application of the standards of the Plan, in particular those set out in Appendix 1, such as Section 3 which acknowledges that the density that might be achievable on any land is dependent on qualitative standards.
7. In the crafting of this draft County Development Plan, including all of the 'town plans' contained therein, as well as in the draft and preparation of Local Area Plan, all efforts are made to integrate the strategies and policies of other Government and state agencies in the area of housing, transport, environment, education, health and climate action. The Local Authority works closely with and is a stakeholder in the preparation of many of these plans / strategies. The key strategies / plans in this regard are detailed in Chapter 2 and 3 of the plan in particular, and throughout the plan in the relevant chapter. In addition, the appendices set out further requirements in these regards.

C2-235

- The establishment of a separate biodiversity function is not matter for the development plan which is a spatial land use framework – this would be an operational and funding matter.
- The 38 proposed text changes to Chapter 6 have all been carefully reviewed. A number of the suggested changes to include details regarding biodiversity and green infrastructure are considered to be addressed adequately in Chapter 17 and 18.
- A number of the wording changes proposed is wording specific to other plans and policy documents such as the NPF & RSES and the Guidelines for Sustainable Residential Development in Urban Areas (2009). It is not considered appropriate to make changes or additions to text that refers to or is a direct quote from another document.
- A number of the proposed changes suggested above are also considered to be overly prescriptive and would not allow for a flexible approach during the lifetime of the plan.

Chief Executive’s Recommendations

No change

Housing Occupancy Controls		
Topic	Housing Occupancy Controls	
ID	Name	Issue raised
C2-37 https://consult.wicklow.ie/en/submit/mission/ww-c2-37	Orla Gleeson	Housing occupancy controls are discriminatory and restricting young people from buying dwellings in County Wicklow. This may impact the rental market. Brexit and Covid have given more opportunities for economy to grow outside of Dublin and having restrictions discriminates against people based on their place of birth/current living circumstances
C2-128 https://consult.wicklow.ie/en/submit/mission/ww-c2-128	Cairn Plc	CPO 6.2 – it is suggested that there is no planning or legal rationale for the inclusion of a restrictive policy such as CPO 6.2 within larger settlements and therefore this policy should be omitted from the Development Plan.
C2-135 https://consult.wicklow.ie/en/submit/mission/ww-c2-135	Capami Ltd	CPO 6.2 – it is suggested that the inclusion of an objective in towns such as Enniskerry is potentially discriminatory and unconstitutional and may prevent the occupation of residential units during a housing crisis, and that there is no clear planning or legal rationale for such a provision set out in current National or Regional Guidelines. It is therefore requested that this provision is omitted from the Development Plan.
C-204 https://consult.wicklow.ie/en/submit/mission/ww-c2-204	Ronan Group Real Estate	It is submitted that there is no planning or legal rationale for the inclusion of a restrictive policy such as CPO 6.2 within larger settlements and therefore this policy should be omitted from the Development Plan.
C2-205 https://consult.wicklow.ie/en/submit/mission/ww-c2-205	Cairn Homes Properties Ltd	The requirement to comply with the requirement that 25% applicant / purchaser of any new home must have lived for at least 3 years duration in County Wicklow, within 15km of the proposed development site, prior to purchasing a home, is a wholly inappropriate policy for urban development in the metropolitan area or core region. There is no national policy or legislative basis for including such an objective. The market for housing is on a regional basis and should not be restricted in this manner. This is likely to deter investment in essential housing developments in the midst of a housing crisis. Any conditions attached to grants of permission specifying this requirement are considered ultra vires and subject to legal challenge.
Chief Executive's Response		
<p>In accordance with national and regional policy, the Draft County Development Plan is pursuing a policy of directly new housing growth into the larger settlements with the best infrastructural capacity to sustainably absorb new housing; outside of the larger towns the approach is to carefully manage growth to that which accord with infrastructural capacity and meets local needs.</p> <p>The smaller settlements of County Wicklow have limited capacity to absorb growth. It is particularly important to safeguard their continued existence into the future, and to ensure that growth is managed and facilitated in a sustainable manner. New residential development should be in proportion to the scale, pattern and grain of the existing settlement/village. Without occupancy controls there may be an unacceptable demand for unsustainable residential development which would be contrary to the Plan's settlement and compact growth policy. Therefore</p>		

these controls are considered reasonable and no change is recommended (other than CPO 6.2 – see below)

Objective CPO 6.2

The concerns raised with respect to CPO 6.2 are accepted and it is recommended that it be **omitted** from the Plan.

Chief Executive's Recommendations

Amend the Draft Plan as set out in '**Proposed Amended Chapter 6 – Housing**' appended to this report.

Topic	Social & Affordable Housing	
ID	Name	Issue raised
C2-125 https://consult.wicklow.ie/en/s/ubmission/ww-c2-125	Blessington District Forum	Social housing should be provided within all private estates.
C2-128 https://consult.wicklow.ie/en/s/ubmission/ww-c2-128	Cairn Plc	It is suggested the CPO 6.9 be amended as follows: <i>To implement the provisions of the Wicklow Housing Strategy and in particular, to apply a 10% (or a greater percentage if provided for in future legislation) social and affordable housing requirement pursuant to Part V of the Planning and Development Act 2000 (as amended) to land zoned for residential use, or for a mixture of residential or other uses, except where the development would be exempted from this requirement.</i>
C2-160 https://consult.wicklow.ie/en/s/ubmission/ww-c2-160 C2-165 https://consult.wicklow.ie/en/s/ubmission/ww-c2-165	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<ul style="list-style-type: none"> - The housing crisis is appalling with homeless numbers far in excess of past decades. The Government's proposal to build 10% of social housing in private estates is not working as the percentage is too low for the current and past demand. Nor has the Government allowed local authorities build houses themselves to meet the demand of lower income earners. People in Wicklow need social and affordable houses - Mixing social and private housing is a good strategy, as it will avoid the ghettoization of low income families. Hope that future housing developments would continue a similar model but on a larger percentage scale of social and affordable to private housing. Welcome the NPF's advice against the intensification of social housing in areas that are already dense with social housing and advocating for the development of diverse neighbourhoods with a balance of social and private housing to create healthy communities. - Wicklow County Council should be facilitated by Government to build social and affordable homes in the area to meet the housing demand. Public land should be used for the public good such as community facilities social and affordable housing. More public land should be acquired over the next few years. - Wicklow County Council should also facilitate the purchase/build of homes to act as women's refuges in Wicklow and provide that service through an NGO to meet the local need for that service in line with the Budapest Convention. The refuge in Wicklow closed and current refuges are experiencing lack of capacity owing mainly to the housing crisis and COVID.
C2-107 C2-177 https://consult.wicklow.ie/en/s/ubmission/ww-c2-107	Billy Timmins	All development public and private, should have a percentage of houses available for private sale.
C2-205 https://consult.wicklow.ie/en/s/ubmission/ww-c2-205	Cairn Homes Properties Ltd	The Plan indicates that 10% of new housing on zoned land will be reserved for social housing. We generally support the Part V allocation. Would suggest that the text is too limiting in that it refers only to social housing and does not accommodate affordable housing which may become a more important part of housing delivery over the period of

		<p>the Plan.</p> <p>The types of housing required in the future will depend on need to facilitate various groups that have varied housing needs such as disabled people, travelling community, families and single people. Housing development both social and private for the aged is important as it would facilitate housing for our increasing elderly population as well as facilitating downsizing for those whose homes have become too large to manage, thus creating more family homes on the market. Welcome the (HNDA), a housing need demand assessment that will be undertaken by the Council.</p>
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Chief Executive’s Response

The CE is keenly aware of the housing issues facing the County, and the acute need to provide more social and affordable housing and other housing services. With respect to the intensity or quantum of social housing in any particular area, and the types / sizes of houses to be built by the Council, and the delivery of other housing services such as sheltered housing, homelessness services, traveller housing etc, the Council’s Housing delivery strategy / programme is a separate plan to the CDP, and is generally driven by need, available land bank and funding available in any given area. This is not within the remit of the CDP but the CDP in its strategies and objectives fully support the delivery of this programme and details same in the Housing Strategy that forms part of the plan.

The Draft Plan provisions require new developments include a range of units types and sizes to meet the needs of all in society.

Objective CPO 6.9

It is recommended that this objective be amended as follows to address the new requirements of the Affordable Housing Act 2021 which allow in certain circumstances for this requirement will be 20% devoted to social and affordable housing.

Chief Executive’s Recommendations

Amend the Draft Plan as set out in ‘Proposed Amended Chapter 6 – Housing’ and ‘Proposed Amended Housing Strategy’ appended to this report.

Topic	Traveller Housing	
ID	Name	Issue raised
<p>C2-242 https://consult.wicklow.ie/en/submit/ww-c2-242</p>	<p>Irish Traveller Movement</p>	<ol style="list-style-type: none"> 1. Traveller specific accommodation developments completed under the last development plan period should be outlined in the Development Plan. Wicklow County Council's draft chapter on housing, Chapter 6, makes no reference to Traveller Accommodation, or to the local authority's statutory obligations under the Housing (Traveller Accommodation) Act 1998. These should be included in the next iteration of the Plan. National-level planning guidelines for Development Plans set out the relationship between the Traveller Accommodation Programme (TAP), the Housing (Traveller Accommodation) Act, 1998 and the statutory Development Plan. They require that the range and type of housing required and the land use aspects of the TAP are incorporated into the Development Plan. The Guidelines also state that this should take the form of '<i>... objectives that clearly set out the approach of the Development Plan in addressing the accommodation needs of the Traveller community and an indication of the specific locations of known Traveller accommodation projects. To support the identification of additional locations for such projects, zoning policies should also be drawn up in a flexible manner to reflect the urgent need to secure additional Traveller accommodation over the lifetime of the plan.</i>' (Section 4.56 of Development Plans: Planning Guidelines for Planning Authorities, 2007). Therefore, projects committed to under the 2019-2024 Traveller Accommodation Programme should be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10) 2. Sites should be identified and zoning of land for Traveller specific accommodation, including transient accommodation, should be mapped and illustrated in the programme, in line with the Planning and Development Act, (2000) as amended, particularly s10(2)(i). The legislation requires that a Development Plan shall include objectives for: '<i>The provision of accommodation for Travellers, and the use of particular areas for that purpose.</i>' Section 94 (2) of the Planning and Development Act, 2000, as amended, sets out that Development Plans should ensure that they counteract undue segregation. With this in mind, sites identified for Traveller specific accommodation should be well located, close to key amenities, and chosen in consultation with the community. Plans should include sufficient green areas and children's play areas. Given the lifespan of the development plan, consideration should also be given for how sites will be identified for the next Traveller Accommodation Programme, including transient sites. 3. A system of monitoring and reviewing at regular intervals the provisions outlined in the Development Plans as they relate to Traveller accommodation should be included in the Development Plan.

		<ol style="list-style-type: none"> 4. All developments should be carried out with consultation at every stage of the process, with all prospective residents, including children and young people, and with the Local Traveller Accommodation Consultative Committee. 5. The Development Plan should identify Travellers as a priority group in its plans to address homelessness and identify what tangible steps will be taken to reduce the overrepresentation of Travellers in homeless figures. This should also take into account the high level of hidden homelessness, where families are living in chronic overcrowding, or without basic facilities of their own, or security of tenure, with plans to alleviate this clearly outlined. 6. Appropriate baseline studies on Traveller accommodation needs should be carried out as part of integrated Housing Need and Demand Assessments for Development Plans, if this has not already occurred. 7. Support the recommendations made by local Traveller organisations in calling for the establishment of tenancy sustainment services, and the allocation of a permanent space for the Bray Travellers Community Development Group to be included in this plan. 8. Wicklow County Council should consider, in this process, how future Development Plans could have their timelines aligned with the timelines of TAPs, for a more integrated approach, in line with the recommendations of the Expert Review on Traveller Accommodation. 9. Eliminating Energy Poverty in Traveller Specific Accommodation. Providing clean affordable energy, and energy efficient homes in Traveller specific accommodation. <ul style="list-style-type: none"> ▪ A recent study by National Traveller MABS found that Travellers living in mobile homes and trailers experience high levels of energy poverty. The study found that on average, families spend 26% of their income on energy compared with a 4.6% spend in the general population. This study also found that Travellers use a wide variety of fuels to heat their homes while simultaneously experiencing damp, condensation in their homes which gives rise to numerous related health issues. The problem of energy poverty among Travellers living on halting sites is broader than the energy efficiency of the mobile or trailer. It arises out of a combination of factors, including the means by which energy is provided as well as the energy efficiency of both the mobile and the day unit/house provided on site. Household income is also a factor in energy poverty. ▪ Traditionally the provision of energy (electricity and natural gas) to Traveller specific accommodation has been problematic. On some halting sites payments are paid directly to the local authority and not to the energy provider. Many families report not getting an accurate energy bill, not getting detailed breakdowns of energy usage and not being in control of their
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		<p>energy costs. National policy on the provision of cheaper energy is to rely on the competitive market, encouraging consumers to shop around to get the best value. In instances where the local authority directly provides energy to halting sites, Travellers are excluded from the market and do not have access to cheaper deals consequently paying more for their energy costs. The other thrust of national energy policy is to create access to sustainable and affordable energy and to provide energy efficient homes through various programmes which are overseen by the Sustainable Energy Authority of Ireland. There is little evidence of Travellers having access to any such programmes despite existing government policy to target the most energy poor.</p> <ul style="list-style-type: none"> ▪ The European Union (Energy Performance of Buildings) Regulations came into force on 1 November 2019 and are given effect through amendments to Part L of the Building Regulations. This requires that newly-built homes be close to zero energy buildings (NZEB). ▪ Such new homes will typically be required to achieve a minimum Building Energy Rating (BER) of A2. Existing accommodation or homes undergoing major renovations, defined as at least 25% of the building surface area, are now required to achieve BER B2 or equivalent. ▪ Under current regulations all planned new residential dwellings are expected to be 70% more energy efficient when compared to 2005 performance requirements. ▪ All planned Traveller specific accommodation should seek to ensure that homes built have the highest level of building airtightness combined with effective ventilation systems. In addition, the council must meet near zero energy building (NZEB) requirements under current regulatory requirements and demonstrate that energy used by the NZEB must be from renewable sources "to a very significant extent", including energy from renewable sources produced on site or nearby. ▪ Given the high levels of energy poverty amongst Travellers living in Traveller specific accommodation we urge the council to review existing Traveller specific accommodation with a view to bringing it up to the current regulatory standards in terms of energy efficiency of the dwellings and in terms of access to sustainable energy sources. <p>10. The Development Plan should reference the work being done on a national level to implement the recommendations of the Expert Review on Traveller Accommodation and commit to incorporating the work and decisions of the programme board into its future processes.</p> <p>11. The Development Plan should reference the local authorities' strategy to implement the relevant recommendations of the Irish Human Rights and Equality Commission's recent Equality Reviews of local authority provision of Traveller accommodation.</p>
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Chief Executive's Response

This submission to the Development Plan process is welcome; however the majority of the issues raised are matters for the Council Housing Delivery Programme, which includes the provision of accommodation for Travellers.

It is not accepted that the Draft Plan does not adequately address the issue of Traveller Accommodation, as it is addressed in the Housing Strategy which forms part of the Draft Plan, rather than Chapter 6 of Draft Plan. Objective CPO 6.9 of Chapter 6 sets out the objective to implement the provisions of the Wicklow Housing Strategy.

It is recommended that additional information with respect to the Traveller Accommodation programme is included in the Housing Strategy.

It is not proposed to amend the land use maps forming part of this Plan to zone lands specifically for Traveller Accommodation. The majority of the identified need for Traveller Accommodation is the in the 'standard' housing format, and these units will be provided on residentially zoned land in settlements, either within Council social housing developments or as part of Part V provision in private developments.

With regard to Traveller Specific Accommodation (specially built to include group housing, halting sites and one-off single sites), the process of identifying suitable Council owned lands in each district to meet demand is ongoing and sites have not been confirmed for 14 of the 21 units of this form of accommodation required. Until such lands have been identified and consent secured it is not considered reasonable to 'zone' such lands for this use.

This proposed amendment is set out in the attached document 'Proposed Amended Housing Strategy' appended to this report.

Chief Executive's Recommendations

Amend the Draft Plan as set out in '[Proposed Amended Chapter 6 – Housing](#)' and '[Proposed Amended Housing Strategy](#)' appended to this report.

Topic		Density – Compact Growth
ID	Name	Issue raised
C2-114 https://consult.wicklow.ie/en/submit/mission/ww-c2-114	Colin Acton – Charlotte Byrne	<p>It is requested that Table 6.1 makes it clear that just being within 500m of a bus stop is not adequate for higher density – it should instead refer to distance to public transport corridor.</p>
C2-160 https://consult.wicklow.ie/en/submit/mission/ww-c2-160	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<p>The Government’s current rules around planning and permitted developments in relation to high density developments are not necessarily in the best interests of people and communities, as they do not always facilitate sustainable communities.</p> <p>Believe that minimum densities of 50 units per hectare are too high and that apartment blocks should be restricted to 3 or 4 storeys.</p> <p>If the concept of compact growth is to be accepted, to alleviate the contributions of such high-density housing to the climate emergency, it is suggested that several essential measures need to be taken:</p> <ul style="list-style-type: none"> - Open spaces must be provided but not just monocultural grassy spaces for dogs and ball-kicking. They should be suitably planted with a variety of trees and bushes to provide biodiversity and visual interest. - Where possible allotments should be provided. - Those residents with small gardens should be encouraged to plant bushes and trees and minimise concreted-over and hard-standing patio areas. - The substitution of front gardens for car parking for two cars should be discouraged. For example, all new houses where the front garden is devoted to car parking could be disallowed, and homes afforded a larger front garden, where they can grow plants and their children can play. - Electric car charging points should be included in all new housing. - Developers should be forced to maximise tree planting along roads. - Tree planting, pedestrian areas and, where possible, new green open spaces, should be encouraged in town centres. - To provide an impetus for advancing such an approach, and to provide some land management capacity, Wicklow County Council should establish a Parks and ‘Greening’ Department. The Department would work with Tidy Town groups, schools and colleges to promote increased biodiversity and ensure that any new green areas are properly managed.
C2-165 https://consult.wicklow.ie/en/submit/mission/ww-c2-165		
C2-171 https://consult.wicklow.ie/en/submit/mission/ww-c2-171		
C2-218 https://consult.wicklow.ie/en/submit/mission/ww-c2-218	Delgany Community Council	<p>Higher density developments should only be considered in locations with access to public transport which provides a fast and frequent service. Housing that is located within 1km of a rail service or 500m of a bus stop will not necessarily provide a reliable and frequent public transport service. The proposed use of “bus stops” in the County Development as an indicator for increased density (up to 50 units per ha) makes little sense if the road infrastructure in small villages, such as Delgany, cannot support frequent bus services.</p>
C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231	GAP (Greystones Area Planning) Community	<p>Higher density developments should only be considered in locations with access to public transport which provides a fast and frequent service. Housing that is located within 1km of a rail service or 500m of a bus stop will not necessarily provide a reliable and frequent public transport service. The proposed use of “bus stops” in the County Development as</p>

		an indicator for increased density (up to 50 units per ha) makes little sense if the road infrastructure is insufficient as it stands. Delgany cannot support frequent bus services.
C2-249 https://consult.wicklow.ie/en/submission/ww-c2-249	Carina Harte-Holmes	<ul style="list-style-type: none"> - There needs to be much greater use of brownfield sites in higher densities in areas such as Bray, Wicklow and Arklow. This would be in line with the need to provide more 1-bedroom and 2-bedroom apartments in well-established urban areas with infrastructure and services already available. Urban sprawl and car dependent residential development is not sustainable. - The proposed use of "bus stops" in the CDP as indicator for increased density (up to 50 units per hectare) makes little sense if the road infrastructure in small villages, such as Delgany, cannot support frequent bus services. Delgany has a very limited and inefficient service given that it takes the bus close to two-hours to reach Dublin city centre. - The use of the DART services in Greystones is limited to two trains per hour even at rush hour (because of the single track from Bray) and this service reached its capacity several years ago. This leaves the car as the only viable option for commuters and there has been virtually no change in the road infrastructure in Delgany/Greystones, which has led to long and increasingly longer car commutes and more stressed residents.
C2-254 https://consult.wicklow.ie/en/submission/ww-c2-254	Glenveagh Properties	While policy to encourage higher densities is welcome, concerns expressed on how these higher densities will be applied on sites where Local Area Plans are in place and identify lower densities as appropriate on certain sites (e.g. 20/ha on Glenveagh owned lands at Killrudey, Bray).
C2-205 https://consult.wicklow.ie/en/submission/ww-c2-205	Cairn Homes Properties Ltd	<p>A minimum density of 50 units per ha within 500m of a bus stop may be an excessive density, particularly where there is a poor bus service. The density relative to Luas or DART is reasonable. Suggest that Table 6.1 is amended to '...within 500m walking distance of bus stop with a peak hour service every 10 minutes...'</p> <p>In addition, there may be instances where a minimum density of 30 units per ha is more appropriate than 35 units per ha in outer suburban and this is recognised by Circular Letter: NRUP 02/2021 in certain contexts.</p>

Chief Executive's Response

The Draft Plan places a strong focus on compact growth by reusing existing buildings and maximising the potential of infill and brownfield sites. Compact growth and active land management is identified as one of the key housing principles in Chapter 6.

Higher densities are encouraged to achieve an efficient use of land and create compact, vibrant and attractive settlements. It is Council policy to encourage higher residential densities at suitable locations in accordance with the Ministerial Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). Locations that are appropriate for higher densities include sites that are particularly close to existing or proposed major public transport corridors and nodes, sites that are within or proximate to major centres of activity such as town and neighbourhood centres.

The Planning Authority accepts that there is significant potential to improve public transport services. However, in relative terms on a county and regional basis, Greystones-Delgany is well served by public transport. The settlement

is therefore more suited to higher density developments than settlements that have little or no public transport services.

Table 6.1: This table clearly states that the key to higher density is proximity to a bus stop which is on a 'public transport *corridor*'. The requirements are based on Ministerial guidelines for 'Sustainable Residential Development in Urban Areas' (2009). While the level of service necessary to be deemed a 'corridor' is not specified, 10 minute frequency is considered unreasonable and unrealistic, and cannot be what is intended by Government policy, as it would preclude nearly all locations in County Wicklow other than in Bray.

As set out in Departmental Circular NRUP 02/2021 (April 2021) notwithstanding the need to increase densities at suitable locations, *'The NPF also acknowledges that there is a need for more proportionate and tailored approaches to residential development. This means that it is necessary to adapt the scale, design and layout of housing in towns and villages, to ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village'*. In light of this guidance, there is still scope for local plans to provide for lands zoned at 'lower' densities having regard to the type of town, the location of the site, and the services available. It is recommended that reference shall be made in the text to this circular.

With regard to any possible 'conflict' between the emerging CDP and existing LAPs with respect to density, all LAPs will be reviewed after the adoption of the CDP to determine if any changes in density standards are appropriate. In the intervening period before new LAPs are adopted, a practical and agreed approach will have to be taken on a case-by-case basis as to whether LAPs densities should be strictly adhered to.

With regard to the suggestions in submissions **C2-160**,

- 1) The Open Space standards set out in the Draft Plan, as proposed to be enhanced via amendments recommended in this report, aim to ensure that open spaces are not 'monocultural' grass spaces, but well landscaped areas that provide for biodiversity, visual diversity and community gardens
- 2) The Draft Plan and the proposed amendments set out in this report explicitly supports the development of allotments / community gardens (see Section 3.3.37)
- 3) The CDP cannot dictate how residents landscape / use their own private gardens, although there are limitations with respect to hard landscaping that can be carried out without a prior grant of planning permission
- 4) The Draft Plan encourages innovative car parking layouts, and does not require all units be provided with standard hard surfaced 2 spaces in every front garden.
- 5) Electric car charging requirements are set out in the Draft Plan (Chapter 12)
- 6) Landscaping in public areas / along roads is required
- 7) The development of new open spaces, with both hard and of landscaping is supported and facilitated in the Draft Plan
- 8) The establishment of a new department or appointment of new staff is an operational and funding matters and outside the remit of the CDP.

C2-254

In the case of the Glenveagh lands at Bray, these were explicitly zoned for a medium density type format (considering that densities of up to 50/ha were provided for on numerous greenfield sites around Bray) on the expressed grounds of protecting the heritage of the Kilruddery Demesne. In such circumstances where the appropriate density was determined following consultation and debate, with a clear logic and reasoning, very strong grounds would need to be provided for exceedance of the LAP density objective until the next LAP review takes place.

Chief Executive's Recommendations

No change

Topic	Height and Scale	
ID	Name	Issue raised
C2-218 https://consult.wicklow.ie/en/s/ubmission/ww-c2-218	Delgany Community Council	CPO 6.18 is welcomed but will require more clarity to ensure that it is implemented correctly. Request a practical tool to show how the impact will be assessed. Believe that full3D tools should be used to see the impact on the local environment and heritage sites in Delgany. Would welcome more interaction with the planners in this area in terms of two-way conversations about future plans.
C2-231 https://consult.wicklow.ie/en/s/ubmission/ww-c2-231	GAP (Greystones Area Planning) Community	CPO 6.18 is welcomed but will require more clarity to ensure that it is implemented correctly. Believe that full 3D tools should be used to see the impact on the local environment and surrounds. .
Chief Executive's Response		
<p>There must be flexibility in how the objectives and standards of a development plan are applied as there is such a wide range and scale of development types that come before the Local Authority for assessment. For example, it would be particularly onerous and costly for every application, including say house extension that entails an increase in height, to commission and pay for a 3-D model of the proposed development. The objectives and standards of the Plan are used to guide professional designers and assessed by professional planners.</p> <p>More detail of how height is to be considered is set out in the Development & Design Standards in Volume 3 of the Plan (Appendix 1). In particular reference is made in this section to Ministerial guidelines regarding height which must be taken into account.</p> <p>It is not considered necessary therefore to be overly prescriptive in this regard.</p> <p>The public have rights to be heard on any application by the making of observations / objections. It would not be feasible or proper for the Council's planners to engage one-on-one with objectors when the Council must objectively and impartially assess applications.</p>		
Chief Executive's Recommendations		
No change		

Topic		Existing Residential Areas
ID	Name	Issue raised
C2-238 https://consult.wicklow.ie/en/submitmission/ww-c2-238	Margaret & John Maguire	<p>This submission has come about following previous planning applications for a site in Bray refused permission for development due to access issues, where the access route into the development site entailed the crossing of a grass verge in a housing development over which the submitter has a right of way. It is requested that the development plan be amended as follows:</p> <p>CPO 6.25 In existing residential areas, the areas of open space permitted, designated or dedicated solely tofor the use of theby residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development. The function of Such lands will be retained as open space for the use ofby residents and new housing or other non-community related uses will not normally be permitted where this primary function is compromised with reference to the percentage of open space remaining, the effect of proposals such as servicing and access arrangement, on the character, use, appearance and value including visual of that open space to the local community.'</p> <p>A new objective is added as follows: 'Access Across Public Open Space <i>The Planning Authority will not normally grant permission for a development which requires or entails vehicular access over public open space or a non-paved route unless the applicant can clearly indicate the necessary right of way or entitlement to carry out the proposed works.'</i></p>
Chief Executive's Response		
<p>Where land is permitted and laid out as the public open space in a residential development, it is important that this function and its use-ability is protected. In this regard therefore it is not considered appropriate to allow for a caveat that on one hand protects the open space, while on the other allows for the development of it for access roads into adjoining lands.</p> <p>It is noted that this scenario does arise periodically, and as a result, care is taken in the design of new developments to ensure that access roads, where they adjoin a potential adjacent site, continue up to the property boundary and do not include an open space 'strip' in between.</p>		
Chief Executive's Recommendations		
No change		

Topic		Sequence / phasing of housing
ID	Name	Issue raised
<p>C2-128 https://consult.wicklow.ie/en/submitmission/ww-c2-128</p> <p>C2-205 https://consult.wicklow.ie/en/submitmission/ww-c2-205</p>	<p>Cairn Plc</p> <p>Cairn Homes Properties Ltd</p>	<p>It is requested that CPO 6.20 be amended as follows:</p> <p><i>Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.</i></p> <p>Where specified by the Planning Authority, <i>n</i>New significant residential or mixed use development proposals (of which residential development forms a component), may be required to provide a social and community facility/facilities as part of the proposed development in an area of the developer. As part of the preparation of a local area plan, it may be required to carry out a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.</p> <p><i>New significant residential or mixed use development proposals in a local area plan will require the preparation of shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:</i></p> <p>(a) local services including shops, schools, health care and recreational facilities, and</p> <p>(b) public transport services.</p> <p><i>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages as part of the local area plan preparation."</i></p>
<p>C2-218 https://consult.wicklow.ie/en/submitmission/ww-c2-218</p>	<p>Delgany Community Council</p>	<p>In Objective CPO 6.20, it is requested that 'may be required' is replaced with 'will be required'</p>
<p>C2-231 https://consult.wicklow.ie/en/submitmission/ww-c2-231</p>	<p>GAP (Greystones Area Planning) Community</p>	<p>In Objective CPO 6.20, it is requested that 'may be required' is replaced with 'will be required'</p>
<p>Chief Executive's Response</p>		
<p>CPO 6.20</p> <p>As part of the Local Plan making process, plan level infrastructure assessments are already carried out, and as result of those assessments, various objectives, including the zoning of land for certain new development, are included in the local plans. This is clearly evident from both the contents of the local plans, but also the various assessments carried out as part of their preparation including an 'asset based assessment' and 'infrastructure assessment' which have both been completed as part of this plan making process.</p>		

The amendment suggested by C2-128 / 205 is not considered acceptable however as it removes the requirement for a developer of large scale development to show via various assessments necessary that the proposed development can be accommodated within available infrastructure capacities. This is an established part of the development management process and should rightly be continued. It is recommended that the objective be strengthened by the use of stronger wording as suggested in C2-218 / C2-231.

Chief Executive's Recommendations

Amend the Draft Plan as follows:

Volume 1, Chapter 6

Objective CPO 6.20

Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.

~~Where specified by the Planning Authority,~~ New significant residential or mixed use development proposals (of which residential development forms a component), ~~may~~ shall be required to ~~provide a social and community facility/facilities as part of the proposed the developer or the developer may be required to carry out~~ be accompanied by a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:

- (a) local services including shops, schools, health care and recreational facilities, and
- (b) public transport services.

Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages as part of the local area plan preparation."

Topic		Dwelling Design / Mix / Sizes / Locations / Formats
ID	Name	Issue raised
C2-42 https://consult.wicklow.ie/en/submit/mission/ww-c2-42	Kiaran O Malley	CPO 6.34 It is suggested that the plan should provide support under CPO 6.34 for the change of use from vacant holiday homes to permanent residences
C2-125 https://consult.wicklow.ie/en/submit/mission/ww-c2-125	Blessington District Forum	All estates built within Co. Wicklow should be built to a much higher standard than in the past, considering energy and resource consumption best practices. Estates should be provided with well-designed public open spaces, with properly planned inner roads, and with ample off-street parking.
C2-128 https://consult.wicklow.ie/en/submit/mission/ww-c2-128 C2-205 https://consult.wicklow.ie/en/submit/mission/ww-c2-205	Cairn Plc Cairn Homes Properties Ltd	CPO 6.30 It is suggested that this objective be amended as follows: <i>The maximum size of any single 'housing character area estate' shall be 2100 units and developments that include more than 2100 units should be broken into a number of smaller 'housing character area estate' which shall be differentiated from each other of materially different design themes.</i>
C2-160 https://consult.wicklow.ie/en/submit/mission/ww-c2-160 C2-165 https://consult.wicklow.ie/en/submit/mission/ww-c2-165	Labour Party, Ross Connolly Branch, Greystones Municipal Area	Support the plan to build no more than 200 houses in any one estate.
Chief Executive's Response		
<p>CPO 6.30</p> <p>As there is no definition of 'housing character areas' in any guidelines; it is not in common use as a replacement for 'housing estate' and therefore it is considered it would be confusing to amend the objective as suggested. Therefore no change recommended.</p> <p>CPO 6.34</p> <p>It is considered that this objective already applies to vacant holiday homes as they constitute 'commercial premises'. It is considered however that this objective should be amended to make it clearer that it relates to vacant properties in towns / villages, as its intention is not to facilitate the conversion of <i>any</i> vacant premises to residential use, but rather those in town and village centres. The conversion of non-residential structures in rural areas to permanent residential use is already addressed in Objective CPO 6.43.</p> <p>With regard to holiday homes specifically, there may be circumstances where it might be possible to consider allowing consent for a permitted holiday home development to change use to permanent homes. These situation are unlikely to arise frequently as (a) holiday homes development as often not designed to the 'standards' for</p>		

permanent occupation in terms of private open space, amenities etc and (b) holiday home development are often located in rural areas, or adjacent to tourism developments outside of towns, and conversion to permanent use would be contrary to and undermine the rural housing policy. It must also be borne in mind that a good stock of tourism accommodation is required to maintain the tourism industry, and this includes holiday homes. It is recommended that a new objective be included in Chapter 11 'Tourism & Recreation' to address this.

Design Standards

The Draft Plan set out a range of strengthened objectives and Development Standards with respect to housing estate design, which address amongst other things, energy efficiency, open space standards, biodiversity, green infrastructure, water protection, safe road design, car parking etc.

Chief Executive's Recommendations

Amend the Draft Plan as follows

Chapter 6 Housing (see 'Proposed Amended Chapter 6' appended to this report)

Amend Objective CPO 6.34 as follows:

CPO 6.34 Support the change of use of vacant commercial premises **in town / villages centres** to residential purposes outside of the retail core areas as identified in Chapter 10, **subject to CPO10.9**.

Chapter 11 Tourism & Recreation

Accommodation

Add new Objective

CPO 11.X To resist consent for change of use of purpose built holiday homes to permanent unless it can be demonstrated that the development would comply with relevant design standards for permanent occupation, as well as the development objectives including occupancy controls where applicable for that location, whether town, village or rural area.

Topic	Rural Housing	
ID	Name	Issue raised
C2-89 https://consult.wicklow.ie/en/s/ubmission/ww-c2-89	Shane Connaty	With regard to CPO 6.41 and Table 6.3 Rural Housing Policy, the definition of social need should also include employment and/or affordability. This is to take into consideration those who cannot afford to buy in the area but can afford to build in the area on inherited land.
C2-225 https://consult.wicklow.ie/en/s/ubmission/ww-c2-225	Wicklow IFA	It is imperative that rural housing is facilitated to maintain rural communities.
C2-233 https://consult.wicklow.ie/en/s/ubmission/ww-c2-233	The Pdraig Smith Partnership Ltd	Request to revise the CPO 6.41 Rural Housing Policy. Amend the section that states: <i>Persons who were permanent native residents of a rural area but due to the expansion of an adjacent town/ village, the family home place is now located within the development boundary of town/ village;</i> and replace with: <i>Persons who are permanent native residents of an area, which was rural, but due to expansion of an adjacent town/ village, the family home is now located within an urban area.</i> Request to add an additional category of persons that can be considered intrinsically linked to a rural area as follows: <i>Permanent native residents of moderate and small growth towns - villages, seeking to build a house in their native town or village within the 60kph / 40mph speed limit on the non-national radial roads, for their own use and not as speculation.</i>
C2-305 https://consult.wicklow.ie/en/s/ubmission/ww-c2-305	Ashford Property Services	Request the Council to comply with Articles 43 and 46 of the EC Treaty which guarantees freedom of movement.
C2-184 https://consult.wicklow.ie/en/s/ubmission/ww-c2-184	Padraic Hayden	<i>The bulk of the points made in this submission refer to the Enniskerry area as a microcosm for the remainder of Co. Wicklow.</i> It is submitted that <ul style="list-style-type: none"> - the settlement strategy and housing policies of the Draft Plan (and preceding Development Plans) have had a detrimental effect on towns such as Enniskerry and its rural hinterland by means of the disintegration of the socio-economic community fabric of long standing local communities, resulting in families with long local lineage therein to relocate to distant urban areas.; - the large scale residential developments in those areas only benefit land owners and cater for wealthy non-locals who have the capacity to purchase the excessively expensive extravagant houses therein, leaving the indigenous communities disadvantaged. - With regards to Objective CPO 6.4.1 [Housing in the Open

		<p>Countryside],</p> <ul style="list-style-type: none"> ▪ the 'economic' need criteria outlined in Table 6.3 [Rural Housing Policy] is the same text as applied in previous Development Plans; ▪ it is vague and imprecise and leaves natives of rural areas in a vacuum that is exacerbated by the poor quality of guidance services provided by Wicklow County Council's Planning Department in the area of pre-planning application consultation. ▪ The term 'open countryside' needs to be re-defined in light of the expansion of settlements into the surrounding countryside. ▪ The 'Economic Need' criteria therein of 'those involved in agriculture' is too limited in remit because many locals to a rural area are not involved in agriculture, yet they are intrinsically linked to the rural area but not involved in agricultural or rural based occupations. This rural housing policy needs to be amended to accommodate planning applications for a single rural house from such native persons. ▪ The 'Social Need' criteria should be elaborated to facilitate local applicants who provide carer services to other family members, as well those working in local health care provision. ▪ The 'economic need' criteria are totally inadequate and requires radical enlargement, in the context of the position of Co. Wicklow as part of the Greater Dublin Area. [Supported by statistics such to depict the high rate of dependency of Co. Wicklow on employment provision in Dublin City and County and the lack of employment creation in Co. Wicklow]. ▪ The economic reality of so many native Wicklow residents having to gain employment in the Dublin Region should not be used as a refusal reason in planning applications for individual rural houses, which is categorised as a negative factor. ▪ Based on the latter economic considerations, this plan has to address the said current negative economic local need contradiction, by the elaboration of the criteria to determine compliance with such a consideration in its assessment of planning applications for individual rural houses.
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Chief Executive's Response

The rural housing policy is carefully worded to ensure that those with a bona fide necessity to live in the rural area are facilitated. The Plan also facilitates housing in smaller rural settlements. These smaller settlements are a huge asset for County Wicklow and their survival and viability is essential for rural Wicklow. The viability of these smaller settlements would be seriously under threat if housing was not managed in the open countryside. Therefore a strong rural housing policy is essential for the viability of rural Wicklow.

While the CE is fully cognisant of the challenges facing individuals and families in securing dwellings in their home areas, created by the on-going national housing crisis, it is important to note that the rural housing policy is not a mechanism to address housing affordability.

In accordance with national policy, the rural housing policy (CPO 6.41) facilitates the development of rural housing for those that have demonstrable economic or social need to live in a rural area. The rural housing policy distinguishes between social and economic need. Therefore economic circumstances do not come within the definition of social need.

The definition of economic need does take into account employment – ‘housing need of persons whose livelihood is intrinsically linked to rural areas’.

The definition of social need does take into account inheritance - ‘A close relative who has inherited, either as a gift or on death, an agricultural holding or site for his/her own purposes and can demonstrate a social need to live in that particular rural area; The son or daughter of a landowner who has inherited a site for the purpose of building a one off rural house and where the land has been in family ownership for at least 10 years prior to the application for planning permission and can demonstrate a social need to live in that particular rural area...’.

The definition of social need is considered to be clear and concise. There is no justification for amending it to include additional categories that will confuse the meaning. Accordingly, it is not considered necessary to amend the wording with regard to persons whose home place is now located within a settlement boundary. The use of the terms settlement boundary rather than urban area is preferable as it is clear and cannot be misconstrued.

This rural housing policy is deemed to be of sufficient flexibility to accommodate a variety of individual socio economic scenarios and is thus not ‘a one size fits all policy’. Furthermore, in the development of this policy the Planning Authority has sought to produce a consolidated policy that is not over-burdened with local need qualifying criteria that renders it overly complex and thus not public user friendly with scope for inconsistency of interpretation and implementation.

It is noted that the Planning Guidelines on Sustainable Rural Housing (2005) remain in place (as was advised in Circular Letter PL 2/2017³) until such time that new Section 28 Ministerial Guidelines are issued.

Chief Executive’s Recommendations

No change

³ <https://www.gov.ie/en/circular/666d6-circular-pl-22017-sustainable-rural-housing-guidelines-for-planning-authorities-2005-local-needs-criteria-in-development-plans/>

Section 3.3	Volume 1
Section 3.3.7	Chapter 7 - Community Development

Topic	Local Strategies	
ID	Name	Issue raised
C2-17 https://consult.wicklow.ie/en/submit/mission/ww-c2-17	County Wicklow Children & Young People's Services Committee (CYPSC)	<ol style="list-style-type: none"> 1. The Wicklow Children and Young People's Plan [CYPP] 2020-2022 should be referenced in the plan. 2. The Development Plan should provide open spaces and child friendly mobility measures reflecting the importance of 'free' and unstructured play to child development. 3. The voices of children and young people should be heard and reflected in relation to land use issues in the county in accordance with the National Strategy on Children and Young People's Participation in Decision Making 2015-2020.

Chief Executive's Response	
Wicklow Children and Young People's Plan [CYPP] 2020-2022	
It is recommended that Section 7.1 of the Plan is amended to include a reference to the CYPP.	
Open Spaces	
The draft development plan addresses the open space needs of the County in some detail, including but not limited to:	
<ul style="list-style-type: none"> - Zoning land in a manner that protects existing open spaces and allows for the creation of new spaces, both active and passive, in accordance with the County 'Sports' and 'Play' policies; - Requiring new developments to include adequate open space and setting out design standards for same, to ensure they meet the needs of all in society, and allow for opportunities for play. 	
Examples of objectives in the draft plan relating to open spaces:	
CPO 7.8	<i>To promote and support Universal Design whereby all environments and facilities can be used to the greatest extent possible by all people, regardless of age, ability or disability.</i>
CPO 7.32	<i>To facilitate opportunities for play and support the implementation of the Wicklow County Council Play Policy and its objectives, including the collection of development levies.</i>
CPO 7.33	<i>In all new residential development in excess of 50 units, where considered necessary by the Planning Authority, the developer shall provide, in the residential public open space area, a dedicated children's play area, of a type and with such features to be determined following consultation with Community, Cultural & Social Development Office of Wicklow County Council. The location of any such proposal shall be situated within a centrally located area capable of being passively supervised by surrounding developments.</i>
CPO 7.34	<i>All-new estates, streets, open spaces/parks and community facilities shall be designed with the needs and safety of children, the elderly and people with disabilities as a priority.</i>
CPO 7.36	<i>In accordance with Objective CPO 7.5, where a deficiency in facilities for teenagers/young adults and/or indoor community space is identified in an area, the proposed development should include proposals to address this deficiency in consultation with young people and appropriate stakeholders.</i>
CPO 7.37	<i>All-new neighbourhood parks or active open space zones shall include a 'mixed-use games area'</i>

(MUGA) of an appropriate size and nature to be determined in, pre-consultation with the Community, Cultural & Social Development Office of Wicklow County Council.

CPO 7.39 To provide for the development of facilities that will contribute to the improvement of the health and well-being of the inhabitants of County Wicklow and facilitate participation in sport and recreation.

CPO 7.42 The development of new sports or active open space zones shall be accompanied by appropriate infrastructure including:

- Fully accessible changing rooms and drinking water fountains;
- Car parking with EV charge points;
- Pedestrian / cycling access and facilities; linkages to public transport.

CPO 7.45 Through the local plan process, to designate suitable open space & covered open space in all settlements, commensurate with its needs and existing facilities, in accordance with the provisions of the Wicklow County Council Play, Sport & Recreation and Active Open Space policies.

CPO 7.46 To require open space to be provided in tandem with new residential development (in accordance with the standards set out in the Development & Design Standards Appendix).

Child Friendly Mobility

The draft development plan addresses the mobility in some detail, including the following objectives in Chapter 7 (Note: Chapter 12 on 'Sustainable Transportation' also addresses this topic extensively):

CPO 7.5 New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means **other than** the private car

- (a) local services including shops, schools, health care and recreational facilities, and
- (b) public transport services.

Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.

CPO 7.34 All-new estates, streets, open spaces/parks and community facilities shall be designed with the needs and safety of children, the elderly and people with disabilities as a priority.

CPO 7.42 The development of new sports or active open space zones shall be accompanied by appropriate infrastructure including:

- Fully accessible changing rooms and drinking water fountains;
- Car parking with EV charge points;
- Pedestrian / cycling access and facilities; linkages to public transport.

CPO 7.40 Facilities for sports shall normally be located on designated active open space, close to towns or villages where they are easily accessed by sustainable mobility options. All efforts shall be made to locate new sports facilities close to existing community facilities, schools or areas of dense residential development. The Council may consider providing sites for these purposes or may be prepared to make financial or other assistance available, subject to reasonable access being made available to the public and to reasonable safeguards for the continued use of the land as open space.

Consultation

At all stages of plan making, young people and children are specifically invited and encouraged to engage in the process and make submissions.

Chief Executive's Recommendations

Amend Plan as follows

Volume 1, Chapter 7

Add new text to Section 7.1 as follows:

7.1.4 Wicklow Children and Young People's Plan [CYPP] 2020-2022

Wicklow Children and Young People's Services Committee [CYPSC] was formally established in April 2011. The purpose of the Children and Young People's Services Committees is to secure better outcomes for children and young people through more effective co-operation and collaboration by existing services and through interventions at local level. Between 2011 and to date two action plans have been developed and implemented to address local needs as consistent with the national outcomes framework. The Wicklow CYPSC 2020-2022 Plan will continue to progress necessary work to meet ongoing and emerging needs.

CYPSC's work towards the five national outcomes for children and young people in Ireland. These are that children and young people

1. Are active and healthy, with positive physical and mental wellbeing
2. Are achieving full potential in all areas of learning and development
3. Are safe and protected from harm
4. Have economic security and opportunity
5. Are connected, respected and contributing to their world

The CYPP presents a coordinated interagency approach to the delivery of services to children and young people in Wicklow for 2020 to 2022 by all agencies in Wicklow. It reflects the priorities that have been identified from an analysis of the needs in the county and a commitment by members to address these needs over the three years of the plan. The voice of children and young people is represented and the CYPSC is committed to strengthening participation with children and young people further during the lifetime of this plan.

Social Infrastructure Assessments / Audits		
Topic	Social Infrastructure Assessments / Audits	
ID	Name	Issue raised
C2-160 https://consult.wicklow.ie/en/submission/ww-c2-160 C2-167 https://consult.wicklow.ie/en/submission/ww-c2-167	Labour Party, Ross Connolly Branch Greystones Municipal Area	Request that the many new communities in the area are assessed as to their needs regarding infrastructure and community supports. Those assessments to be part of the ongoing development plan and public consultation.
C2-218 https://consult.wicklow.ie/en/submission/ww-c2-218	Delgany Community Council	Suggest social audits should be conducted and updated in areas like Greystones and Delgany where there has been significant development without provision of suitable services and community facilities. Social audits that are submitted by developers need to be examined, assessed and commented on as they are sometimes inaccurate due to lack of local knowledge.
C2-231 https://consult.wicklow.ie/en/submission/ww-c2-231	GAP (Greystones Area Planning) Community	To help with objective setting for Greystones and Delgany, believe a social audit would be very useful considering the significant development that has occurred without accompanying investment in associated facilities. This social audit should happen with engagement and input of all stakeholders particularly residents and not just developers.
C2-205 https://consult.wicklow.ie/en/submission/ww-c2-205	Cairn Homes Properties Ltd	Request deletion of objectives CPO 7.5, 7.6, 7.7 <ul style="list-style-type: none"> - CPO 7.5 is a duplication of objective of CPO 6.20. - CPO7.6 and CPO 7.7 require the provision of social infrastructure audits, potentially requiring developers to deliver infrastructure which they cannot do on their own. This is a function of local area planning process.

Chief Executive's Response

Key existing social / community facilities are identified and evaluated in the crafting of all local plans insofar as is feasible, including an evaluation of schools, sports facilities, open spaces etc, and where deficiencies are identified, objectives including zoning of lands for certain purposes are integrated in plans. More detailed assessment of particular localised needs, such as sports / recreation, or community space needs are carried out by the Council's Community, Cultural and Social Development directorate, as and when needed and funding is available. Similarly more localised analysis of schools and childcare is carried out by the Dept of Education and the County Childcare Committee.

For example, in September 2021 the Council commenced survey / community engagement on a 'Community Audit' for the Greystones – Delgany area. The Council will strive to carry out further surveys / assessments, particularly in areas where services / infrastructure appear to be coming under pressure.

Social infrastructure audits at a more localised level are thereafter required for large scale housing applications, which has been the norm for some time and is a requirement of the current CDP. The key changes in this Draft Plan relate to the scale of application that would trigger the need for a SIA, more clarity about the scope of a SIA and the documentation required to be submitted therewith. It is accepted that not all social infrastructure deficiencies may be rectifiable by a developer (e.g. the provision of schools) however the plan provisions make it clear that there are a range of option available where issues are identified, such as reducing the scale of the development to match available infrastructure, or phasing to match timeline for delivery of new infrastructure. It is recommended that the objective be strengthened by the use of stronger wording.

All documentation submitted by private developers in support of an application are a matter of course and statute examined and assessed by the Planning Authority in its decision making function. The Draft Development in this regard sets out enhanced requirements for private developers with regard to social infrastructure audits, in particular Objectives CPO 7.5, 7.6, 7.7, and Appendix 1 Section 7. In particular, the new provisions will require documentary evidence / confirmation from social / community infrastructure providers, schools, community organisations etc that the information set out in any social infrastructure audit is accurate.

Objective CPO 7.5 is duplicated in Chapter 6 (housing). While this is not optimal and generally is avoided, it was considered necessary to include this provision in both the 'housing' and 'community' chapters to re-assert its importance. The delivery of housing without necessary social / community infrastructure has been identified as one of the most important issues facing the County at present.

Chief Executive's Recommendations

Amend Plan as follows

Volume 1, Chapter 7

Amend **Objective CPO 7.5** as follows:

Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.

~~Where specified by the Planning Authority,~~ New significant residential or mixed use development proposals (of which residential development forms a component), ~~may shall~~ be required to ~~provide a social and community facility/facilities as part of the proposed the developer or the developer may be required to carry out~~ **be accompanied by** a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:

- (a) local services including shops, schools, health care and recreational facilities, and
- (b) public transport services.

Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages as part of the local area plan preparation."

Topic	Community & Recreation Facilities (Submissions relating to need for indoor swimming pool in specific towns is dealt with in section to follow)	
ID	Name	Issue raised
<p>C2-62 https://consult.wicklow.ie/en/submission/ww-c2-62</p> <p>C2-132 https://consult.wicklow.ie/en/submission/ww-c2-132</p>	<p>Swim Ireland</p> <p>Water Safety Ireland Kildare</p>	<p>Request that Section 7.3 is amended to include swimming as one of the leisure and recreation facilities. Swimming is one of the few sports that is accessible by all ages, genders and abilities, regardless of fitness levels or health status and as such the provision of facilities for swimming warrants specific consideration in the Development Plan.</p> <p>The popularity of Open Water Swimming has increased substantially because of COVID -19, a trend that appears to be sustaining itself. Request that CPO 7.44 is amended to include outdoor swimming as an outdoor activity:</p> <p>Swim Ireland have been delivering open water programmes in Wicklow Harbour, Bray and Arklow. Changing shelters, notice boards for safety information and marker buoys are examples of things would add considerably to the development and safety aspect of the outdoor swimming. The locations of our open water programmes would greatly benefit from enhanced facilities for open water swimmers.</p> <p>Water testing at popular bathing areas should take place year - round in recognition of the trend towards year – round outdoor swimming and would also advocate for a review of the identified bathing waters within the County and to identify popular spots that are currently not being tested for water quality. An example of this is Black Castle.</p> <p>Request that National Governing Bodies (NGBs) of Sport should be included in the list of bodies to be consulted in CPO 7.1 and CPO 7.39. As the delivery agents of National Sports Policy, NGBs are a significant stakeholder and can add considerably to the discourse.</p> <p>Request that National Sports Policy is referenced in CPO 7.31.</p> <p>Sporting bodies such as Swim Ireland and Water Safety Ireland should be consulted at the design phase of new facilities. Swim Ireland, for example, can provide advice on design elements which could impact on the longer-term use of swimming pools.</p>
<p>C2-97 https://consult.wicklow.ie/en/submission/ww-c2-97</p>	<p>Deirdre McCormack</p>	<p>Recognise and support the provision of suitable premises and lands for community initiatives and groups such as women’s sheds, community gardens, suitable outdoor spaces for arts and cultural events.</p>
<p>C2-65 https://consult.wicklow.ie/en/submission/ww-c2-65</p>	<p>East Coast Regional Drugs & Alcohol Task Force</p>	<p>All MDs should be planned with the view to providing a multi-agency community hub to provide for vital services and supports.</p>
<p>C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125</p>	<p>Blessington District Forum</p>	<p><i>This is a lengthy and detailed submission and the reader is advised to review the original submission in full, and only a summary can be</i></p>

wicklow.ie/en/su bmission/ww-c2-125		<p><i>provided herein.</i></p> <ul style="list-style-type: none"> - Draw attention to the need for universal design particularly in community facilities; - Need to ensure sufficient lands in appropriate locations are zoned to cater for social and community needs. Promote the shared use of educational and community facilities, to maximize the sustainable use of such infrastructure and promote community cohesion. A key focus of the new plan must be around developing sustainable communities and not just around zoning for housing. The explosion in population in West Wicklow and indeed all over the county over the last two decades has created a severe lack of community facilities. - Growth towns such as Blessington, Baltinglass, Bray, and Wicklow etc along with smaller areas like Dunlavin, Tinahely etc. need to ensure that the local community groups like Rugby, Soccer, Scouts, GAA and others have the required space available to them to facilitate the younger members of the community. Serious consideration should also be given to the allocation of community ground for community allotments. - Need to ensure community buildings are flexible and adaptable and can be used by all age cohorts, including young people. - Women sheds are developing all over the county and premises will need to be secured. - Changing Places facility to be included in the Interpretative Centre for the Blessington Greenway.
C2-137 https://consult.wicklow.ie/en/su bmission/ww-c2-137	Wicklow Swimming Club	<ul style="list-style-type: none"> - The mental health and physical well-being of swimming both indoor and outdoor should be an integral part of the Healthy Wicklow Strategy - Swimming pools should be available in all large towns - A number of site location specific amenity infrastructural improvements to Wicklow harbour infrastructure suggested as well as water safety features; ranging from a disability access point, to new permanent toilet and outdoor showers and a 50 metre outdoor sea water pool. - Ensuring the maintenance of high water quality in the River Vartry is advocated. - Support is expressed for objective CPO 7.43 in its current format. - Amendment to CPO 7.44 proposed to incorporate reference to 'outdoor swimming'. - Support expressed for the Swim Ireland submission to this Plan
C2-151 https://consult.wicklow.ie/en/su bmission/ww-c2-151	Community Pool for West Wicklow	<p>This submission primarily relates to the need for a pool in West Wicklow, and this is deal with in more detail in the section to follow. However the submission also details the need for a sports complex in West Wicklow, providing for a variety of sports including swimming, football, rugby, multi-use hall for gymnastics, basketball, fencing, scouts and girl guides etc.</p>
C2-160 https://consult.wicklow.ie/en/su bmission/ww-c2-160	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<ul style="list-style-type: none"> - Open spaces need to be put aside for recreation. If it were possible for the Council to buy large spaces of land for the creation of public parks, it would be a great asset for the town's futures. However, are aware that the cost of such land can be prohibitive. - The creation of more dog parks across the Country is required. Note with regret that the dog park planned for Greystones was not a

<p>C2-167 https://consult.wicklow.ie/en/su bmission/ww-c2-167</p>		<p>suitable space for dogs.</p> <ul style="list-style-type: none"> - Minority groups, such as immigrants, should be provided with spaces to meet, socialise and learn. - Community facilities/places for teenagers are needed especially in housing areas who have or will have a high volume of teenagers. Facilities such as youth cafés and youth clubs should be considered.
<p>C2-274 https://consult.wicklow.ie/en/su bmission/ww-c2-274</p>	<p>West Wicklow Environmental Network</p>	<p>Seek the addition of 'Community Trail' under settlement Levels 3 to 8 in in Table 7.1 Community Facilities Hierarchy Model.</p>
<p>C2-231 https://consult.wicklow.ie/en/su bmission/ww-c2-231</p>	<p>GAP (Greystones Area Planning) Community</p>	<ul style="list-style-type: none"> - With respect to educational infrastructure in Greystones in 2021, there were significant issues with places in both primary and secondary schools throughout the area. At one stage, there was close to 200 primary school children without secondary school places. This was stressful for the parents involved, gained considerable coverage in local and national media and was discussed several times in the Dail with significant representation from elected officials. - This information should have been available through the last census carried out. If the case is put forward that the census could not help with identifying this pressure point, it highlights even further how "broke" the planning system is that planning permission for developments can be granted without accompanying investment in all other societal infrastructure.
<p>C2-205 https://consult.wicklow.ie/en/su bmission/ww-c2-205</p>	<p>Cairn Homes Properties Ltd.</p>	<ul style="list-style-type: none"> - Request deletion of objective CPO 7.9; this requires the provision of changing rooms in all new community buildings. This may not be appropriate or possible to provide and operate, and can give rise to management and other problems. - CPO 7.42 requires the provision of fully accessible changing rooms and of linkages to public transport in new sports facilities. The provision of such fully accessible changing rooms may not be appropriate in all instances and it may not be possible to link with public transport, if none exists. Request amendment to wording to include phrase 'as appropriate' and omission of '<i>linkages to public transport</i>'.
<p>C2-293 https://consult.wicklow.ie/en/su bmission/ww-c2-293</p>	<p>Kilcoole Residents & Community Development Association</p>	<ul style="list-style-type: none"> - The lack of access for the disabled, infirm and buggies at Kilcoole beach is not in keeping with RPO 9.12. It is requested that plan includes reference to improving access to Kilcoole beach via an underpass. - On account of the increased use of Kilcoole beach for swimming, it is requested that WCC continue to monitor water quality, identify the beach as a 'bathing water' and assess its suitability for green or blue flag designation. - It is also requested that Kilcoole be provided with a public WC.
<p>C2-300 https://consult.wicklow.ie/en/su bmission/ww-c2-300</p>	<p>Wicklow Planning Alliance</p>	<ul style="list-style-type: none"> - There is a serious shortage of parks in Wicklow's towns and the Draft Plan makes no reference to regional parks. - It is critically important that we do not conflate public parks with the prescribed open space in a particular development. Nor can private open space such as golf courses be counted as public open space. Young parents in Bray take young children to the public park in Cabinteely for recreation, not to the open space in a housing estate in Greystones or Kilcoole.

		<ul style="list-style-type: none"> - Poor quality or lack of community and public space exacerbates pre-existing inequalities, undermines the Sustainable Development Goals and the aims of a Just Transition. - Disadvantaged urban communities and residents in confined urban spaces generally are most in need of access to green space. Children need easy access to public parks.
C2-229 https://consult.wicklow.ie/en/su_bmission/ww-c2-229	Wicklow PPN	<p>More schools are needed</p> <p>Need for community spaces / buildings, sports facilities, shared community areas, outside spaces including youth facilities, outdoor exercise equipment, public parks and sensory gardens.</p> <p>Need for community theatres and arts centres</p>
C2-107 https://consult.wicklow.ie/en/su_bmission/ww-c2-107 C2-177 https://consult.wicklow.ie/en/su_bmission/ww-c2-177	Billy Timmins	<p>Under the Planning and Development Act 2000 Planning Authorities can place a charge on developments to assist in the provision of facilities and infrastructure. These policies are desirable as there should be a community benefit from development.</p>

Chief Executive's Response

Outdoor Swimming / Beach Facilities

It is acknowledged that swimming is an important leisure / sporting activity and as such deserves recognition in the plan. It is considered that Section 7.3.3 should be amended to include a section on swimming.

The Draft Plan sets out a significant number of policies and objectives that would support the delivery of beach accessibility improvements as well as enhanced swimming and safety infrastructure (7.3, 7.4, 7.8, 7.31, 7.32, 7.39). The delivery / running of facilities / schemes would be an operational and funding matter and not a matter for the CDP.

The intention of CPO 7.44 is to outline support for 'park' type of activities that are becoming more popular but are subject to limitations due to weather. It is not considered appropriate to amend same to include covered outdoor swimming pools / areas as that is not the purpose of the objective. No change is therefore recommended.

With regard to water quality testing, this is a matter for the EPA / Local Authority Pollution Control programme and does not come under the remit of the County Development Plan.

Community Facilities

The Draft Development Plan includes objectives to support the development of community facilities throughout the County. The community facilities hierarchy model, as shown in Chapter 7, Table 7.1, provides a list of the social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however, the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal.

Table 7.1 Community Facilities Hierarchy Model

COMMUNITY FACILITIES HIERARCHY MODEL	
LEVEL 1 – SETTLEMENTS WITH POPULATION RANGE 15,000 – 30,000	
Multi-purpose Community Resource Centre Regional and Local Indoor Sports and Recreation Facilities Swimming Pool/Leisure Centre Youth Centre Athletics Track and Field Facilities Arts and Cultural Centre Local Multi-Purpose Community Space/Meeting rooms	Outdoor Water Sports Facilities (where applicable) Neighbourhood Parks and Local Parks Outdoor (full size) Multi-Use Games Areas – Synthetic/ Hardcourt Playground(s) Playing Pitches Alternative/Minority Sports Facilities Open Space/Urban Woodlands/Nature Areas Library
Acceptable rural catchment commuting time by car: 30 min	
LEVEL 2 – SETTLEMENTS WITH POPULATION RANGE 7,000 – 15,000	
Multi-purpose Community Resource Centre Sport & Recreation Centre Swimming Pool/Leisure Centre Youth Resource Centre Local Multi-Purpose Community Space/Meeting Rooms Outdoor Water Sports Facilities (where applicable) Neighbourhood and Local Parks	Outdoor Multi-Use Games Areas – Synthetic/ Hardcourt Playground(s) Playing Pitches Alternative/Minority Sports Facilities Open Space/Urban Woodlands/Nature Areas Library Arts and Cultural Centre
Acceptable rural catchment time by car: 15 mins	
LEVEL 3 – SETTLEMENTS WITH POPULATION RANGE 2,000 – 7,000	
Community/Parish Hall Multi-purpose Community Space/Meeting Rooms Local /Town Park (s) and Open Spaces/Nature Areas Outdoor Multi-Use Games Area – Synthetic/ Hardcourt	Playgrounds Playing Pitches Library
Acceptable rural catchment commuting time by car: 10-15 mins	
LEVEL 4 – SETTLEMENTS WITH POPULATION RANGE < 2,000	
Community/Parish Hall Open Spaces/Play Areas	Outdoor Multi-Use Games Area – Synthetic/ Hardcourt Playing Pitches
Acceptable rural catchment commuting time by car: 5-10 mins	

This is not to say that an area cannot benefit from greater provision of community facilities and support for this is also provided for in the draft plan under the following objective:

CPO 7.3 *To support and facilitate the delivery and improvement of community facilities in accordance with the 'Hierarchy Model of Community Facilities' prepared under the Development Levy Scheme (under Section 48 of the Planning and Development Acts) (as set out on Table 7.1 of this chapter). While the above 'Hierarchy Model of Community Facilities' provides an extensive list of community infrastructure, the Council recognises that needs may differ from area to area over time and therefore it is recognised that additional community infrastructure needs may arise and such facilities will be facilitated where considered appropriate.*

In this regard, it is not considered necessary include 'community trails' in the hierarchy.

Parks / Open Spaces

It is accepted that there is a shortfall in public open spaces in many towns in the County, and the Council is endeavouring to rectify this deficiency where opportunities and funding arise, for example through the URDF and RRDF programmes and through the delivery of new public open spaces as part of large scale development proposals (not new housing estates). The role of the County Development Plan is to put in place a spatial framework and objectives (such as the zoning of land) to support this programme of open space enhancement. The Draft Plan explicitly supports the development of regional scale parks and open spaces via Objective CPO 7.50.

Sports complexes

The objectives of the Development Plan, as well as the provisions of LAPs (including zoning of land for sports and community uses) fully support the development of sports facilities, both indoor and outdoor. There is a challenge in securing the funding (and sometimes the land) required for such significant projects and the CE is committed to continuing to work with various agencies to secure such funding. With regard to West Wicklow in particular, the CE is committed to the development of a pool complex in West Wicklow being a top development priority for the district.

Education

The Department of Education is the provider of education services. The Department has considerable data available to it with respect to school demands – in particular when and where they will arise, both from the Census and other national data sources. In the preparation of development plans, the Department will provide information to the Council as to emerging needs for new school, places / new schools and it is the role of the Development Plan to ensure that the policies and objectives, such as the zoning of land, support the Department in delivering the required facilities. The Council has no further role in the delivery of new / expanded schools other than the granting of permission for same when application are made.

The Department of Education generally is not in a position to provide 'advance' schools where new housing growth is planned or even under construction, as the education needs of the future population cannot be determined until the residents and children are in situ in that location.

A key question is whether permission should be granted for new housing where existing schools are at capacity. This is more challenging as the capacity in future years (beyond 1-2) is difficult to predict as school entry applications are generally only made the year prior to entry and therefore lead in time from providing new classrooms / school buildings is limited. In order to try to assist in dealing with this challenge, the Draft Plan proposes that more detailed and evidence based social infrastructure audits are carried out, which must be supported by documentation / evidence / report from the Department and the local schools to verify information. Nonetheless, it will remain a challenge, given the housing shortage as the need to get new houses built and people into homes will remain the high priority across all of Government.

Changing Places

With regard to 'changing places' being developed a part of the Blessington greenway interpretive centre, this would be a project specific request, that would be more appropriately directed to the consultation process for said centre. However the Draft plan set out the following objectives in this regard:

CPO 7.8 *To promote and support Universal Design whereby all environments and facilities can be used to the greatest extent possible by all people, regardless of age, ability or disability.*

CPO 7.9 *To require that new social / community buildings provide for on-site child and adult changing facilities as appropriate.*

Objectives

CPO 7.9: It is considered reasonable to expect new community buildings to provide adult / child changing facilities in order to accord with the 'Universal Design' principles. No change therefore recommended.

CPO 7.42: It is considered reasonable that new sports zones are provided with changing facilities, water foundations etc and accessibility measures. A key overriding theme of this plan is climate action, and a key element of this is sustainable transportation, and therefore it is essential that facilities attracting large number of users are

provided with the opportunity to walk, cycle or use public transport to access same. The objective does not require public transport to be provided to such location, rather that linkages to public transport infrastructure be available. No change therefore recommended.

Consultation with National Governing Bodies

With regard to CPO 7.1 and consultation with national governing bodies, it is noted that the legislation for preparing local area plans identifies prescribed bodies that must be consulted as part of the LAP process. However as part of the public consultation, the Planning Authority will advertise the consultation and invite members of the public and organisations to make submissions that will inform the Plan. While not explicitly mentioned as one of the parties, national governing bodies of individual sports can of course be part of that process by making a submission as part of that public consultation. It is recommended that the Plan can be enhanced in this regard.

The Planning Authority will encourage developers to consult with sporting bodies in the design of new community facilities. However it is not considered appropriate to include this as an objective. It is considered appropriate to reference the National Sports Policy 2018-2027 in CPO 7.31.

C2-107 & C2-177

CPO7.3 refers to development levies for community facilities.

Chief Executive's Recommendations

Amend the plan as follows

Volume 1, Chapter 7

CPO 7.1 To consult and engage with prescribed bodies, **National Governing Bodies of Sport**, local community interest groups and individuals during the local plan-making process for towns and villages to determine community / social infrastructure deficiencies and needs in accordance with the provisions of the Planning and Development Act.

Amend **Section 7.3.3** to include new paragraph:

Swimming: Swimming is a sport that enhances safety on and near water and is a form of physical activity that is particularly well-suited to lifelong participation. It is one of the few sports that is accessible by all ages, genders and abilities, regardless of fitness levels or health status. The importance of swimming as a sport in its own right and as a gateway to other sports including surfing, rowing, canoeing and kayaking is recognised in the National Sports Policy 2018 – 2027. The expansion and improvement of indoor and outdoor swimming facilities will be supported.

Amend **CPO 7.31** as follows:

CPO 7.31 Support the objectives of public health policy including Healthy Ireland, **National Sports Policy** and the National Physical Activity Plan.

Swimming Pools – West Wicklow & Rathdrum		
Topic		
ID	Name	Issue raised
C2-21 https://consult.wicklow.ie/en/su bmission/ww-c2-21	Una O'Donovan	All of the submission listed to the left detail their support the development of a community swimming pool in West Wicklow and call for the development of a swimming pool (and sports complex) to be made a priority by Wicklow County Council.
C2-24 https://consult.wicklow.ie/en/su bmission/ww-c2-24	Rachel Murphy	
C2-26 https://consult.wicklow.ie/en/su bmission/ww-c2-26	Jennifer Campbell	
C2-30 https://consult.wicklow.ie/en/su bmission/ww-c2-30	Marion Mc Nally	
C2-50 https://consult.wicklow.ie/en/su bmission/ww-c2-50	Catherine Kehoe	
C2-62 https://consult.wicklow.ie/en/su bmission/ww-c2-62	Swim Ireland	
C2-67 https://consult.wicklow.ie/en/su bmission/ww-c2-67	Canoeing Ireland	
C2-73 https://consult.wicklow.ie/en/su bmission/ww-c2-73	Fiona Curry	
C2-74 https://consult.wicklow.ie/en/su bmission/ww-c2-74	Derek Larney	
C2-107 https://consult.wicklow.ie/en/su bmission/ww-c2-107	Billy Timmins	
		The submission set out a wide range of reasons in support of same, and in particular highlight: <ul style="list-style-type: none"> - Only district in the County without a pool; - Improvement to health and fitness of local residents; - Promotion of water safety awareness; - Benefit accruing the school swimming programmes which are curtailed / limited due to lack of proximate facilities; - The service and support is would provide to local clubs, and community groups, including outdoor recreation clubs that could sue the facilities for winter training; - The benefit to the local economy

C2-125 https://consult.wicklow.ie/en/su bmission/ww-c2-125	Blessington District Forum	
C2-141 https://consult.wicklow.ie/en/su bmission/ww-c2-141	Tracey Nolan	
C2-147 https://consult.wicklow.ie/en/su bmission/ww-c2-147	Jennifer McManus	
C2-151 https://consult.wicklow.ie/en/su bmission/ww-c2-147	Community Pool for West Wicklow	
C2-180 https://consult.wicklow.ie/en/su bmission/ww-c2-180	Jane Nolan	
C2-185 https://consult.wicklow.ie/en/su bmission/ww-c2-185	David Giles	
C2-190 https://consult.wicklow.ie/en/su bmission/ww-c2-190	Blessington AFC	
C2-193 https://consult.wicklow.ie/en/su bmission/ww-c2-193	Niamh Buckley	
C2-145 https://consult.wicklow.ie/en/su bmission/ww-c2-145	Lakeshore Striders Running Club	
C2-186 https://consult.wicklow.ie/en/su bmission/ww-c2-186	Susan Rossiter	
C2-285 https://consult.wicklow.ie/en/su bmission/ww-c2-285	Louise Hogarty	

<a href="http://wicklow.ie/en/su
bmission/ww-
c2-285">wicklow.ie/en/su bmission/ww- c2-285		
C2-27 <a href="https://consult.wicklow.ie/en/su
bmission/ww-
c2-27">https://consult. wicklow.ie/en/su bmission/ww- c2-27	Valerie Walsh	A gym/swimming pool/leisure centre is needed and long overdue in Rathdrum.

Chief Executive's Response

Swimming Pool West Wicklow

The Draft Plan includes an objective to support the development of a community swimming pool in West Wicklow:

CPO 7.43 *'To facilitate and support the development of a community swimming pool facility within the western region of the County, so located to achieve maximum accessibility to the residents of West Wicklow'.*

It is considered that this objective can be enhanced, as set out to follow.

In addition, a wide range of additional objectives would support the development of larger sports complexes including such a pool, including but not limited to Objectives CPO 7.2, 7.3, 7.31, 7.32, 7.39, 7.40, 7.44. With regard to West Wicklow in particular, the CE is committed to the development of a pool complex in West Wicklow being a top development priority for the district.

It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however, the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal.

Leisure Facility with Swimming Pool Rathdrum

The Draft Plan includes a Community Facilities Hierarchy Model (Table 7.1) which provides a list of social and community facilities that are considered necessary in settlements according to their size. Swimming pool / leisure centre is considered necessary for settlements ranging in size from 7,000 to 15,000. The population of Rathdrum in 2016 (Census) was 1,716. Accordingly the Draft Plan does not include an objective for such a facility in Rathdrum.

Chief Executive's Recommendations

Amend the Plan as follows:

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CPO 7.43 To **prioritise**, facilitate and support the development of a community swimming pool facility **and a sports complex** within the western region of the County, so located to achieve maximum accessibility to the residents of West Wicklow.

Community Gardens & Allotments		
Topic	Community Gardens & Allotments	
ID	Name	Issue raised
C2-14 https://consult.wicklow.ie/en/submitmission/ww-c2-14	Blessington Allotments Campaign	<ul style="list-style-type: none"> - The plan text should be updated to reflect that allotments are not a new form of open space use. - References to allotments should be expanded to include 'community gardens'; there should be a new section in the Plan on allotments and community gardens; - Wicklow has no Council provided allotments or community gardens, one of only 8 local authorities in Ireland that have not made provision for such facilities. Therefore proposed o for allotments in the CDP should be strengthened. - Stronger support objectives should be provided in the plan (example provided), for example consideration could be given to the provisions of community gardens and / or allotments in new developments. - A new action should be included in the plan <i>"It is the policy of Wicklow County Council: To ensure that Wicklow has a supply of allotments and/or community gardens to meet the needs of the community. This includes supporting the identifying of potential sites on Council owned land for every urban area within the county for the development of public allotments and community gardens. Community gardens/allotments/local markets/pocket parks shall be provided where clear public demand exists, and in particular as temporary uses on vacant, under-utilised or derelict sites in the county. Consideration should be given to the provision of community gardens and/or allotments in new developments."</i>
C2-74 https://consult.wicklow.ie/en/submitmission/ww-c2-74	Derek Larney	Council should provide public land for allotments in Blessington.
C2-97 https://consult.wicklow.ie/en/submitmission/ww-c2-97	Deirdre McCormack	Recognise and support the provision of suitable lands for allotments.
C2-125 https://consult.wicklow.ie/en/submitmission/ww-c2-125	Blessington District Forum	Serious consideration should also be given to the allocation of community ground for community allotments.
C2-271 https://consult.wicklow.ie/en/submitmission/ww-c2-271	Donal McCormack	Support for provision of allotments in Blessington including access to lands needed for community groups all over Wicklow to use for similar purposes.
C2-229 https://consult.wicklow.ie/en/submitmission/ww-c2-229	Wicklow PPN	Need for community gardens, orchards, city farms, beehives and allotments.

Chief Executive's Response

The Draft Plan recognises the importance of community open spaces and allotments and supports their provision.

For example, the Plan includes the following objectives:

CPO 7.3 *To support and facilitate the delivery and improvement of community facilities in accordance with the 'Hierarchy Model of Community Facilities' prepared under the Development Levy Scheme (under Section 48 of the Planning and Development Acts) (as set out on Table 7.1 of this chapter).*

CPO 7.48 *To facilitate the development of allotments, of an appropriate scale, on lands which meet the following criteria:*

- *land situated within or immediately adjacent to the edge of towns/villages;*
- *land that is easily accessible to the residents of a particular town or village;*
- *where an adequate water supply can be provided;*
- *where adequate road infrastructure and access exists/can be provided; and*
- *where adequate parking facilities can be provided.*

It is considered that the objectives could be improved with some wording changes (as set out below).

It is not recommended that developers of new housing estates be supported or encouraged to devote part of the residential open space in a development to allotments, as such as use would render such land unusable for amenity purposes, and would have the effect of closing off the use of the space to those that do not engage in allotment growing. The concept of a community garden is however supported, where the entire residential community is allowed to access the space and benefit from its produce.

The purchase of lands and provision / development of community gardens / public allotments by the Local Authority would be a funding and operational matter and outside the remit of the County Development Plan; the plan puts in place the land-use framework (such as making provision of zoning of land for open space) and policy support for the development of such projects by state agencies or private organisations.

It is accepted that the plan text should be updated to acknowledge that allotments are not a new form of open space use.

Chief Executive's Recommendations

Amend the Plan as follows:

Volume 1, Chapter 7

Section 7.3.3

5. ~~An emerging new form of open space is the use of land for allotments.~~ Interest and activity continues to grow in the use of land for allotments and community gardens. Allotment gardens allow a number of people to cultivate their own vegetables in individual plots/land parcels on lands owned by another private individual or body. The individual size of a plot/parcel ranges between 200-400sqm and often the plots include a shed for tools and shelter. The individual gardeners are usually organised in an allotment association which leases the land from the owner who may be a public, private or ecclesiastical entity, provided that it is only used for gardening (i.e. growing vegetables, fruits and flowers), but not for residential purposes. Unlike allotments which are plots of land that are worked on by individuals or families, a community garden is all about sharing – both the work and the harvest.

Public allotments and community gardens are becoming an increasingly important element of sustainable

communities. They have a number of benefits including the promotion of healthy lifestyles, biodiversity and providing a cheaper local and sustainable source of food. The Council supports the provision and wider distribution of such facilities across the County.

CPO 7.48 To **support and** facilitate the development of allotments, of an appropriate scale, on lands which meet the following criteria:

- land situated within or immediately adjacent to the edge of towns/villages;
- land that is easily accessible to the residents of a particular town or village;
- where an adequate water supply can be provided;
- where adequate road infrastructure and access exists/can be provided; and
- where adequate parking facilities can be provided.

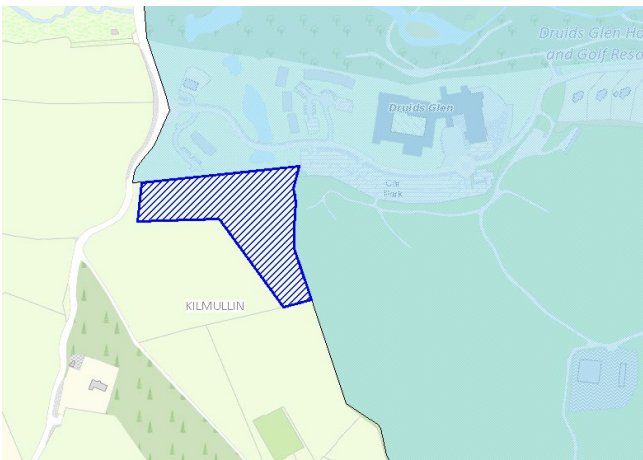
Volume 3

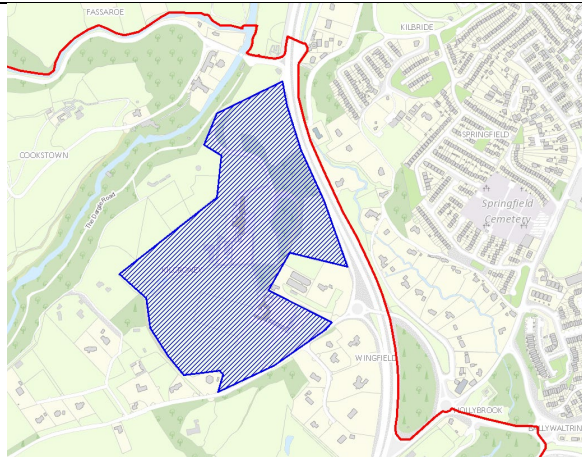
Appendix 1 Development & Design Standards

8.5 Residential public open space

Public open space in residential developments shall be provided in accordance with the following standards:

- Public open space will normally be required at a rate of 15% of the site area – areas within the site that are not suitable for development or for recreational use must be excluded before the calculation is made;
- Where a public park is being provided by the same developer (or by a group of developers in a combined Action Area) in close proximity to the residential development site, the public open space provided on site may be reduced to 7.5% of the residential site area, with the remainder being made up in the park;
- The need to provide public open space in town centre developments may be waived, particularly where public amenity space such as a town park or beach is in close proximity;
- Open spaces shall be attractively landscaped through the use of both hard and soft landscaping where appropriate. Open spaces should incorporate existing features and encourage pedestrian use by suitable paving;
- In greenfield developments, subject to the size of the site, a hierarchy of open spaces shall be provided to provide for the different play needs of different age groups. In this regard, all developments shall aim to include:
 - At least one, flat space with dimensions on not less than 20m x 40m, suitable for ball games (trees should only be planted around the perimeter)
 - A number of smaller spaces immediately adjacent to dwellings, with interesting contours and natural features, suitable for play activities of younger children.
- The layout and orientation of residential developments should maximize the potential for passive surveillance of open spaces - all efforts shall be taken to ensure that all houses are in visual range of one open area.
- **In larger developments (in excess of 1ha), consideration should be given to dedicating part of the residential open space (not exceeding 25% of the total space) to community gardens; at a minimum, landscaping plans will be required to identify a suitable area (in terms of soil type, gradient, light, drainage etc) within the residential open space area that would be suitable for future community garden use by the resident community.**

Residential Care Homes – Nursing Homes - Zoning			
Topic	ID	Name	Issue raised
C2-64 https://consult.wicklow.ie/en/submit/mission/ww-c2-64	E Bourke & M Hoctor	<p>It is requested that lands measuring c. 2ha at Kilmullin (as shown indicatively in blue hatch on the map below; light blue lands adjacent are Druid's Glen ITLR zone) be zoned for Nursing Home use, including independent housing units (including necessary retail / retail services to serve residents).</p> <p>In support of this request it is put forward that:</p> <ul style="list-style-type: none"> - Land adjacent to Druids Glen Resort (and previously formed part of the tourism zoning associated with same) which could provide services / amenities to residents; - Residential care facilities for the elderly would be a more appropriate use than tourism; - Would serve an ageing population; - Quiet location close to Kilcoole and Newtown in close proximity to large town of Greystones – Delgany and close to N11. 	 <p>The map shows a geographical area with a road on the left. A section of land is highlighted with blue diagonal hatching. To the right of this hatched area is a larger area labeled 'Druid's Glen' which includes 'Druid's Glen Ho and Golf Reso' and 'C.R. Park'. The area to the left of the hatched area is labeled 'KILMULLIN'.</p>
C2-250 https://consult.wicklow.ie/en/submit/mission/ww-c2-250	Legionaries of Christ	<p>This submission relates to lands at Kilcronee, comprising Kilcronee house and estate, currently occupied by Oaklands / Dublin Oak Academy school (as show indicatively on map below)</p> <p>It is requested a special policy objective be included in the Plan to acknowledge the long-established institutional use and infrastructure on site; and providing for a future retirement / nursing home village. In support of this new use, it is put forward that</p> <ul style="list-style-type: none"> - The lands in function, form and location are highly suitable for this use - A retirement would be complementary to the existing institutional sue and complement surrounding land uses including the River Dargle Nursing Home north of the site - Site is proximate to Bray and accessible by bus - Lands are located within an area of vast open space; provides opportunities for walkways, river walks, gardens and allotments for residents. 	



(Boundary of Bray shown in red)

Chief Executive's Response

The Draft Plan does not provide for zoning of rural areas outside of settlements for nursing homes / retirement villages. The Draft Plan does however set out a number of detailed objectives with regard to such developments, which provides for example that consideration may be given to nursing homes in rural locations where the certain criteria are fulfilled, as set out in the following objectives:

- CPO 7.19** *To facilitate the development of healthcare uses at suitable locations, in liaison with the appropriate health authorities. Health facilities will be considered at all locations and in all zones provided that:*
- *the location is readily accessible to those availing of the service, with a particular presumption for facilities in towns and villages and in areas of significant residential development. Isolated rural locations will not generally be considered except where it can be shown that the nature of the facility is such that demands such a location;*
 - *the location is generally accessible by means other than private car, in particular by public transport services, or by walking/cycling; and*
 - *the location is accessible to those with disabilities.*
- CPO 7.20** *To facilitate the establishment of new or expansion of existing hospitals, nursing homes, centres of medical excellence, hospices, wellness/holistic health centres, respite care facilities or facilities for those with long term illness.*
- CPO 7.22** *To facilitate the development and improvement of new and existing residential and daycare facilities throughout the County.*
- CPO 7.24** *Residential and daycare facilities shall, in general, be required to locate in existing towns or villages where sustainable mobility is easily achieved, shall be located close to shops and other community facilities required by the occupants and shall be easily accessible to visitors, staff and servicing traffic. Locations outside of delineated settlement boundaries shall only be considered where:*
- *The site is located in close proximity to a settlement and would not comprise an isolated development;*
 - *An alternative site within the settlement boundary is not available;*
 - *There are excellent existing or potential to provide new vehicular and pedestrian linkages to settlement services; and*
 - *The design and scale of the facility is reflective of the semi-rural location.*
- CPO 7.25** *'Retirement villages', made up of a number of independent housing units, with limited / no on-site care facilities will be required to locate on residentially zoned land in settlements (or where no local area plan exists, within the defined boundary of the settlement).*

CPO 7.26

Clinically managed/supervised dwelling units, such as 'step down' (i.e. post-acute care) accommodation or semi-independent housing provided as part of a medical facility, nursing home or other care-related facilities, will be considered strictly only on the following basis:

- *The units are associated with an already developed and established medical facility, nursing home or other care-related facilities; the units are held in single ownership with the overall medical / nursing home/care facility; no provision is made for future sale or subdivision; and a strict management agreement is put into place limiting the use of such structures to those deemed in need of medical supervision or care;*
- *The number of such units on any such site shall be limited to 10% of the total number of hospital/ nursing/care home bedrooms unless a strong case, supported by evidence, can be made for additional units;*
- *Such units shall be modest in scale and limited to single bedroom units only and independent facilities such as car parking and gardens shall not be provided to each unit (in order to ensure such units are not rendered suitable for standalone use as private dwellings).*

Therefore it is not recommended that either site is specifically zoned for nursing home / retirement village use as there is sufficient policy support and guidance in the draft plan for acceptable proposals.

With respect to the existing educational use at **Kilcrouney C2-250**, no planning policy support is necessary to support the ongoing use and improvement of this activity. Therefore no change is recommended in this regard.

With respect to the previous zoning of the lands at **C2-64 Kilmullin**, these lands have been omitted from the Druid's Glen ITLR zone in the Draft Plan, not being associated with same, and may have been included originally in error.

Chief Executive's Recommendations

No change

Topic	Community Development Objectives	
ID	Name	Issue raised
<p>C2-151 https://consult.wicklow.ie/en/submission/ww-c2-151</p>	<p>Community Pool for West Wicklow</p>	<p>The following changes to objectives are suggested:</p> <p>CPO 7.1 To consult and engage with prescribed bodies, National Governing Bodies of Sport, local community interest groups and individuals during the local plan-making process for towns and villages to determine community / social infrastructure deficiencies and needs in accordance with the provisions of the Planning and Development Act.</p> <p>CPO 7.3 To support and facilitate the delivery and improvement of community facilities in accordance with the 'Hierarchy Model of Community Facilities' prepared under the Development Levy Scheme (under Section 48 of the Planning and Development Acts) (as set out on Table 7.1 of this chapter). While the above 'Hierarchy Model of Community Facilities' provides an extensive list of community infrastructure, the Council recognises that needs may differ from area to area over time and therefore it is recognised that additional community infrastructure needs may arise and such facilities will be facilitated where considered appropriate. The Council recognises that each community will understand and be best aware of its changing needs and therefore the Council commits to listening and working with communities and community groups to identify these changing needs and deficiencies within the community's infrastructure and facilities.</p> <p>CPO 7.5 Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents. Where specified by the Planning Authority, new significant residential or mixed use development proposals (of which residential development forms a component), will be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.</p> <p>New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents /occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:</p> <ol style="list-style-type: none"> 1. local services including shops, schools, health care and recreational and sports facilities, and 2. public transport services. <p>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.</p>

		<p>CPO 7.14 Where practicable, education, community, recreational and open space facilities shall be clustered. However, schools shall continue to make provision for their own recreational facilities as appropriate. The need for schools to have access to local sports and swimming facilities is also recognised and will be taken into account when considering the need and planning and development of such facilities.</p> <p>CPO 7.43 To prioritise, facilitate and support the development of a community swimming pool facility and sports complex within the western region of the County, so located to achieve maximum accessibility to the residents of West Wicklow. To work with the Community Pool for West Wicklow community group, local communities and relevant NGBs including Swim Ireland, Water Safety Ireland and Canoeing Ireland to ensure the successful delivery of this project.</p>
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Chief Executive’s Response

CPO 7.1 The suggested change is considered reasonable.

CPO 7.3 The suggested change is not a land use planning matter and relates to the manner in which the Council will engage with communities / various stakeholders in the development of community infrastructure. Such an objective therefore is not possible to implement through the land use planning process. This would be more appropriately addressed via the LECP, which is the Council’s community development plan. Therefore no change is recommended.

CPO 7.5 The suggested change is considered reasonable.

CPO 7.14 The suggested change is considered reasonable.

CPO 7.43 The changes in the first sentence are considered reasonable. However the proposed new sentence relates to the manner in which the Council will engage with various stakeholders in the development of a swimming pool / sports complex. Such an objective therefore is not possible to implement through the land use planning process. This would be more appropriately addressed via the LECP, which is the Council’s community development plan. Therefore no change is recommended.

Chief Executive’s Recommendations

Amend the Plan as follows:

Volume 1, Chapter 7

Section 7.4 Community Development Objectives

CPO 7.1 To consult and engage with prescribed bodies, **National Governing Bodies of Sport**, local community interest groups and individuals during the local plan-making process for towns and villages to determine community / social infrastructure deficiencies and needs in accordance with the provisions of the Planning and Development Act.

CPO 7.5 Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents. Where specified by the Planning Authority, new significant

residential or mixed use development proposals (of which residential development forms a component), will be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents /occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:

1. local services including shops, schools, health care and recreational **and sports facilities**, and
2. public transport services.

Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.

CPO 7.14 Where practicable, education, community, recreational and open space facilities shall be clustered. However, schools shall continue to make provision for their own recreational facilities as appropriate. **The need for schools to have access to local sports and swimming facilities is also recognised and will be taken into account when considering the need and planning and development of such facilities.**

CPO 7.43 To **prioritise**, facilitate and support the development of a community swimming pool facility **and sports complex** within the western region of the County, so located to achieve maximum accessibility to the residents of West Wicklow.

Section 3.3	Volume 1
Section 3.3.8	Chapter 8 Built Heritage

Topic	General	
ID	Name	Issue raised
C2-229 https://consult.wicklow.ie/en/s/ubmission/ww-c2-229	Wicklow PPN	Preserve, maintain and development our built heritage More centres are needed to promote our heritage
C2-235 https://consult.wicklow.ie/en/s/ubmission/ww-c2-235	Wicklow Greens	The submission requests that Oldcourt Castle in Bray, which has been the subject of vandalism and is in a state of disrepair, is Compulsorily Purchased and the OPW take it in charge as an amenity for County Wicklow

Chief Executive's Response

The goal of the provisions of Chapter 8, and other parts of the plan that overlap with heritage matters, is to protect and enhance our built heritage, and to enhance access to and understanding of it, in particular (as set out in Chapter 8):

- *To ensure that the protection and conservation of the built heritage of Wicklow is an integral part of the sustainable development of the county and safeguard this valuable, and in many instances, non-renewable resource through proper management, sensitive enhancement and appropriate development;*
- *To safeguard archaeological sites, monuments, objects and their settings above and below ground and water listed in the Record of Monuments and Places (RMP), and any additional newly discovered archaeological remains;*
- *To identify and protect archaeologically sensitive historic landscapes;*
- *To ensure the protection of the architectural heritage of Wicklow through the identification of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding of designed landscapes and historic gardens, and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the County; and*
- *To support the actions in the County Wicklow Heritage Plan, in order to enhance the understanding, appreciation and protection of Wicklow's built heritage.*

With regard to submission C2-235, it is not within the remit of the County Development Plan to identify individual buildings for compulsory purchase orders.

Chief Executive's Recommendations

No change

Topic		Archaeology
ID	Name	Issue raised
C2-195 https://consult.wicklow.ie/en/submission/ww-c2-195	Roger Garland	<p>The following additional objectives are suggested:</p> <ol style="list-style-type: none"> 1. Recognising the importance of archaeology and National Monuments as part of our heritage, promote, enhance, facilitate, encourage, support, improve and protect public access to National Monuments, Archaeological Sites, castles, sites of historic interest to and to archaeological landscapes in State or private ownership, including those listed in the RMP, in co-operation with landowners. 2. Promote, provide and encourage appropriate signage to publicly accessible archaeological sites and National Monuments listed in the RMP. 3. Traditional access routes will be designated as public rights of way. In other cases, routes will be acquired by agreement with landowners or by way of compulsory powers. 4. The Council will continue to develop a programme of survey and management of Council-owned monuments and structures of historic interest. 5. Protect and preserve in situ all archaeological sites and features of historic interest discovered/identified subsequent to the publication of the RMP. 6. When assessing planning applications for development have regard to the RMP and archaeological sites identified since the publication of the RPM. 7. Preserve, protect and, where necessary, enhance mass rocks and holy wells.
C2-196 https://consult.wicklow.ie/en/submission/ww-c2-196	Save Ireland's Ancient East	<p>It is gratifying that the Draft Plan gives due regard to the important and significant heritage of the Baltinglass area, in particular what is now called the Baltinglass Hillfort Complex and its surrounding landscape.</p> <p>However there are elements of the draft plan fall short of what is required to protect this area and develop it in historically and environmentally sound ways; in particular</p> <ul style="list-style-type: none"> - The landscape classification does not reflect the sensitivity of the area, and - as a result allow wind farms to be considered in this area. <p>An Archaeology Officer should be appointed.</p>
C2-198 https://consult.wicklow.ie/en/submission/ww-c2-198	West Wicklow Wind Action Group	<ul style="list-style-type: none"> - The focus of this submission is to highlight the unique archaeological integrity of the entire Baltinglass Hillfort Complex. - It is submitted that the Draft Plan has no formal proposals that would substantively have the effect of giving the proper protection to the Baltinglass Hillfort Complex. These protections are critical in order to stop any further potential industrial development such as the recent industrial windfarm planning application by ABO Wind Ireland - The various mentions of the landscape importance of the Baltinglass Hills in the previous CDP are clearly not enough to stop inappropriate industrial planning applications. The importance of the Baltinglass Hillfort Complex is already nationally and internationally recognised. Leading Archaeologists have written extensively and published articles on the importance

		<p>of the Baltinglass Hillfort Complex.</p> <ul style="list-style-type: none"> - There are a number of supporting documents attached to the submission including submissions made to planning application Reg. Ref. 21/60 for a wind farm.
<p>C2-263 https://consult.wicklow.ie/en/submission/ww-c2-263</p>	<p>Eoin Llewellyn</p>	<p>Suggest the development of an interactive heritage experience at the Glen Of the Downs recreating the hill forts as viewing platforms; relocation of cell masts off Coolnaskeagh; re-instatement of protected status to Coolagad / Downs Hill / Coolnaskeagh hillforts; development of heritage centre at former Glen Of the Down golf course.</p> <p>Suggest the development of a series of linked natural and built heritage sites through Greystones - Delgany area</p>

Chief Executive's Response

Baltinglass

With regard to Baltinglass Hillfort, the Draft Plan includes a County Policy Objective (CPO 8.6) to protect the integrity of the complex:

***CPO 8.6** To protect the integrity of Baltinglass Hills archaeological landscape including identified monuments and their wider setting by resisting development that may adversely impact upon the significance and understanding of this important landscape.*

The draft Plan also includes a map (Map 08.01A) entitled Baltinglass Historic Landscape which identifies the clusters of prehistoric hilltop sites and prehistoric monuments. The County Development Plan is not however a heritage or conservation management plan for the area and therefore does not include more specific proposals or 'actions' to be undertaken by the Council with respect to this area. This may be more of an issue for the next County Heritage Plan, or for the plans of the National Monuments Services.

It is not the purpose of landscape designation and heritage objectives to sterilise land for particular types of development. Any future application for development in this area will be assessed having regard to the impact it will have on the hillfort complex once this objective is adopted.

Issues raised with regard to the landscape classification and the Wind Energy Strategy for this area are dealt with in Sections 3.3.16 and 3.3.17 of this report. It is recommended in Section 3.3.17 that the landscape character designation around this area be amended.

Glen of Downs – Delgany – Greystones

With respect to the suggested heritage / tourism experience relating to the hillforts / archaeology around Glen of Downs – Delgany – Greystones, and the development of a heritage interpretive centre relating to same while there would be no presumption against such a project in the Draft Plan, and the objective of the tourism chapter would support same (e.g. CPO 11.14, 11.8), 11.39 subject to normal planning consideration, it would be premature to identify this as an specific objective at this time as it has not been sufficiently developed by either the various heritage or tourism agencies as yet to determine if it is feasible and viable.

The plan provisions would support the development of linking natural and built heritage sites in the Greystones – Delgany area, but this might be more appropriate to examine in more detail in the next review of the LAP for that area.

C2-195

With regard to the new objectives suggested

1. *Recognising the importance of archaeology and National Monuments as part of our heritage, promote, enhance, facilitate, encourage, support, improve and protect public access to National Monuments, Archaeological Sites, castles, sites of historic interest to and to archaeological landscapes in State or private ownership, including those listed in the RMP, in co-operation with landowners.*

It is recommended that CPO 8.5 be enhanced to include some of the text suggested.

2. *Promote, provide and encourage appropriate signage to publicly accessible archaeological sites and National Monuments listed in the RMP.*

It is recommended that CPO 8.5 be enhanced to include some of the text suggested.

3. *Traditional access routes will be designated as public rights of way. In other cases, routes will be acquired by agreement with landowners or by way of compulsory powers.*

This is addressed in Chapter 18 of the plan. No change is recommended to Chapter 8.

4. *The Council will continue to develop a programme of survey and management of Council-owned monuments and structures of historic interest.*

Wicklow County Council does not have a conservation officer or archaeologist, and therefore cannot commit to such a programme.

5. *Protect and preserve in situ all archaeological sites and features of historic interest discovered/identified subsequent to the publication of the RMP.*

It is considered that this suggestion is already encompassed by CPO 8.1; therefore no change is recommended.

6. *When assessing planning applications for development have regard to the RMP and archaeological sites identified since the publication of the RPM*

It is considered that this suggestion is already encompassed by CPO 8.1; therefore no change is recommended.

7. *Preserve, protect and, where necessary, enhance mass rocks and holy wells.*

It is considered that this suggestion is already encompassed by the proposed amended CPO 8.1; therefore no change is recommended.

Archaeology Officer

The appointment of a new officer in the Council would be an operational and funding matter and not within the remit of the CDP.

Chief Executive's Recommendations

Amend Draft Plan as follows:

Volume 1, Chapter 8

- CPO 8.5** To facilitate **new or improved** public access to and **erection of appropriate interpretive signage** at National Monuments, **archaeological sites, castles, sites of historic interest and archaeological landscapes** in State **or Local Authority** or private ownership, as identified in Schedule 08.02 and Map 8.02 of this plan, **in co-operation with landowners.**

Topic	Architectural Heritage – Record of Protected Structures <i>Note: Submissions with regard to specific structures on the RPS are addressed in Section 3.5.2 of this report</i>	
ID	Name	Issue raised
C2-218 https://consult.wicklow.ie/en/submission/ww-c2-218	Delgany Community Council	<ul style="list-style-type: none"> - Delgany has a unique heritage, both in terms of its landscape and the built environment. A full audit of its buildings should be carried out to determine whether there are buildings that should be added to the RPS and to determine whether the current level of protection is sufficient in order to retain the unique character of the village. - Delgany would benefit from a community heritage centre which could showcase our heritage. - Protected Structures: The CDP should outline clearly what steps will be taken to ensure that protected structures are actually protected. Designating a building as a Protected Structure is not sufficient. Such buildings need to be monitored so that they are not damaged or destroyed by anti-social behaviour. Delgany has already lost Stylebawn House and Kindlestown House has fallen into disrepair. - C.P.O. 8.13 is laudable but practical steps need to be identified to ensure that it is meaningful
C2-231 https://consult.wicklow.ie/en/submission/ww-c2-231	GAP (Greystones Area Planning) Community	<ul style="list-style-type: none"> - Believe that Delgany has a unique heritage, both in terms of its landscape and the built environment. A full audit of its buildings should be carried out to determine whether there are buildings that should be added to the RPS and to determine whether the current level of protection is sufficient to retain the unique character of the village. - Delgany would benefit from a community heritage centre which could showcase our heritage. - Protected Structures: The County Development Plan should outline clearly what steps will be taken to ensure that protected structures are actually protected. Delgany has already lost Stylebawn House and Kindlestown House has fallen into disrepair. Designating a building as a Protected Structure is not sufficient as it stands. Protected Structures need to be monitored so that they are not damaged or destroyed by anti-social behaviour.
Chief Executive's Response		
<p>There are a significant number of structures already on the RPS in Delgany, and there is an ACA already designated. It is considered that Delgany has a very high level of architectural protection measures in place. The resources are unfortunately not available for the Local Authority to carry out a full audit of all structures in the settlement.</p> <p>With regard to protected structures, it is clearly set out in statute and guidelines what the effect is of including a structure on the record. When a structure is added to the record, the landowner is formally notified of their obligations to protect the structure. The Local Authority can assist landowners in this where funding is available and can provide advice and guidance. Unfortunately the resources would not be available to monitor every protected structure in the County, there being over 500 structures listed. Even the monitoring of building cannot however stop accidental damage by fire and anti-social behaviour. That is the responsibility of the landowner.</p> <p>The provisions of the Draft Plan, and indeed the LAP would support the development of a heritage centre in the</p>		

Delgany area should such a project be brought forward by a group or agency.

Chief Executive's Recommendations

No change

Topic 2		Architectural Heritage – ACAs
ID	Name	Issue raised
C2 – 78 https://consult.wicklow.ie/en/submit/mission/ww-c2-78	Burnaby Residents Association	<p>The Residents Association commissioned a review of the ACA for the Burnaby and on foot of same suggest the following:</p> <ul style="list-style-type: none"> - Existing ACA lacks detail and guidance. - All Planning applications and public works should include Architectural Heritage Impact Assessment. - Full inventory including photos should be carried out. - Houses in NIAH survey should be protected structures. - Extensions should be proportionate and sympathetic. - Objective for increased density conflicts ACA designation. - Zoning fails to protect character of area and should be altered/density lowered. - Subdivision of plots eroding character. - New road schemes losing historical fabric/character. - Mature trees should be replaced when lost. - New density/building height guidelines could result in apartment development on ACA. Restrictions should be maintained. - The residents would like to see more active management of the ACA, with specific objectives in the Development Plan supporting same. - All works by public utilities, planting and traffic management, street furniture should recognise the conservation objectives of the ACA. Objective to remediate existing inappropriate insensitive works required. - Planning Enforcement needs swift action within ACA. - Development Plan should state lower housing densities will apply in ACAs where necessary to preserve character of area.
C2-218 https://consult.wicklow.ie/en/submit/mission/ww-c2-218	Delgany Community Council	<p>Welcome the fact that Delgany village centre is recognised as an ACA, and we hope that Wicklow County Council will ensure the preservation and protection of the unique heritage character of the village which has stood the test of time.</p>
C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231	GAP (Greystones Area Planning) Community	<p>Welcome the fact that Delgany village centre is recognised as an ACA, and we hope that Wicklow County Council will ensure the preservation and protection of the unique heritage character of the village which has stood the test of time.</p>
Chief Executive's Response		
<p>The Draft Plan includes objectives regarding ACAs throughout the County. It is considered that the issues raised are fully addressed in the objectives included in the Draft Plan.</p> <p>Principles for new development within an ACA are set out under the following objectives:</p> <p>CPO 8.21 <i>Within Architectural Conservation Areas, all those buildings, spaces, archaeological sites, trees, street furniture, views and other aspects of the environment which form an essential part of their character, as set out in their character appraisals, shall be considered for protection. The repair and refurbishment of existing buildings within the ACA will be favoured over demolition/new build in so far as practicable.</i></p> <p>CPO 8.22 <i>The design of any development in Architectural Conservation Areas, including any changes of use of an existing building, should preserve and / or enhance the character and appearance of the Architectural Conservation Area as a whole. Schemes for the conservation and enhancement of the character and</i></p>		

appearance of Architectural Conservation Areas will be promoted. In consideration of applications for new buildings, alterations and extensions affecting Architectural Conservation Areas, the following principles will apply:

- *Proposals will only be considered where they positively enhance the character of the ACA.*
- *The siting of new buildings should, where appropriate retain the existing street building line.*
- *The mass of the new building should be in scale and harmony with the adjoining buildings, and the area as a whole, and the proportions of its parts should relate to each other, and to the adjoining buildings.*
- *Architectural details on buildings of high architectural value should be retained wherever possible. Original features, which are important to a building's character such as window type, materials, detailing, chimneys, entrances and boundary walls, both within and outside the architectural conservation area should be retained where possible.*
- *A high standard of shopfront design relating sympathetically to the character of the building and the surrounding area will be required.*
- *The materials used should be appropriate to the character of the area. Planning applications in ACAs should be in the form of detailed proposals, incorporating full elevational treatment and colours and materials to be used.*
- *Where modern architecture is proposed within an ACA, the application should provide details (drawings and/or written detail) on how the proposal contributes to, or does not detract from the attributes of the ACA.*

In addition to this, in Chapter 5 of the Draft plan, which deals with healthy placemaking sets out:

CPO 5.17 *To harness and integrate the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive reuse, recognising its important contribution to placemaking. New development should respect and complement the historic fabric of existing towns and villages – the traditional street patterns, plot sizes, mix of building types, distinctive paving and attractive street furniture.*

A character appraisal of the Burnaby has already been carried out and this formed the basis for the designation of the Burnaby ACA. It is not intended to carry out a further appraisal including photographic survey. The Development Plan sets out a framework for the protection of the ACA and it is considered that this is adequately addressed in the draft plan.

With regard to the active management of the ACA, it is noted that the ACA is a conservation designation, which is implemented through its application in the assessment of application for consent for development, whether by private or public bodies. It is not an operational / management tool for the area. All persons including utility companies that carry out works are required to comply with the objectives for the ACA. The Planning Authority will investigate alleged unauthorised works and take enforcement action where necessary.

With regard to the zoning of the Burnaby ACA, this is a matter for the review of the Greystones-Delgany Kilcoole Local Area Plan.

It is not considered appropriate to request that every planning application within an ACA carry out an Architectural Heritage Impact Assessment as this would be an onerous and expensive requirement. Point 7 of CPO 8.22 states '*Where modern architecture is proposed within an ACA, the application should provide details (drawings and/or written detail) on how the proposal contributes to, or does not detract from the attributes of the ACA*' adequately addresses the concerns raised in the submission.

The submission requests that all NIAH houses should be considered for inclusion in the RPS. Approximately 35 structures within the Burnaby ACA are identified under the NIAH and some of these are already included in the RPS. It is considered that the ACA designation affords adequate protection to the character of these buildings. Furthermore, it is not possible at this stage in the Development Plan process to make further fresh additions for the RPS.

With regard to the concern raised that the new Building Height Guidelines may result in apartment development, Section 2 Building Heights and the Development Plan states in 2.8

'Historic environments can be sensitive to large scale and tall buildings. In that context, Planning Authorities must determine if increased height buildings are an appropriate typology or not in particular settings. An Initial assessment of the existing character and setting of a place will assist in a robust framework for decision-making that will facilitate increases in building height and involve an integrated understanding of place. With regards to large-scale and tall buildings in historic urban areas, an examination of the existing character of a place can assist planning authorities, and others to:

- establish the sensitivities of a place and its capacity for development or change and;*
- define opportunities for new development and inform its design'.*

CPO 8.22 states *'The mass of the new building should be in scale and harmony with the adjoining buildings, and the area as a whole, and the proportions of its parts should relate to each other, and to the adjoining buildings'.*

This adequately covers the concerns of the residents association.

Enforcement proceedings are dealt with under Part VIII of the Planning and Development Act. Each enforcement case will be addressed in accordance with the appropriate legislation. The development plan is not an appropriate tool to stipulate how enforcement proceedings are carried out within an ACA.

Chief Executive's Recommendations

No change

Section 3.3	Volume 1
Section 3.3.9	Chapter 9 - Economic Development

Topic	Economic Strategy	
ID	Name	Issue raised
C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125	Blessington District Forum	<p><i>This is a lengthy and detailed submission and the reader is advised to review the original submission in full, and only a summary can be provided herein.</i></p> <ul style="list-style-type: none"> - The jobs ratio is lower in the County than regional average, with Blessington's ratio lower again; - Facilitating improved economic opportunities and encouraging local enterprise in the District via investments in roads, transportation, communications, tourism/leisure and community infrastructure will lead to greater employment choices within the district as well as the reducing the environmental and social impacts from the level and duration of commuting. - Increased access to enterprise and employment support services, such as Local Enterprise Office and Local Employment Network Service, and facilities such as co-working hubs will boost the ability of employment in the area to grow. - Social and care services for both the elderly and the young are lacking in the area. These are necessary to support people in employment and they are also sources of employment.
C2-160 https://consult.wicklow.ie/en/submission/ww-c2-160 C2-164 https://consult.wicklow.ie/en/submission/ww-c2-164 C2-166 https://consult.wicklow.ie/en/submission/ww-c2-166	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<ul style="list-style-type: none"> - The move to develop more industry in Wicklow is excellent as this will provide local employment which in turn will lower carbon footprint as the 2016 census describes 40% of workers travelling outside the county to work. The recent survey on commuting in the Wicklow area was very informative and showed a huge percentage of people commute to work. Many large towns in Wicklow are effectively commuter towns. - The entire issue of climate change entails a systemic change to the way we organise our lives. Wicklow needs more sustainable employments to limit the amount of time people travel to work. Support the development of employment in the high growth towns to lower emissions and facilitate people having more time with their families and a better life work balance. It is important that Wicklow develops the infrastructure, provides land and accessibility for new employments/businesses. Support the Council's intention to develop the IDA lands in Greystones, with a view to bringing more employment locally. - Support for the development of service hubs, co-working hubs for people working at home as this would further develop this goal.
C2-218 https://consult.wicklow.ie/en/submission/ww-c2-218	Delgany Community Council	<ul style="list-style-type: none"> - Detailed employment / jobs plans and high value-added jobs are needed for the County particularly in areas of high housing expansion in the County, such as Greystones – Delgany. - There needs to be strong contacts established with Enterprise Ireland and the IDA in order to attract more sustainable high quality employment into the area. - To make the area attractive to these type of industries and companies – there is need for a third level satellite hub/centre of

		<p>excellence – most likely from one of the major universities in Dublin such as UCD, Trinity or DCU. By locating a satellite centre in the County, this will act as an anchor and would be a suitable collaborator with the new industry partners. This would help to encourage clustering of these new industries in the county. Clermont in Rathnew will not be sufficient. The Media/Film site in Greystones is welcome, but recognise that while some high paid employment is available in this sector, it may not lead to high value, secure employment for all its employees.</p>
<p>C2-249 https://consult.wicklow.ie/en/su_bmission/ww-c2-249</p>	<p>Carina Harte-Holmes</p>	<ul style="list-style-type: none"> - Wicklow needs a detailed strategy and plan to attract high value-added employment companies which will give residents good options in terms of local employment opportunities (e.g. ICT/financial services office/data hubs in Bray and Greystones). A number of financial companies are also looking to find satellite offices outside Dublin and there's a significant opportunity for Wicklow County Council to be pro-active in setting out a strategy and plan to attract these types of companies to set up in the county. - To make the area attractive to these types of industries and companies, there is need for a satellite third level hub/centre of excellence, most likely from one of the major universities in Dublin such as UCD, Trinity or DCU. These satellite centres could act as an anchor and a collaborator with the new companies/industry partners. This would also help to encourage further clustering of these high value-added (highly paid) industries and service companies. Clermont in Rathnew will not be sufficient. While the Media/Film site in Greystones is very welcome, this sector is not known to provide secure and highly paid employment.
<p>C2-231 https://consult.wicklow.ie/en/su_bmission/ww-c2-231</p>	<p>GAP (Greystones Area Planning) Community</p>	<ul style="list-style-type: none"> - Wicklow needs a detailed strategy and plan to attract high value-added employment opportunities (e.g. ICT/financial services office/data hubs in Bray and Greystones). A number of financial companies are also now looking to find suitable locations for satellite offices outside Dublin and Wicklow should be pro-active in seeking to attract these companies. - It is clear from the low jobs ratio in the Greystones-Delgany area that the majority of residents commute to Dublin for their work (in normal, non COVID times). There is a need for high value-added jobs (i.e. highly paid employment) in the Delgany-Greystones area. Strong contacts should be fostered with Enterprise Ireland and the IDA in order to attract more sustainable highly paid employment into the area.
<p>C2-229 https://consult.wicklow.ie/en/su_bmission/ww-c2-229</p>	<p>Wicklow PPN</p>	<ul style="list-style-type: none"> - More local training and employment hubs needed. - Attract digital industry and educate young people to feed it - More digital hubs needed.
<p>C2-125 https://consult.wicklow.ie/en/su_bmission/ww-c2-125</p>	<p>Blessington District Forum</p>	<ul style="list-style-type: none"> - Infrastructure improvements needed to improve west Wicklow economically. - Access needed to the Local Enterprise Office and Local Employment Network service. - Community Employment schemes need more diverse placement opportunities. - Lack of childcare for working parents and social care for elderly and

		young. Free WIFI, enterprise hubs support for small start-ups all needed.
Chief Executive's Response		
<p>The Draft Plan acknowledges that economic development and employment is one of the key elements in delivering sustainable communities. It sets out a spatial planning framework for economic development and jobs growth. The role of the County Development Plan in terms of economic development is addressed in detail in Section 9.3 of the draft Plan. It is important to note that the County Development Plan is not the economic plan for the County. The land-use objectives of the County Development Plan support the strategies of the Wicklow Local Economic and Community Plan and the Wicklow Local Enterprise Office, all of which have a wider remit than the County Development Plan in the area of economic development, training, the development of employment / digital hubs etc</p> <p>The Local Authority's economic development unit works closely with the employment agencies such as the IDA and EI to attract new employment to County Wicklow, and to support local smaller and medium indigenous businesses.</p> <p>The draft plan sets out a wide range of objectives to support and facilitate the enhancement of the infrastructure that supports employment, including but not limited transport (Chapter 12), energy and communications (Chapter 16), community services include childcare (Chapter 7). The Council will continue to use its resources, and work with other agencies, to continue to enhance these services.</p> <p>There are ample lands zoned within the County to cater for new economic development and third level education. However the actual delivery of development on these lands is outside the remit of the development plan, and is dependent on public and private sector funding and project initiation.</p>		
Chief Executive's Recommendations		
No change		

Topic	Objectives for Economic Development	
ID	Name	Issue raised
C2-41 https://consult.wicklow.ie/en/s/ubmission/ww-c2-41	SSE	<ul style="list-style-type: none"> - SSE welcome CPO 9:22 which seeks to encourage and facilitate the development of offshore wind operation and maintenance bases which will create new opportunities for employment and skills development. - As the East and South Coast of Ireland, is soon to be the heartland of offshore wind, SSE believe this area is ideally positioned for the development of a Centre of Excellence for training and development of crew and technicians to support the further development of the industry and associated supply chain. SSE believes that offshore wind energy can act as an enabler to unlock new infrastructure investment in ports. Ireland's proposed Operations and Maintenance Facility (OMF) at Arklow Harbour will support the Council's plans to enable the renewal of the area and redefine the role of the harbour to deliver a mix of uses. To realise these opportunities, integrated land and marine planning is essential.
C2-71 https://consult.wicklow.ie/en/s/ubmission/ww-c2-71	An Post	<ul style="list-style-type: none"> - Due to the age of some of facilities as well as the requirement to efficiently modernise postal facilities as a result of recent trends in the postal services market, An Post, over the coming years, will seek to enhance facilities at existing and new locations. The enhancement of An Post's facilities and the future provision of new facilities could generate employment in the County, reinvigorate redundant and underutilised lands and support climate change mitigation with the transition to e-vehicles in An Post's fleet. - It is requested that the Council provide flexibility under their land use zonings and objectives in relation to An Post's facilities and operational requirements to allow for the enhancement of existing facilities and the development of new postal infrastructure. It is requested that the Council include provisions for both An Post Retail and An Post Mails & Parcels operations as permissible or open for consideration land uses across all zoning objectives. - Request to include the following policy objectives: <ul style="list-style-type: none"> ▪ <i>To support the provision of new postal facilities and the enhancement of existing facilities, including operational requirements in the County.</i> ▪ <i>To facilitate the provision of postal infrastructure at suitable locations in the County.</i> ▪ <i>To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement.</i> - An Post require flexibility in terms of car parking standards (An Post require significant additional parking/delivery vehicle areas) and in terms of hours of operation for 24 hr deliveries. - Request that during the preparation of any future public realm and movement strategies, the Council consult with An Post to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centre areas for the public.
C2-274 https://consult.wicklow.ie/en/s	West Wicklow Environmental Network	<p>Suggest Objective CPO 9.21 be amended as follows: <i>To encourage and facilitate the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies,</i></p>

ubmission/ww-c2-274		<p>waste recycling, and conservation, particularly nature-based solutions to climate change.</p> <p>It is noted that there is no reference to circular economy enterprise opportunities in this chapter; this is something which should be allowed for, preferably with the addition of a new objective.</p>
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Chief Executive’s Response

C2-41
The comments from SSE are noted. County Policy Objectives 12.63 and 16.2 provide further support for the delivery of onshore infrastructure for off-shore wind energy.

C2-71
The comments from An Post are noted. The Council acknowledges that An Post provides an essential service that is coming under increasing pressure due to the rise on on-line shopping. However, as with any application for new development, the expansion of existing facilities or provision of new postal facilities will be assessed in accordance with the proper planning and sustainable development of the area. This includes assessing the impacts on any proposal on the existing area in terms of visual or residential amenities, traffic impact and traffic safety. It is considered that there are a number of policy objectives in the Draft Plan which will support An Post in their endeavours but particularly CPO 9.1, 9.2, 9.3, 9.6, 9.18. As with similar employment development that require warehouses / offices/ structures, large car parks etc, unless there are reasons to the contrary, such development would be expected to locate on zoned employment lands in settlements, or other zoned employment lands. It is not considered appropriate to provide a *carte blanche* to An Post to develop such facilities in any location / any zone category in the County. Given the important and essential role of An Post it is considered reasonable to include a new objective which provides support for the expansion or development of new An Post facilities.

C2-274
The Draft plan is a wide range of objectives across a number of chapters supports the use of nature based solutions to address climate change; nature based solutions are actions to protect, sustainably manage, and restore natural or modified ecosystems. The use of nature based solutions is an activity, rather than an industry or employment type in itself. It is not considered appropriate therefore to amend Objective CPO 9.21 as suggested. The ‘circular economy’ is an economic system of closed loops in which raw materials, components and products lose their value as little as possible, renewable energy sources are used and systems thinking is at the core. The policies and objectives of Chapter 9 of the Draft Plan already support such activities, but this can be strengthened by amending Objective CPO 9.21.

Chief Executive’s Recommendations

Amend the Draft Plan as follows:

Volume 1, Chapter 9

CPO 9.21 To encourage and facilitate the ‘circular economy’ and the development of ‘green’ industries, including industries relating to renewable energy and energy-efficient technologies, material / waste recycling and conservation.

Add new objective as follows:

CPO 9.X To support the provision of new postal facilities and the enhancement of existing facilities at suitable locations in the County subject to proper planning and sustainable development.

Topic	Objectives for Wicklow's Rural Economy	
ID	Name	Issue raised
C2-70 https://consult.wicklow.ie/en/s/ubmission/ww-c2-70	Roadstone Ltd	<ul style="list-style-type: none"> - Due regard should be given to the fact that the County has significant but finite mineral resources and it should be the aim of the CDP to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry. There is a need to safeguard valuable un-worked deposits from permanent development that would prevent or hinder their future extraction and thus appropriate control measures should be put in place to avoid such a scenario. - Request that the CDP highlights areas containing proven deposits on an appropriate map, in order to protect them from the future development of incompatible land use. - Request that the CDP add the following policy objective to ensure that quarry and extractive sites are made safe following the cessation of operations: CPO 9.55 To encourage the rehabilitation of disused quarries and extractive sites, to include by backfilling with inert soil and stone, to possible uses including habitat restoration, agriculture, recreation/amenities, commercial, industrial, and residential, or a combination of same, subject to normal planning and environmental considerations.
C2-160 https://consult.wicklow.ie/en/s/ubmission/ww-c2-160 C2-166 https://consult.wicklow.ie/en/s/ubmission/ww-c2-166	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<ul style="list-style-type: none"> - Historically, Greystones had a fishing industry. Support the redevelopment of a fishing industry in Greystones and reasonable harbour rates to land their fish. - Support any measure to allow our fishermen to land their catch where they have done so historically. - Dismayed that the Draft Development Plan has shown no regard for our fisherman and designated Greystones Harbour as a leisure Harbour. - Would argue that in the interests of heritage and industry that this aspect of the plan is changed.
C2-195 https://consult.wicklow.ie/en/s/ubmission/ww-c2-195	Roger Garland	<p><i>This is very detailed submission that would not be possible to summarise as it includes over 15 separate and specific suggestions for new objectives or amendments to existing objectives. The reader is advised to read the submission in full using the attached link.</i></p> <p>All suggestions set out therein are duly assessed to follow</p>
C2-246 https://consult.wicklow.ie/en/s/ubmission/ww-c2-246	Newtownmount -kennedy Town Team	Diversification from farming to use remote working/hubs should be supported
C2-304 https://consult.wicklow.ie/en/s/ubmission/ww-c2-304	Ashford Property Services	Suggest that the Plan facilitates changing farm buildings to locations for commercial enterprise. This would facilitate development as a result of changes in rural areas and would support the viability of rural areas.
C2-274 https://consult.wicklow.ie/en/s/ubmission/ww-c2-274	West Wicklow Environmental Network	As plantations in upland areas mature, there should be a shift from automatically replanting, to restoring areas of deep peat once felling has taken place. These forests require immediate action in the form of alternative management approaches if their peatland ecosystems are to be placed on a more sustainable footing. As site conditions vary, there

		<p>should be a scientific, land use approach to identify the most sustainable option for the future management of each forest.</p> <p>In keeping with Wicklow's position as a 'centre of excellence' in forestry research and management (CPO 9.45) West Wicklow Environmental Network seeks the addition of a new objective in the forestry section of Chapter 9:</p> <p><i>Ensure that forest management is based on a scientific, land use approach to identify the most sustainable option for the future management of each forest.</i></p>
<p>C2-228 https://consult.wicklow.ie/en/submit/ww-c2-228</p>	<p>Wicklow PPN</p>	<p>Support and develop local fishing industry</p>

Chief Executive's Response

C2-70: Extractive Industry

It is considered that the objectives included in the Draft Plan provide adequate and appropriate support for the extractive industry. The new objective suggested is not considered necessary as (a) Section 4.3 of the Development & Design Standard set out in the Draft Plan already addresses the issue of aftercare and restoration and (b) any future uses of quarries after land restoration carried out (other than agriculture) not specifically detailed in the original application would require to be the subject of a further application for consent, which would be assessed in the normal manner.

With regard to aggregate mapping, the OPR has requested that the Plan include a map to identify reserves of aggregates and minerals, and it is recommended that this be included in the plan.

C2-304, C2-246: Rural Diversification

The Strategic Objective for Economic Development in Rural Areas (Section 9.6 of the Draft Plan) recognises the importance of supporting economic diversification in rural areas:

Strategic Objective - To preserve the amenity, character and scenic value of rural areas, and to generally require employment-generating development to locate on zoned / designated land within existing settlements. Notwithstanding this, it is the objective of the Council to enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services including those addressing climate change and sustainability and through the development of appropriate rural based enterprises, which are not detrimental to the character, amenity, scenic value, heritage value and environmental quality of a rural area.

It is considered that the Plan includes adequate objectives to facilitate appropriate development in rural areas, for example:

CPO 9.31 *To permit the development of employment generating developments in rural areas, where it is proven that the proposed development requires to be located in a rural area (e.g. dependent on an existing local resource) and will have a positive impact on the location.*

CPO 9.34 *To permit the development of small-scale commercial / industrial developments in rural areas that are not dependent on an existing local resource, subject to compliance with all of the following criteria:*

- *The proposed development shall be a small-scale industrial / commercial scheme or service and the number employed shall be appropriate in scale to the location and its characteristics, including proximity to the*

workforce and customers;

- *the proposed development shall be located on the site of a redundant farm building / yard or similar agricultural brownfield site; and*
- *the nature and scale of the proposed development and the proposed process or activity to be carried out, shall be appropriate to and compatible with, the character of the rural environment of the site at which the development is proposed, and shall not be detrimental to the rural amenity of the surrounding area. In the assessment of planning applications, cognisance shall be taken of the location of the site vis-à-vis the proximity of the site to the national and regional road network.*

CPO 9.37 *To encourage and facilitate agricultural diversification into suitable agri-businesses. Subject to all other objectives being complied with, the Council will support the alternative use of agricultural land for the following alternative farm enterprises:*

- *Specialist farming practices, e.g. organic farming, horticulture, specialised animal breeding, deer and goat farming, poultry, flower growing, forestry, equine facilities, allotments, bioenergy production of crops and forestry, organic and speciality foods; and*
- *Suitable rural enterprises.*

With regard to remote working hubs, these are supported in the Draft Plan via CPO 9.7 for locations in town and villages, which are the appropriate locations for such facilities with respect to accessibility (particularly by public transport and active modes) and digital / broadband services, rather than in rural areas, which will generally be car dependent and therefore not considered most optimal or sustainable. No change is recommended in this regard.

C2-274: Forestry

While the County Development plan is not the forestry 'management plan' for the County, it supports and promotes sustainable forest management, as guided by the legislation, strategies and standards set out for the forestry sector by the Department of Agriculture, Food and the Marine, for example in the Department's 'Felling and Reforestation Policy' (2017). It is considered it would be inappropriate for Wicklow County Council to set out its own unilateral requirements for land management after felling, which would be guided by any felling licence issued by the Department. No change is recommended.

C2-228 / C2-160: Fishing Industry

It is considered that the objectives included in the Draft Plan (CPO 9.49, 9.50) provide clear and appropriate support for the fishing industry, in all parts of the County. The Draft Plan does not 'designate' Greystones a 'recreational harbour'; Objective CPO 12.62 supports the development of additional recreational facilities at Bray, Greystones, Wicklow and Arklow harbours and does not state that other uses are therefore precluded or not supported.

C2-195: Various

Assessment of new objectives suggested:

1. *Only grant planning permission for new buildings or the expansion of existing industrial business enterprises in the countryside where the development would not cause a detrimental impact or erode rural character and is compatible with neighbouring land use. Any new building will be required to respect the appearance of and character of the landscape. It will not be acceptable where it is unduly prominent in the landscape, where it results in build-up of development when viewed with existing and/or approved building or where the impact of the ancillary works, including the creation of visibility splays would damage rural character or impact negatively on the environment or which fails to protect Natura Sites, conservation areas, natural heritage or the environment or fails to protect and improve or is injurious to amenities (including visual amenities). Buildings should be kept simple and finished with material appropriate to rural settings and should reflect the size, scale and pattern of development in the area. Buildings of excessive height will not be permitted and should be sited to make use of existing hedgerows and topography to provide natural screening*

It is considered that these suggestions are already addressed Appendix 1, Section 4.3.1 (commercial / employment development in rural areas) and therefore no change is recommended.

2. *Ensure that economic development that is urban in nature should be located in urban areas.*

It is considered that this is adequately addressed via CPO 9.34, which strictly limits rural commercial / industrial development to that which is compatible with the rural environment. No change is therefore recommended.

3. *Recognise and support the role of farmers as custodians of the natural resources of the countryside and of rural landscapes.*

This is not a land-use matter and therefore it is not recommended to inclusion in the plan.

4. *Promote, at national level, the adoption of a Land Use Strategy.*

As this is a 'national' matter, it is outside the remit of this plan. No change is therefore recommended.

5. *Protect and conserve rural amenities, archaeological and natural heritage, landscape and the environment generally, from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, ensure that they do not have an undue negative impact on the visual/scenic amenity of the countryside and its appearance and character and integrate into the landscape. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines. Identify mitigating measures where required*

It is considered that this is adequately addressed in CPO 9.36. No change is therefore recommended.

6. *Recognising the contribution that forestry makes to well being, develop, promote, provide, protect, improve and encourage the provision of greater public access to new and existing forestry, both state and private, for recreational activities such as walking, hiking, cycling, and other non-noise generating activities and the provision of nature trails, as part of connected network of walking and cycle routes in cooperation/consultation with Coillte, the Forest Service, private landowners, local interest groups and other relevant stakeholders and agencies.*

It is considered that this is adequately addressed in CPO 9.44, 18.4, 18.9, 18.10, 18.11. No change is therefore recommended.

7. *Retain existing rights of way and identify them and established walking routes before planting commences and maintain them as rights of way/walking routes. Ensure that existing public rights of way, traditional walking routes are not obstructed*

Where a PROW exists on any land for which permission is being sought to develop (for forestry or otherwise), it a normal part of the development management process to evaluate the impact (if any) of the proposed development on any PROW and to require proposals to address any such impact, which normally includes measures to protect and maintain the existing PROW. It is not considered necessary for this normal assessment to be embodied by a specific objective in the plan and therefore no change is recommended. With respect to 'traditional walking routes', if these are not legally PROWs or have other legal designation / protection, it would be excessively onerous and possibly ultra vires to require their protection.

8. *No new or replacement coniferous forests will allowed on summits generally above 250mtrs.*

As set out in CPO 9.42, the draft plan facilitates afforestation in accordance with the 'Wicklow Indicative Forestry Strategy', which set out a range of criteria for establishing optimal and permissible locations for forestry which is more nuanced and detailed than a simple contour limit. Therefore this suggestion is not supported and no change is recommended.

9. *Applications for new development for aggregate extraction, processing and associated processes, shall identify existing public rights of way and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/Walking Routes*

As per point 7 above. No change is recommended.

10. *Restrict development of aggregate extraction, processing and associated concrete production which could impinge or impact on public rights of way or walking routes and satisfactorily address the potential impact on recreational activities*

As per Point 7 above. In addition, it is considered that CPO 9.51, 9.54 and Appendix 1 Section 4.3.6 already address this issue. No change is therefore recommended.

11. *Recognising that the development for aggregates/mineral extraction, processing and associated developments can impose adverse impacts on amenities, ensure the protection, conservation, preservation and safeguarding of recorded monuments and areas in their vicinity, World Heritage Sites(including Tentative Sites), NHA's, Euro Sites, Nature Reserves, scenic views and prospects archaeological sites and features, natural heritage, natural environment, features of natural beauty or interest and prescribed sites, geological sites and areas of geological/geomorphological or historic interest and areas of high scenic amenity from inappropriate development that might be detrimental to them. Applicants must recognise that the aggregates (stone and sand/gravel deposits and mines) concrete products industry have a particularly sensitive role. Development must be carried out so that it minimises adverse effect on the environment and visual and natural amenities to the greatest possible extent must be carried out during all life cycle stages, whether in respect of new quarries or extensions to existing ones and development will be prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or there is a reduction of the visual amenity of areas of high amenity. All working should be landscaped either by the retention of existing vegetation or by screening*

It is considered that Objectives CPO 9.51, 9.54, as well as many of the objectives in Chapter 8 (Built Heritage), and 17 (Natural Heritage and Biodiversity), and Appendix 1 Section 4.3.6 already address this issue. No change is therefore recommended.

12. *Require that development proposals on or in proximity to a quarry site should investigate the nature and extent of the risks associated with the development together with appropriate mitigation*

It is considered that CPO 9.51, 9.54 and Appendix 1 Section 4.3.6, as well as EIA legislation already address this issue. No change is therefore recommended.

13. *In assessing applications for new quarries or extension to existing quarries the council will have regard to visual impact on sensitive landscapes*

It is considered that CPO 9.51, 9.54, 17.35, 17.36, 17.37, 17.38, and Appendix 1 Section 4.3.6, as well as EIA legislation already address this issue. No change is therefore recommended.

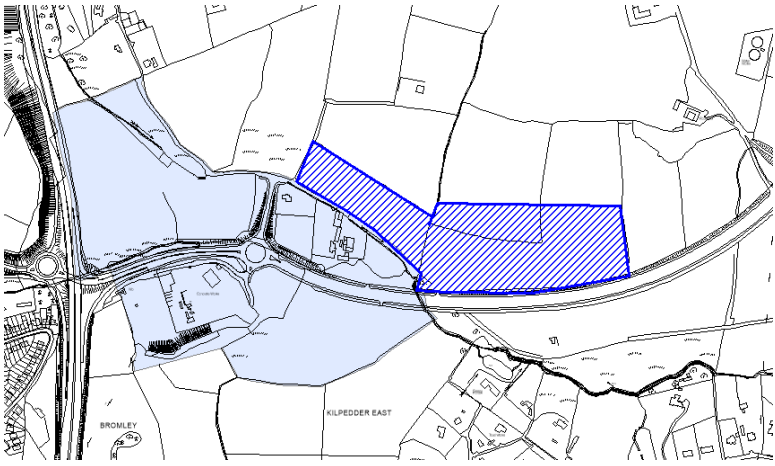
New text suggested:

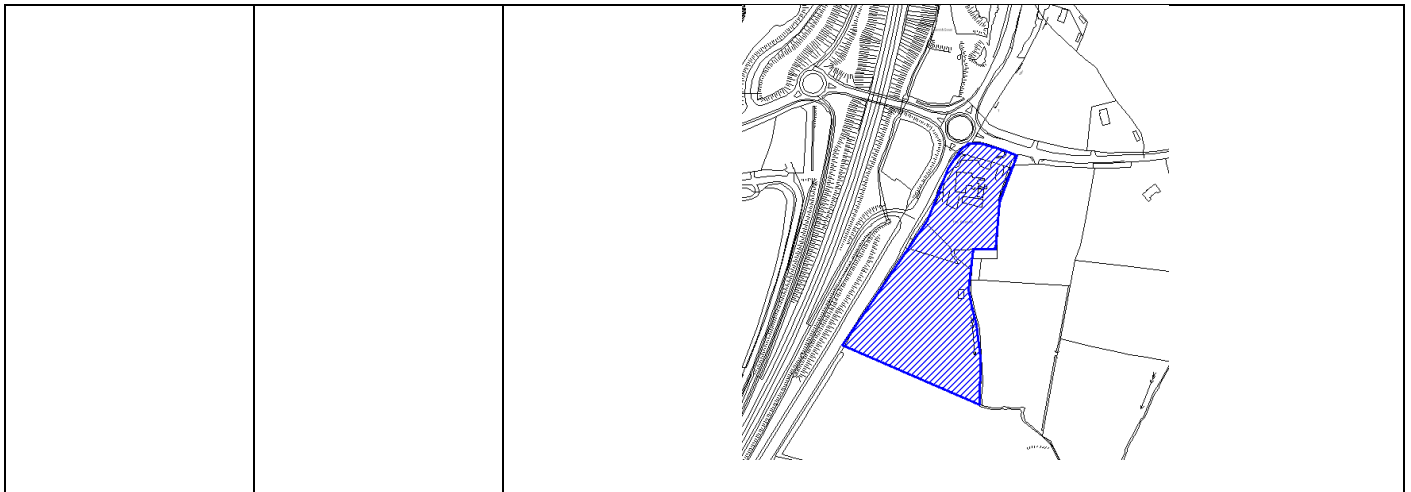
- Commonage and other rough grazing land should be regarded primarily as an important recreational, environmental and amenity resource.

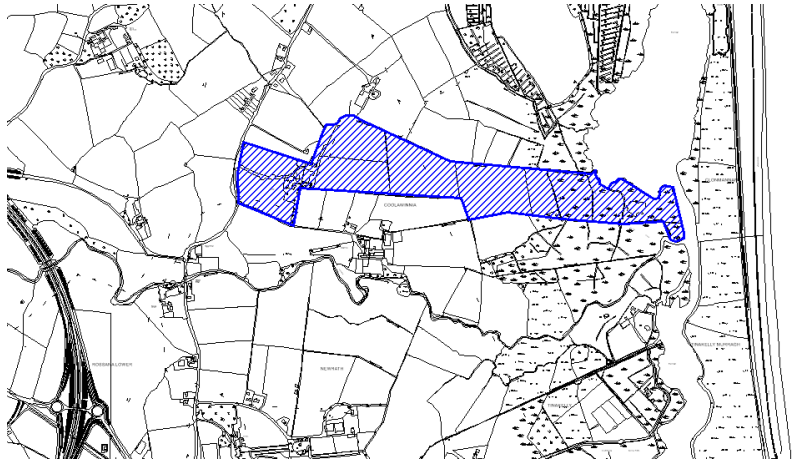
It is considered that CPO 18.14 in Chapter 18 addresses this issue and therefore no change is recommended.

Chief Executive's Recommendations

No change

Topic	Employment Zoning (see also Section 3.1 of this report)	
ID	Name	Summary of issues raised
C2-15 https://consult.wicklow.ie/en/submit/mission/ww-c2-15	Brian MacDonagh Ecologic Data Centres	CPO 9.15; Map 09.01 Newtownmountkennedy (data centre) It is requested that land folios WW21790F and WW36378F be included in the Newtownmountkennedy development boundary, as they are in the current plan.
C2-101 https://consult.wicklow.ie/en/submit/mission/ww-c2-101	Greystones Tidy Towns	CPO 9.15; Map 09.02 Kilpedder interchange There are two small watercourses that run through this area that form the Cannistown River that runs along the Mass Trail. This area should be considered for biodiversity conservation rather than development. Developing this motorway side area may result in creating a new locus of development in conflict with the CDP goals around compact development described in 2.4.3 Strategic County Outcomes as well as other sections.
C2-217 https://consult.wicklow.ie/en/submit/mission/ww-c2-217	Quanta Capital	CPO 9.15; Map 09.01 Newtownmountkennedy (data centre) Request revised wording as follows: <i>To provide for data centre and associated uses including enterprise, employment and related logistic uses set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage. The associated uses will benefit from co-location or clustering with data centres.</i> The revised wording is requested to provide clarity in respect of the capacity to develop ancillary uses and infrastructure on the site including ICT, logistics and distribution.
C2-282 https://consult.wicklow.ie/en/submit/mission/ww-c2-282	Grattan Evans Adrian Doyle	CPO 9.15; Map 09.02 Kilpedder interchange It is requested that lands abutting existing employment lands at Priestsnewtown/Kilpedder are zoned for employment purposes (shown indicatively on map below) 
C2-290 https://consult.wicklow.ie/en/submit/mission/ww-c2-290	Charles O'Reilly Hyland	Request to have lands, approximately 4.8ha, located at Beehive Bar & Restaurant, east of Coolbeg, Co. Wicklow zoned for either (A) Employment or (B) Motorway Service Area (shown indicatively on map below) Detailed justifications for each proposal have been submitted and these can be accessed via the link to the submission. It is set out that this is a long established commercial area with a bar, restaurant, guesthouse, HGV parking and park and ride facility on site.



<p>C2-296 https://consult.wicklow.ie/en/submit/mission/ww-c2-296</p>	<p>Sam Hartshorn</p>	<p>Request to have land zoned at Coolawinna, Ashford, for film related activity. The land has been regularly used for set locations for filming since 2015.</p> 
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Chief Executive's Response

Mountkennedy Demesne (C2-15, C2-217)

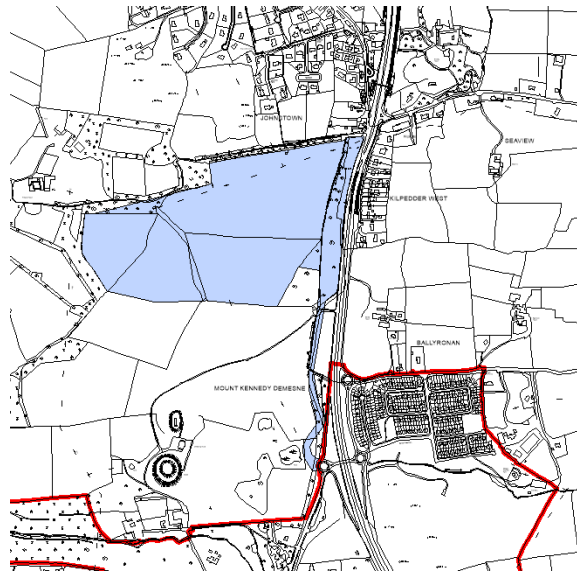
The folios detailed in C2-15 generally align to those lands zoned for employment development (specifically data centre use) in the Draft Plan (Objective CPO 9.15). No reason is put forward in the submission for the request other than to maintain what is in the current plan.

The lands are zoned for data centre employment use in the current (2016) CDP, and none of the County Development Plans preceding that (i.e. 2010, 2004, 1999) showed these lands as being within the boundary of Newtownmountkennedy. In the 2008 Newtownmountkennedy LAP, the LAP map showed these lands as have a County Plan zoning of AG*¹ which was the CDP zoning that applied to those lands at that time (in the 2004 CDP).

The lands in question are located north of the proposed Newtownmountkennedy plan boundary (shown in red below, with the data centre zoning shown in blue); the lands in between comprising open farmland associated with the protected structures Mount Kennedy House and Bellfield House and their attendant grounds. These lands are

¹ AG* had the following objective: To provide for agricultural uses with an option for the life of the plan to provide for a business, office, science and technology park set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage.

not zoned for development. The lands directly adjoin the Kilpedder village boundary and in spatial terms are most closely connected to Kilpedder than to Newtown.



It is not clear what, in spatial planning terms, would be achieved by extending the Newtown plan boundary to encompass these lands, with unzoned lands in between; not including these lands in the Newtown plan boundary has no impact on the proposed zoning which is a stand-alone zoning. Therefore no change is recommended.

With regard to the wording of the objective of CPO 9.15 relating to Map no. 09.01, the proposed wording is not acceptable as it would facilitate a broad range of new employment uses and generate significant amounts of traffic. This would be contrary to the employment zoning as it would unduly impact on the N11. The subject zoning is a footloose zoning. It does not form part of any settlement. This zoning does not strictly accord with the principles set out in the RSES. However, having regard to (a) the fact that there already is permission on the lands for a data centre and (b) the Minister's 'acceptance' of this zoning during the course of the last development plan subject to the zoning being strictly for data centre use only; it was considered that this zoning should be retained in the plan provided that the uses permitted on it were limited.

It is considered that the objective should be more clearly worded to clarify the limitation of uses on the site. In this regard it is considered that the objective should be amended as set out to follow.

Kilpedder Interchange (C2-101, C2-282)

These lands have been zoned since 1999; the appropriateness of this zoning was previously confirmed by the Minister (by way of a Ministerial Direction providing for the inclusion of this zoning in the Plan) as part of the making of the 2016 Development Plan, notwithstanding any possible conflict with Spatial Planning and National Road Guidelines for Planning Authorities 2012. Permission has already been granted and development commenced on the southern part of these lands.

With respect to the northern side of the Farrankelly Road, while permission was granted in 2009 for an industrial / warehousing development on the eastern part of these lands, this permission lapsed in 2014. In the intervening years, permission has been refused on a number of occasions, for a variety of reasons, for various industrial / warehousing developments on this side of the road.

In light of the concern expressed by the OPR, the Regional Assembly and others, and the conflict of this zoning with the employment location principles set out in the RSES and the CDP, it is recommended that the employment zoning be removed on the northern portion of these lands. In addition, it is not recommended that any additional

lands be zoned for employment purposes on the north side of the Farrankelly Road.

It should be noted that there are ample lands within the settlements of Greystones-Delgany and Kilcoole to facilitate economic growth in this area.

Beehive Bar & Restaurant Lands (C2-290)

There is no justification for zoning the subject lands for employment as they do not form part of a settlement and do not meet the principles for zoning land as identified in Section 9.3 (ii) (b) of the Draft Plan. The zoning of land for employment at this location could give rise to a significant intensification of use on the site which would be contrary to proper planning and sustainable development, would encourage unsustainable commuting and would potentially undermine the role of nearby settlements particularly Wicklow-Rathnew and Arklow as the preferred locations for employment development in this part of the County.

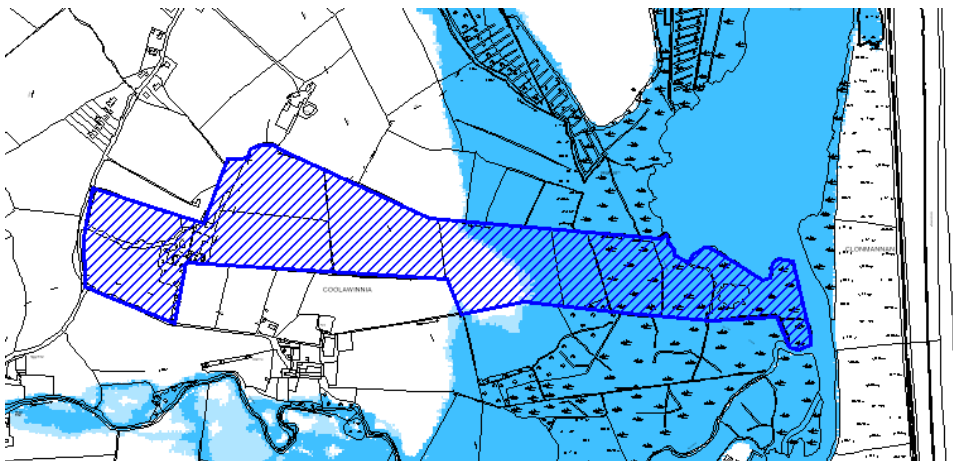
The TII Service Area Policy sets out the national policy with regard to the provision of Motorway Service Areas on the national road network. Motorway services areas are a place where road users can park, rest and access facilities. The TII Policy targets the provision of Service Areas at regular intervals on the dual carriageway/motorway network. The current policy was adopted in 2014. A review was commenced in 2019 but a revised policy has yet to be adopted. In the absence of national policy identifying the need for a service area at this location on the M11, there is no justification for zoning the lands for a motorway service area.

Coolawinna (C2-296)

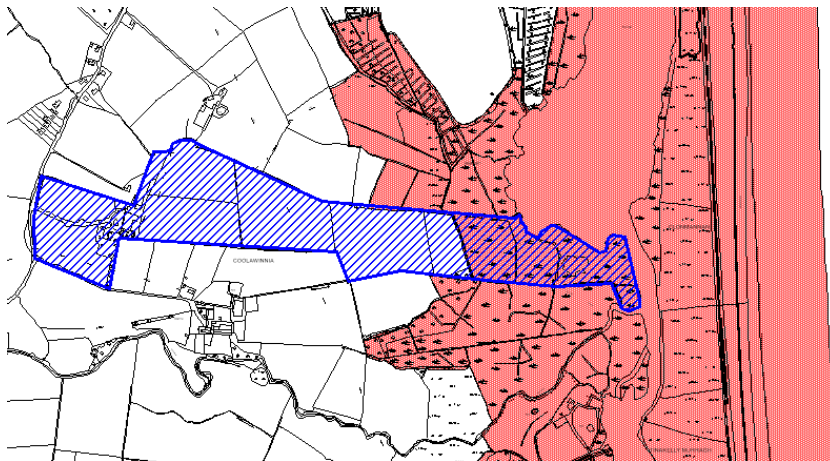
The subject land is located east of Ashford and the M11 and north of Wicklow-Rathnew. It is not within a settlement boundary. It is accessed off the narrow and poorly aligned Coast Road from Rathnew-Newcastle.

There are ample lands identified in the Draft Plan (and Local Area Plans) for employment uses including film related activities in this area. Furthermore, the subject lands are partially located within a flood risk area and within the Murrough Wetlands Special Area of Conservation (SAC) and the Murrough Special Protection Area (SPA).

Flood Risk



European Sites (SAC / SPA)



Therefore the zoning of this land is not recommended.

Chief Executive’s Recommendations

Amend the plan as follows:

Chapter 9

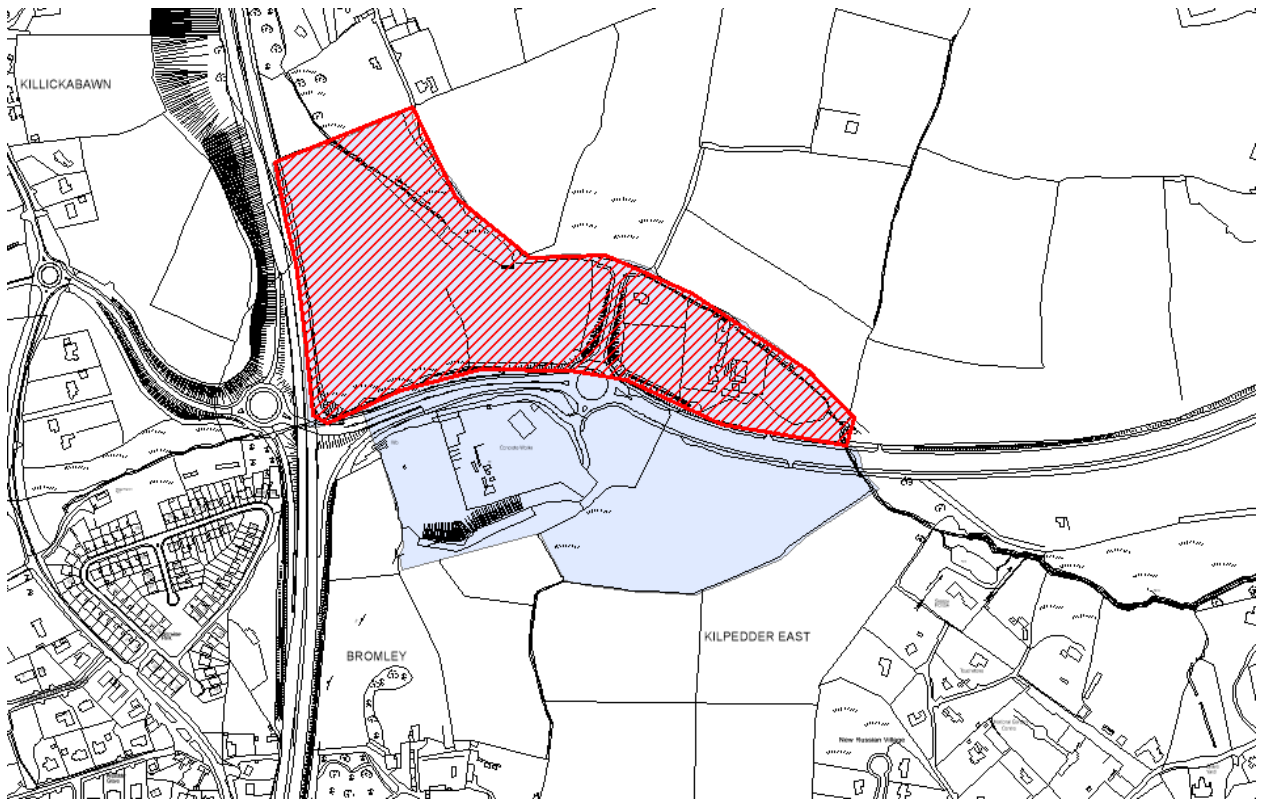
Objective 9.15

Location	Map No.	Size (ha)	Zoning Objective
Mountkennedy Demesne, Kilpedder	09.01	34.7	To provide for a data centre facility ² and ancillary uses associated related industries set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage. Employment types other than those strictly related to data storage shall show a clear process related requirement to locate in proximity to a data centre.

² A data centre is a facility used to house computer systems and associated components, such as telecommunications and storage systems. It generally includes redundant or backup power supplies, redundant data communications connections, environmental controls (e.g., air conditioning, fire suppression) and security devices.

Map 09.02 Kilpedder

Omit the area shown below in red hatch



Section 3.3	Volume 1
Section 3.3.10	Chapter 10 Retail

Topic		Convenience Stores
ID	Name	Issue raised
C2-129 https://consult.wicklow.ie/en/submit/ww-c2-129	Tesco Ireland	<ul style="list-style-type: none"> - The retail sector makes a major contribution to County Wicklow, by increasing the vitality and viability of its towns and villages, and acts as an economic anchor, creating significant employment and indirect economic and social activity. - Encourage the Local Authority to continue to engage with stakeholders in the retail sector to ensure that appropriate policies and objectives are brought forward in the new Plan that will attract both new investment to the County and also protect the viability and vitality of retail premises within towns and villages - Request that WCC provides policies that support existing retail stores and promote the development of retail stores of an appropriate scale, at suitable locations across the County, in accordance with the projected population growth of the County. - Notes that some County settlements may be under-served by convenience retail floorspace and may be losing trade to neighbouring larger settlements and that there is potential for additional convenience retail in some settlements in the County, given their projected population growth over the lifetime of the plan. - Given the projected population increase of the County and its key settlements, it is submitted that the future provision of retail facilities and enhancement of existing centres should be considered and facilitated as part of the new Plan. It is important that new residential growth areas are adequately served by retail facilities and as such, it is requested that the Local Authority provide flexibility with regard to zoning policies in order to facilitate the provision of scale-appropriate retail floorspace at appropriate locations. - It is submitted that it is important that when sites are not available in town centre locations that consideration is given to edge of centre sites, as the town centre cannot always accommodate the new retail development due to site constraints such as plot size, site layout, parking requirements, delivery access etc. When suitable sites are not available in the town centre, it is submitted that edge of centre sites must be considered with flexible zoning objectives to accommodate a modern convenience retail store with an appropriately sized floorplate. - The Draft Plan states that it is necessary to ensure that retail sites are within walking distance of the town centre, i.e., generally no further than 400 metres. The Draft Plan also states a site that is physically separated from the centre and that is not easily accessible will not be considered appropriate for retail development. Request that the Local Authority adopts a flexible approach regarding this requirement to allow for development necessary to provide important local services and amenities for the growing population across settlements in the County. - The submission also requests that the growth of Click and Collect retail services and on line Grocery Home Shopping are supported in the Plan with a new policy <i>"To support and accommodate the growth of 'Click and Collect' retail</i>

services and grocery home shopping.”

Chief Executive’s Response

The ‘sequential approach’ as set out in the Draft Plan and the Retail Planning Guidelines (2012) is utilised in the both the identification of appropriate sites in development plans for new retailing and in the assessment of applications. This requires identification of the different types of locations within a town; such as Core Retail Area, town centre, edge of centre, out of town etc. The priority at all times is to ensure new retail enhances and complements existing town centres, and does not draw trade away from established centres, or effects their viability and vitality.

As set out in the Guidelines (Section 4.7) : **Edge-of-Centre Retailing** - *Where, following the sequential approach, the consideration of an edge-of-centre site becomes necessary, the applicant and the planning authority must ensure that edge of-centre sites are within easy walking distance of the identified primary retail area of the city or town. The distance cannot be defined precisely as different centres vary in their size and scale but should generally not be further than 300 to 400 metres.*

The provisions of the Draft Plan are drawn up to be consistent with these guidelines, and therefore no change or additional ‘flexibility’ is recommended in this regard.

With regard to the support for convenience retailing generally, it is considered that the draft plan provides such support and sets out clear expectations and objectives with respect to future retail needs and formats in the various settlement types in the County.

It is not clear why a specific objective would be needed to support ‘Click and Collect’ and grocery home shopping when these activities form a normal part of the existing retail services provided at retail outlets, and do not appear to have any special requirement for policy support and can be assessed on their merits; therefore no change is recommended.

Chief Executive’s Recommendations

No change

Topic		
'No-Fry' zone		
ID	Name	Issue raised
C2-105 https://consult.wicklow.ie/en/submit/mission/ww-c2-105	No Fry Zone 4 Kids Committee	Fully support CPO10.14. Request amendment to include: <i>Exclude any new fast-food/takeaway outlet from being built or from operating within 400m of the gates or site boundary of schools or playgrounds 24 hours a day, 7 days a week, excluding premises zoned town centre</i>
C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231	GAP (Greystones Area Planning) Community	Support CPO 10.14 in the County Development Plan as a means to plan for a healthier, built environment in our communities and especially around schools. Request that CPO 10. 14 is strengthened even further as recommended by No Fry Zone 4 Kids committee – amending the wording to include “24 hours a day, 7 days a week”. This is to ensure the objective is even more robust and adhered to as intended for future planning applications.
Chief Executive’s Response		
The text amendment proposed is considered unnecessary and unreasonable given the normal hours of operation of schools and playgrounds. No change is therefore recommended.		
Chief Executive’s Recommendations		
No change		

Section 3.3	Volume 1
Section 3.3.11	Chapter 11 Tourism & Recreation

Topic	Tourism Strategy / General Objectives	
ID	Name	Issue raised
C2-160 https://consult.wicklow.ie/en/submit/mission/ww-c2-160 C2-167 https://consult.wicklow.ie/en/submit/mission/ww-c2-167	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<ul style="list-style-type: none"> - The continuous development of the tourism industry is to be commended as it will provide local employment. - The building of a hotel in Greystones would provide a much needed service and employment to the town, as Greystones no longer has a hotel. - Commend the development at existing proposed tourism, leisure, recreational, and complexes at Druids Glen-Woodstock Demesne, Belmont Demesne (Greystones) and two other areas. It would be helpful if Belmont Demesne was more publicized and signposted as a number of local people are not aware of its existence.
C2-195 https://consult.wicklow.ie/en/submit/mission/ww-c2-195	Roger Garland	A number of new objectives are suggested which are too specific and detailed to be summarised but are addressed in the assessment to follow.
C2-196 https://consult.wicklow.ie/en/submit/mission/ww-c2-196	Save Ireland Ancient East	There is huge tourism potential in West Wicklow, particularly related to the Baltinglass Hills, in the areas of environmentally and ecologically positive, low density activities that focus on walking, landscape, nature and heritage. While the draft plan recognises some potential, in these areas, the plan lacks the focus and determination to press forward a genuine opportunity for local businesses and small communities. <i>(A lengthy and detail tourism vision and proposition submitted as part of this submission)</i>
C2-246 https://consult.wicklow.ie/en/submit/mission/ww-c2-246	Newtownmount-kennedy Town Team	<ul style="list-style-type: none"> - Newtownmountkennedy should be included/ identified as a tourism town within the plan. - It has two hotels, landmark trails and RRDF for a park. - The 'Mountains to the Sea' greenway should be included within the development plan - Diversification from farming to tourism should be supported
C2-265 https://consult.wicklow.ie/en/submit/mission/ww-c2-265	Luggala Estate Limited	Under the Section 11.2, after 'approach' on line 6 add ' <i>with environmental protection, biodiversity and sustainable development underpinning key developmental decisions</i> '.
C2-274 https://consult.wicklow.ie/en/submit/mission/ww-c2-274	West Wicklow Environmental Network	<ul style="list-style-type: none"> - The tourism strategy / objectives do not adequately take account of the inherent fragility of our natural amenities - Tourism in the Wicklow Mountains needs to be carefully managed to sustain its character and attributes in physical, environmental quality and biodiversity terms - Where is evidence to support the statement in Section 11.2 that Wicklow '<i>has the capacity to become a year-round international outdoor activity destination</i>', or that Wicklow '<i>has enormous untapped potential arising from its natural and built assets</i>' (11.1.4). - Glendalough and the wider Wicklow Mountains National Park needs investment before it can sustain increased numbers

<p>C2-263 https://consult.wicklow.ie/en/submit/mission/ww-c2-300</p>	<p>Eoin LLeuwellyn</p>	<ul style="list-style-type: none"> - Mechanisms are needed to draw tourists through Wicklow on journey from Dublin to Cork, through the eastern part of the County, to address over-concentration of tourism activity around Powerscourt and Glendalough - Tourism packages should be developed in Wicklow to provide 2-3 day experience weaving the arts, crafts, heritage, nature, outdoor adventure, music and nightlife, accommodation and food - Additional transportation services including travel by sea options should be developed
<p>C2-229 https://consult.wicklow.ie/en/submit/mission/ww-c2-300</p>	<p>Wicklow PPN</p>	<p>More hotels are needed to attract foreign and local tourism as well as attracting large corporate events.</p>

Chief Executive's Response

Section 11.1 of Chapter 11 outlines and summaries the key various national, regional and local tourism and recreation strategies that have already been developed by tourism agencies / bodies, including Wicklow Tourism that will affect and influence tourism and recreational development in the County. The County Development is not the tourism development plan for the County – it aims to support and facilitate the strategies and plans of these other agencies / bodies.

Any critique of these strategies is not a matter that can be addressed via this Development Plan. The overall strategy for tourism and recreation thereafter sets out in Section 11.2 is based on these plans / strategies. It is considered that the overall strategy set out in the Draft Plan for tourism and recreation fully acknowledges that tourism development (and other forms of development) must be balanced with the need to protect and enhance the environment, especially vulnerable or protected locations. This is very explicitly set out throughout this chapter in the strategic objectives, the tourism development principles and the objectives.

Glendalough / Wicklow Mountains

It is agreed that encouraging more visitors and the development of tourism products / facilities in sensitive areas like Glendalough and Wicklow Mountains needs to be carefully managed and likely will require investment in enhanced infrastructure. It is for this very reason that the Council is working with Failte Ireland, in cooperation with National Parks and Wildlife Service (NPWS), the National Monuments Service and the Office of Public Works (OPW) to prepare a 'Visitor Experience and Management Masterplan' for Glendalough and the Wicklow Mountains National Park, which aims to address and propose options around enhancing the key visitor attractions and visitor experience, visitor facilities including tourism information and access / car parking. The provisions of Chapter 11 of the CDP and the 'Laragh – Glendalough land use and tourism plan' that forms part of the CDP will fully support the implementation of the measures that will be recommended in the final masterplan.

East Coast

The Draft plan sets out a range of policies and objectives that would support enhancement of tourism themes and products along the east coast as part of costal a journey from Dublin to Cork (e.g. CPO 11.29, 11.31, 11.45)

West Wicklow

It is considered that the Draft Plan provides robust support framework for the development of appropriate tourism attractions and infrastructure in West Wicklow, in particular (but not limited to) CPO 11.29, 11.30, 11.39, 11.45, 11.46. The detailed suggestion set out in submission C2-196 may be more appropriately directed to County Tourism and Failte Ireland.

Newtownmountkennedy

It appears to be an omission that Newtown is not included in Objective 11.29, particularly as this objective includes other settlements in Level 4 of the settlement hierarchy. It is noted that Kilcoole should also be included in this regard.

The 'Mountains to the Sea' amenity route is included in the Draft Plan – Objective CPO 11.37.

Tourist accommodation

The Draft Plan set out a wide range of objectives supporting the enhancement of tourism accommodation, including the enhancement / extension of existing or development of new hotels, in particular Objectives CPO 11.10, 11.11, 11.20, 11.21.

Rural Diversification

Appropriate rural diversification for tourism use is supported in the Draft Plan – Objectives CPO 11.4, 11.5, 11.6, 11.7, 11.15, 11.16, 11.33 in Chapter 11 and Objectives CPO 9.31 – 9.41 in Chapter 11.

Sea-based transportation

The County Development plan, through a range of objectives set out in both the tourism and transportation chapters would support and facilitates the development of sea tours / sea based tourism transportation in the County, in particular Objectives CPO 10.62, 11.24, 11.41, 19.3, 19.4.

Tourism Promotion

The promotion, marketing, advertising etc of tourism products and locations would be more a matter of the individual businesses and the tourism agencies, and would be outside the remit of the CDP.

Proposed new objectives

1. *Support development, in co-operation with various stakeholders to promote, preserve, improve, encourage public access to lakes, beaches, coast, riversides, uplands and other areas that have been traditionally used for outdoor recreation and extend recreational amenities including riverside and canal walks and walking and cycling routes.*

It is considered that this is already adequately addressed in CPO 18.4, 18.5, 18.10, 18.11, 18.13 in Chapter 18. Therefore no change is recommended.

2. *Promote and encourage the recreational use of coastline, rivers and the development of blueways which provide opportunities for walkers, cyclist and canoers.*

It is considered that this is already adequately addressed in CPO 18.4, 18.5, 18.6, 8.10, 18.11, 18.13 in Chapter 18. Therefore no change is recommended.

3. *Protect and preserve recreational attractions such as scenic beauty, woodlands and waterways, coastal areas and beaches, natural heritage, the character and distinctiveness of scenic landscape and the environmental quality. It will normally only permit development where it won't result in damage to sites of nature conservation or important features of archaeological heritage, will not cause harm to the appearance and character of the landscape and can be readily absorbed into its surroundings by taking advantage of existing vegetation and/or topography, where the enjoyment of the countryside isn't adversely affected by the nature, scale, extent, frequency or timing of the proposed activities including any noise likely to be generated and any ancillary development shall be small in scale, designed to a high standard and sympathetic to environment in*

its setting, layout and landscaping.

It is considered that this is already adequately addressed by the objectives in Chapters 8 (Built Heritage), 17 (Natural Heritage) and Appendix 1, and therefore is not required to be repeated in Chapter 11.

4. *Ensure that golf course development does not impinge on existing public rights of way and walking routes by identifying them prior to development.*

Where a PROW exists on any land for which permission is being sought to develop (for golf course use or otherwise), it is a normal part of the development management process to evaluate the impact (if any) of the proposed development on any PROW and to require proposals to address any such impact, which normally includes measures to protect and maintain the existing PROW. It is not considered necessary for this normal assessment to be embodied by a specific objective in the plan and therefore no change is recommended.

5. *Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation.*

It is considered that the control of noise and other possible nuisance from sport use is already adequately addressed in Objectives CPO 15.14, 15.15, 15.16 and appendix 1. Therefore no change is recommended.

6. *Adopt Bye-laws banning the use of motor bikes and quads (except for bona fide agricultural purposes) in privately- owned areas of rough grazing (including commonage) and motorised para gliders.*

By-laws are not a matter for the Development Plan.

Chief Executive's Recommendations

Amend the plan as follows:

Volume 1, Chapter 11

CPO 11.29 In conjunction with Fáilte Ireland, to support the development of Bray, Wicklow-Rathnew, Arklow, Greystones - **Delgany**, Blessington, Baltinglass, Enniskerry, **Kilcoole**, **Newtownmountkennedy**, Rathdrum and Tinahely/ Shillelagh/Carneu (South West Wicklow) as tourism hubs.

Wicklow Outdoor Recreation Strategy		
Topic		
ID	Name	Issue raised
C2-235 https://consult.wicklow.ie/en/submit/mission/ww-c2-235	Wicklow Greens	Enniskerry, as a key gateway to the Wicklow Way should be included in this list of outdoor recreational hubs.
C2-268 https://consult.wicklow.ie/en/submit/mission/ww-c2-268	Carl & Julia Strickland	Enniskerry, as a key gateway to the Wicklow Way should be included in this list of outdoor recreational hubs.
Chief Executive's Response		
<p>The County Wicklow Outdoor Recreation Strategy 2020 – 2025 identifies five outdoor recreations hubs / clusters – Glendalough, Rathdrum, Blessington/Baltinglass, Tinahely/Shillelagh and East Coast maritime.</p> <p>The Strategy does not form part of this draft County Development Plan and it is outside the remit of the plan to amend the areas identified in a separate document.</p>		
Chief Executive's Recommendations		
No change		

Topic		
Tourism & Recreation Infrastructure		
ID	Name	Issue raised
C2-74 https://consult.wicklow.ie/en/s/ubmission/ww-c2-74	Derek Larney	Permit fees for kayaking at the Blessington lakes should be abolished which would encourage more tourists in the area.
C2-195 https://consult.wicklow.ie/en/s/ubmission/ww-c2-195	Roger Garland	Submit that CPO 11.27 be omitted as it is out of place in an era of sustainability and climate change.
C2-274 https://consult.wicklow.ie/en/s/ubmission/ww-c2-274	West Wicklow Environmental Network	It is suggested that Objective CPO 11.28 be amended as follows: <i>To support tourist/visitor park and ride facilities at appropriate locations that will facilitate access to upland amenity areas as identified in the Glendalough and Wicklow Mountains National Park Masterplan or by the Wicklow Outdoor Recreation Committee.</i>
C2-107/C2-177 https://consult.wicklow.ie/en/s/ubmission/ww-c2-107	Billy Timmins	A priority schedule of "picnic areas " should be identified on a MD basis and one per MD developed each year over a five year period (similar to road ramps at schools) with the payment coming from the members discretionary funding

Chief Executive's Response

CPO 11.27

This objective (detailed below) was inserted in the draft plan by the resolution of the members, in order to promote tourism. While private car use is not being championed or promoted in this plan, it must be recognised that not all parts of the County are served by public transport or sustainable / active transportation infrastructure, and therefore no change is recommended.

CPO 11.27 *To promote the development of infrastructure to support tourist driving trails around Wicklow 'a circle of Wicklow' taking in villages.*

CPO 11.28

The suggestion made is noted and it is suggested that the objective be amended but with slightly alternative wording to ensure that options are not unduly restricted.

Blessington Lakes

The County Development Plan does not play any part in terms of fees to access recreational infrastructure or amenities. This issue is therefore outside the remit of the County Development Plan.

Picnic benches

While the proposal for picnic bench scheme is a good one, and would be supported by the Draft Plan provisions, this would (as identified in the submission) be a matter for each District Council.

Chief Executive's Recommendations

Amend the plan as follows:

Volume , Chapter 11

CPO 11.28 To support tourist/visitor park and ride facilities at appropriate locations that will facilitate access to upland amenity areas, **as may be identified in the Glendalough and Wicklow Mountains National Park Masterplan, or by strategies / plans of the Wicklow Outdoor Recreation Committee, Wicklow Tourism or other tourism agencies.**

Tourism & Recreation Themes & Products		
Topic	Tourism & Recreation Themes & Products	
ID	Name	Issue raised
C2-48 https://consult.wicklow.ie/en/submit/mission/ww-c2-48	Ann Naughton	The valley between Keadeen Mountain and Kilranelagh Hill is extremely scenic, home to beautiful trees and wildlife and is part of the biggest ringfort complex in Ireland, in a very historical area. Would like to see this area preserved for tourism and joined with the Wicklow Way.
C2-125 https://consult.wicklow.ie/en/submit/mission/ww-c2-125	Blessington District Forum	Suggest the Blessington Greenway be completed; expansion of tourism accommodation in west Wicklow, and development of Viking TV Series links in west Wicklow as tourism driving routes
C2-56 https://consult.wicklow.ie/en/submit/mission/ww-c2-56	Ruth Prenderville	<ul style="list-style-type: none"> - It is requested that greenways/blueways are opened up as multi use pathways for equestrian activity. More infrastructure is required to promote equestrian tourism which is underexploited. Existing tracks and trails should be reviewed /refurbished. - Signposting Wicklow as a premiere equestrian tourism destination would be a great opportunity for Wicklow.
C2-90 https://consult.wicklow.ie/en/submit/mission/ww-c2-90	Shawna Waters	No mention of horses in entire plan. Getting more dangerous to ride on roads. Horse trails and access to existing trails for horses a good idea.
C2-195 https://consult.wicklow.ie/en/submit/mission/ww-c2-195	Roger Garland	Objective CPO 11.34 should be repositioned into Chapter 12. Objective CPO 11.41 should have the word 'touring' omitted.
C2-200 https://consult.wicklow.ie/en/submit/mission/ww-c2-200	Cathy Haines	Need more off road riding trails
C2-239 https://consult.wicklow.ie/en/submit/mission/ww-c2-239	Suzanne Campbell	No provision of safe horse-riding routes in the plan. Dedicated tracks and trails needed.
C2-246 https://consult.wicklow.ie/en/submit/mission/ww-c2-246	Newtownmount-kennedy town team	Support the development of horse trails.
C2-274 https://consult.wicklow.ie/en/submit/mission/ww-c2-274	West Wicklow Environmental Network	<ul style="list-style-type: none"> - Many areas in the western part of the Wicklow Mountains are already displaying erosion from heavy footfall, evidence that current activity levels are beyond the natural carrying capacity of the land. The likely increase in extreme weather events due to climate change will exacerbate pressure on Wicklow's trails and informal recreational routes in the uplands and other natural settings. There is need for strategic investment to

		<p>manage the impact of current activity levels and to upgrade selected trails and hillwalking routes so that they have the capacity to carry increased numbers sustainably.</p> <ul style="list-style-type: none"> - With respect to CPO 11.37, it is suggested that 'hill walking trails in West Wicklow' be changed to 'Walking trails in West Wicklow', as West Wicklow is very poorly served in terms of marked walking routes when compared with East Wicklow, and because hillwalking as an activity is based on informal routes, rather than defined trails. - In addition, it is requested that the following is added: <i>The development of a series of community walking trails, in conjunction with local community groups and with the agreement of landowners.</i>
<p>C2-293 https://consult.wicklow.ie/en/submit/mission/ww-c2-293</p>	<p>Kilcoole Residents & Community Development Association</p>	<p>The Draft Plan makes insufficient references to Kilcoole with respect to tourism objectives. Despite its location in the 'East Coast Maritime' outdoor recreation hub, and having one of the County's ITLR complexes, Kilcoole is not mentioned in relation to tourism infrastructure, whereas Greystones is identified as one of the six key settlements to be developed as visitor hub. It is suggested that Kilcoole be added to the list of key visitor hubs and the list of 8 significant tourism hubs.</p>
<p>C2-264 https://consult.wicklow.ie/en/submit/mission/ww-c2-264</p>	<p>Justin Ivory</p>	<p>This submission refers to CPO 11.37 (Coastal Route Bray to Arklow); raises concerns regarding the development of this route as a greenway which would contradict the commitment of the CDP re sustainable development protecting biodiversity and natural environment. Existing walkway is oversubscribed and it should not be suburbanised.</p>
<p>Chief Executive's Response</p>		
<p>As set out Chapter 11 of the Draft Plan and reinforced by the objectives set out in Chapter 17 (Natural Heritage & Biodiversity) and Chapter 18 (Green Infrastructure), the plan provisions are explicit that tourism and recreation development, including the development of new / enhanced tourism destinations / attractions, products and infrastructure, including new / expanded greenways, walking trails and recreational routes, will be supported and balanced with the overriding objective to protect the environment from harm. This is a strong theme throughout the plan, as expressed in the following objectives:</p> <p>CPO 11.4, 11.47, 11.48, 11.49 in Chapter 11; CPO 17.1, 17.2, 17.8, 17.9, 17.12, 17.14 in Chapter 17; and CPO 18.9, 18.17, 18.18 in Chapter 18.</p> <p>Directing or determining investment in existing / new trails would be a funding and operational matter for the Local Authority and Tourism Agencies, and the provisions of the Plan would support and facilitate such investment.</p> <p>Horse riding</p> <p>The draft plan supports the enhancement of existing and development of new recreational trails. It does not specifically address horse riding along trails, as Sport Ireland, in their 'A Guide to Planning and Developing Recreational Trails in Ireland' describe trails as facilitating 'walking, jogging, hiking, rollerblading, wheelchair recreation, cycling, horseback riding and canoeing or kayaking on water trails'.</p> <p>Sport Ireland's guidelines go on to detail that 'generally, developed trails fall into one of four categories: Walking Trails - can range from urban walkways to rural paths. Cycling Trails - road based or off-road trails including mountain bike trails.</p>		

Horse riding Trails – trails designated for horse riding generally in rural areas.

Water Based Trails – generally canoe trails on inland waterways.

Where trails are suitable and appropriately designed, they may be shared-use and capable of facilitating walkers, cyclists and in some instances horse riders or some combination of these users. Such trails are sometimes known as 'greenways'.

Another possible option is to develop a trail network which may cater for more than one category of user, using different trails within the network. For example trails for walkers, cyclists and horse riders could be provided in the same area (e.g. in a forest) but each using different trails. This provides an area which caters for a range of recreational needs thus maximising the use of the land available.'

With respect to greenways / blueways, the Minister for Transport has recently stated that there are a number of issues that would need to be considered with regard to permitting horses on greenways; these would include the impact on the surface, horse waste removal, the additional width required to accommodate horses to the side of the greenway and perhaps most importantly, child safety as greenways attract large numbers of family groups with often very small children who would not be expected to understand how to behave around horses and could put themselves in danger.

In light of all of the above, it is suggested that a number of objectives be amended as set out to follow.

CPO 11.29

It is noted that Kilcoole and Newtownmountkennedy are the only settlements in Levels 1-4 of the settlement hierarchy that is not listed in objective CPO 11.29. It is recommended that this be corrected.

Note: It is not possible to list Kilcoole as one of the 6 key settlements to be developed as tourism hubs (Section 11.1.4) as this is the list of towns identified in the Wicklow Tourism Strategy and Marketing Plan 2018-2023 and the CDP cannot change this.

CPO 11.34

This objective relates to the development of trails, which are a recreational asset, not intended for 'transportation' purposes and therefore it is not recommended that this objective be moved into Chapter 12, which explicitly already supports and promotes active modes of transport.

CPO 11.37

It is agreed that reference to 'hill walking trails' in west Wicklow should be amended to 'trails'.

It is not recommended that text with relation to 'community trails' is necessary to add to CPO 11.37 as the development of additional routes, with the consent of the landowner, is already supported in the Plan in **Objective**

CPO 18.10

'To facilitate access to amenity areas in the County for the benefit of all, on the basis of cooperation with landowners, recreational users and other relevant stakeholder groups to promote "agreed access" on public and privately owned land in the County on the basis of sustainability, consultation and consensus'.

CPO 11.41

'Touring' may be considered the activity of travelling on an extended journey, usually taken for pleasure, visiting places of interest along the route. This is considered a reasonable tourism related activity along the coastal area, and therefore no change is recommended.

Chief Executive's Recommendations

Amend the plan as follows:

Volume 1

Chapter 11

- CPO 11.29** In conjunction with Fáilte Ireland, to support the development of Bray, Wicklow-Rathnew, Arklow, Greystones, Blessington, Baltinglass, Enniskerry, **Kilcoole, Newtownmountkennedy**, Rathdrum and Tinahely/ Shillelagh/ Carnew (South West Wicklow) as tourism hubs.
- CPO 11.34** To support the development of a strategic national network of **walking, cycling, horse riding and water-based** trails.
- CPO 11.37** To protect and enhance existing and support the development of new, walking, cycling **and horse riding** routes / trails, including facilities ancillary to trails (such as sign posting and car parks) and the development of linkages between trails in Wicklow and adjoining counties. In particular, to encourage and facilitate:
- on-road cycling routes across the Wicklow Mountains (in particular across the Sally Gap) and along coastal routes;
 - the development of a new **walking-route trail** from Bray Head, via the Sugarloaf Mountains, joining up with The Wicklow Way;
 - **hill-walking** trails in West Wicklow;
 - the development of a lakeshore **walk trail** around the Vartry reservoir;
 - the development of a **walking-route trail** along the disused Great Southern and Western Railway line (Naas to Tullow branch) through Dunlavin and Baltinglass subject to consultation and agreement with landowners;
 - the development of a coastal route from Bray to Arklow as well as links between this potential route and the coast road;
 - The Wicklow Way and St. Kevin's Way (as permissive waymarked routes).
 - The Wicklow to Glendalough "pilgrim walk" incorporating ancient wells.
 - 'Mountains to the Sea' amenity route incorporating Glendalough, Laragh, Annamoe, Roundwood, Newtownmountkennedy and Kilcoole-Newcastle.
 - The development of an amenity and active travel **walking-and-cycling** route between the Bray Harbour area northwards to the Dun Laoghaire Rathdown administrative area to provide for future connection to the proposed Woodbrook DART station.

Chapter 18

- CPO 18.5** To identify and facilitate the provision of linkages along and between green / river corridors within the county and adjoining counties to create inter connected routes and develop riverside parks and create linkages between them to form 'necklace' effect routes including development of walkways, cycleways, **bridleways** and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.
- CPO 18.6** To promote and facilitate the development of coastal **paths trails** linking up with existing recreational **paths/strategic walkways/cycleways trails**, creating new linkages between coastal sites and inward linkages to settlements and green spaces in built up areas and extensions to existing facilities where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.

CPO 18.11

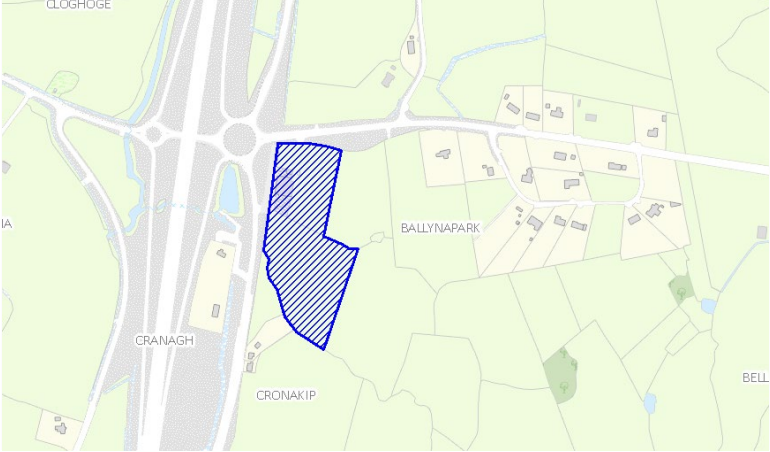
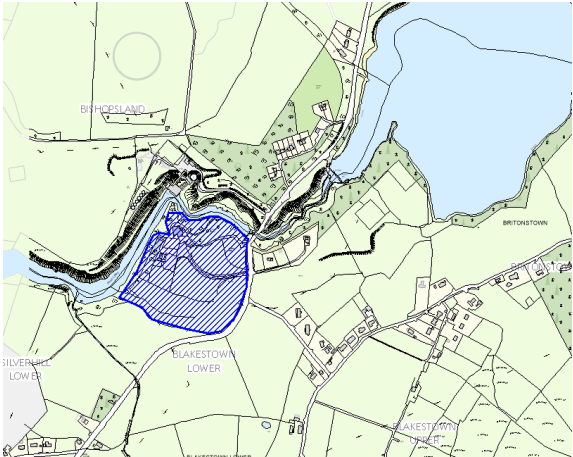
To support the development of greenways, blueways and other access routes along natural corridors while ensuring that there is no adverse impact on the flora and fauna, biodiversity or water quality of natural assets.

In particular, to support the development of existing and examine the feasibility of new walking, ~~and~~ cycling, horse riding and water based routes and trails along the following routes:

- from Bray Head, via the Sugarloaf Mountains, joining up with The Wicklow Way;
- the extension of the 'Blessington Greenway' walk around the Phoulaphuca reservoir;
- the expansion of a lakeshore walk around the Vartry reservoir;
- the extension of the old Shillelagh branch recreational trail - railway walk from Arklow to Shillelagh;
- the development of a route along the disused Great Southern and Western Railway line (Naas to Tullow branch) through Dunlavin and Baltinglass.
- the development of a coastal route from Bray to Arklow as well as links between this potential route and the coast road;
- the Wicklow Way and St. Kevin's Way (as permissive waymarked routes).
- the Wicklow to Glendalough "pilgrim walk" incorporating ancient wells.
- 'Mountains to the Sea' amenity route incorporating Glendalough, Laragh, Annamoe, Roundwood, Newtownmountkennedy and Kilcoole-Newcastle.

Topic		Tourism Zoning – ITLR Objectives
ID	Name	Summary of issues raised
C2-6 https://consult.wicklow.ie/en/submitmission/ww-c2-6	Senan Sexton	<p>It is requested that the site of ‘Sexton’s Garden Centre’ should be designated / zoned for tourism use, including tourist office, interpretive centre (related to the Glen Of The Down Nature Reserve – Woodlands of Ireland / Environmental Awareness Theme), educational facilities for sustainability / environment and centre of excellence for arts and crafts, as well as public parking and public toilet facilities.</p>
C2-134 https://consult.wicklow.ie/en/submitmission/ww-c2-134	Rathsallagh Golf & Country Club	<p>Relates to Rathsallagh Golf and Country Club (110.8ha) - proposed zoning Integrated Tourism/Leisure/Recreational Complex (ITLR)</p> <p>It is requested that:</p> <ul style="list-style-type: none"> - The plan should allow flexibility in terms of permitting permanent residences, as well as short term holiday and long term lettings as part of the tourist, recreational and leisure facilities, in certain cases for large tourism and recreational facilities, to secure the long-term viability of such amenities - examples of this are noted specifically Druids Glen Hotel & Golf Resort. - Rathsallagh Golf Club’s continued use is crucial to achieving the objective of the Dunlavin small town plan to increase jobs in Dunlavin, as outlined in Volume 2, Part 3 of the Draft Plan; - The wording of Objective CPO 11.22 and CPO 11.14 is overly restrictive, and it appears the policy has failed as Rathsallagh’s ability to continue with this facility is marginal; - Low density development could be achieved which will not result in an imposing outcome in terms of rural housing but instead safeguard the continued use of the amenity. <p>It is requested CPO 11.22 be amended as follows:</p> <p>CPO 11.14 <i>To require the developers/owners of new holiday homes/self-catering developments to enter strict legal agreement (under Section 47 of the Planning & Development Act) with the Planning Authority specifying that:</i></p> <ul style="list-style-type: none"> - <i>In the case of larger scale developments, the units may only be used for tourism purposes and shall not be allowed to be used as a permanent residences the units may be used as permanent residences subject to the investment gained being used to secure the long-term viability of the facility; and</i> - <i>in the case of small-scale development, the entire development, including all buildings, land and any on-site tourist facility, shall be held in single ownership and shall not be subdivided. All units shall be available for short term letting only of a maximum duration of 4 weeks.</i> - <i>in the case of larger scale developments⁵ all lands, including any on-site tourist facility shall be held under the management of a</i>

		<p>single Estate Company (including all lands included in the site boundary and land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application) and</p> <ul style="list-style-type: none"> - in the case of small-scale developments, in the event that any unit is sold or leased, the owner/lessee shall enter a legal agreement with the Estate Company stipulating that the purchaser, lessee and any successors in title be, and remain, members of the Estate Company, and stipulating that the unit may only be used by the owner/lessee for holiday use for a maximum of 3 months in any year and shall at all other times be used/leased/ marketed by the Estate Company for short term (maximum 4 weeks) tourism use. <p>It is requested CPO 11.22 be amended as follows:</p> <p>CPO 11.22 To require all applications for development at identified or new ITLR sites to comply with the following requirements:</p> <ul style="list-style-type: none"> - Development shall be carried out on the basis of an integrated, comprehensive master plan and business plan, to be agreed at the outset of the development with the Planning Authority; —The development as a whole shall be held in the single ownership of the developer. In the event that certain elements of the development will require to be sold/leased to make the project viable, this shall be stated at the outset and measures proposed to operate/manage/market the entirety of the facility as a single entity; —Any holiday home/self catering type accommodation proposed as part of the facility shall accord with Objective T14; and - All development shall be so designed to respect the character of the area and any existing heritage features on the site, including demesne houses or other protected features. - Any future proposals for development will be assessed against the carrying capacity of the land and its ability to absorb development without detracting from the landscape and built and natural heritage context.
<p>C2-123 https://consult.wicklow.ie/en/submission/ww-c2-123</p>	<p>Tadhg Kennedy (Jack White’s Inn)</p>	<p>It is requested that the land shown indicatively on the map below, located at the interchange on the N11 serving Brittas Bay, be zoned for Integrated Tourism & Recreation.</p> <p>In support of this request, it is put forward that:</p> <ul style="list-style-type: none"> - Lands are currently zoned ITLR in 2016 Plan; - Zoning would facilitate the development of tourist caravan / camping and glamping facilities, adventure centre, recreation complex (themed on Jack White the smuggler / pirate), playground, Events Park and open farm etc.

		
<p>C2-179 https://consult.wicklow.ie/en/submit/mission/ww-c2-179</p>	<p>Daniel & Claire Lewis</p>	<p>This submission relates to Poulaphuca House and Falls, which is an existing small hotel located on the N81 (as shown indicatively on map below) just south of the Poulaphuca Dam.</p> <p>It is requested that land be zoned for tourism use (as detailed in a submitted master plan), in order facilitate further development of the facility as follows:</p> <p><i>"Poulaphuca House and Falls - Tourist Hotel Development to allow for uses on site such as Hotel, Function Room, Staff Accommodation, Glamping Development, Trails (Walking/Cycling), Security Gate Lodge, Managers Accommodation, Concerts and Outdoor Arena use, Fisherman's Cottages, Artist Retreats, Restaurant and Craft Shop Use, Pet Farm Use, Equestrian Use and associated recreational development"</i></p> <p>It is put forward in support of this request that the lands have public water and extensive sewage treatment plant.</p> <p>Submit a master plan for the site which includes:</p> <ul style="list-style-type: none"> - existing facilities - managers accommodation - security gate lodge - glamping park - amphitheatre/ concerts area - walking cycle trail 

Chief Executive's Response

Sextons (C2-6)

The zoning of the lands in question for more intensive use is not supported for the following reasons:

- The identification of these lands for a more extensive and intensive type of development as suggested would be premature pending the finalisation of plans for the improvement of the N/M11 in the area;
- The justification for the proposed zoning on the basis of linkage to the Glen Of the Downs is tenuous as the lands are not connected to the Glen Of the Down Nature reserve and would require considerable new road / footpath construction, including a public road crossing in this N11 interchange area, to create a genuine connection. Such works would potentially interfere with the carrying capacity and safety of this interchange and could be costly to the developer (as would have to be borne by the them not being a public project - its suggested in the submission this should be provided by the Council);
- As a result of the lack of possible to connection to the nature reserve, the proposal is therefore not linked to any 'tourist attraction' and in essence would become a tourist attraction in itself at this location; such a proposal is not supported as a development of this type and scale, in an area removed from any settlement or tourist attraction would be contrary to the overriding principles set out in the NPF, RSES, this CDP as well as the 'Spatial Planning and National Roads' Guidelines' (DoECLG 2012).
- Permission has previously been refused for a development of this nature (interpretative and tourist centre, arts and craft buildings) having regard to (a) concerns that the development would essentially be a predominantly retail based development which would not be acceptable at this location, (b) the open location of the site would result in a visually unacceptable and incongruous development and (c) concerns regarding the serviceability of the site vis-a-vis wastewater disposal. These concerns would remain.

C2-134 Rathsallagh

To allow for the development of private, permanent dwellings at Rathsallagh golf club would serve to undermine the rural housing policy of the Council, which in accordance with Ministerial guidelines and the NPF, must ensure that rural housing is reserved to those with a bona fide social or economic necessity to live in an unserved rural areas. There is no suggestion in the submission that it is proposed to restrict the sale or use of any such dwellings on the ground of Rathsallagh to those that fulfil this criterion.

Furthermore, there is concern that to consider such housing development would undermine the role of Dunlavin as the main housing and service centre in this area. Therefore no change is recommended.

Jack Whites (C2-123)

It is the policy of the Plan to generally require tourism development to locate in existing settlements (CPO 11.3) except where a tourism development may be linked to an existing tourism resource or product (CPO 11.4, CPO 11.5). The zoning of unserved lands remote from settlements is likely to undermine the role of settlements as tourism centres / tourism hubs. Therefore it is not recommended that these lands be specifically identified and zoned for tourism use.

As is noted in the submission, there are a range of policy objectives in Chapter 11 of the Draft Plan that give support to tourism developments; any applications for development at Jack Whites would be assessed in accordance with these objectives.

Poulaphouca House & Falls (C2-179)

It is set out in the submission that zoning is *needed* in order to secure consent for the type of redevelopment envisaged. However this is not the case. The objectives of the current and Draft Plans provide clear support for accommodation infrastructure, and for the enhancement of existing tourism facilities including hotels, including

the development of additional recreational uses on their grounds, in particular (but not limited) CPO 11.5, 11.7, 11.8, 11.10, 11.11, , 11.23, 11.24, 11.32, 11.33, 11.35, 11.36.

It is noted that there have been no application rejected on these lands on the basis of lack of zoning and there have been no recent requests for pre-planning advice for the development of these lands. It is not clear therefore how it was determined that the lack of zoning was an obstacle.

There are many hotels in rural parts of the County and the majority are not 'zoned' and many of these have secured permission for expansion / development of new uses. The only tourism sites that are zoned in the Draft Plan are the large scale ITLR sites, which in reality do not need this zoning designation to support their further development having regard to the objectives of the Plan. Therefore no change is recommended.

Chief Executive's Recommendations

No change

Section 3.3	Volume 1
Section 3.3.12	Chapter 12 Sustainable Transportation

Topic	Transport plans & strategies	
ID	Name	Issue raised
C2-218 https://consult.wicklow.ie/en/submit/mission/ww-c2-218	Delgany Community Council	<ul style="list-style-type: none"> - Would like to see an assessment of transport options carried out for the Greystones-Delgany area given the high proportion of residents who commute to the greater Dublin area for employment and education. Expanding the N11 will be a costly undertaking (both in construction costs and the costs to climate). This area should be prioritised for a quality bus commuter route; appropriate sites need to be identified for park and ride facilities on the N11. - The traffic in Delgany Village has become increasingly heavy, compounded by the ongoing high level of HGV activity associated with the continuing high level of residential development activity. Request that a traffic survey be implemented to review the situation and propose actions to address the increasing risks to both drivers and pedestrians, schoolchildren in particular, associated with the current situation. The poor footpath infrastructure and associated traffic risks forces parents to drive children to school, further increasing the level of traffic and associated risk. This vicious circle needs to be broken with a fundamental review of traffic flows and road/pathway infrastructure. The levies said to WCC should be used to fund addressing this increasingly important issue.
C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231	GAP (Greystones Area Planning) Community	<ul style="list-style-type: none"> - Would like to see an assessment of transport options carried out for the Greystones-Delgany area given the high proportion of residents who commute to the greater Dublin area for employment and education. Expanding the N11 will be a costly undertaking (both in construction costs and the costs to climate). This area should be prioritised for a quality bus commuter route & appropriate sites need to be identified for park and ride facilities on the N11. - Believe a key focus of sustainable travel needs to be that people are encouraged NOT to use their cars for local trips and to use public transport. - For local travel (Bray, Greystones, Delgany, Kilcoole, Newtownmountkennedy loop or similar), review and revamp of bicycle lane infrastructure in addition to local public transport options – small electric multi-passenger environmentally friendly vehicles as opposed to the diesel buses we have (polluting, inefficient vehicles). Consideration for elderly and incapacitated passengers too. - The DART system today is over capacity, not efficient and more frequency is needed, probably delivered by an increase in the number of lines from 1 to 2. - Would like to see the NTA traffic study completed in Greystones as a matter of urgency and that no other planning applications will be considered until this has been completed.

<p>Chief Executive's Response</p> <p>Greystones - Delgany – Kilcoole Area Based Transport Assessment (ABTA)</p> <p>The Draft Plan, under Objective CPO 12.3, supports the preparation of Area Based Transport Assessments or Local Transport Plans for the larger towns in the County.</p>
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Work has commenced on an ABTA for Greystones- Delgany – Kilcoole, with consultants appointed in October 2021. This study will address all of the issues raised, and will be used to inform future land use and investment decisions.

Chief Executive's Recommendations

No change

Section 12.1 – Active Modes of Transport		
Topic	Name	Summary of issues raised
C2-5 https://consult.wicklow.ie/en/submission/ww-c2-5	Brittas Bay Residents Interest Group	It is requested that the development plan includes an objective for the provision of a footpath between McDaniel's Hotel and the north beach car park.
C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125	Blessington District Forum	<ul style="list-style-type: none"> - Sustainable travel with cycling should be a key feature Development Plan. This should include planning and the links of segregated cycleways both within and to all towns in the area; - The Council should invest in and roll out cycle and walking friendly signage, solar powered speed signs with particular emphasis around the schools; - Need rollout of proper cycling lanes
C2-160 https://consult.wicklow.ie/en/submission/ww-c2-160 C2-167 https://consult.wicklow.ie/en/submission/ww-c2-167	Labour Party, Ross Connolly Branch, Greystones Municipal Area	The desire to increase cycle paths and walks throughout the county will be beneficial. Commend the Council's plans to create safe cycling routes and its encouragement to people to walk thereby limiting their use of petrol/ diesel cars. However, people need to feel safe if they are to walk more and use public transport.
C2-195 https://consult.wicklow.ie/en/submission/ww-c2-195	Roger Garland	This submission set out in excess of 35 suggestions for new / amendments to objectives relating to walking and cycling, which would not be possible to summarise. All are addressed in the assessment to follow.
C2-274 https://consult.wicklow.ie/en/submission/ww-c2-2574	West Wicklow Environmental Network	The provision of walking and cycling routes within towns and between towns forms an essential part of a connected transport system. It is not clear how routes will be selected to be part of this connected transport system. West Wicklow Environmental Network encourages Wicklow County Council to work with community groups in deciding on routes.
C2-229 https://consult.wicklow.ie/en/submission/ww-c2-229	Wicklow PPN	Enhanced cycleways required.
Chief Executive's Response		
<p>Route identification & Investment</p> <p>The provisions and objectives of the Draft Plan explicitly support the enhancement of walking and cycling infrastructure in the County. The National Transport Authority has allocated funding to Wicklow County Council for 'active' travel infrastructure improvement. This project is due to commence in earnest in early 2022 when detailed survey and assessment of County footpath and cycleway needs will be carried out and an investment plan developed for new / improved facilities. Public consultation will form part of this process.</p> <p>Brittas Bay</p> <p>The Draft Plan provides policy support for the delivery of such local infrastructure, including the following objectives:</p> <p>CPO 12.13 <i>To facilitate the development of pedestrian and cycle linkages through and between new and existing developments to improve permeability and provide shorter, more direct routes to schools,</i></p>		

public transport, local services and amenities while ensuring that personal safety, particularly at night time, is of the utmost priority.

CPO 12.14 *To facilitate the implementation of local projects which support pedestrian and cyclist permeability, safety and access to schools and public transport.*

CPO 12.15 *To support the improvement / development of the inter-urban, strategic pedestrian and cycle route projects as may be identified in Wicklow County Council's Sustainable Transport Plan, as may be amended and updated during the life of the plan.*

The County Development Plan is a strategic and high level policy document regarding future land use and development in the County. It is not its function to list all or any infrastructure works that may (subject to funding) be carried out by the Council during the lifetime of the plan, but rather to focus on strategic infrastructure and infrastructure delivery principles. The delivery of local footpaths for example is generally delivered through the Municipal Districts in their annual works plans; each MD has a list of desired works to be carried out in that area which are delivered according to priority and funding available, agreed with the MD members each year. In addition, Wicklow County Council was allocated over €7m by the NTA in 2021 for sustainable transport / mobility projects, including the provision of cycling lanes and footpaths and the Roads & Transportation Directorate are working on the detailed plans for such improvements.

It would not therefore be possible or appropriate to specify which local works would be carried out during the lifetime of the plan as this would limit the flexibility and decision making for the MD / Transportation teams. In addition, it would not be practical to list all such works, which would likely run into hundreds of projects, in the development plan.

These footpath requests will be brought to the attention of the MD / Roads project teams.

Proposed new / amended objectives C2-195

- 1. Promote and facilitate the continuing development of a regional and local network of Ways and Permissive Access Routes that provide a network of long distance walking, running and hiking trails and routes. Encourage the re-routing of existing trails off public roads.*
- 2. In view of the obesity and diabetes crisis, support, improve, develop, upgrade and facilitate Slí na Sláinte routes. These should be waymarked/signposted, where feasible.*
- 3. Promote walking through the development and expansion of a network of safe walking trails within towns and villages and their environs. Such routes can link with existing waymarked trails, Sli na Sláinte and the Green Infrastructure Network and existing or new public rights of way.*
- 4. Support the provision of proposed long distance walking trails that provide access to scenic uplands, riverine and coastal features.*
- 5. Research and map existing network of traditional paths used for leisure purposes to determine their legal status.*
- 6. Employ a full time Walks Officer at an appropriate senior level. To which you should add: under the control of the Council.*
- 7. The Council will co-operate with relevant agencies, both public and private, including the National Trails Office, NWMWAC, Coillte, the Heritage Council, adjoining councils, community groups and local landowners, to support the development, maintenance, facilitation and enhancement of short medium and long distance hiking/walking routes, community walks, heritage trails and off-road trails particularly in the uplands. This will include consultation with adjoining councils with a view to promoting routes extending beyond the county boundary.*
- 8. Lobby the appropriate Government Department to agree and implement a scheme to indemnify private landowners with regard to recreational users of their land.*
- 9. Ensure the protection of and co-ordinate the continuation of strategic walking routes and trails.*

10. *Established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments.*
11. *Facilitate the development of a walking trail between Ballymore Eustace, Golden Falls, Russborough and Barretstown, in co-operation with landowners and government agencies.*
12. *Preserve and protect and, where possible enhance, the integrity of existing public walking and access routes (including long distance walking routes) which contribute to the general amenity by ensuring that development does not impinge on these routes particularly at seashores, mountains, lakeshores river banks or other places of natural beauty or recreational activity and those in scenic and high amenity areas and along inland waterways.*
13. *Protect listed walks from development that creates or has the potential to create dis-amenities.*
14. *Take the potential impact of proposed development into account when considering/assessing applications for permission in the vicinity of established walking routes that might impinge on walking routes(including long distance) or potential walking routes.*
15. *Protect access routes to upland walks and public rights of way.
Should include a Table with maps of Way-marked Ways including medium/long-long distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hillwalks, forest walks and other defined walking trails and a data base should be set-up and up-dated as new trails emerge and should be included in web-site. Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included on the web site pending inclusion in the next Plan.*
16. *Promote, facilitate, support, improve and encourage the development, enhancement and expansion of an integrated coherent network of safe cycle routes (including long distant routes) by facilitating the construction of cycleways. Support the development of the National Cycle Network and The National Cycle Network Scoping Study (2010) and enhance and maintain these routes with better signposting and road surfaces separated from vehicular traffic. Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. Routes should, where possible, follow off-road tracks and quiet country roads.*
17. *Cycle routes should be designed using current thinking and best practice from experience in other locations, lower speed limits and priority over motorised transport to ensure road safety for pedestrians and cyclists.*
18. *Assign an officer at appropriate senior level as a "Cycling Officer". To which you should add: under the control of the Council.*
19. *Promote and facilitate the development of cycle routes in accordance with the National Cycle Network Scoping Study 2010.*
20. *Support the development, maintenance and enhancement of trails and routes in co-operation with Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity.*
21. *Produce cycle maps.*
22. *Support community, authority or agency led projects that would deliver identified strategic cycling links.*
23. *Support the policies of the National Cycle Framework 2009.*
24. *Support the introduction of the East Coast Cycle Route (Killiney to Bray) in co-operation with other agencies.
Should include a Table of Cycle routes with maps. To this you should add: Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included on the web site pending inclusion in the next Plan*
25. *Support, promote, facilitate and develop a comprehensive network of greenways, linking parks and public open spaces and work with the NTA, adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future national and regional greenways, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists.*
26. *Signpost and waymark walking and cycle routes with appropriately designed quality signage and information boards.*
27. *Provide, create, promote, plan, support, maintain, enhance, encourage, extend, facilitate and support the*

development and improvement of walking, rambling and cycling in conjunction/co-operation the Irish Sports Council, walking and cycling groups, landowners, farmers, local groups and communities and other relevant organisations and bodies by identifying/defining more dedicated walking and cycling routes(named) to enable the creation of a high quality, coherent, pleasant, integrated and comprehensive dedicated off road countywide joined up network of local and regional cycling/walking routes, footpaths, greenways, particularly in rural areas between settlements, that link communities to key destinations and amenities, including looped walks, local walks, community walks medium/long distance walks and established rights of way, through open spaces, strategic green corridors(including river corridors) and other off-road routes), particularly those with historic associations or other areas of interest and maximise their potential. Expand and extend existing routes by utilising links from residential areas to provide access to coasts, mountains, lakeshores, rivers and scenic areas. Bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off road paths and cycleways that are attractive and facilitate casual walkers and cyclists. Investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity.

28. Seek opportunities for the development of suitable walking routes, cycle tracks and bridle paths along historic access routes. Explore the potential of inter-county trails (named). Augment existing networks and trails at key heritage sites.
29. Develop and promote a Walking and Cycling Policy/Strategy within two years of the adoption of the Plan, working in partnership with statutory bodies, private and voluntary sectors, landowners and other stakeholders with a view to establishing a register of walking routes and the legal status of same, the mapping and promotion of guided walks developing links with adjoining counties. The Strategy should list trails, evaluate these routes and make recommendations for their promotion and would address, inter alia, the possibility of cycle-ways in recreational areas and along river banks, car parking for walkers and cyclists and improved signage.
30. Provide adequate car parking and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark.
31. Establish new Walkways and cycle routes on a legal and permanent basis.
32. Develop a strategy to support and underpin funding for the development, extension and enhancement of walking/cycling trails, greenways and continue to engage with funding agencies such as DoTTS, NTA, Heritage Council and associated transport agencies and LEADER.
33. Ensure that walking and cycling routes and the public footpaths network are maintained and where feasible improved.
34. Protect the integrity, extent, scenic quality, visual setting and functionality of existing Greenways and walking and cycle routes.
35. Protect the routes of, and prohibit development which would hinder the creation and development of future Greenways, walking and cycling routes including those identified in the Plan.
36. Ensure that development proposals protect the routes of potential linkages such as linear paths footpaths trails, greenways and cycleways through a site where the Council considers that an opportunity to provide a linkage to or between adjoining areas.
37. Protect established walking and cycling routes and keep them free from development which would adversely impact upon them.
38. Actively encourage, support, promote and facilitate the development of disused railways (named) for greenways, walkways and cycleways and other recreational activity to develop a network including medium and long-distance walking and cycling routes and bridle paths with related signage and way marking.
39. Protect and preserve routes of former railway lines (named) for recreational development free from development by protecting, enhancing, conserving, safeguarding and preserving potential greenway routes as long distance walking and cycling routes along or near these rail lines which could compromise their development as walking/cycle routes in the future. Along these corridors other uses shall not be considered. Where these corridors have been compromised by development, adjacent land which could provide opportunities to bypass such an impediment and reconnect these routes for walking/cycling shall be protected for this purpose.

- 40. *While it should be possible to provide most routes along the existing track alignment, there may be a need for diversions and deviations following detailed survey and design work and consultation with landowners. The aim is to include these routes in a map in the Plan. Meanwhile adequate protection needs to be given to abandoned rail lines so as to avoid inappropriate development that could compromise their viability.*
- 41. *Where feasible, provide separate trails for walkers and cyclists in the interests of safety and convenience with appropriate surfaces for each type of user.*

This is an extensive list of suggestions and all have been considered carefully. It is considered that the Draft Plan, across a range of chapters (not just this chapter 12) already addresses and supports the majority of the issues / suggestions raised, and no changes are recommended.

It is accepted that the development plan does not contain the type of maps and data suggested in this submission, but it is not considered that this is the purpose of the CDP, which is not a tourism or recreation plan, but a land-use and spatial framework. To provide such maps / data would be a very considerable exercise, and well outside the scope of the plan process to try to include such information at this stage of the plan making programme. It is considered that this type of information (such as amenity and long distance walking / cycling routes, cycle network plans etc) would be more appropriately researched and presented in various sustainable active transport, tourism and recreation strategies / programmes of the Council and other agencies, which the CDP fully supports.

The employment of staff / officers and the exercise of lobbying would not be matters for the CDP.

Chief Executive's Recommendations
No change

Topic	Section 12.2 Public Transport	
ID	Name	Issue raised
C2-72 https://consult.wicklow.ie/en/submitmission/ww-c2-72	John Hall	An advanced, efficient rail system is needed for the east coast region, overreliance on diesel buses for public transport, need for increased provision of bus stops and pull in spaces for public transport, increased cycling provision inclusive of increased segregated cycle lanes on the ground of safety & efficiency.
C2-58 https://consult.wicklow.ie/en/submitmission/ww-c2-58	Sarah Mac Artain	Buses serving primary and secondary schools in Wicklow town have no designated bus stop locations where they are collecting students from.
C2-114 https://consult.wicklow.ie/en/submitmission/ww-c2-114	Colin Acton – Charlotte Byrne	It is requested that the plan supports the delivery of bus services above and beyond those provided by BusConnects in Bray.
C2-125 https://consult.wicklow.ie/en/submitmission/ww-c2-125	Blessington District Forum	<i>This is a lengthy and detailed submission and the reader is advised to review the original submission in full, and only a summary can be provided herein.</i> <ul style="list-style-type: none"> - Improved public transport services are required, particularly serving West Wicklow; and connecting students to schools and colleges in the region; - Need to increase capacity and identify express bus routes that support commuters through working with the NTA, Bus Eireann and Dublin Bus; - Park & stride & park and ride facilities suggested for towns like Blessington
C2-128 https://consult.wicklow.ie/en/submitmission/ww-c2-128	Cairn Plc	With reference to objective CPO 12.27 it is submitted that are virtually impossible to enforce and ultimately it is not the role of private developers to fund public bus services and Cairn requests that CPO 12.27 be omitted from the Draft Plan.
C2-160 https://consult.wicklow.ie/en/submitmission/ww-c2-160 C2-169 https://consult.wicklow.ie/en/submitmission/ww-c2-169	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<ul style="list-style-type: none"> - Support the plans to make improvements to the rail line through Wicklow and to open old railway stations on the line. Support the development of an increased train service to all areas on the train line, as North Wicklow currently has an increasingly high volume of commuters - However, the train line over Bray Head and the Murrough is a single line which limits the volume of train traffic from Bray to Arklow. However costly, we all know that owing to coastal erosion will have to develop new double line train tracks further inland. Would suggest that such an undertaking begins to be proactively planned now prior to the route becoming inaccessible. Given the growth of Greystones and Kilcoole suggest that the DART be extended to Kilcoole with a new station and Park and Ride in the Charlesland area owing to the predicted increases in population. - Support the Council's plans to support the development of more links from the East to the West of Wicklow and suggest the bus transport system should be reviewed annually with the public given the population growth in the County to ensure that the public's transport needs are being met.

		- The Council's plan to develop the lands around the Greystones Municipal Building include retaining the Park and Ride facility; owing to COVID the demand for spaces in the Park and Ride has lessened but as people return to work outside of Greystones this demand will again increase. Prior to COVID the plans were to extend this facility. Hope that the Council will retain this plan and extend the Park and Ride in Greystones unless an extra Train Station is built around Charlesland.
C2-274 https://consult.wicklow.ie/en/submission/ww-c2-274	West Wicklow Environmental Network	The possible extension of the Luas to Blessington is welcomed and feeder buses should be provided into Blessington to make it easier for people access public transport from Blessington into the city. There is also a need for park and ride facilities in Blessington, which should be provided irrespective of the Luas project.
C2-205 https://consult.wicklow.ie/en/submission/ww-c2-205	Cairn Homes Properties Ltd	Request Objective CPO 12.27 be deleted; this requires residential developers of sites greater than 2km distance from train or Luas stations to fund feeder bus services for a period of 3 years. Such objectives are virtually impossible to enforce and ultimately it is not the role of private developers to fund public bus services.
C2-229 https://consult.wicklow.ie/en/submission/ww-c2-229	Wicklow PPN	Improved and affordable public transport links are required to reduce car dependency.
C2-107/C2-177 https://consult.wicklow.ie/en/submission/ww-c2-107	Billy Timmins	Luas to Blessington should be included in the plan.

Chief Executive's Response

The County Development Plan is a strategic and high level policy document regarding future land use and development in the County. It is not its function to list all or any infrastructure works that may (subject to funding) be carried out by the Council during the lifetime of the plan, but rather to focus on strategic infrastructure and infrastructure delivery principles. It should be noted however that the Development Plan is not the 'Transport Plan' for the County, and the overall transport strategy and delivery programme is developed and implemented by the transport agencies, including but not limited to the NTA, TII and the Council Roads & Transportation Directorate.

The deficiencies in the existing public transport system and infrastructure in parts of the County are noted; the Development Plan supports the improvement of same through the following objectives¹:

CPO 12.2 *Through sustainable planning and investment in transport infrastructure, including roads and public transport systems, to reduce journey times, length, congestion and to increase the attractiveness of public transport.*

CPO 12.20 *To cooperate with NTA and other relevant transport planning bodies in the delivery of a high quality, integrated transport system in County Wicklow.*

CPO 12.21 *To promote the development of transport interchanges and 'nodes' where a number of transport*

¹ Note that the wording of some of these objectives is recommended for amendment as part of the CE recommendations set out in Section 3.1.

types can interchange with ease. In particular:

- to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and /or Regional Authority
- to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;
- to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Rathdrum, Wicklow and Arklow;
- to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;
- to promote car sharing parking spaces at premium locations in car parks;
- to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;
- ~~- to promote the Luas extension from City West/ Tallaght to Blessington;~~
- to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus services / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;
- to encourage the improvement of bicycle parking facilities at all transport interchanges;
- to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and
- to support the development of bus shelters, that shall incorporate disabled access and bicycle parking facilities where possible.

CPO 12.22 To continue to work with Iarnrod Eireann and the NTA on the improvement of mainline train and DART services into Wicklow and in particular, to facilitate all options available to increase capacity through Bray Head and along the coastal route south of Greystones.

CPO 12.23 To ensure that possibilities for improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and can facilitate future improvements. In particular:

- to resist any development within 20m of the railway line;
- to resist demolition or removal of any former train station structures or apparatus, other than for safety reasons;
- to require any development proposals in the vicinity of former train stations to be so designed to facilitate future access to the station and to reserve adequate space for future car parking;
- to ensure coastal protection measures are put in place to protect the railway line from coastal erosion and to consider identifying corridor options for route continuity in the event of coastal land loss.

CPO 12.24 To support the undertaking of a study to assess the feasibility of extending regular rail services to south Wicklow.

CPO 12.27 To promote the delivery of improved and new bus services both in and out of the County but also within the County by:

- supporting the development and delivery of bus service enhancement projects, including Bus Connects;
- facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);
- requiring the developers of large-scale new employment and residential developments in the designated key towns in the County that are distant (more than 2km) from train / Luas stations to fund / provide feeder bus services for an initial period of at least 3 years; promoting the growth of designated settlements to a critical mass to make bus services viable and more likely to continue;
- provision of bus lanes on M11 / N11;
- to work with Bus Eireann and the NTA to improve services in south and west Wicklow.

CPO 12.28 *To support and facilitate the existing service providers and encourage the further development of the Local Link Rural Transport Programme (and any other or subsequent rural transport programmes).*

CPO 12.29 *In accordance with 'Our Rural Future Rural Development Policy 2021 – 2025' support and facilitate the delivery of improved rural public transport services and ensure that public transport services in rural areas are accessible to persons with disabilities.*

Bus Connects

With respect to BusConnects for Bray, it is not within the scope or remit of the Development Plan to provide for bus services above or different from those provided or to be provided by the transport agencies – the Local Authority is not a provider of such services and therefore it would be a misleading objectives and not possible to implement. Therefore no change is recommended in this regard.

Luas to Blessington, Park-and-Ride Blessington

In Part 3.1 of this report, the OPR, Regional Assembly, and the NTA were explicit that the Luas to Blessington does not form part of their strategies and investment plans, will not be feasible to deliver and should be omitted from the plan. It is therefore recommended that Objective CPO 12.21 be amended as set out to follow, which will continue to address the need for enhanced public transport services, including park-and-ride facilities, in West Wicklow.

CPO 12.27

It is considered reasonable to require developers of large scale employment and residential development to provide feeder buses for a short term period until the critical mass is present to support permanent public transport services. Therefore no change is recommended.

Greystones Park-and-Ride

The Draft Plan under Objective CPO 12.21 already supports the enhancement of the Greystones park-and-ride facility. No change is therefore required.

Chief Executive's Recommendations

Amend plan as follows:

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- CPO 12.21** To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular:
- to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and /or Regional Authority ;
 - to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;
 - to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Rathdrum, Wicklow and Arklow;
 - to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;
 - to promote car sharing parking spaces at premium locations in car parks;
 - to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray

train station and Fassaroe;

- ~~to promote the Luas extension from City West/ Tallaght to Blessington;~~
- to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus services / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;
- to encourage the improvement of bicycle parking facilities at all transport interchanges;
- to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and
- to support the development of bus shelters, that shall incorporate disabled access and bicycle parking facilities where possible.

CPO 12.22 To continue to work with Iarnrod Eireann and the NTA on the improvement of mainline train and DART services into Wicklow and in particular,

- To facilitate all options available to increase capacity through Bray Head ~~and along the coastal route south of Greystones.~~
- To support the delivery of the DART + programme
- To support electrification of the rail line south of Greystones and the provision of high speed and high frequency services on the existing underutilised south east rail line to south Wicklow.

CPO 12.23 To ensure the ~~continued and long term operation of and that possibilities for~~ improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and can facilitate future improvements. In particular:

- to ensure coastal protection measures are put in place to protect the railway line from coastal erosion and to consider identifying corridor options for route continuity in the event of coastal land loss.
- to resist any development within 20m of the railway line;
- to resist demolition or removal of any former train station structures or apparatus, other than for safety reasons;
- to require any development proposals in the vicinity of former train stations to be so designed to facilitate future access to the station and to reserve adequate space for future car parking;

~~**CPO 12.24** To support the undertaking of a study to assess the feasibility of extending regular rail services to south Wicklow.~~

Section 12.3 Public Roads – National Roads		
Topic	ID	Issue raised
	Colin Acton – Charlotte Byrne	It is suggested Objective CPO 12.36 be amended as follows: CPO 12.36 Objectives for the M/N11: <ul style="list-style-type: none"> ▪ Upgrading of the N11/M11 between the northern County boundary to Junction 14 Coyne's Cross <i>in line with the conclusions of the on-going N11/M11 upgrade study, which may include public transport improvements and facilities, including</i> road capacity, ancillary and associated road schemes, provide additional lanes, and safety improvements to the main carriageway and all necessary improvements to associated junctions (including service roads and linkages to cater for local traffic movements); ▪ Improving the M11 / M50 merge; <i>Improving the downstream southbound capacity of the M11 south of the M50 to alleviate issues at the merge;</i> ▪ <i>Subject to the conclusions of the N11/M11 upgrade study,</i> upgrading the N11 interchange at the Glen of the Downs to facilitate the provision of a northern link road from the N11 to Greystones; ▪ <i>Subject to the conclusions of the N11/M11 upgrade study</i> upgrade Ballyronan Interchange to facilitate improved access to Newtownmountkennedy and a possible link road from Ballyronan to Kilcoole;
	Blessington District Forum	Blessington is served by the N81 and serious consideration and pressure needs to be applied to TII for a much improved and safer road network for the residents of West Wicklow.
Chief Executive's Response		
<p>CPO 12.36: While some of the suggestions are noted and some wording changes are recommended (see below) on foot of same, the wording changes suggested with respect to the Glen Of the Downs and Ballyronan interchanges are not recommended as this might limit options to improve these interchanges, should such improvements not be identified in the current programme.</p> <p>CPO12.37 supports the improvement of the N81.</p>		
Chief Executive's Recommendations		
Amend the Plan as follows		
Volume 1, Chapter 12		
<p>CPO 12.36 Objectives for the M/N11:</p> <ul style="list-style-type: none"> ▪ Upgrading of the N11/M11 between the northern County boundary to Junction 14 Coyne's Cross <i>in line with the conclusions of the on-going N11/M11 upgrade study, including enhanced</i> road capacity, ancillary and associated road schemes, provide additional lanes, and safety improvements to the main carriageway and all necessary improvements to associated junctions (including service roads and linkages to cater for local traffic movements); ▪ Improving the M11 / M50 merge; <i>Improving the downstream southbound capacity of the N11/M11 south of the M50 to alleviate issues at the M50 / M11 merge;</i> 		

- Upgrading the N11 interchange at the Glen of the Downs to facilitate the provision of a northern link road from the N11 to Greystones;
- Upgrade Ballyronan Interchange to facilitate improved access to Newtownmountkennedy ~~and a possible link road from Ballyronan to Kilcoole;~~
- The provision of a third interchange on the Arklow by-pass, linking the M11 to Vale Road.

(Note: The amendments recommended below are on foot of the submission above, and other submissions made to the Draft Plan, as set out in Sections 3.1 and 3.4 of this report)

Section 12.3 Public Roads – Regional Roads		
Topic	Section 12.3 Public Roads – Regional Roads	
ID	Name	Issue raised
C2-114 https://consult.wicklow.ie/en/su bmission/ww-c2-114	Colin Acton – Charlotte Byrne	With respect to Objective 12.44 , the following amendments are suggested: CPO 12.44 Objectives for Regional Roads: <ul style="list-style-type: none"> ▪ To maintain and improve the R756 (Wicklow Gap), having due regard to the designation of the Wicklow Mountains as a European site; ▪ To improve the R747 (Arklow – Aughrim – Tinahely – Baltinglass), including re-alignment or by-passing of existing sections where necessary, having particular regard to the role this route may play in a future LOOR; ▪ <i>Subject to the conclusions of the N11/M11 upgrade study</i> the provision of a 'northern access road' from north Greystones to the N11 (at the Glen Of The Downs N11 interchange); and ▪ To provide other smaller, more localised road improvement schemes required during the lifetime of the plan, as funding allows.
C2-107/C2177 https://consult.wicklow.ie/en/su bmission/ww-c2-107	Billy Timmins	An upgrade of road links from Baltinglass to Dunlavin and the N9, and enhancing the R747 from Arklow to the N9 should be referenced.
C2-125 https://consult.wicklow.ie/en/su bmission/ww-c2-125	Blessington District Forum	The inner relief road in Blessington should be completed without delay; it will serve to alleviate town centre bottle necks.
Chief Executive's Response		
<p>CPO 12.44</p> <p>It is not recommended that possible development of a northern access road to Greystones from the Glen Of the Downs should be linked to the M/M11 improvement current programme, as this project is a very long term objectives, which is not currently part of the scope of the M/N11 study.</p> <p>CPO 12.44 already provides for the improvements of the R747 from Arklow to Baltinglass, but does not provide for this objective to extend to the N9; similarly the Draft Plan does not include the linking of Dunlavin to the N9 as an objective. At this time, there are no plans for such a link and no investigations underway as to the feasibility of providing a new or improved link on existing roads. Regional roads objectives within Chapter 12 allow for future road improvements throughout the County, should this be identified during the lifetime of the plan as a project to be progressed.</p> <p>Therefore no change is recommended.</p> <p>Blessington Inner Relief Road: the CE is committed to driving forward the completion of the Blessington inner relief road; this is explicitly supported in Objective CPO 12.45 <i>'To support and drive the development and completion of the Blessington Inner Relief Road (in consultation with Kildare County Council) and upon completion, to significantly improve pedestrian and cycling infrastructure on the Main Street and surrounding town centre local road network'</i></p>		
Chief Executive's Recommendations		
No change		

Section 12.3 Public Roads - Road Safety		
Topic		
ID	Name	Issue raised
C2-226 https://consult.wicklow.ie/en/submit/mission/ww-c2-226	Wicklow IFA	With footpaths now being laid down on country roads the width of the roads has become a real issue e.g. Ballycoog / Woodenbridge Road. This road is now a one vehicle road with large trucks, milk tankers, feed trucks and large machinery travelling on it. The Aughtim / Woodenbridge road needs a full upgrade.
C2-87 https://consult.wicklow.ie/en/submit/mission/ww-c2-87	Kamila Kwasniewska	The submission seeks the reduction of speed limits Aghowle Upper, Ashford area for the following reasons: <ul style="list-style-type: none"> - Large field gates in the area and the farming machinery that use them create hazards due to the bended nature of the roads there is limited visibility. - Private entranceways on the narrow road make overtaking turning cars hazardous. - The current speed limits make it dangerous for hikers and horse riders to cross.
C2-229 https://consult.wicklow.ie/en/submit/mission/ww-c2-229	Wicklow PPN	Improved road safety is required, including improved lights, speed ramps.
Chief Executive's Response		
<p>The County Development Plan is a strategic and high level policy document regarding future land use and development in the County. It is not its function to identify all or any local road safety improvements that may be needed during the lifetime of the plan, but rather to focus on strategic infrastructure and infrastructure delivery principles.</p> <p>The delivery of local road safety improvements and setting of speed limits for example is generally delivered through the Municipal Districts in their annual works plans and each MD has a list of desired works to be carried out in that area which are delivered according to priority and funding available, agreed with the MD members each year.</p> <p>The concerns will be brought to the attention of the MD / Roads project teams.</p>		
Chief Executive's Recommendations		
No change		

Topic		Section 12.3 Public Roads - Road signage
ID	Name	Issue raised
C2-58 https://consult.wicklow.ie/en/submit/mission/ww-c2-58	Sarah Mac Artain	Wicklow Town towards the Beehive and the M11, there is no sign to indicate the junction from Twomilewater. Oncoming drivers have no indication that they may meet cars/farm machinery at this junction. Clear signage would be very helpful
C2-87 https://consult.wicklow.ie/en/submit/mission/ww-c2-87	Kamila Kwasniewska	"Wild Animal Crossing" signage should be provided for the protection of wildlife as well as a traffic slowing measure.
Chief Executive's Response		
<p>The County Development Plan is a strategic and high level policy document regarding future land use and development in the County. It is not its function to identify all or any infrastructure works that may (subject to funding) be carried out by the Council during the lifetime of the plan, but rather to focus on strategic infrastructure and infrastructure delivery principles. The delivery of local signage is delivered through the Municipal Districts in their annual works programmes.</p> <p>These signage issues will be brought to the attention of the teams</p>		
Chief Executive's Recommendations		
No change		

Topic		Section 12.3 Public Roads - Road Traffic Noise
ID	Name	Issue raised
C2-36 https://consult.wicklow.ie/en/submit/ww-c2-36	Eimear Allister	Requests the provision of noise barrier at Jn12 - N11
C2-200 https://consult.wicklow.ie/en/submit/ww-c2-200	Cathy Haines	Requests improvements to N11 at Coynes Cross to minimise noise
Chief Executive's Response		
<p>Noise arising from the National Road is addressed by the Local Authority via its Noise Action Plan (updated 2019). This was prepared in accordance with the requirements of the S.I. No. 140 of 2006, also known as the Environmental Noise Regulations 2006. These regulations give effect to the European Union Environmental Noise Directive 2002/49/EC relating to the assessment and management of Environmental Noise. The Noise Action Plan focuses on the impact of major roads within County Wicklow. The actions detailed have been drawn up to assess noise exposure in priority areas, as indicated by strategic noise mapping located on the identified routes within County Wicklow. The results have been analysed and recommendations made to limit population exposure to environmental noise pollution.</p> <p>The Noise Action Plan applies, as per the Environmental Noise Regulations 2006, to the areas adjacent to roads in County Wicklow, which experience traffic volumes in excess 3 million vehicles a year and railways in Wicklow with more than 30,000 train passages per year.</p> <p>The Draft Plan provides the planning policy support for the implementation of the Noise Action Plan (CPO 15.12).</p> <p>These noise concerns will be brought to the attention of the National Road team.</p>		
Chief Executive's Recommendations		
No change		

Section 12.4 Parking		
Topic	Section 12.4 Parking	
ID	Name	Issue raised
C2-128 https://consult.wicklow.ie/en/submission/ww-c2-128	Cairn Plc	With respect to Objective CPO 12.57 , the following amendment is suggested: <i>In locations where public transport and parking enforcement are not available, the car parking standards set out in Appendix 1 Table 7.3 shall be taken as a target minimum standard in order to ensure that haphazard unregulated car parking does not occur in the vicinity of the development.</i>
C2-205 https://consult.wicklow.ie/en/submission/ww-c2-205	Cairn Homes Properties Ltd	With respect to bicycle parking, it is suggested that requirement are amended to 1 space per bedroom and 1 visitor space per 5 units (instead of per 2 units)

Chief Executive's Response

CPO 12.57
This objectives relates to locations where there are no or limited public transport services (where the majority of longer distance travel will be required to be by car) and no parking enforcement is available and therefore there is a risk of uncoordinated and hazardous on-street parking. Therefore adequate private car parking must be provided. No change is therefore recommended.

Bicycle parking
Having reviewed and researched this standard, it is recommended that the standard is amended to 1 space per 5 units.

Chief Executive's Recommendations

Amend Draft Plan as follows:

Appendix 1

Table 2.4 - Bicycle parking standards

Type of Development	Cycle Parking Standard
Residential units	1 space per bedroom + 1 visitor space per \geq 5 units

Topic	Section 12.6 Strategic Sites in Bray	
ID	Name	Issue raised
C2-114 https://consult.wicklow.ie/en/submit/mission/ww-c2-114	Colin Acton – Charlotte Byrne	It is put forward that an element of road infrastructure identified in the Bray and Environs Transport Study, namely a new road bridge from Herbert Road to Upper Dargle Road is not listed in the table setting out the infrastructure required for the full build out of Fassaroe.
Chief Executive's Response		
The Bray and Environs Transport Study does not require a new road bridge from Herbert Road to Upper Dargle Road to be developed to allow for the full build-out of Fassaroe (see Section 2.3.1 of said study). Therefore no change is warranted.		
Chief Executive's Recommendations		
No change		

Topic	Section 12.8 Objectives Climate Action & Environmental Protection Objectives	
ID	Name	Issue raised
C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125	Blessington District Forum	<ul style="list-style-type: none"> - A detailed plan and timeline for the delivery of Electric Vehicles charging points in public spaces is suggested; - Suggested that all new developments (housing) provide a public charging point, along with the necessary ducting for residential charging points.
C2-160 https://consult.wicklow.ie/en/submission/ww-c2-160 C2-164 https://consult.wicklow.ie/en/submission/ww-c2-164	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<ul style="list-style-type: none"> - Welcome the transport policy as it identifies the use of other sources of power other than petrol, gas and diesel and plans to support electric cars with an increased number of e-charging stations around the county. - Electric charging points need to be installed through our area and outside individuals' homes. Suggest that builders are required to place car charging points in every new house built. - Would hope that significant grants will be provided to homeowners to retrofit their homes as the cost of this is challenging to many households. Currently, this is government led.
C2-274 https://consult.wicklow.ie/en/submission/ww-c2-274	West Wicklow Environmental Network	<ul style="list-style-type: none"> - More specific commitments in relation to the roll-out of EV charging points, this is important in giving people the confidence to transition to electric vehicles. - The number of EV points for non-residential should increase from one to two with ducting infrastructure for all spaces. This is on the basis that 30% car sales so far in 2021 have been hybrid or EV, and because the sale of new fossil fuel cars sales may be banned from 2030.
C2-229 https://consult.wicklow.ie/en/submission/ww-c2-229	Wicklow PPN	Need increased electric charging points

Chief Executive's Response

The Draft Plan set out requirements for the installation of EV charging points in new developments. Having regard to a number of submissions received with regard to EV standards for new developments and national regulation in relation to same (see in particular Part 3.1 of this report), it is considered that the standards set out are acceptable and in accordance with national requirements, with one amendment recommended as set out to follow.

The role out of 'public' charging points is supported by the provision of the CDP but the programme for the delivery of same by the Local Authority or other public bodies would an operational and funding matter. Such programmes are being address separately through the Council's separate climate action programmes.

The provision of financial support / grants for EV installation is outside the remit of the CDP.

Chief Executive's Recommendations

Amend Plan as follows:

Volume 1, Chapter 12

CPO 12.8 To require the implementation if the following standards for EV charging in new developments:

Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Installation of at least 1 recharging point. Installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces) Installation of ducting infrastructure for every parking space within property boundary.
New (single-unit residential) buildings	New 'own door' dwelling with car parking space located within the property boundary.	Installation of recharging points for electric vehicles on site.
New (single-unit residential) buildings	New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.	Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents Installation of ducting infrastructure for every parking space within development.

Section 3.3	Volume 1
Section 3.3.13	Chapter 13 Water Services

Topic	General	
ID	Name	Issue raised
C2-274 https://consult.wicklow.ie/en/s/ubmission/ww-c2-274	West Wicklow Environmental Network	The focus on water quality and the conservation of water resources is welcomed, however would like to see a greater focus on nature- based solutions to address climate change and protect water quality.
C2-263 https://consult.wicklow.ie/en/s/ubmission/ww-c2-263	Eoin LLeuwellyn	Nature based solution should be used to absorb ground water

Chief Executive's Response

The Draft Plan clearly provides for and encourages nature based solutions with respect to storm and surface water management, wherein it is stated: *'Over the lifetime of this plan the effective management of this issue through Sustainable Urban Drainage Systems and Nature Based Solutions will be required'*.

The following objectives of Chapters 13 and 18 also explicitly address this issue:

CPO 13.21 *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*

CPO 13.22 *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

CPO 18.1 *To recognise the importance and contribution of Green Infrastructure for the maintenance of biodiversity and ecosystem services, ensuring that the region and county will be better able to adapt and respond to climate change issues.*

CPO 18.2 *To protect existing green infrastructure resources and to facilitate, in consultation with relevant stakeholders, the development of green infrastructure that recognises the benefits that can be achieved with regard to the following:*

- provision of open space amenities,*
- sustainable management of water,*
- protection and management of biodiversity,*
- protection of cultural heritage, and*
- protection of protected landscape sensitivities.*

CPO 18.3 *New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment.*

Chief Executive's Recommendations

No change

Topic		Water Quality
ID	Name	Issue raised
C2-274 https://consult.wicklow.ie/en/s/ubmission/ww-c2-274	West Wicklow Environmental Network	<p>Suggest that the plan provides practical support to communities concerned about invasive species along waterways.</p> <p>Request the following change to CPO 13.6 - <i>To encourage and promote the use of catchment-sensitive farming practices, including the avoidance of hill burning, in order to meet Water Framework Directive targets and comply with the River Basin Management Plan. (When land is burned, vegetation is lost, resulting in soil entering streams and rivers, thereby increasing water treatment costs).</i></p>
C2-229 https://consult.wicklow.ie/en/s/ubmission/ww-c2-229	Wicklow PPN	<p>Better water quality is required.</p>
Chief Executive's Response		
<p>It is a key aim of the Development Plan, in conjunction with other plans and programmes of the Council and other state agencies to improve water quality as set out in Objectives CPO 13.1 – 13.7.</p> <p>The provision of 'practical support' to communities is not matter for the County Development Plan is a spatial planning framework, not an operational plan. The Local Authority and other agencies, such as the EPA, LAWPRO etc are committed to working together with communities to address water quality issues.</p> <p>It is not recommended that Objective CPO 13.6 be amended as suggested – it is considered that the mechanisms and methods by which the most sustainable land management is achieved would be more appropriately address through the WFD and RBMP programmes.</p>		
Chief Executive's Recommendations		
<p>No change</p>		

Topic	Wastewater	
ID	Name	Issue raised
C2-218 https://consult.wicklow.ie/en/submission/ww-c2-218	Delgany Community Council	There are still too many properties on septic tanks. Many of those properties are older, with failing systems and percolation areas that cause risk to nearby waterways. Some are very close to new developments but connection to mains services can still be extremely costly for such houses. WCC should do what is possible to encourage and incentivise home-owners to connect to mains services when feasible. When new developments are constructed an effort should be made to connect nearby properties to mains sewer.
Chief Executive's Response		
<p>The Local Authority is aware of the issues with some older systems, and carries out an inspection programme under the direction of the EPA, guided by a risk assessment of vulnerable water bodies. . Grants are available for older individual systems that are failing or in high status areas to be improved where feasible. The connection of such sites to the mains network is encouraged where feasible, but is a matter for Irish Water. No funding is available to the Local Authority to support such connections the public systems.</p>		
Chief Executive's Recommendations		
No change		

Section 3.3	Volume 1
Section 3.3.14	Chapter 14 Flood Risk Management <i>(Note: The submissions addresses in this section of the report are those raising general flood risk management issues; where specific issues regarding the SFRA regarding particular towns are identified, these are addressed in the part of the report addressing that town plan)</i>

ID	Name	Issue raised
C2-154 https://consult.wicklow.ie/en/submission/ww-c2-154	John Gerrard	<ul style="list-style-type: none"> - Policy objectives in relation to climate change and flood risk should be included in the Plan. - With climate change and increases in the frequency and severity of extreme weather events there should be no development allowed in river flood plains. Water compatible development type zoning such as Open Space should be used for lands in river flood plains at risk of flooding. <p>Section CPO 14.10 in the County Development Plan states the following: <i>"To prohibit development in river flood plains or other areas known to provide natural attenuation for floodwaters except where the development can clearly be justified with the Flood Risk Management Guidelines 'Justification Test."</i> This section needs to be amended to the following to exclude the exception as this would result in bad planning and unsustainable development: <i>"To prohibit development in river flood plains or other areas known to provide natural attenuation for floodwaters. Water compatible development type zoning such as Open Space should always be used for lands in river flood plains at risk of flooding"</i>.</p> <ul style="list-style-type: none"> - With climate change and increases in the frequency and severity of extreme weather events there should be no development allowed in flood risk areas. Section CPO 19.10 states the following: <i>"To prohibit the development of habitable structures below 3m (OD Malin), in the interest of public safety and the protection of property and residential amenity"</i>. The latest Intergovernmental Panel on Climate Change (IPCC) Report states that "Coastal areas will see continued sea level rise throughout the 21st century, contributing to more frequent and severe coastal flooding in low-lying areas and coastal erosion. Extreme sea level events that previously occurred once in 100 years could happen every year by the end of this century." The 3m (OD Malin) is an outdated and insufficient level and needs to be amended under the Precautionary Principle change to the following: <i>"To prohibit the development of habitable structures below 6m (OD Malin), in the interest of public safety and the protection of property and residential amenity. This level includes a climate change and land movement allowance and is above the 1-in-200 year return period coastal flood event level."</i> - With climate change and increases in the frequency and severity of extreme weather events there should be no development allowed on

		<p>soft shorelines. Section CPO 19.11 states the following: "To protect both public and private investment by prohibiting any new building or development (including caravans and temporary dwellings) within 100m of 'soft shorelines' i.e. shorelines that are prone to erosion, unless it can be objectively established based on the best scientific information at the time of the application, that the likelihood of erosion at a specific location is minimal taking into account, inter alia, any impacts."</p> <p>The level of 100m of soft shorelines is insufficient and needs to be increased under the Precautionary Principle. Also the exception as drafted is incomprehensible and should be omitted. The following is the suggested redrafted policy: "To protect both public and private investment by prohibiting any new building or development (including caravans and temporary dwellings) within 600m of 'soft shorelines' i.e. shorelines that are prone to erosion, notwithstanding coastal defences built upon the shoreline."</p> <p>Coastal defences are not sustainable protection measures in the medium term due the impacts of climate change, in particular rising sea levels and increases in the frequency and severity of extreme weather events.</p>
<p>C2-160 https://consult.wicklow.ie/en/submit/mission/ww-c2-160</p> <p>C2-170 https://consult.wicklow.ie/en/submit/mission/ww-c2-170</p>	<p>Labour Party, Ross Connolly Branch, Greystones Municipal Area</p>	<ul style="list-style-type: none"> - The Developmental Plan notes significant areas of flooding identified in the Strategic Flood Risk Assessment in Appendix 8. Welcome their intention to prepare new or update existing flood risk assessments and flood zones within the County as part of the review process for Local Area Plans, zoning operations and Small Town Plans where considered necessary. - The Development Draft Plan Flood Risk Assessment states that "the flood zones are generated without the inclusion of climate change factors. The flood zones only account for inland and coastal flooding. They should not be used to suggest that any areas are free from flood risk as they do not account for potential floods from pluvial and groundwater flooding" (Appendix 8 page 7.). However many households in the County experience flooding that is not recognised in the plans. The housing estate that backs onto the Three Trout Stream has experienced flooding and some houses closer to the stream cannot get insurance owing to this. Understand that some houses in Beechwood Park in Kilcoole experience flooding, as water runs down the road into their homes. There are many examples of this, and ask the Council to remedy all these localised flooding problems for people prior to them becoming very serious problems owing to climate change. - Recognising that vulnerability of the eastern coast due the climate change is an important step to be made by the council.
<p>C2-235 https://consult.wicklow.ie/en/submit/mission/ww-c2-235</p>	<p>Wicklow Greens</p>	<p><i>This submission proposes changes to text within this chapter, which would not be possible to summarise (please see full submission for details).</i></p> <p>Suggested that flood defence schemes should include provisions for protection and regeneration of wildlife habitats, especially coastal protection schemes. Suggest that the Swan River floodplain is planted with perimeter trees.</p>

<p>C2-265 https://consult.wicklow.ie/en/submission/ww-c2-265</p>	<p>Luggala Estate Limited</p>	<p>In the CPOs 'where feasible' should be removed as it offers a get out clause for not ensuring tightest measures are used.</p>
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Chief Executive's Response

Climate Change

It is not accepted the Flood Risk Management provisions or the SFRA of the Draft Plan do not adequately address climate change. In the SFRA alone it is referenced nearly 50 times and Section 4.10 of the SFRA is devoted to addressing climate change.

Objective CPO 14.02 is explicit in this regard:

CPO14.02 *To support and facilitate flood management activities, projects or programmes as may arise, including but not limited to those relating to the management of upstream catchments and the use of 'natural water retention' measures¹, and ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.*

The SFRA sets out numerous requirements with respect to the integration of 'climate 'proofing' for example:

4.5.3 Less vulnerable development in Flood Zone A or B

This section applies to less vulnerable development in Flood Zone A which has passed the Justification test for development plans, and less vulnerable development in Flood Zone B, where this form of development is appropriate, and the Justification Test is not required. Development which is less vulnerable to flooding, as defined in The Planning Guidelines, includes (but is not limited to) retail, leisure and warehousing and buildings used for agriculture and forestry (see Table 1-5 for further information). This category includes less vulnerable development in all forms, including refurbishment or infill development, and new development both in defended and undefended situations.

*The design and assessment of less vulnerable development should begin with 1% AEP fluvial or 0.5% tidal events as standard, **with climate change and a suitable freeboard included in the setting of finished floor levels.***

*The presence or absence of flood defences informs the level of flood mitigation recommended for less vulnerable developments in areas at risk of flooding. In contrast with highly vulnerable development, there is greater scope for the developer of less vulnerable uses to accept flood risks and build to a lower standard of protection, which is still high enough to manage risks for the development in question. However, any deviation from the design standard of 1%/0.5% AEP, **plus climate change**, plus freeboard, needs to be fully justified within the FRA. However, in County Wicklow there are limited locations where flood defences are present; Baltinglass, Wicklow and Bray all have some form of flood defence asset.*

4.6 Development in Flood Zone C

*Where a site is within Flood Zone C but adjoining or in close proximity of a watercourse, there could be a risk of flooding associated with factors such as **future scenarios (climate change)** or in the event of failure of a defence, blocking of a bridge or culvert. Risk from sources other than fluvial and coastal must also be addressed for all*

¹ Natural Water Retention Measures (NWRM) are multi-functional measures that aim to protect water resources and address water-related challenges by restoring or maintaining ecosystems as well as natural features and characteristics of water bodies using natural means and processes.

development in Flood Zone C, including groundwater flooding and/or flooding associated with stormwater deficiencies, restrictions or blockages.

A statement from a competent person stating that the development will not contribute to flooding within the relevant catchment or be at risk from 'other' sources of flooding will be required with all small developments of areas of 1 hectare or less. For larger developments, an appropriately detailed Flood Risk Assessment will be required.

As a minimum the flood impact assessment should be undertaken which will screen out possible sources of flood risk and where they cannot be screened out it should present mitigation measures. For developments in Flood Zone C, the most likely mitigation measure will involve setting finished floor levels to a height that is above the 1% AEP fluvial event or 0.5% AEP tidal flood event level, **with an allowance for climate change** and freeboard, or to ensure a step up from road level to prevent surface water ingress. Design elements such as channel maintenance or trash screens may also be required. Evacuation routes in the event of inundation of surrounding land should also be detailed.

The impacts of climate change should be considered for all proposed developments. This is particularly important for development near areas at risk of tidal flooding. A development which is currently in Flood Zone C may be shown to be at risk when an allowance for sea level rise is added to the extreme (1 in 200 year) tide. Details of the approach to incorporating **climate change impacts** into the assessment and design are provided in Section 4.5.4.

In the preparation of '**site specific flood risk assessments**', the following is required to be carried out: *To assess all types of flood risk for a new development. FRAs identify the sources of flood risk, the effects of climate change on this, the impact of the development, the effectiveness of flood mitigation and management measures and the residual risks that remain after those measures are put in place. Must be carried out in all areas where flood risks have been identified but level of detail will differ if SFRA at development plan level has been carried out.*

Development in Flood Risk Zones

With respect to possible development in areas at risk of flooding, Ministerial Guidelines provide for this possibility, subject to rigorous testing and justification. The SFRA and Draft Plan provisions have been drawn up to accord with the guidelines. Therefore no change is considered warranted to CPO 14.10 as suggested.

Sea Level Rises / Soft Shorelines

Sea level rise scenarios have been modelled into the CFRAM programme, which forms the basis for the SFRA and Flood Maps prepared for this Draft Plan. For the purposes of the CFRAM Programme, the OPW adopted two indicative potential futures for flood risk assessment; the Mid-Range Future Scenario (MRFS) and the High-End Future Scenario (HEFS). These were selected to reflect, based on information available at the time, a future in the latter part of the century that would be: (a). typical or near to the general average of the future climate projections (MRFS), and (b) a more extreme future based on the upper end of the range of projections of future climatic conditions and the impacts such changes would have on the drivers of flood risk (HEFS).

The allowances for the MRFS and HEFS for mean sea level rise were close to the average and the top end of the projections from the IPCC 5th Report respectively. In the HEFS, the mean sea level rise allowance was +1m and land movement was -5mm/year.

On this basis, no change is therefore recommended to CPO 19.10.

The suggestion regarding the set back from 'soft shorelines' has been carefully considered, and no evidence /

studies could be found that would provide the evidence to support a set back of 600m. Therefore no change is recommended in this regard. With regard to the 'caveat', it is considered that such language is necessary, in order to ensure adequate flexibility is available to correctly and fully evaluate all development proposals and to not set unnecessary barriers to otherwise acceptable development. Therefore no change is recommended in this regard.

Flood Maps

As set out in the Draft Plan and SFRA, the flood maps are indicative of fluvial and coastal flooding only and it is accepted that there may be areas that have experienced past flooding or may be vulnerable to flood risk now or in the future not shown on the indicative flood maps, arising from pluvial (surface water) or groundwater sources, or from the failure of drainage system and other man-made infrastructure. The Draft Plan and SFRA clearly stated that even in areas when no risk of fluvial or coastal flooding is identified (Flood Zone C); localised flooding from sources other than rivers and the coast can still occur and may need to be taken into account at the planning application stage.

Flood Remediation Measures

With respect to remedying flooding problems such as at the locations detailed in C2-160, these are localised issues that generally are a result of pluvial flooding or failure of infrastructure and would be matters for the local MD rather than the CDP.

Design of Flood Defence Schemes

Flood Defence Schemes will take a wide range of formats and integrate a range of technical solutions depending on the circumstances, normally including both hard and soft measures, which must address the requirements of EU Directives (including the Habitats, Birds and Water Framework Directives), EU guidance, RBMPs and the habitat protection objectives of the Development Plan. Such significant schemes will invariably be required to undergo EIA and AA, which will identify any potential adverse impacts on nature and biodiversity and include proposals to address same. It would therefore be considered unnecessary to include a specific provision or objective in the Development Plan that habitat protection and regeneration 'shall' form part of the design of any such schemes in those circumstances. Therefore no change is recommended.

Swan River

The Council does not own the Swan River floodplain and therefore would not be in position to carry out planting as requested. The Council is happy to work with and support stakeholders, including the OPW and landowners to carry out measures to address flood risk.

Suggested Text Changes

With regard to the text changes proposed in **C2-235** and **C2-265**

Change 1 refers to a suggested change to the text in Planning System & Flood Risk Management – Guidelines for Planning Authorities 2009.

However, this is a separate document and the text of same cannot be altered via the CDP process.

Change 2 refers to Section 14.2 Strategic Flood Risk Assessment

Submission suggests that in Line 16, delete 'considered' insert 'adhered to'. The sentence in question reads:
The County Wicklow SFRA contained within the appendices of this Development Plan, provides information on various flood risk indicators that occur within the County. It also provides information on the three types of flood zones, the SFRA's for each settlement within the County, the sequential approach and justification test to be considered and implemented at the development management stage.

It is clear that this sentence requires the sequential and justification tests be '**implemented**' as well as 'considered'; furthermore, the various objectives set out in this chapter including (but not limited to) CPOs 14.06, 14.09 clearly set out that adherence to the steps set out in the guidelines will be required. No change is therefore recommended.

Change 3 refers to CPO 14.15, and it is requested the phrase 'where feasible' be omitted (this is also suggested in C2-265): *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new developments to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions*'.

The phrase 'where feasible' is required as it may not always be possible in all scenarios of development to carry out the desired 'green' infrastructure works, for example in built up urban areas. Therefore no change is recommended.

Chief Executive's Recommendations

No change

Section 3.3	Volume 1
Section 3.3.15	Chapter 15 Waste & Environmental Emissions

Topic	Light Pollution	
ID	Name	Issue raised
C2-125 https://consult.wicklow.ie/en/s/ubmission/ww-c2-125	Blessington District Forum	It is suggested that the Council undertakes an examination of the issue of rural lighting in terms of installation and lifecycle costs and in the context of helping the Council to reduce its energy costs in line with the EU Energy efficiency Directive (2012/27/EU).
C2-160 https://consult.wicklow.ie/en/s/ubmission/ww-c2-160 C2-164 https://consult.wicklow.ie/en/s/ubmission/ww-c2-164	Labour Party, Ross Connolly Branch, Greystones Municipal Area	Supports the Council's plan to roll out LED lighting throughout the County as it will lower our carbon footprint. However, the County must also take account of light pollution and should not install the very bright blue/white LED lights that are problematic for people, their sleeping pattern, and wildlife.
C2-274 https://consult.wicklow.ie/en/s/ubmission/ww-c2-274	West Wicklow Environmental Network	Welcomes the inclusion of Light Pollution Objectives in the draft plan, from the perspectives of energy saving, biodiversity protection and human health. In pursuing these objectives, the Council should have regard to the Dark Sky Ireland guidelines.

Chief Executive's Response

The provisions and objectives of the Draft Plan (set out in Chapter 15) aim to ensure that external lighting is designed in such a way as to not cause excessive light spillage / pollution in order to protect the amenities of properties and wildlife.

With respect to the Council's LED lighting replacement programme, the LED upgrade project takes account of colour rendering and limits the colour temperature of proposed lanterns to 3000K (warm white) for normal situations and 2700K for ecologically sensitive areas. LED lanterns provide a more focused light and reduce the amount overspill lighting more commonly associated with less energy efficient fittings.

While the Dark Sky Ireland guidelines are noted, they have no grounding at this time in legislation/regulation or Ministerial guidance, and are not therefore considered appropriate to reference in the Development Plan. However, it is intended that they, along with other relevant guidance and standards, will be considered and the principles integrated where possible, in the future revisions to WCCs 'Guidelines for Public Lighting Works' being prepared by the Council's public lighting team. It is however recommended that some enhancements to the standards be included, as set out below.

Chief Executive's Recommendations

Amend the Plan as follows:

Volume 3, Appendix 1 Development & Design Standards

1.4.4 Light Pollution

Applications for permission which include the provision of new street lighting or significant on site / on building

lighting shall be accompanied by a certificate from a suitably qualified professional in the field confirming that all lighting has been so positioned and designed to eliminate or mitigate impacts on adjoining properties, particular residences (light trespass) or on the night (sky glow).

The design of lighting in new development shall integrate a hierarchy of light intensity zones to ensure that environmental impact is minimised as far as possible particularly in areas proximate to ecological corridors.

Regard shall be taken of Guidance Notes for the Reduction of Light Pollution (Institute of Lighting Engineers, 2000), 'Guidance Note for the Reduction of Obtrusive Light' (ILP 2021) and 'Guidance Note 9: Domestic Exterior Lighting' (ILP 2019).

All external lighting attached to buildings shall be cowled and directed away from the public roads and adjacent dwellings.

To preserve the character of the night time landscape, roads in rural areas should use the minimum amount of lighting necessary, restricted to critical intersections. Passive measures, such as cat's eyes and reflectorised markings, should be preferred as night time safety guides.

Topic		Air Pollution
ID	Name	Issue raised
C2-300 https://consult.wicklow.ie/en/submit/mission/ww-c2-300	Wicklow Planning Alliance	Objectives CPO 15.9-15.11 do not go far enough and the plan should include the following objectives: <ul style="list-style-type: none"> - Retrofit heat pumps into Council houses and block chimneys (to prevent burning wood and coal) - Remove barriers to cycling - Make parking more difficult and employ extra wardens to stop parking on pavements etc. - Have a no idling campaign or parking outside schools - Require mobility plans for residential developments - Plant more trees
Chief Executive's Response		
<p>Retrofitting</p> <p>The Council is actively engaged in a process of improving the energy efficiency of its housing stock. This is an ongoing project and an operational matter, and not a matter for the CDP.</p> <p>Mobility</p> <p>The Draft Plan, through its wide range of policies, objectives and standards and support for the programmes of the NTA and other transport agencies fully support the enhancement of the cycle network (Chapter 12 in particular).</p> <p>As set out in NTA guidance, mobility management plans relate to work sites / collection of work sites; they are not tools generally used for residential development as it would be difficult to bring into effect a traffic and transport management structures for an entire housing estate of different individuals / families with different needs / schedules and there would be no funding mechanism in place to support / deliver shared services. However, the point is well made that measures are required to encourage more sustainable transportation patterns, and it is considered that the Draft Plan provides a well range of policies and objectives with this goal in mind, for example: the land use zoning principles which will result in more compact development, closer to existing public transport infrastructure; Objectives CPO 6.3, 6.5, 6.7, 6.20 in Chapter 6 and CPO 12.1, 12.2, 12.3, 12.5, 12.11, 12.13, 12.14, 12.15, 12.16, 12.20, 12.21 of Chapter 12.</p> <p>Parking</p> <p>The management of car parking is an operational one and not a matter for the CDP.</p> <p>Tree Planting</p> <p>The Draft Plan, through its extensive range of policies, objectives and standards encourages and support new tree planting, and resists existing tree removal.</p>		
Chief Executive's Recommendations		
No change		

Topic	General	
ID	Name	Issue raised
C2-110 https://consult.wicklow.ie/en/su bmission/ww-c2-110	Gas Networks Ireland	GNI welcomes the inclusion of CPO 15.4 which facilitates the development of waste-to-energy facilities, particularly the use of landfill gas and biological waste, and the fact that WCC recognises that waste disposal and damaging emissions to the environment are one of the most problematic areas of environmental management.
C2-274 https://consult.wicklow.ie/en/su bmission/ww-c2-274	West Wicklow Environmental Network	Concern that WCC's recycling centres no longer take soft plastic. Understand this is due to contamination. In light of the need to improve waste recovery this situation should be revisited
C2-229 https://consult.wicklow.ie/en/su bmission/ww-c2-229	Wicklow PPN	We need to keep and increase capacity of recycling centres.
Chief Executive's Response		
<p>Waste to Energy Support from GNI is noted.</p> <p>Waste Recycling The operations of the Local Authority's recycling centres are not a matter for the CDP.</p>		
Chief Executive's Recommendations		
No change		

Section 3.3	Volume 1
Section 3.3.16	Chapter 16 - Energy Infrastructure & Communications

Topic	Energy Infrastructure - General	
ID	Name	Issue raised
C2-41 https://consult.wicklow.ie/en/submit/mission/ww-c2-41	SSE	<ul style="list-style-type: none"> - The preparation of a new CDP provides an opportunity to re-evaluate County Wicklow's planning policies and ensure Wicklow is at the forefront of national decarbonisation efforts throughout this decade. - Security of supply – recognise the ongoing importance of security of supply in the CDP and the continued need for flexible, low carbon generation capacity. - Opportunities for shared CCS and hydrogen infrastructure to decarbonise conventional generation, industry and transport should be supported. - Energy efficiency needs to be considered as an infrastructure priority. - Wicklow's CDP should reflect Action 64 in the Climate Action Plan which seeks to increase the energy efficiency of Local Authority social housing stock.
C2-57 https://consult.wicklow.ie/en/submit/mission/ww-c2-57	Alex O'Connor	WCC should not permit further data centre developments due to energy security concerns that would detrimentally impact the local grid. While CPO 16.32 is a national policy more local based objective should be to prevent unsustainable development.
C2-103 https://consult.wicklow.ie/en/submit/mission/ww-c2-103	Not Here Not Anywhere	<p>Burning fossil fuels is the single biggest cause of climate change, and taking climate action means developing fossil free communities. The CDP should ensure a rapid phasing out of all fossil fuels including gas across the County using all tools at the Council's disposal including the planning system.</p> <ul style="list-style-type: none"> - The CDP should not allow the expansion of the gas grid; new gas infrastructure is not required for energy security; the CDP should restrict development of Liquefied Natural Gas (LNG) terminals along the Wicklow Coast line; the CDP should ban fracked gas in its energy mix. - Any new large scale fossil fuel infrastructure projects must be mandated to undertake climate impact assessment to ensure they are consistent with Ireland's fair share net cumulative carbon dioxide (CO2) quota in line with the Paris agreement. - New data centres in Wicklow must be powered entirely by on site or new off-site renewable energy; existing centres should be required to transition rapidly to on site or new off-site renewables; where technically possible, heat generated from a data centres should be utilised for district heating systems; it is crucial that every City and County Council takes into consideration the cumulative impact of data centres' energy demand on a nationwide basis, as opposed to examining impact solely on a case-by-case basis.
C2-125 https://consult.wicklow.ie/en/submit/mission/ww-c2-125	Blessington District Forum	Stronger supports requested for the Sustainable Energy Communities (SEC) in Blessington, and throughout the County. The current supports in place are minimal and can result in a lot of SECs quickly becoming disillusioned and failing.

<p>C2-160 https://consult.wicklowlow.ie/en/submit/mission/ww-c2-160 C2-164 https://consult.wicklowlow.ie/en/submit/mission/ww-c2-164</p>	<p>Labour Party, Ross Connolly Branch, Greystones Municipal Area</p>	<p>Welcome the aspiration to facilitate the development and use of green energy</p>
<p>C2-195 https://consult.wicklowlow.ie/en/submit/mission/ww-c2-195</p>	<p>Roger Garland</p>	<p><i>A number of new / amended objectives are suggested, and it would not be possible to summarise same. All are addressed in the assessment to follow.</i></p>
<p>C2-229 https://consult.wicklowlow.ie/en/submit/mission/ww-c2-229</p>	<p>Wicklow PPN</p>	<p>Need more energy efficient towns and villages, the development of green energy.</p>
<p>C2-125 https://consult.wicklowlow.ie/en/submit/mission/ww-c2-125</p>	<p>Blessington District Forum</p>	<ul style="list-style-type: none"> - Rural lighting costs should be examined to help WCC reduce energy costs. - Stronger support for SECs needed.
<p>C2-235 https://consult.wicklowlow.ie/en/submit/mission/ww-c2-235</p>	<p>Wicklow Greens</p>	<p>A power point presentation on SECs and CDP was submitted. No specific observations made.</p>

Chief Executive's Response

De-carbonisation / Renewable Energy

The Draft Plan recognises that it is imperative that further progress is made in terms of renewable energy and that alternative renewable sources are further expanded and developed; the objectives set out in Section 16.3 support and facilitate the development of range of alternative energy types, including wind, solar, hydro, bio, geo-thermal etc. It is noted that other forms of energy may become viable during the lifetime of this plan that are not explicitly identified in the Draft Plan; therefore it is recommended that an additional objective be added in support of all new renewable energy sources.

Transmission and distribution

As renewable energy sources can only be developed where they occur, the Draft Plan acknowledges that it will also be necessary to put in place an electricity transmission and distribution network that can accommodate this change.

Energy Efficiency

The Draft Plan includes a range of objectives with regard to promoting and ensuring energy efficiency, in particular

(but not limited to):

CPO 16.21 *To require all new developments during the design process to incorporate sustainable electricity technologies in accordance with Part L of the Buildings Regulations and as part of any application for permission, to demonstrate how these requirements will be met.*

CPO 16.22 *To facilitate retrofitting of existing buildings with electricity saving devices and installations, where permission is required for such works.*

CPO 16.28 *To require all new developments during the design process to incorporate sustainable heating technologies in accordance with Part L of the Buildings Regulations and as part of any application for permission, to demonstrate how these requirements will be met.*

CPO 16.29 *To facilitate retrofitting of existing building with heat saving devices and installations, where permission is required for such works.*

Section 1.2.2 of the Development & Design Standards also addressed energy efficient design requirements in some detail.

The energy standards for new non-domestic buildings including mandatory requirements for renewable sources are set out in Part L of the Building Regulations. While it may be desirable to set higher standards for the County, particularly for high energy use development such as data centres, the Draft Development Plan Guidelines indicate that development plans are not empowered to introduce new or bespoke localised standards for the construction of buildings that are governed by the Building Regulations at a national level.

With regard to the Council's own housing stock, the Council is actively delivering a programme of energy efficiency upgrades. With regard to public lighting, a lighting replacement programme, which aims to significantly address energy usage, is already in train.

Data Centres

In terms of data centre development, all applications will be assessed in accordance with **CPO 16.17** which states '*To facilitate high energy demand development only at appropriate locations, most accessible to the National Grid*'.

It is noted there is an on-going debate about the long term impact of data centres on the Grid and the potential need for independent electricity back up supplies at such centres, but there is no instruction at this time from the Government that data centre development should be halted / restricted. The CE will be guided by national policy in this regard should any application come before the Council during the lifetime of the plan.

Fossil fuels

The concerns raised in relation to gas and other fossil fuels are noted. The County Development Plan is a land use framework that has been prepared to be consistent with national policy in terms of climate action, and it clearly commits to supporting the development of renewable sources of energy in order that the dependency on fossil fuels can be reduced.

While the comments with regard to 'security of supply' are noted, which generally refers to the need to maintain non-renewable sources. It is not considered desirable to include an objective on the Development Plan to support the development of non-renewable electricity generating developments.

The Development Plan will be guided by policy at national level in terms of gas infrastructure. It would not be within the scope of the CDP to 'ban' fracked gas as the CDP has no role in the delivery of electricity into the grid.

Transport fuels

While the Draft Plan addresses electric vehicle infrastructure it does not directly address alternative transport fuel types. It is recommended that Objective CPO 16.26 be enhanced in this regard.

Sustainable Energy Communities

It is recommended that the Plan includes an objective to support SECs.

Suggested new / amended objectives

1. Produce a Renewable Energy Strategy within the lifetime of the Plan

The Draft Plan comprehensively addresses the strategy and goals with respect to renewable energy development in the County. Therefore no change is recommended.

2. Developments must be appropriately/suitably located.

The provisions of the plan provide guidance on the location of renewable energy development and therefore no change is recommended.

3. Developments, including any ancillary facilities or buildings, must be considered individually by taking into account their scale and layout and their incremental/cumulative effect due to other proposals, the degree to which impacts are highly visible over a vast area, their visual impact on scenic landscape as well as local visual impacts, impacts on archaeology, should not create a hazard or nuisance, including the risk land instability and take into account the character and appearance of the surrounding area, the openness and visual amenity of the countryside, landscapes, protected areas such as NHA's, SPA,s SAC's and sites of historic or archaeological interest or in proximity to National Monuments. Development will only be permitted where they will not have an adverse impact on the environment including natural heritage and the protection of amenities and landscapes. Where impacts are inevitable what mitigation features have been taken into account or in the case of European conservation sites, facilities can only be accepted if they comply with Art 6 of the Habitats Directive.

The Draft Plan comprehensively addresses these areas already, particularly in the objectives set out in Chapters 8 and 17, in the Wind Energy Strategy and in Appendix 1. Therefore no change is recommended.

4. In assessing development proposals the Council will take into account/take cognisance of public access to the countryside and the impact on the landscape, public rights of way and walking routes, protected or designated areas – NHAs, SPAs, national monuments and mitigation features where impacts are inevitable.

The Draft Plan comprehensively addresses these areas already, particularly in the objectives set out in Chapters 8, 17, 18, in the Wind Energy Strategy and in Appendix 1. Therefore no change is recommended

Chief Executive's Recommendations

Amend the Plan as follows

Volume 1, Chapter 16

Add new objective

CPO 16.XX To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel.

CPO 16.XX To support and promote the development of 'Sustainable Energy Communities' and in particular

to encourage and facilitate developments that are energy neutral / low emission, integrate renewable energy technology or involve local renewable energy production.

Amend Objective as follows

CPO 16.26 To facilitate the development of services and utilities for electric vehicles and other low emission alternative vehicles / fuel types, including the roll-out of additional electric charging points and alternative fuel distribution infrastructure in collaboration with relevant agencies, at appropriate locations.

Topic		Wind Energy
ID	Name	Issue raised
C2-41 https://consult.wicklow.ie/en/su bmission/ww-c2-41	SSE	<ul style="list-style-type: none"> - Offshore wind presents significant opportunities for County Wicklow. Integrated land and marine planning is essential to its development. - The consistent implementation of the Wind Energy Development Guidelines (WEDG)–a key piece of national policy currently under review -is of crucial importance to onshore wind. SSE urges the Council to consistently implement the WEDG to ensure adherence with national policy. - The SEAI Wind Atlas, or any similar general wind resource data, is not recommended for use as a constraint when identifying suitable areas for onshore wind in Wicklow’s revised WES. Wind farm developers will carry out wind assessment studies before progressing an application to planning to ensure that a site is technically and commercially viable. - It is also recommended that existing grid constraints should not be considered hard constraints. - New consents need to allow for 30-35 years operation at a minimum so as not to unnecessarily limit operations and ensure developers are able to build a strong business case at the outset. - Recognise the importance of ensuring the continued use, reuse or repowering of existing infrastructure where appropriate to enable Ireland to meet its energy needs. - Request to include a policy to consider favourably the repowering and extension of existing windfarm developments where equipment is upgraded and/or replaced with the best available technology subject to development management standards and environmental considerations.
C2-49 https://consult.wicklow.ie/en/su bmission/ww-c2-49	Codling Wind Park	<p>Codling Wind Park is located in an area called Codling Bank, approximately 13km off the coast of Wicklow between Greystones and Wicklow Town and has been designated Phase 1 project status under the transitional arrangements of the Maritime Area Planning (MAP) Bill. The current programme would see the wind farm operational by 2026 and, once built, it will contribute significantly to Ireland’s target of generating 70% of electricity from renewables by 2030, including 5GW from offshore wind.</p> <ul style="list-style-type: none"> - Request that WCC ensure that the new Plan provides a clear and supportive policy framework, which takes account of off-shore wind farm development and its facilitating onshore infrastructure. - It is requested that WCC consider an update to SC07 to insert the following words: “Support the transition to low carbon clean energy by facilitating renewable energy use and generation at appropriate locations and supporting the development of land-based off-shore renewable energy enabling infrastructure including electrical grid infrastructure and other facilitating infrastructure, and at ports and harbours...” - It is requested that WCC consider an update to CPO 16.19 to insert the following words: “To support and facilitate the development of landing locations and associated onshore electrical grid

		<p>infrastructure for offshore generated wind energy and for any cross - channel power interconnectors.”</p> <ul style="list-style-type: none"> - It is requested that WCC update Appendix 5 ‘Wicklow Wind Energy Strategy’ to reference the potential for offshore wind energy development in the Irish Sea along the coastline of County Wicklow. It is also requested that additional text and commentary is provided to reinforce the favourable policy provisions in the main body of the Plan for land-based enabling infrastructure such as electrical grid infrastructure and Operations and Maintenance (O&M) bases which are critical for the successful development of offshore wind and in turn for meeting Ireland’s renewable energy targets for 2030 and 2050.
<p>C2-57 https://consult.wicklow.ie/en/su bmission/ww-c2-57</p>	<p>Alex O’Connor</p>	<p>Encourage the development of wind energy while maximising the positive impact for local communities. Encourage engagement between wind energy projects and local communities and require that local communities are given the opportunity to invest financially in any new local wind energy development.</p>
<p>C2-198 https://consult.wicklow.ie/en/su bmission/ww-c2-198</p>	<p>West Wicklow Wind Action Group</p>	<ul style="list-style-type: none"> - The focus of this submission is to highlight the unique archaeological integrity of the entire Baltinglass Hillfort Complex. It is submitted that the Draft Plan has no formal proposals that would substantively have the effect of giving the proper protection to the Baltinglass Hillfort Complex. These protections are critical in order to stop any further potential industrial development such as the recent industrial windfarm planning application by ABO Wind Ireland - The various mentions of the landscape importance of the Baltinglass Hills in the previous CDP are clearly not enough to stop inappropriate industrial planning applications. - There are a number of supporting documents attached to the submission including submissions made to planning application Reg. Ref. 21/60 for a wind farm.
<p>C2-195 https://consult.wicklow.ie/en/su bmission/ww-c2-195</p>	<p>Roger Garland</p>	<p>This submission proposes a number of new / amended objectives which would not be possible to summarise but all are addressed in the assessment to follow.</p>
<p>C2-196 https://consult.wicklow.ie/en/su bmission/ww-c2-196</p>	<p>Save Ireland’s Ancient East</p>	<ul style="list-style-type: none"> - While it is set out in the Draft Plan that no changes to the Wind Energy Strategy are being considered until new guidelines are produced. However the process of preparing new guidelines has been ongoing since 2013, and yet this did not stop the Council from amending the Wind Energy Strategy in 2016. - It is requested in this regard that the area around Kilranelagh Hill in west Wicklow be amended from ‘Less Favoured’ for wind energy development to ‘Not Favoured’.
<p>C2-199 https://consult.wicklow.ie/en/su bmission/ww-c2-199</p>	<p>DP Energy & Iberdrola Renewables</p>	<p>Request that the Shelmalere Offshore Wind Farm and Latitude 52 Offshore Wind Farm developments which are both located off County Wicklow and County Wexford’s coasts are acknowledged in the Plan.</p>
<p>C2-235 https://consult.wicklow.ie/en/su bmission/ww-c2-235</p>	<p>Wicklow Greens</p>	<p>It is requested that the designation in the WES for the Kilranelagh / Baltinglass Hillfort complex is changed. Wicklow Greens understand that</p>

wicklow.ie/en/submission/ww-c2-235		<p>the Baltinglass hillfort / Kilranelagh area is under a Ministerial circular not to be amended until new guidelines regarding its wind strategy designation are finalised. This area should be zoned as 'Red', guidelines permitting once they are issued by the Minister. In addition it should be developed as a heritage recreation area, as proposed by the local community.</p> <p>Wording change suggestion for CPO 16.3 To support community-based wind energy projects <i>through a partnership with a dedicated Energy Agency.</i></p>
<p>C2-253 https://consult.wicklow.ie/en/submission/ww-c2-253</p> <p>C2-267 https://consult.wicklow.ie/en/submission/ww-c2-267</p>	<p>Wind Energy Ireland</p> <p>RWE Renewables Ireland</p>	<p><i>This is a lengthy and detailed submission that would not be possible to succinctly summarise, the reader is advised to review other original submission. The key points raised are as follows:</i></p> <ul style="list-style-type: none"> - Onshore wind needs to continue growing in Ireland to meet future renewable energy targets; it is therefore critical that Wicklow's energy strategies facilitate getting as many of the projects currently in development through the planning and approvals system to enable them to contribute to hitting our 2030 targets. - WCC should seize the opportunity and seek to identify enough land to accommodate as much as possible of the additional 4.2GW of additional onshore wind energy required by the Climate Action Plan by 2030. - The Council is encouraged to engage with the adjacent County Councils to ensure a consistent approach is taken across county boundaries as each Local Authority moves to prepare or review its WES - When finalising the new WES for Wicklow, the Council is urged not to consider the following potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments (detailed rationale set out): <ul style="list-style-type: none"> 1. Grid Capacity. 2. Wind Speed 3. Nature Conservation Areas
<p>C2-255 https://consult.wicklow.ie/en/submission/ww-c2-255</p>	<p>Ocean Winds</p>	<ul style="list-style-type: none"> - The submission relates to the proposed Cailleach Offshore Wind Farm which is located in the Irish Sea, off the coast of counties Wicklow and Dublin. Three plausible landfall locations have been identified including the Northern Area (Poolbeg substation), Central Area (Shankill area), and Southern Area (south of Greystones). - Request that the Council include the energy targets for renewable and offshore renewable energy directly for 2030 and post 2030 as high level objectives as set out by the programme for Government - Request that the Council acknowledge that importance of Bulk Marine Renewable-Energy Infrastructure development is directly linked and critical to the achievements of the Government's legal commitments to renewable energy targets. - Request to include a strategic objective that in order to attract high quality industries e.g. green linked data centres, the development of off shore renewable energy and offshore wind farms needs to be supported as these industries are circularly linked. - Request to include a strategic objective to recognise the need for the

		<p>electricity transmission grid as both a local and regional asset terrestrial and marine area.</p> <ul style="list-style-type: none"> - CDP should indicate that the Council is committed to participate, encourage, facilitate and raise awareness of the need for public participation during offshore consent processes that applies to marine area consenting. - The Development Plan should include decision making criteria and measures to consider consenting bulk marine renewable-energy infrastructure development as a prescribed body to future strategic marine infrastructure projects. - The Development Plan and Local Area Plans should include policy and zoning objectives to facilitate the provision of bulk marine infrastructure.
<p>C2-259 https://consult.wicklow.ie/en/submission/ww-c2-259</p>	<p>Claire Chambers</p>	<ul style="list-style-type: none"> - The downside of wind energy is never mentioned; the lack of robust data on health and environmental effects throughout the lifecycle of the turbine. Decommissioning is rarely mentioned. - In Ireland, it is not considered necessary, under current legislation, to have Extended Producer Responsibility (EPR) for wind farms. This has been adopted in photovoltaic (PV) sector and electrical industry (WEE). This could be the next 'ecological disaster'. - Currently at decommissioning, rotor blades are going to land fill. Many of individual polymer chemicals are classified as hazardous, (physical properties, health or environment), e.g. Bisphenol A, considered as 'Substance of very high concern (SVHC) and included in the candidate list for authorisation' by the European Chemicals Agency (ECHA). Bisphenol A carries 3 hazard pictograms: corrosive; serious health hazard; Health hazard/Hazardous to the ozone layer. It is also considered an endocrine disruptor. - Rotor blades do not remain in pristine condition throughout the expected 25- 30 year life cycle. The tip and leading edge of the turbine blade are the most exposed and thus vulnerable to rain erosion resulting in degradation. Recent studies from Ireland and Scotland have shown that monthly blade erosion rates in the Wicklow uplands could be between 0.05% and 0.07% blade weight.

Chief Executive's Response

Circular PL 20-13 advised local authorities to defer amending their existing Development Plan policies with regard to wind energy until the completion of the new wind energy guidelines. In July 2017, Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, were published. In December 2019, Draft Wind Energy Development Guidelines were published. However, the adopted guidelines have not been published to date. Accordingly, the Wind Strategy for County Wicklow remains unchanged. This position is in accordance with the advice issued in Circular PL 20-13 and no changes are therefore recommended at this time. It is considered likely however that the Guidelines will be made in the short-term and a variation of the Plan will be quickly progress if necessary thereafter.

It is clearly stated in the draft development plan that *'Upon the making of any new guidelines the Wind Energy Strategy and the provisions of the CDP relating to wind energy will be updated if required'* (Chapter 16, Section 16.2.1.1). Therefore no amendment or new objective is considered necessary.

With respect to meeting the County's share of national renewable energy targets, having regard to the national target outlined by the OPR (12GW), and of this the wind energy targets being +3.5GW of off-shore wind energy

and +4.2GW of additional on-shore wind energy (source: 2019 Climate Action Plan), County Wicklow should endeavour to deliver 3% of the on-shore growth requirement (Wicklow comprising 3% of the land mass of the Republic of Ireland), which equates to +126MW. This is recommended to be detailed in the Plan, via the amendment recommended to follow.

It is considered that the WES set out in the draft Development Plan makes adequate provision for the delivery of such a quantum of on-shore wind energy generation and in particular, 52,500ha are identified in the WES as 'most favoured' for the development of wind farms (where wind energy development will be considered favourably for consent), and another 59,000ha is identified as 'less favoured' where wind farm development will also be considered, but taking into account the additional sensitivities in these areas compared to the 'most favoured' areas. This accounts for c. 55% of the total area of the County, which is considered high, taking into account that considerable areas of the County are protected upland or coastal areas.

It should be borne in mind however much of this land may not have the capacity to be developed for wind energy if mandatory set-backs from dwellings are required by future Government policy. The prevalence of one-off rural dwellings in certain counties should be taken into account in this regard, as this may limit the ability of certain counties to provide their 'share' of the national output.

The CE notes the concerns identified with regard to the use of the SEAI's Wind Atlas, which identifies wind speeds and directions across the country. The Wicklow WES does not set out wind speeds as a limiting factor influencing whether areas are suitable for wind farms or not; it may be the case that certain areas that are deemed 'suitable' in terms of capacity to absorb turbines, may not be 'viable' with respect to wind speeds having regard to current technologies and designs. It is considered that it is most conducive to the future delivery of on shore wind to not rule out areas that might become viable due to changes in technology.

With regard to Grid connection, the Wicklow WES does not set out grid connection as a limiting factor influencing whether areas are suitable for wind farms or not. Any future amendments to the WES in relation to this issue will be guided by Government guidelines.

With regard to nature conservation, this is considered an extremely important factor in the development of the WES, and it will continue to do so, unless otherwise advised by future Government guidelines.

The Draft Plan provides ample support for renewable energy including off-shore renewable energy projects. It is considered that the wording of SC07 and the objective in Chapter 16 specifically CPO 16.2 and CPO 16.19 adequately supports the development of off-shore renewable energy and enabling infrastructure.

CPO 16.2 *To facilitate and support the development of off-shore wind energy projects insofar as onshore facilities such as substations/connections to the grid may be required and the development of Operations and Maintenance (O&M) bases as may be required.*

CPO 16.19 *To support and facilitate the development of landing locations for off shore generated wind energy and for any cross channel power interconnectors.*

With regard to access to the grid, it is noted that any application for wind energy development will be assessed on its own merits in accordance with the policy objectives set out in the County Development Plan (notably Section 16.3) and national guidelines. It will be up to each applicant to demonstrate that access to the grid is achievable.

In terms of decommissioning or reuse/repowering of wind energy infrastructure, the Planning Authority will comply with national guidance in the assessment of any planning applications. The Draft Wind Energy Guidelines that were published in 2019 set out measures to be addressed in terms of decommissioning or repowering. The Guidelines noted that given the time lag between permission and decommissioning, any decommissioning plan would have to be flexible and take into account advancements in knowledge and technology.

With respect to the request for an objective that supports repowering of existing wind farms (i.e. extending the planning lifetime of existing windfarms with no or minimal impact), it is not recommended that such an objective be included in the plan, unless or until same becomes Government policy via the awaited Wind Energy Guidelines. Technologies change, as does what is acceptable or desirable from one generation to the next, and therefore it is considered necessary that the power to periodically re-evaluate such large scale developments is retained.

CPO 16.3 provides support for community based wind energy projects. Matters relating to investment opportunities are outside the remit of the development plan.

With respect to the request that the Plan acknowledges specific wind farms it is considered premature to identify potential wind farms until the appropriate permissions and environmental assessments have been completed. A general acknowledgment of the importance of delivering renewable energy is the preferred approach.

Including the wording 'through a partnership with a dedicated Energy Agency' would imply that Wicklow County Council would be directly involved in any new energy related installations or operations, which would not necessarily be the case. The CE considers that the existing wording is adequate and no change is recommended.

Submission C2-195

1. *Prepare Maps showing the degree of acceptability from prohibition to preferred including areas in adjoining counties considered unsuitable:*

The Wind Energy Strategy set out in the Appendix provides this information. Therefore no change is recommended.

2. *Prepare a Wind Energy Development Strategy and publish it as a proposed variation of this plan following the review of the DECLG's Wind Energy Development Guidelines.*

The Wind Energy Strategy set out in the Appendix provides this information. Therefore no change is recommended.

3. *Identify existing public rights of way and established walking routes and maintain and preserve them free from development.*

This is addressed in Chapter 18.

4. *Restrict large scale wind energy structures in the rural hinterland and mountain areas to protect their overriding visual and environmental values.*

The Wind Energy Strategy set out in the Appendix set out the locations preferred / not preferred for wind energy development but does not include blanket bans, as to do same may be contrary to renewable energy and climate action goals.

5. *All applicants should include a LIA dealing with possible impacts on any existing rights of way or established walking routes.*

6. *Ensure that the assessment of wind energy development proposals will have regard to the impacts on public rights of way and walking routes.*

Where a PROW exists on any land for which permission is being sought to develop (for wind energy or otherwise), it is a normal part of the development management process to evaluate the impact (if any) of the proposed development on a PROW and to require proposals to address any such impact, which normally includes measures to protect and maintain the existing PROW. It is not considered necessary for this normal assessment to be embodied by a specific objective in the plan and therefore no change is recommended. With respect to 'walking routes', if these are not legally PROWs or have other legal designation / protection, it would be excessively onerous and possibly ultra vires to require their protection.

7. *The assessment of wind energy proposals will include consideration the sensitivity of the landscape and adjoining landscapes, the scale, size and layout of the project, any cumulative effects due to other projects and the degree to which impacts are highly visible over extensive areas, the visible impact on protected views and prospects, designated scenic landscapes, local visual impacts, the impact on nature conservation and archaeology and the visual and environmental impacts of access roads and plant and grid connections*

The Wind Energy Strategy set out in the Appendix set out the assessment criteria that will be employed. Therefore no change is recommended.

C2-196 Kilranelagh Hill

Upon initiation of the overall review of the Wind Energy Strategy in due course, the appropriateness of the current designation will be re-evaluated. However, until such a review is completed, the CE is satisfied that the provisions of the current CDP and the Draft Plan provide robust protections to this area from inappropriate development; in this regard a recent application for a wind farm in this area was refused by the Council taking particular account of the archaeological and historical sensitivity of the area. (Please see Section 3.3.17 of the report wherein it is recommended that via this plan process, the 'landscape classification' of this area be amended to Area of Outstanding Natural Beauty).

Chief Executive's Recommendations

Amend the Draft Plan as follows:

Volume 1, Chapter 16 Energy Infrastructure & Communications

16.2.1 Electricity Generation

In accordance with the provisions of section 28(1C) of the *Planning and Development Act 2000* (as amended), and having regard to the Government's commitment in the *Climate Action Plan 2019* to achieve 70% of electricity from renewable sources by 2030 (adding 12GW of renewable energy capacity nationally), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and section 28 guidelines *Wind Energy Development Guidelines 2006* and the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change 2017*, the development plan aims to put in place the appropriate supports that will allow County Wicklow to contribute its share of the additional national renewable electricity target (excluding off shore wind energy generation), which estimated to be **255MW**.

16.2.1.1 Energy

Having regard the County target for renewable energy generation set out above (255MW), and national targets of 4.2GW to be sourced from on-shore wind, the on-shore wind generation target for County Wicklow is **126MW** (unless other sources of renewable energy generation allow the overall target of 255MW to be met).

It is considered that the WES set out in the Development Plan makes adequate provision for the delivery of such a quantum of on-shore wind energy generation and in particular, 52,500ha are identified in the WES as 'most favoured' for the development of wind farms (where wind energy development will be considered favourably for consent), and another 59,000ha is identified as 'less favoured' where wind farm development will also be considered, but taking into account the additional sensitivities in these areas compared to the 'most favoured' areas. This accounts for c. 55% of the total area of the County, which is considered high, taking into account that considerable areas of the County are protected upland or coastal areas.

Solar Energy		
Topic	Solar Energy	
ID	Name	Issue raised
C2-195 https://consult.wicklow.ie/en/submission/ww-c2-195	Roger Garland	Suggests the following objectives: <ol style="list-style-type: none"> i. Make representations to the appropriate government department to make Planning Guidelines for ground mounted solar farms. ii. Development must safeguard and protect the natural heritage and must have no significant adverse impact on the surrounding natural environment or on the visual character of the landscape and amenities. There is a presumption against their being located in sensitive areas such as Natura 2000 sites. Development must have regard to its effect on scenic routes, its possible cumulative effect and the potential for mitigation through screening with hedges.
C2-235 https://consult.wicklow.ie/en/submission/ww-c2-235	Wicklow Greens	Wording change suggestion for CPO 16.4 to the following <i>To facilitate and support the development of solar generated electricity through a partnership with a dedicated Energy Agency.</i>
Chief Executive's Response		
<p>CPO 16.4 Including the wording '<i>through a partnership with a dedicated Energy Agency</i>' would imply that Wicklow County Council would be directly involved in any new energy related installations or operations, which would not necessarily be the case. The CE considers that the existing wording is adequate and no change is recommended.</p> <p>Suggest new objectives</p> <ul style="list-style-type: none"> - Making representation is not within the remit of the CDP, which is a land-use framework - It is considered that the Draft Plan already addresses this issue in the implementation of the objectives set out in Chapter 17. Therefore no change is recommended. 		
Chief Executive's Recommendations		
No change		

Hydro Energy		
Topic	Hydro Energy	
ID	Name	Issue raised
C2-195 https://consult.wicklow.ie/en/submission/ww-c2-195	Roger Garland	Suggests the following objectives: i. In assessing hydro energy schemes proposals the Council will take into account the impact on public rights of way and walking routes. ii. Development must not have a negative effect on the surrounding environment, landscape and local amenities.
C2-259 https://consult.wicklow.ie/en/submission/ww-c2-259	Claire Chambers	In Wicklow, there are not only hydroelectric generating stations but numerous large and smaller drinking water sources administered by Irish Water. Wicklow water has supplied urban areas for over 150 years. This is an untapped energy source of clean water that could power turbines not just as it leaves reservoirs but at every entry into a housing estate. Water is also most plentiful in winter months when power consumption is highest. As the country is moving to electricity as the main energy source this should be utilised. Wicklow County Council could be a pioneer in this resource.
C2-235 https://consult.wicklow.ie/en/submission/ww-c2-235	Wicklow Greens	Wording change suggestion to CPO 16.7 as follows: <i>To facilitate the development of expanded or new river / lake-based hydroelectricity plants, subject to due consideration of ecological impacts, in particular, the free flow of fish and maintenance of biodiversity corridors, through a partnership with a dedicated Energy Agency.</i>

Chief Executive's Response

C2-195

- i. Where a PROW exists on any land for which permission is being sought to develop (for hydro-energy production or otherwise), it is a normal part of the development management process to evaluate the impact (if any) of the proposed development on any PROW and to require proposals to address any such impact, which normally includes measures to protect and maintain the existing PROW. It is not considered necessary for this normal assessment to be embodied by a specific objective in the plan and therefore no change is recommended. With respect to 'walking routes', if these are not legally PROWs or have other legal designation / protection, it would be excessively onerous and possibly ultra vires to require their protection.
- ii. The Draft Plan already sets out very wide range of environmental protection objectives and standards that would apply to hydro development; therefore no change is recommended.

C2-259

These comments are noted. The Plan includes objectives to support hydro energy (CPO 16.7 and CPO 16.8). This would be more a matter however for Irish Water, the operator of the County's water supply systems.

C2-235

Including the wording '*through a partnership with a dedicated Energy Agency*' would imply that Wicklow County Council would be directly involved in any new energy related installations or operations, which would not necessarily be the case.

The CE considers that the existing wording is adequate and no change is recommended.

Chief Executive's Recommendations

No change

Topic		Bio-Energy
ID	Name	Issue raised
C2-110 https://consult.wicklow.ie/en/submit/mission/ww-c2-110	Gas Networks Ireland	GNI welcomes the inclusion of bioenergy objective CPO 16.9 which facilitates the development of projects that convert biomass to gas or electricity. Anaerobic digestion can be used as a key element in Ireland's move towards a more sustainable economy.
Chief Executive's Response		
These comments are noted.		
Chief Executive's Recommendations		
No change		

Topic		Small scale renewable objectives
ID	Name	Issue raised
C2-235 https://consult.wicklow.ie/en/submit/mission/ww-c2-235	Wicklow Greens	Wording change suggestion to objective 16.11 to the following CPO 16.11 To facilitate and support the development of small-scale electricity generation installations through a partnership with a dedicated Energy Agency.
Chief Executive's Response		
Including the wording 'through a partnership with a dedicated Energy Agency' would imply that Wicklow County Council would be directly involved in any new energy related installations or operations, which would not necessarily be the case.		
The CE considers that the existing wording is adequate and no change is recommended.		
Chief Executive's Recommendations		
No change		

Topic		Transmission & Distribution objectives	
ID	Name	Issue raised	
C2-195 https://consult.wicklow.ie/en/submit/mission/ww-c2-195	Roger Garland	<p>Suggests the following additional objectives:</p> <ol style="list-style-type: none"> i. The Council should ensure that transmission lines are located in non scenic areas, where possible, thereby avoiding landscapes of high value or sensitivity, areas of nature conservation and archaeological interest so that that the visual impact is minimised. ii. If, for whatever reason, Council has decided to permit overhead powerlines and television cables it is acknowledged that these powerlines can have an adverse/ negative impact on the natural environment and the character of its setting, and natural heritage, ensure that they are designed to have regard to possible interference with or damage to heritage sites, areas of archaeological importance, pNHAs, cSACs, SPAs or sites of nature conservation. Minimise their obstructive impact, their obtrusiveness and their visual intrusiveness particularly in mountains areas, by their being integrated with their surroundings and that proposed development is consistent with international best practice. Safeguard Natura sites and the sensitive, open character of areas of high visual amenity or areas of high landscape designations and scenic views. The route should be identified with due consideration for environmental impacts through the relevant environmental assessment .Where impacts are inevitable mitigation must be taken into account in respect of Natura Sites. Where avoidance is not possible full consideration should be given to the undergrounding of the lines. Networks must comply with Art 6 of the Habitats Directive. iii. Landscape Impact and Visual Assessments shall be submitted where a proposed development is located in lands in high amenity and mountain areas or have the potential to impact upon county landscape designations and important designated sites. They shall be screened for potential impacts on Natura 2000 sites. 	
Chief Executive's Response			
<p>All of the matters are already addressed in the plan in the objectives set out in Chapter 17, in particular CPO 17.1, 17.4, 17.5, 17.6, 17.7, 17.8, 17.12, 17.14, 17.15, 17.35, 17.36, 17.37, 17.38.</p>			
Chief Executive's Recommendations			
No change			

Topic		Transport Energy
ID	Name	Issue raised
C2-41 https://consult.wicklow.ie/en/submit/mission/ww-c2-41	SSE	Spatial planning at a local authority level will be critical to drive the electrification of transport. Wicklow's CDP should go further than the policies currently outlined to identify areas where EV charge points could be installed and competitively tender for these assets.
C2-110 https://consult.wicklow.ie/en/submit/mission/ww-c2-110	Gas Networks Ireland	<ul style="list-style-type: none"> - Draw the Council's attention to two initiatives - renewable gas production via anaerobic digestion (AD) and compressed natural gas (CNG) in transport - The decarbonisation of HGVs is particularly challenging as electricity is currently not a viable alternative to diesel. Compressed Natural Gas is a potential option with reduced carbon emissions relative to diesel. CNG is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles. When the injection of renewable gas is increased on the gas network, and utilised by CNG vehicles as bio-CNG, carbon neutral transport can be achieved. - CNG vehicles can be run on 100% biomethane. Biomethane is a renewable and carbon neutral fuel, produced via AD plants from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste. Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study. - Request that the CDP includes a policy objective to support the use of gas in transport by a presumption in favour of applications for CNG refuelling infrastructure, provided planning and environmental criteria are satisfied.

Chief Executive's Response

C2-41

The comments are noted. However, it is considered that the policy objective in the Draft Plan with regard to the provision of EV charging points is adequate. In terms of installing further EV points, this is outside the remit of the County Development Plan and will be implemented in accordance with the Council's budget for delivery of services, should it be deemed appropriate that the Council will deliver this service.

C2-110

Section 16.2.2 of the Draft Plan acknowledges the challenges with regard to decarbonising transport energy. While the Draft Plan addresses electric vehicle infrastructure it does not directly address alternative transport fuel types. It is recommended that Objective CPO 16.26 be enhanced in this regard.

Chief Executive's Recommendations

Amend the Plan as follows

Volume 1, Chapter 16

Add new objective

CPO 16.XX To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel.

Amend Objective as follows

CPO 16.26 To facilitate the development of services and utilities for electric vehicles and other low emission alternative vehicles / fuel types, including the roll-out of additional electric charging points and alternative fuel distribution infrastructure in collaboration with relevant agencies, at appropriate locations.

Topic		Communications
ID	Name	Issue raised
C2-195 https://consult.wicklow.ie/en/submit/mission/ww-c2-195	Roger Garland	Suggests the following additional objectives: <ol style="list-style-type: none"> i. Require the identification of Public Rights of Way and established walking routes prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or impact thereon or on recreational amenities or public access to the countryside or on the natural environment. ii. The Council shall, in assessing an application, take into account the impact on established walking routes.
C2-229 https://consult.wicklow.ie/en/submit/mission/ww-c2-229	Wicklow PPN	Need better broadband infrastructure
C2-125 https://consult.wicklow.ie/en/submit/mission/ww-c2-125	Blessington District Forum	High speed broadband needed to make all towns self-sustaining.
Chief Executive's Response		
<p>The Draft Plan sets out objectives to support and facilitate improvements to County broadband services, in particular CPO 16.31, 16.32 and set out in the Development and Design Standards in Appendix 1.</p> <p>Where a PROW exists on any land for which permission is being sought to develop (for communication infrastructure or otherwise), it is a normal part of the development management process to evaluate the impact (if any) of the proposed development on any PROW and to require proposals to address any such impact, which normally includes measures to protect and maintain the existing PROW. It is not considered necessary for this normal assessment to be embodied by a specific objective in the plan and therefore no change is recommended. With respect to 'walking routes', if these are not legally PROWs or have other legal designation / protection, it would be excessively onerous and possibly ultra vires to require their protection.</p>		
Chief Executive's Recommendations		
No change		

Section 3.3	Volume 1
Section 3.3.17	Chapter 17

Topic	General	
ID	Name	Summary of issues raised
C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125	Blessington District Forum	<ul style="list-style-type: none"> - Blessington and community is, to a large extent, founded on and shaped by its Natural Heritage, its mountains and wooded hills, the reservoir and its streams and valleys and its very rich biodiversity. Request that these rich natural characteristics be afforded a much stronger protection and preservation, in the Plan before it is too late to do so. - Request the addition of at least one full time Biodiversity Office for Co. Wicklow.
C2-195 https://consult.wicklow.ie/en/submission/ww-c2-195	Roger Garland	<p>This submission suggests in excess of 65 new or amended objectives for this chapter. While some are general, some relate to specific headings in the chapter and are dealt with in further sub-sections of this part of the report. The general suggestions are dealt with here.</p> <p>As these suggestions are so specific and detailed it would not be possible to summarise same; however all are addressed in the assessment to follow.</p>
C2-229 https://consult.wicklow.ie/en/submission/ww-c2-229	Wicklow PPN	More use should be made of the natural environment to combat climate change.
C2-264 https://consult.wicklow.ie/en/submission/ww-c2-264	Justin Ivory	Weak language such as 'adverse effects' 'discourage' , 'encourage' and 'resist' are vague. Stronger wording of objectives are needed within Chapter 17.
C2-265 https://consult.wicklow.ie/en/submission/ww-c2-265	Luggala Estate Ltd	No reference to a responsible agent within WCC to push for the achievement of the strategies and objectives - should appoint a Natural Heritage & Biodiversity officer (ecologist, environmental, or biological scientist).
C2-268 https://consult.wicklow.ie/en/submission/ww-c2-268	Carl & Julia Strickland	Request text on p324 is rewritten: <i>"planners and business have varying levels of experience in assessing and integrating ecosystem services in policy and planning"</i> . However the CDP should state that ignorance of environmental law is not a defence for allowing poor and incorrect planning decisions. The text on p324 relating to the EU Habitats directive gives the impression to the reader that a general adherence or best endeavours to be compliant to the Directive <i>"will do"</i> .
C2-274 https://consult.wicklow.ie/en/submission/ww-c2-274	West Wicklow Environmental Network	<p>The introduction to this chapter should be amended as follows:</p> <p><i>'Natural heritage includes the variety of life, often referred to as biodiversity, its physical or geological foundation, and the landscapes which form the surrounding environment. Wicklow supports a good diversity of natural and semi natural habitats such as marine, coastal, wetland, woodland, lake, river and uplands that in turn support a wide range of associated wild plant and animal species. There are also many geological heritage sites of interest in the County which are an important</i></p>

		<i>element of the natural heritage. The conservation and management of the natural environment must be viewed as a central element in the long-term economic and social development of the County. Protecting and enhancing biodiversity and landscapes is vital for the health, well-being and quality of life of communities today and will also be vitally important in the future in adapting to climate change and it has a vital role to play in our response to the climate emergency.</i>
C2-235 https://consult.wicklow.ie/en/submit/mission/ww-c2-235	Wicklow Greens	The following points have been raised in the submission: <ul style="list-style-type: none"> - The text relating to the EU Habitats directive/ EU guidance needs to be strengthened as it gives the impression to the reader that a general adherence or best endeavours to be compliant to the Directive 'will do.' Need more detail and targets in this area. - It is requested that the plan includes an objective to appoint a Landscape Officer
C2-307 https://consult.wicklow.ie/en/submit/mission/ww-c2-307	Eleanor Mayes	<ul style="list-style-type: none"> - With regard to Chapter 17 and CPO 17.5, 17.6, 17.7, 17.8 and 17.12, it should be noted that Screening for Appropriate Assessment and Ecological Impact Assessment ecological baseline desk and field studies are generally required in the first instance, to determine whether there is a potential for likely significant impacts or effects on protected sites, habitats, species, and biodiversity to arise. - It is submitted that Ecological baseline studies should be carried out by suitably qualified personnel and submitted with all development proposals, and that these studies should identify biodiversity features to be protected and enhanced in the context of the proposed development, to assist in the implementation of Natural Heritage and Biodiversity CPOs 17.13 to 17.23 inclusive.

Biodiversity / Landscape Officer

The Development Plan is land-use and spatial planning framework, which cannot direct the establishment of a new function, which would be an operational and funding matter. The Council will continue to use all of the resources available to it to properly implement and monitor the provisions of the plan. This suggestion may be more appropriate for the next iteration of the County Biodiversity Action Plan and the Biodiversity and Climate Action SPC.

Climate Change

The importance of the natural environment in addressing climate change is accepted, and this theme runs throughout the plan, and is directly addressed in a number of chapters particularly (but not limited to) Chapters 14, 17, 18 and 19.

The text suggested in C2-274 is considered an enhancement as it more clearly references the importance of the natural environment in addressing climate change and the draft plan should be amended as suggested.

West Wicklow

It is considered that the natural heritage protections objectives set out in the Draft Plan for the West Wicklow area are those which are necessary, appropriate and legal, and reflect the rich natural characteristics of the area. A wide range of designations and objectives apply in this area, including but not limited to Natura 2000 sites, NHAs, national parks, protected river basins and water bodies, protected trees, landscape character protection, listed views and prospects etc

EU legislation / guidance

The Draft Plan provides an outline of the most relevant EU legislation / guidance that has been considered in the crafting of the plan and will be utilised in the assessment of applications. It is not intended to be an exhaustive or complete list, and does not determine or restrict how such legislation or guidance will be applied and utilised on a day to day basis. In addition to EU legislation and guidance, there is considerable national law and guidance which sets out in considerable detail how applications for consent should be assessed and evaluated vis-a-vis natural heritage considerations.

With respect to the text highlighted by submission **C2-268**, this text is taken directly from the 2019 EU publication '*EU Guidance on integrating ecosystems and their services into decision making*' in its description of the purpose of its guidance; the quoting of this document in no way suggests that the Council is seeking to establish some kind of derogation from best practice due to inadequate knowledge or understanding of EU law. The Council will in all its functions continue to adhere to all EU and national legislation, and to ensure that officers and decision makers are fully knowledgeable as to their statutory requirements.

Appropriate Assessment / Ecological assessment

The Draft Plan has been subject to SEA and AA as required by legislation, which included the gathering and analysis of significant amounts of environmental data. The purpose of same is to identify possible conflicts between the plan provisions and environmental protection so that same can be avoided or mitigated. The Draft Plan does however still need to include mitigation objectives to ensure that individual projects that might be proposed are suitably assessed and tested to ensure no unforeseen impacts, that were not envisaged in the provisions of the plan, do not arise. In addition, notwithstanding the carrying out of plan SEA and AA, regulations also require project specific EIA and AA in certain circumstances.

The provisions of the plan (including objectives and development standards) require the carrying out of ecological assessments where certain protected features / sites / species or environmental vulnerabilities are present or identified.

Plan language

The language used in the objectives is not considered to be vague or meaningless, the draft plan is written to avoid being overly prescriptive to allow for all manner of scenarios.

C2-195: Suggested objectives

1. NPO60 of the NPF should be referenced in this chapter

The NPF objectives are not referenced / detailed in this chapter, as it would be overly cumbersome to list every national or region objective that related to every topic in every chapter, and effort is made to make the 'context' section of each chapter as relevant to the topic as possible, without excessive repetition of higher level statute or policy. It is considered that the context information set out in Chapter 17 is acceptable and adequate. It should be noted the NPO-60 is referenced elsewhere in the plan, No change is therefore recommended.

2. Recognizing the role played by natural amenities and landscapes as major resources as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, improve, facilitate, safeguard and enhance public access to heritage sites and features, natural heritage and amenity areas, including Natura 2000 sites, nature reserves, mountains, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for active recreational activities such as mountaineering and hill-walking, which have been traditionally used for outdoor recreation, and to the countryside generally, by creating a meaningful network of access routes as the opportunity or need arises. This will be done in co-operation,

consultation and consensus with state agencies, landowners, community groups other interested bodies.

3. *Designate traditional walking routes to the uplands as public rights of way*
4. *Seek* to negotiate access to lands using access agreements, where appropriate and feasible, in order to provide access to lands for amenity purposes. *It would be better if seek to was omitted.*
5. *Encourage and support sensitive development which provides for the provision of access to natural habitats and heritage features.*
6. *Impose "Precautionary Principles" which are an integral component of planning policies on environmental and heritage matters. Where uncertainty exists regarding the potential impact of a proposed development on natural heritage, full account shall be taken of these Principles.*
7. *Adopt a regional approach to the protection, conservation and management of the environment by co-operating with adjoining councils to ensure that the natural environment is maintained to encourage a collaborative and consistent policy that could identify threats to the integrity of such sites through a transboundary approach.*
8. *Preserve the open character of commonage land and other hill land and secure access over paths and tracks through consensus with landowners, particularly in mountain areas.*
9. *Encourage and support sensitive development which provides access to natural habitats subject to nature conservation considerations.*

All of the above suggestions (2-9) have been carefully considered. It is considered these goals are addressed already in the draft plan, insofar as it is considered possible and reasonable, staying within the remit and confines of a land-use and spatial plan. There is a concern however that a number of these suggested objectives have primarily at their core the desire to increase public access to natural areas / sites, rather than the protection of the areas / sites per se, which may give rise to conflicts. The recreational / amenity use of natural areas is addressed in more detail in Chapters 11 and 18 of the Draft Plan and therefore no changes are recommended to Chapter 17 on foot of these suggestions.

Chief Executive's Recommendations

Amend Draft Plan as follows

Chapter 17

Section 17.0 Introduction

Natural heritage includes the variety of life, often referred to as biodiversity, its physical or geological foundation, and the landscapes which form the surrounding environment. Wicklow supports a good diversity of natural and semi natural habitats such as marine, coastal, wetland, woodland, lake, river and uplands that in turn support a wide range of associated wild plant and animal species. There are also many geological heritage sites of interest in the County which are an important element of the natural heritage. The conservation and management of the natural environment must be viewed as a central element in the long-term economic and social development of the County. Protecting and enhancing biodiversity and landscapes is vital for the health, well-being and quality of life of communities today ~~and will also be vitally important in the future in adapting to climate change~~ and it has a vital role to play in our response to the climate emergency.

Topic	Biodiversity	
ID	Name	Summary of issues raised
C2-101 https://consult.wicklow.ie/en/submit/mission/ww-c2-101	Greystones Tidy Towns	<ul style="list-style-type: none"> - Wicklow County Council needs to prioritise the protection, preservation and restoration of natural biodiversity. - Request a new zoning category for 'Biodiversity' should be introduced in the CDP and subsequent LAPs providing for land management with biodiversity at its core, habitat restoration, regeneration and preservation - The next Greystones-Delgany-Kilcoole LAP should include areas identified in the 2021 Greystones Biodiversity Action Plan as important area of natural biodiversity in a biodiversity zoning (namely Three Trout's Steam, St. Crispin's graveyard, Kilruddery Deerpark stream, D'Arcy's fields, coastal cliffs rocky shoreline and south beach). - In the context of the management of semi-urban / semi-rural habitats, particularly grasslands within the ownership of Wicklow County Council, the plan should include the review of management and machinery that can be used throughout Wicklow to promote the Wicklow Pollinator Plan and to address the Biodiversity Emergency. This is a lost opportunity that can easily be addressed and it is recommended that it is included in the County Development Plan. The recycling, composting and/or reuse of these organic "waste" streams can be diverted into a circular economic arrangement providing for silage, commercial compost, or biomass energy which cross-cuts other sustainability themes within the CDP.
C2-163 https://consult.wicklow.ie/en/submit/mission/ww-c2-163 C2-146 https://consult.wicklow.ie/en/submit/mission/ww-c2-146 C2-153 https://consult.wicklow.ie/en/submit/mission/ww-c2-153 C2-159 https://consult.wicklow.ie/en/submit/mission/ww-c2-159 C2-143 https://consult.wicklow.ie/en/submit/mission/ww-c2-143	Anne Keatings Ken Carney James Heggie Jacqui Horgan Keith Scanlon	<ul style="list-style-type: none"> - Steps to protect biodiversity in the draft plan welcomed; however stronger mobilization required. - All recommendations from the Greystones biodiversity report should be included in the development plan. - The following commitment should also be included. <i>"Wicklow Co Co will establish a dedicated Biodiversity Planning and Development function to monitor, plan and develop our biodiversity. Within 90 days, this function will set the first smart targets for short term (1-10 years) and long term (up to 100 years) biodiversity planning and development for County Wicklow."</i>
C2-218 https://consult.wicklow.ie/en/submit/mission/ww-c2-218	Delgany Community	<ul style="list-style-type: none"> - The Plan does not adequately address the value of biodiverse ecosystems. If the biodiversity value of a site is damaged by

icklow.ie/en/submit/mission/ww-c2-218	Council	<p>development, it cannot be compensated for by a requirement for the developer to allocate or retain a percentage of the site after development as new open space. New planting takes many years to mature to maintain a complex eco system. The emphasis should be on retaining and conserving biodiversity where possible even if this means a reconfiguration of plans and lower density.</p> <ul style="list-style-type: none"> - Plan should identify "Local Nature Reserves and wildlife corridors". While there are Special Areas of Conservation (SAC) in Greystones-Delgany, there are also valuable wildlife corridors which should be identified, named and protected. - A new 'biodiversity' zoning category should be included in the next plan for Greystones- Delgany – Kilcoole which identifies areas of important biodiversity identified in the 2021 'Greystones Biodiversity Action Plan' (list provided).
C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231	GAP (Greystones Area Planning) Community	<ul style="list-style-type: none"> - Believe that Draft Plan does not adequately address the value of biodiverse ecosystems. Suggest that Planning & Development strategy to date (with housing zoning & regulation focus) has not worked to preserve our Biodiversity or protect our Climate. Declared a Climate & Biodiversity Emergency but not significantly changed our Planning approach to suit. Recommend that a Biodiversity Planning and Development function is established. - Wicklow County Council should as a matter of priority be identifying "Local Nature Reserves and wildlife corridors". While there are Special Areas of Conservation (SAC) in Greystones/Delgany, there are also valuable wildlife corridors which should be identified, named and protected. - If the biodiversity value of a site is damaged by development, it cannot be compensated for by a requirement for the developer to allocate or retain a percentage of the site after development as new open space. New planting takes many years to mature. The emphasis should be on retaining and conserving biodiversity where possible even if this means a reconfiguration of plans and lower density. - Believe strongly that the significant development in Greystones and Delgany over the last few years has had an adverse impact to local agriculture and unbalanced the local biodiversity in the area. We are seeing a gradual disappearance of habitats for protected species including frogs, newts, owls, bats, red squirrels and other native species as illustrated so clearly in the Greystones Biodiversity action plan 2021 commissioned by Greystones Tidy Towns. The 2021 Greystones Biodiversity Action Plan (BAP) identifies several areas of important natural biodiversity which are examples of Local Biodiversity Areas in the Greystones area. - Support the recommendations these areas be classified as "Biodiversity zones" in both this Draft Plan and the next Greystones-Delgany and Kilcoole Local Area Plan. These biodiversity zones should have a specific focus of sustainable land management with biodiversity and habitat restoration, regeneration, or preservation as its core.
C2-300	Wicklow	<ul style="list-style-type: none"> - Urgent need for protection of general biodiversity where the largest

<p>https://consult.wicklow.ie/en/submission/ww-c2-300</p>	<p>Planning Alliance</p>	<p>declines have been happening. There needs to be a measure of the cumulative impact of development on all aspects of the natural world.</p> <ul style="list-style-type: none"> - This lack of protection can be easily addressed by actions such as: <ul style="list-style-type: none"> (a) better rules, design, landscaping guidelines for developments i.e. inclusion of swift bricks, artificial House Martin nests, spaces for Bats to roost in all new buildings. (b) living roofs and walls in new buildings (c) more extensive and better natural landscaping around developments - native trees, shrubs, wildflowers, cover for animals, hedgerows, hedgehog highways between houses etc (d) planning for hedgerows, trees, natural cover between all developments, urban areas linking out to the wider countryside (e) the building of wildlife under and over passes at roads (a wildlife over pass at Glen of the Downs for example is urgently required to improve the value of the area to wildlife) (f) the new County Development Plan to have a clear and measurable objective to create a network of wildlife corridors connecting all our protected sites, forests, wider countryside and urban areas together. - Wildlife corridors can be a mixture of hedgerows, treelines, riparian ways, wildflower verges, over and underpasses. This is vital to prevent islandisation of habitats and species. - To mitigate some of these issues the WPA support the concept that there should be more robust labelling of areas of unprotected local nature rich sites and a specific designation for Areas of Biodiverse - The draft Plan makes no attempt to explain the range of services (the social, cultural, and public health value) that Biodiverse ecosystems provide to humans. If the predevelopment biodiversity value of site is destroyed by development, it cannot be compensated for by a requirement for the developer to allocate or retain a percentage of the site after development as new open space. The emphasis must be on retaining and conserving the predevelopment biodiversity value of a site, not new "open space". - Suggested amendments as follows: New objective: to identify a new category of Local Biodiversity Areas not otherwise protected by legislation. New objective to map these non designated but important areas
<p>C2-263 https://consult.wicklow.ie/en/submission/ww-c2-263</p>	<p>Eoin LLewellyn</p>	<ul style="list-style-type: none"> - Request that the Three Trouts Stream and adjoining lands and Greystones north beach be designated an area of special amenity under Section 202 of the Act. - Request that lands at Greystones North beach (above north beach and either side of Cliff Walk) be purchased to create a nature reserve, from Bray Head SAC to Greystones, to become an extension to the SAC. - Suggest the creation of a nature reserve in G-D comprising 6 separate but connected projects. - Supports the protection of non-designated sites, identification and recording of locally important biodiversity areas and species. - Suggest the development of a series of linked natural and built heritage sites through Greystones – Delgany area - Suggest purchase of lands at Arklow (along river, west of town

		centre), along north side of Wicklow Town PRR, in Blacklion Greystones for biodiversity rehabilitation, bird / insect habitats, carbon sequestering, natural flood defences
C2-229 https://consult.wicklow.ie/en/submitmission/ww-c2-229	Wicklow PPN	Marine life / environment should be included in natural heritage and biodiversity actions. Good use of natural resources required for environmental sustainability, health and well-being.
C2-264 https://consult.wicklow.ie/en/submitmission/ww-c2-264	Justin Ivory	<ul style="list-style-type: none"> - This submission raises concerns regarding the lack of action with the national and Wicklow Biodiversity Action Plans - Lack of designated areas and those that are not well managed or protected. - Urgent need for protection of general biodiversity where the largest declines have been happening. There needs to be a measure of the cumulative impact of development on all aspects of the natural world. - This lack of protection can be easily addressed by actions such as: <ul style="list-style-type: none"> ▪ better rules, design, landscaping guidelines for developments i.e. inclusion of swift bricks, artificial House Martin nests, spaces for Bats to roost in all new buildings. ▪ living roofs and walls in new buildings ▪ more extensive and better natural landscaping around developments ▪ planning for hedgerows, trees, natural cover between all developments, urban areas linking out to the wider countryside ▪ the building of wildlife under and over passes at roads ▪ measurable objective to create a network of wildlife corridors connecting all our protected sites, forests, wider countryside and urban areas together.

Chief Executive's Response

- The CDP addresses natural heritage and biodiversity in considerable detail, insofar as it intersects with land use and development, and indeed the Draft Plan sets out significant objectives in this regard, but it is not the biodiversity plan for the County, is not a biodiversity 'action' plan and is not the Council's plan for the practical management / maintenance of its land bank. There is a separate 'Biodiversity Action Plan' which would be more appropriate for integrating many of the requests / suggestions made in the submissions for example, for integrating the findings of the 2021 'Greystones Biodiversity Action Plan' into Local Authority strategy and policy, or integrating enhanced processes for the each MD team with respect to land care. In addition, it may be more appropriate to consider the planning implications of this particular report in the next LAP for Greystones – Delgany.
- It is not accepted that the Draft Plan does not adequately address biodiversity and ecosystems or explain their importance. There are in fact a number of chapters and appendices contained in the draft plan directly addressing this issue and it is considered that the Plan comprehensively and appropriately addresses this area, given its remit as land-use framework, not a biodiversity or heritage plan. The 'Development and Design Standards' of the Draft Plan have in fact be recalibrated compared to previous plans to particularly emphasise the importance of protecting nature and biodiversity in new developments, with strong emphasis on enhancing biodiversity, protecting trees even if they are not subject of TPO, protecting hedgerows, etc. Ecological Assessment will be now required when there are concerns regarding potential environmental impacts arising from new development, as well as more detailed landscaping plans, with native and pollinator friendly species. In this regard, it is recommended that the standards for landscaping

plans should be further enhanced as detailed to follow.

- Through the implementation of the objectives and standards of the Plan, it is the goal to ensure that valuable and vulnerable biodiversity, particularly that designated for preservation, is not significantly damaged by new development, however it must be acknowledged that the plan is required to facilitate new housing, employment, community development, retail etc and in doing so, natural areas may have to be built upon. The plan must try to balance the competing demands that society places on the lands, in an equitable and sustainable manner. In this regard, it is recommended that the standards for development site management should be further enhanced as detailed to follow.
- It is not accepted that providing housing at lower density would allow for enhanced protection of biodiversity; on the contrary lower density will require more land overall to be developed to meet the same housing targets, which will clearly therefore have a much wider and profound impact on biodiversity protection.
- Where possible and where data is available to support same, local biodiversity areas (non designated areas) and wildlife corridors are identified in local plans, which has been done in this Draft Plan via the SEA, AA and SFRA processes. Further LAPs will also undergo this process. The Draft Plan clearly sets out a significant number of objectives in relation to the identification and protection of such non-designated areas and corridors (CPO 17.12-17 for example).
- With respect to wildlife under or over passes at major roads (such as at the Glen of the Downs on the N11) the Draft Plan would support such projects (as set out in Objective CPO 18.7), but is not in a position to indicate this particular crossing as a specific objective at this time, as this would be a matter that would require significant further investigation and assessment by the TII.
- The purchasing of land for the development of nature reserve / nature parks is not a matter for the County Development Plan.
- The designation of area as 'Special Amenity Area' under Section 202 of the Planning Act is a separate process to the preparation of a County Development Plan; therefore there is no scope within this process to make such designation. The making of a SAAO is a matter for the members, either on their own instigation or under the direction of the Minister. Very specific criteria must be fulfilled for a SAAO designation to be considered appropriate, and there is no evidence that the sites suggested would qualify. This is a matter that could be considered separately by the members of Greystones MD.
- The conservation management of European sites (SACs / SPAs) is a matter for the NPWS, which sets the conservation objectives and manages the regulation / permitting regime for activities therein. Objectives 17.4, 17.5, 17.6 and 17.10 support the achievement of these management objectives. Full details of the management objectives for each site are set out in the SEA / AA accompanying the plan.
- The Development Plan is a land-use and spatial planning framework, which cannot direct the establishment of a new function as suggested (biodiversity officer), which would be an operational and funding matter. The Council will continue to use all of the resources available to it to properly implement and monitor the provisions of the plan. This suggestion may be more appropriate for the next iteration of the County Biodiversity Action Plan and the Biodiversity and Climate Action SPC.

Chief Executive's Recommendations

Amend the Plan as follows

Volume 3

Appendix 1 Development & Design Standards

1.3 Protecting Nature & Biodiversity

Landscaping and biodiversity enhancement plans shall generally be required for new developments, particularly but not limited to those on greenfield sites, and shall be submitted with the planning application. These plans shall highlight existing landscape natural features (such as trees, hedgerows, verges, watercourses etc) to be retained and enhanced, and detail new landscaping and biodiversity enhancement measures including (but not limited to) species, number, size and location of new planting, the provision of swift bricks / boxes or towers, bat boxes, etc. and measures to protect ecological corridors, water courses etc. The plan should put an emphasis on the use of native species where possible. Planting schemes shall take account of future maintenance requirements. All landscaping design and management shall be pollinator friendly. ~~They should~~ generally according with the planting and maintenance approach set out in the Pollinator Friendly Planting Code of the All-Ireland Pollinator Plan.

1.4.6 ~~Waste &~~ Construction Management

~~All development will be required to comply with the provisions of Waste Management Acts and Regulations;~~

All construction sites shall be appropriately managed to ensure that environmental emissions are strictly controlled.

Where necessary (such as for larger scale developments or developments in ecologically sensitive areas) this will be enforced by requiring (by planning condition) the agreement and implementation a 'construction and demolition management plan', which should set out, at a minimum, the various best practice construction measures/mechanisms that will be put in place during the construction phase to avoid, or mitigate, the impacts of: construction traffic, waste, noise, lighting, dust, storm water run-off etc, on adjoining residences and properties, on existing biodiversity, public roads, etc.

~~which will set out detailed measures to manage waste arising from the construction activity.~~

~~In drawing up such plans, developers should have regard to DoEHLG guidance publication 'Best Practice Guidelines on the preparation of Waste Management Plans for Construction and Demolition Projects' (2006) as may be amended and revised.~~ In particular, such plans will set out:

- Construction programme for the works
- Hours of operation
- A traffic management plan
- Noise and dust mitigation measures ~~(including details of a truck wheel wash at the site entrance~~
- Details of construction lighting
- Waste minimisation and management plan, including recycling / re-use of waste where possible (in accordance with circular economy principles);
- Measures for the protection of natural features, including (but not limited to) mature trees and hedgerows, protected species, ecological corridors and watercourses

A Construction Manager will be required to be appointed to liaise directly with the various sections of the Planning Local Authority.

Topic	Protected Sites & Species Sites & Corridors of Ecological & Biodiversity value	
ID	Name	Summary of issues raised
C2-48 https://consult.wicklow.ie/en/submit/mission/ww-c2-48	Ann Naughton	The valley between Keadeen Mountain and Kilranelagh Hill is extremely scenic, home to beautiful trees and wildlife and is part of the biggest ringfort complex in Ireland, in a very historical area. Would like to see this area included in the Wicklow Mountains National Park.
C2-101 https://consult.wicklow.ie/en/submit/mission/ww-c2-101	Greystones Tidy Towns	<ul style="list-style-type: none"> - Plan should include specific direct reference to conservation objectives for the management of SACs. - Pleased to see a large parcel of land zoned out for Special Zoning Objective in Kilcoole, CPO 17.11, and would like to see many more of these types of zonings especially around watercourses.
C2-195 https://consult.wicklow.ie/en/submit/mission/ww-c2-195	Roger Garland	A number of detailed suggestions are made under these headings for new / amended objectives, that would not be possible to summarise; all are addressed in the assessed to follow.
C2-196 https://consult.wicklow.ie/en/submit/mission/ww-c2-196	Save Ireland's Ancient East	The ecology and environment of the Baltinglass Hills area requires more attention, with proper surveys of flora and fauna. This unspoiled natural environment is a more intangible asset than the National Monuments Service can list, as for ancient monuments, but is equally an asset and resource, and even more at risk if unprotected. The CDP recognises aspects of this, but feel landscape and environment deserve more attention.
C2-264 https://consult.wicklow.ie/en/submit/mission/ww-c2-264	Justin Ivory	<ul style="list-style-type: none"> - All development within an NHA or pNHA should require an EIA. - Visitors to the national park should be limited to protect it.

Chief Executive's Response

Baltinglass Hills / Keadeen Mountain / Kilranelagh Hill

The heritage significance of the Baltinglass Hills - Keadeen Mountain – Kilranelagh Hill areas is accepted and a range of objectives in the Draft Plan provide for its protection and managing development therein. The provisions of the Draft Plan would support the carrying out of further ecological assessment of the area; however it is not within the remit of the CDP to direct or commission such a study and this may be more a project for the County Heritage or Biodiversity Plans. . The CE is satisfied that the provisions of the Draft plan provide a robust framework for the protection of the ecology and environment in this area. Therefore no change is recommended.

It is not within the scope of the CDP to amend the national park boundary; this would be a matter for NPWS (with respect to landscape designation, please see assessment later in this section), nor is it within the remit of the CDP to limit visitors in the national park.

EU Sites (SACs, SPAs)

The Draft Plan sets out a number of objectives relating to the protection and conservation of European Sites (SACs and SPAs) in particular CPO 17.4, 17.5, 17.6. The SEA and AA accompanying the Draft Plan provides significant information on the conservation objective of all EU sites in potentially impacted by the Draft Plan provisions and it is matter of law that these conservation objectives are considered in the assessment of any possible impacts of EU

sites arising from new development. There no change is recommended.

Natural Heritage Areas (NHA / pNHA)

It is not within the scope of the CDP to direct that all and any application for permission within a (p)NHA shall require an EIA; EU and national legislation and regulation sets out the parameters for determining when an EIA is required.

The Rocks, Kilcoole

The special zoning for 'the Rocks' Kilcoole is a 'one-off' zoning added to the plan by the members. Without detailed justification via survey and ecological assessment, it is not recommended to add similar designations in an ad hoc manner in the County. It is considered that the Draft Plan (as with the current and previous plans) provides for a very wide range of protections for environmentally sensitive sites, whether designated / identified or not. No change is therefore recommended.

C2-195

CPO 17.9 Suggests this objective should be repositioned in a new subsection entitled 'National Parks'

CPO 17.15 Suggests this objective should be repositioned in a new subsection entitled 'Wetlands'

It is not agreed that it is warranted to provide additional plan 'sub-sections' to deal with these issues and therefore no change is recommended.

Suggest the following additional objectives

1. *Restrict development within a pNHA to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage, visual amenities and the landscape*
2. *Maintain the conservation value of Council owned land within designated or proposed NHA's and promote the conservation value of adjoining council-owned land.*
3. *Protect, conserve, preserve, enhance, identify and maintain sites of natural heritage importance, in co-vulnerable, rare and threatened species of wild fauna and their habitats. Where necessary restore the integrity of Natura and NHA Sites, including areas adjacent thereto, designated or proposed, under National and European legislation and in other relevant International Conventions and Agreements and Processes, by prohibiting development which might damage or be harmful to or result in serious deterioration, dereliction or disturbance of species or which could have a significant adverse effect on the integrity of a Site and maintain and develop linkages between them. Support, in co-operation with relevant statutory authorities, the management of proposed or designated sites to achieve conservation objectives. Protect and maintain the favourable conservation status/value and where necessary the restoration of designated or proposed sites. When assessing development proposals ensure the protection and conservation and enhancement of wildlife habitats.*
4. *Apply the precautionary principle in relation to proposed developments in environmentally sensitive areas to ensure that all potential adverse impacts on a designated NHA or Natura 2000 Site arising from any proposed development or land use activity are avoided, remedied or mitigated.*
5. *Protect the conservation value of designated sites identified by the Minister for DAHG and any other sites that may be proposed for designation during the lifetime of this plan.*
6. *Development on or adjacent to a proposed or designated National or European Site will be permitted only where an assessment has been carried out to the satisfaction of the Council in consultation of with the NPWS and where the overall integrity of the site will not be compromised or adversely affected.*
7. *Protect plant, animal species and habitats identified by the Habitats Directive including Annex 1, Birds Directive Annex 2, Wildlife Acts 1976 to 2000 and the Flora Protection Order S.I No 94 of 1999.*
8. *Maintain or restore the favourable conservation condition of designated or proposed site under the control of the Council.*

All of these suggestions have been carefully considered. It is considered that the objectives set out with respect to protected sites and species already adequately address these goals and therefore no change is recommended.

Chief Executive's Recommendations

No change

Topic	Bird Protection	
ID	Name	Summary of issues raised
C2-247 https://consult.wicklow.ie/en/submit/mission/ww-c2-247 C2-257 https://consult.wicklow.ie/en/submit/mission/ww-c2-257	Gary Gill Birdwatch Ireland	<p>These submissions include details regarding swift population which has rapidly declined in Ireland due to loss of nesting sites and methods used to improve and encourage Swift nesting.</p> <p>Requests that the Draft Plan includes the following:</p> <p>When working on new builds or renovations to buildings that do not have Swifts nesting:</p> <ul style="list-style-type: none"> - At the planning stages for all new public buildings (over 5 metres), built-in Swift bricks (preferable) or externally fixed Swift nest boxes should be incorporated. - At the planning stages of all new private buildings (over 5 metres) built in Swift bricks or externally fixed Swift nest boxes should be stipulated by county planners

Chief Executive's Response

The Draft Plan provides for a wide range of objectives and development standards that require consideration of existing ecology and mitigation / avoidance of impact on same, including addressing potential impacts on fauna / birds in the design of developments e.g.

CPO 17.8 *Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

CPO 17.12 *To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

CPO 17.14 *Ensure that development proposals support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses(rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the European network in Wicklow.*

CPO18.8 *To require the integration of green infrastructure principles and inclusion of native planting schemes in all development proposals in landscaped areas, open spaces and areas of public space.*

Appendix 1

1.2.1 Addressing climate change in new developments

□ Consideration should be given in the design of new buildings to the provision of green roofs or walls (i.e. roof gardens / planted balconies etc), to aid in both water absorption but also to contribute positively to the environment and visual amenity.

1.3 Protecting Nature & Biodiversity

All development proposals should seek to enhance biodiversity and avoid or minimise loss of existing local habitats and wildlife corridors.

Development that requires the felling of mature trees of environmental and/or amenity value, even though they may not have a TPO in place, will be discouraged. The preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees will be required, as will the planting of native broad leaved species, and species of local provenance in new developments.

The retention, wherever possible, of hedgerows and other distinctive boundary treatment will be required. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site will be required.

In order to comply with European and National legislation on nature conservation, and to ensure that areas of biodiversity value are adequately protected, an Ecological Assessment will be required for development proposals that have the potential to impact on environmentally sensitive sites. This includes sites that are protected under EU and National Legislation and sites that may be in use by, or contain protected species or habitats; or sites that are in proximity to significant watercourses / ecological corridors.

Landscaping plans shall generally be required for new developments, particularly but not limited to those on greenfield sites, and shall be submitted with the planning application. These plans shall highlight existing landscape features to be retained and detail new landscaping including species, number, size and location of new planting. The plan should put an emphasis on the use of native species where possible. Planting schemes shall take account of future maintenance requirements. All landscaping design and management shall be pollinator friendly. They should generally accord with the planting and maintenance approach set out in the Pollinator Friendly Planting Code of the All-Ireland Pollinator Plan.

Tree planting can be used to complement hard-landscapes in high-density / urban developments and re-inforce and enhance existing natural features and integrate development with surrounding landscape.

Nevertheless, it is recommended that an amendment be made to more explicitly address the issues raised in these submissions.

Chief Executive's Recommendations

Amend Plan as follows

Volume 3

Appendix 1

1.3 Protecting Nature & Biodiversity

Landscaping **and biodiversity enhancement** plans shall generally be required for new developments, particularly but not limited to those on greenfield sites, and shall be submitted with the planning application. These plans shall highlight existing **landscape natural** features (such as trees, hedgerows, verges, watercourses etc) to be retained **and enhanced**, and detail new landscaping **and biodiversity enhancement** measures including (but not limited to) species, number, size and location of new planting, **the provision of swift bricks / boxes or towers, bat boxes, etc. and measures to protect ecological corridors, water courses etc** The plan should put an emphasis on the use of native species where possible. Planting schemes shall take account of future maintenance requirements. All landscaping design and management shall be pollinator friendly. ~~They should~~ generally **according** with the planting and maintenance approach set out in the Pollinator Friendly Planting Code of the All-Ireland Pollinator Plan.

Topic	Woodland, Trees and Hedgerows Note: This part of the report deals only with the tree protection objectives and existing TPOs of the draft CDP. Any submissions made in relation to the proposals to add to or amend Tree Preservation Orders as listed on Schedule 17.05B of the Draft Plan are addressed in the separate report – ‘ Tree Preservation Orders - Report under Section 205 (5) of the Planning & Development Act ’.	
ID	Name	Summary of issues raised
C2-160 https://consult.wicklow.ie/en/su bmission/ww-c2-160 C23-164 https://consult.wicklow.ie/en/su bmission/ww-c2-164	Labour Party, Ross Connolly Branch, Greystones Municipal Area	Trees are the lungs of the earth and need to be respected for the service they provide us, and this can be done by developing a policy on tree plantation and preservation in our areas.
C2-195 https://consult.wicklow.ie/en/su bmission/ww-c2-195	Roger Garland	Where appropriate, the Plan should protect mature trees not formally protected by TPOs.
C2-218 https://consult.wicklow.ie/en/su bmission/ww-c2-218	Delgany Community Council	A better system for preserving trees is required. Trees also need to be protected from harm during the construction process. There are a number of development sites in this area where only a very limited amount of healthy mature trees have been retained.
C2-231 https://consult.wicklow.ie/en/su bmission/ww-c2-231	GAP (Greystones Area Planning) Community	A better system for preserving trees is required. Trees also need to be protected from harm during the construction process - numerous beautiful mature eucalyptus, birch, elm and other deciduous trees have been removed. Virtually no mature trees have been retained on the Eastmount and Melwood development sites in Delgany. Mature Trees should not be cut down as a standard without impact assessment made.
C2-205 https://consult.wicklow.ie/en/su bmission/ww-c2-205	Cairn Homes Properties Ltd	Request CPO 17.23 be amend as this often incompatible with the development of higher density complex residential developments. Indeed, this objective appears to relate principally to one-off housing in rural areas. CPO 17.23 To encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable <i>as part of a single house development</i> , provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).
C2-225 https://consult.wicklow.ie/en/su bmission/ww-c2-235	Wicklow Greens	<ul style="list-style-type: none"> - It is requested that the plan includes an objective to appoint a Tree Officer - It is requested there should be a policy objective that the felling of any tree over 10 years old is forbidden without a felling licence.
C2-264 https://consult.wicklow.ie/en/su	Justin Ivory	<ul style="list-style-type: none"> - No reference to the pending Wicklow Tree Strategy in the draft Plan. - CPO 17.18 should be amended so that all trees over 10 years should

bmission/ww-c2-264		<p>be preserved</p> <ul style="list-style-type: none"> - Replace the TPO process with a blanket protection of all trees.
<p>C2-299 https://consult.wicklow.ie/en/su_bmission/ww-c2-299</p>	<p>Judy Osborne</p>	<p>TPOs are limited in their effectiveness to prevent unnecessary tree felling. There should be a policy objective that the felling of ANY tree over 10 years old is forbidden without a felling licence, in line with regulations that currently apply to felling of trees outside of town boundaries.</p> <p>Suggest new objectives as follows</p> <ul style="list-style-type: none"> - acknowledge the value of tree planting as a carbon sink and aid in preventing flooding, and in urban areas to provide shade and shelter for increasing numbers of pedestrians and cyclists - acknowledge the importance of increasing urban tree cover to assist in the adaptation to higher rainfall resulting from climate change and to provide shade and shelter particularly for pedestrians and cyclists - encourage landscaping and native tree planting in an environmentally sensitive manner within the plan area as a means of air purification, the filtering of suspended particles and the improvement of Wicklow’s micro- climate. - to support and facilitate tiny native woodland patches in towns and villages - support the establishment of community orchards for community action, local food resilience, and pollinators
<p>C2-300 https://consult.wicklow.ie/en/su_bmission/ww-c2-300</p>	<p>Wicklow Planning Alliance</p>	<ul style="list-style-type: none"> - The current system for the making of specific Tree Preservation Orders does not identify sufficient trees to prevent wholesale destruction; there should be a policy objective that the felling of ANY tree over 10 years old is forbidden without a felling licence, in line with regulations that currently apply to felling of trees outside of town boundaries. The Council should apply for funding to appoint a Tree Officer/Biodiversity officer who would be responsible for handling such applications. - It is suggested to include an objective to encourage the provision of trees in urban areas (existing centres and new housing / mixed use schemes) as follows: CPO 17.X: To acknowledge the value of tree planting as a carbon sink and aid in preventing flooding, and in urban areas to provide shade and shelter for increasing numbers of pedestrians and cyclists. - Suggest Objective CPO 17.19 be amended as follows: <i>CPO 17.19 To consider the making of Tree Preservation Orders (TPOs) to protect trees and woodlands of high value where it appears that they are in danger of being felled.</i> - Request that new / amend objectives be included in the plan as follows: <ul style="list-style-type: none"> (a) To acknowledge the importance of increasing urban tree cover to assist in the adaptation to higher rainfall resulting from climate change and to provide shade and shelter particularly for pedestrians and cyclists. (b) Encourage landscaping and native tree planting in an environmentally sensitive manner within the plan area as a means of air purification, the filtering of suspended particles and the improvement of Wicklow’s micro- climate. (c) To support and facilitate tiny native woodland patches in towns

		<p>and villages</p> <p>(d) support the establishment of community orchards for community action, local food resilience, and pollinators</p> <p>(e) support communities / individual residents to put forward their own tree planting proposals</p> <p>(f) CPO 17.23 To encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).</p> <p>(g) Insert new policy objective to complete and implement The Tree Strategy without delay.</p>
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Chief Executive's Response

Tree Protection Objectives

The processes available to protect trees are those set out in statute and the development plan cannot alter same. The Draft Plan (as with the current plan) sets out clear requirements with regard to the retention and protection of trees and hedgerows on development sites, whether subject of TPO or not. It is the case however that the law does allow for tree / hedgerow removal on urban lands, without the need for felling licences / permits separate to the permission process. The CDP provisions cannot alter the national law in this regard. No policy objectives can override national statute / regulations. While the desire to protect mature trees is noted, it would not be possible and potentially not lawful to 'blanket' designate all trees in a district as TPOs.

It is agreed that Objective CPO 17.19 should be amended as suggested, as the making of TPOs should not be just due to a concern regarding possible felling.

While the many suggestions regarding tree protection objectives are noted and welcomed, it is considered that the Development Plan already addresses and supports these goals; some of these desired objectives may be more suitably included in the next County Biodiversity Action Plan, the impending Tree Management Policy document or future Local Area Plans.

With regards to tree (and hedgerow) protection on development sites, and landing plans, please the proposed amended objectives/ standards set out earlier in this part of the report.

With regard to community gardens, it is recommend in **Part 3.3.7** of this report that a new standard be provided requiring a proportion of the open space in larger new developments be laid out so as to facilitate community gardens/orchards.

Hedgerows

CPO 17.23 relates to all development types, not just single houses, including high density residential development. Hedgerows are biodiverse and home to many species, and are a key element in the ecological network. Therefore the suggested amendment is not recommended.

Tree Officer

The Development Plan is land-use and spatial planning framework, which cannot direct the establishment of a new function, which would be an operational and funding matter. The Council will continue to use all of the resources

available to it to properly implement and monitor the provisions of the plan. This suggestion may be more appropriate for the next iteration of the County Biodiversity Action Plan and the Climate Action and Biodiversity SPC.

Tree Management

The Council's 'Tree Management Policy' (which addresses tree care and tree planting on Council owned / controlled lands) is in development and its implementation would be an operational matter.

Chief Executive's Recommendations

Amend Plan as follows

Volume 1, Chapter 17

CPO 17.19 To consider the making of Tree Preservation Orders (TPOs) to protect trees and woodlands of high amenity value ~~where it appears that they are in danger of being felled.~~

Topic	<p>Tree Preservation Orders</p> <p><i>Note: This part of the report deals only with request for new TPOs, the majority of which include detailed lists and / or maps, which are not included here. The interested reader should view the full submission)</i></p> <p>Any submissions made in relation to the proposals to add to or amend Tree Preservation Orders as listed on Schedule 17.05B of the Draft Plan are addressed in the separate report – 'Tree Preservation Orders - Report under Section 205 (5) of the Planning & Development Act'.</p>	
ID	Name	Summary of issues raised
C2-18 https://consult.wicklow.ie/en/submitmission/ww-c2-18	Delgany Tidy Towns	All mature native trees in the Greystones Municipal District (GMD) should be protected by default Tree Preservation Order(s). List of 300+ trees submitted for TPO preservation.
C2-113 https://consult.wicklow.ie/en/submitmission/ww-c2-113	Sean Duggan	TPO-B7 should be extended to include 5 other tree groups in the Headlands area. Trees identified and mapped in submission
C2-125 https://consult.wicklow.ie/en/submitmission/ww-c2-125	Blessington District Forum	All mature native trees in the town of Blessington and the Baltinglass Municipal District should be protected by default by Tree Preservation Order(s).
C2-140 https://consult.wicklow.ie/en/submitmission/ww-c2-140	Neil Molloy	Request a TPO for an Oak tree at Johnstown, Arklow
C2-163 https://consult.wicklow.ie/en/submitmission/ww-c2-163	Anne Keatings	Request TPOs to be placed on the Scots Pines and native trees up the hill by Kindlestown Park and by the first roundabout as you head to Charlesland from Mill Rd.
C2-235 https://consult.wicklow.ie/en/submitmission/ww-c2-275	Wicklow Greens	A number new TPOs are suggested in the Bray Municipal District (maps and details have been submitted)
C2-246 https://consult.wicklow.ie/en/submitmission/ww-c2-246/observation#attachments	Newtownmount-kennedy Town Team	Seeks TPOs for a large number of trees in the Newtownmountkennedy area (map and details have been submitted).
C2-248 https://consult.wicklow.ie/en/submitmission/ww-c2-248	Shane Stokes	Seeks retention and protection of group of trees in Newtownmountkennedy adjacent to Season Park farm

C2-258 https://consult.wicklow.ie/en/submit/mission/ww-c2-258	Jason Mulhall	Seeks TPOs for a number of trees in the Blessington and Baltinglass areas (trees identified by photograph and map in submission)
C2-271 https://consult.wicklow.ie/en/submit/mission/ww-c2-271	Donal McCormack	Seeks TPO's for a large number of trees in the Blessington area including Russborough House, Glending forest, Dempsey's Lane and Deerpark estate.
C2-299 https://consult.wicklow.ie/en/submit/mission/ww-c2-299	Judy Osborne	New TPOs for 11 locations in Wicklow Town suggested.

Chief Executive's Response

While the desire to protect mature trees is noted, it would not be possible and potentially not lawful to 'blanket' designate all trees in a district as TPOs.

The legal provisions for making a TPO state *"If it appears to the planning authority that it is expedient, in the interests of amenity or the environment, to make provision for the preservation of any tree, trees, group of trees or woodlands, it may, for that purpose and for stated reasons, make an order with respect to any such tree, trees, group of trees or woodlands as may be specified in the order"*. The tree preservation order is one of only two legal mechanisms in place for the protection of trees, the other being a Felling Licence established under the 2014 Forestry Act. Trees that are subject to a preservation order cannot be felled unless the owner applies for planning permission to the local authority.

Amenity is the essential requirement of a TPO. This generally refers to the visibility of the tree and the extent it can be seen by the public. The impact of the tree or trees is also an important consideration. This would include their size, future potential, rarity, cultural or historical value, or their contribution to the character or appearance of the landscape or local area. As well as amenity, the planning authority are also required to consider the expediency of making a TPO, having regard to the amenity importance of the trees and the degree of risk to which they are considered to be exposed.

The assessment of trees / groups of trees for possible TPOs involves detailed assessment of the trees / groups of trees in question, under a number of criteria including but not limited to condition, retention span, relative public visibility, known or perceived threat to the tree(s), and other factors. Each and every tree / group of trees requires to be fully and individually assessed before a TPO should be made and therefore blanket designation for all trees in an area would not be feasible.

The process for making TPOs is a separate process to the CDP review process, although the two are being run concurrently.

The Planning Authority has already identified existing TPOs that it has determined require amendment, as well as trees / groups of trees not currently subject to TPO but warranting same. This list was heavily influenced by previous submissions made by members of the public / landowners over the last 5 years.

These amendments / proposals were detailed in the Draft Plan on table 17.05B. As part of this process in accordance with statutory requirements, all landowners affected were contacted formally and given the opportunity to comment.

Any submissions made by landowners, and by any other members of the public in relation to the proposals in table 17.05B are assessed in a separate part of this report, having regard to the separate section of the Act that guides this process.

The submissions detailed above are requesting further additional trees be considered for TPOs. These proposals had not been brought to the attention of the Planning Authority before now.

In order to consider further TPOs, it would be necessary to initiate a fresh process under Section 205(5) of the Act which entails:

- Detailed assessment the trees / groups of trees concerned by qualified arborist / similar professional; the assessment of trees / groups of trees for possible TPOs involves detailed assessment of the trees / groups of trees in question, under a number of criteria including but not limited to condition, retention span, relative public visibility, known or perceived threat to the tree(s), and other factors. Each and every tree / group of trees requires to be fully and individually assessed before a TPO should be made;
- Careful consideration of said assessment and determination, in accordance with the criteria set out under the Act, if said trees / groups of trees fulfil the criteria for possible TPO. The legal provisions for making a TPO state *"If it appears to the planning authority that it is expedient, in the interests of amenity or the environment, to make provision for the preservation of any tree, trees, group of trees or woodlands, it may, for that purpose and for stated reasons, make an order with respect to any such tree, trees, group of trees or woodlands as may be specified in the order"*.
- Publication maps / details, formal notification to landowners, and a further consultation period.

It would not be possible to complete such a process within the time scales of this stage of plan making. In particular, time would be required to tender for a suitably qualified professional to carry out this work, and to allow the assessment to take place which would likely take many months.

It is recommended that after the adoption of this Plan in 2022, as part of the implementation programme, further consideration is given to these proposals with a view to determining if it is appropriate to initiate a new Section 205(5) process. In addition, other mechanisms may be possible to consider achieving the same tree protection goals, such as strengthen objectives in future LAPs.

Chief Executive's Recommendations

No change

Topic	Rivers & waterbodies	
ID	Name	Summary of issues raised
C2-18 https://consult.wicklow.ie/en/s/ubmission/ww-c2-163	Delgany Tidy Towns	<ul style="list-style-type: none"> - The Three Trout's Stream from source to sea should be named as a 'Wicklow Community Nature Reserve' - Objective CPO 17.26 is supported which states: <i>"CPO 17.26 Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban location) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible."</i> It is requested that the following stipulations be added: <i>"All applicants for planning permission will be required to prove how they have complied with this condition, both at Application stage and again at notification of Site Plan before construction commences".</i> - Wicklow County Council should urgently request EPA to ensure that the main watercourses in each Municipal District are monitored. One glaring current omission is that the main watercourse in our Greystones Municipal District, The Three Trout Stream, is currently completely unclassified and designated "Not at Risk", despite high levels of nutrient enrichment and unprecedented levels of construction along its catchment and heavy levels of construction silting detected, reported & stopped by Delgany Tidy Towns (with WCC enforcement and developer co-operation) in Nov & Dec 2020"
C2-101 https://consult.wicklow.ie/en/s/ubmission/ww-c2-101	Greystones Tidy Towns	Support the proposed creation of Community Nature Reserve at Three Trout's Steam
C2-125 https://consult.wicklow.ie/en/s/ubmission/ww-c2-125	Blessington District Forum	Protection of our rivers, wetlands, hedgerows, and the creation of wildlife corridors.
C2-160 https://consult.wicklow.ie/en/s/ubmission/ww-c2-160 C2-164 https://consult.wicklow.ie/en/s/ubmission/ww-c2-164	Labour Party, Ross Connolly Branch, Greystones Municipal Area	The development of more SACs (Special Areas of Conservation) and SPA's (Special Protective Areas) should be increased such as the riparian land of the rivers and streams throughout Wicklow, as once these biodiverse areas are destroyed, they are gone for our children.
C2-195 https://consult.wicklow.ie/en/s/ubmission/ww-c2-195	Roger Garland	This submission set out a number of detailed suggestions for new / amendments to objectives relating to rivers and waterbodies,

wicklow.ie/en/s/ubmission/ww-c2-195		inland waterways and wetlands, which would not be possible to summarise. All are addressed in the assessment to follow.
C2-218 https://consult.wicklow.ie/en/s/ubmission/ww-c2-218	Delgany Community Council	The recommendations of IFI (Inland Fisheries Ireland) should be implemented as part of the planning process.
C2-231 https://consult.wicklow.ie/en/s/ubmission/ww-c2-231	GAP (Greystones Area Planning) Community	Support the objective to protect watercourses – CPO 17.26 We ask that the following is added: <i>“All applicants for planning permission (including housing, roads, greenways) will be required to prove how they have complied with this condition, both at Application stage and again at notification of Site Plan before construction commences”</i> . In conjunction with Delgany Tidy Towns and several other local interest groups, support the proposed creation of a Community Nature Reserve to protect the course of the Tree Trouts Stream, which was identified as “the most important area of natural habitat remaining in the Delgany-Greystones area in the recent Greystones BAP.
C2-300 https://consult.wicklow.ie/en/s/ubmission/ww-c2-300	Wicklow Planning Alliance	<ul style="list-style-type: none"> - CPO 17.26 suggest the following is added: All applicants for planning permission (including housing, roads, greenways) will be required to prove how they have complied with this condition. - Wicklow County Council should request EPA to ensure that the main watercourses in each Municipal District are monitored and classified. One obvious current omission is that the main watercourse in Greystones Municipal District, the Three Trouts Stream, is currently unclassified. - WPA supports the request by both Greystones Tidy Towns and Delgany Tidy Towns to designate the Three Trouts Stream river systems from source(s) to sea as a key Local Biodiversity Area. - The Plan could also offer more support to people trying to protect the environment of their local streams if there were additional objectives inserted into development control section to better control the disposal of surface water into streams, particularly the surface water from new large estates where silt and car rubber dust and oil from roads is increasingly spoiling our streams and rivers. Whilst SUDS and attenuation tanks are required, these are often not properly inspected or maintained or not sufficiently sized for the job.
C2-263 https://consult.wicklow.ie/en/s/ubmission/ww-c2-263	Eoin Llewellyn	Suggest the development of a rehabilitated ‘riparian way’ starting from Sugarloaf car park, down Red Lane, Glen of the Downs, Three Trouts, and Delgany onto Charlesland and to the sea (detailed proposal document attached to submission). Suggest lands be purchased along said route to ensure connectivity.
C2-307 https://consult.wicklow.ie/en/s/ubmission/ww-c2-307	Eleanor Mayes	With regard to CPO 17.26, the protection of rivers, streams and other water courses would usefully be extended to include estuarine and coastal waters. It is submitted that protection of rivers, streams and watercourses should apply in urban, suburban, villages, and in rural areas. It is suggested that all development proposals should include Construction Environmental Management

		Plans (CEMP) that identify watercourses within and/or adjoining and/or downslope of the proposed development site boundary. The CEMP should identify silt control measures as appropriate to individual development proposals.
C2-268 https://consult.wicklow.ie/en/s-ubmission/ww-c2-268	Carl & Julia Strickland	Carefully managed buffer zones needed between rivers

Chief Executive's Response

General

The Draft Plan, through its significant number of objectives, in conjunction with the strategies and programmes of other agencies (such as the EPA) all strive to improve the water quality and biodiversity of the County's streams and rivers.

The Council's water pollution team works closely with the EPA and has a significant ongoing programme of water body monitoring and testing. The Development Plan has no role in directing operations of other agencies such as the EPA.

It is not within the gift of the CDP to designate additional watercourses as SACs or SPAs which are EU designations.

Nature based solutions are actions to protect, sustainably manage, and restore natural or modified ecosystems. The Draft Plan has a wide range of objectives across a number of chapters (for example CPO 13.21, 13.22, 18.1, 18.2, 18.3) that support the use of nature based solutions to address climate change. Therefore it considered that no new objective in this regard is required.

With respect to Objective CPO 17.26, all plan objectives are as a matter of course and legislation considered in the assessment of planning applications and therefore there is no need to add caveats onto this particular objective as it will be considered at application stage. There is no 'notification of site plan' stage as suggested in submission C2-231.

CPO 17.26 is an objective directly relating to stream and rivers, and riparian environments. The protection of coastal water is addressed under Objectives CPO 17.24, 18.16 (Chapter 18), and 19.7-19.15 (Chapter 19). The protection of watercourses relates to all areas, types and settlement scales. Construction Management Plans are required, as set out in Objective CPO 15.1 and Section 1.4.6 of the Development & Design Standards, and as proposed earlier in this part of the report, it is recommended that these provisions be strengthened.

Three Trout's Stream

While the desire to enhance the protection of waterbodies, including the Three Trout's Stream, is commended and has the Council's full support, there is no such designation as a 'Community Nature Reserve'. A 'Nature Reserve' is protected under Ministerial order and therefore it would not be possible to so designate Three Trout's via the County Development Plan.

Furthermore, this river corridor is already identified as an important 'green corridor' (and indicative green route) in the Greystones – Delgany - Kilcoole LAP and is zoned in the LAP as 'open space' / 'greenbelt' which provides protection; this protected corridor links directly with the existing Glen Of the Downs SAC. The Draft Plan would support any projects that came forward to enhance or appropriately develop the biodiversity and understanding of this water course.

Greystones – Delgany – Kilcoole LAP objectives (set out below) are clear in that such green routes are a secondary aspiration with protection of biodiversity being the priority:

HER5 *To protect the biodiversity value and associated habitats of water bodies within the plan area in accordance with the objectives as set out in the Wicklow County Development Plan and Eastern River Basin District Management Plan. In considering proposals for development, regard shall be paid to the recommendations set out in Greystones-Delgany Local Biodiversity Area Study (2006). In particular, recommendations relating to the Three Trout's Stream shall be implemented, as deemed appropriate, by the planning authority.*

TS12 *To develop the 'greenroute' network for pedestrian and/or cycling facilities. The proposed indicative 'greenroute' network is indicated on Map B. Greenroutes should be developed with a common scheme of signage and/or markings. Where feasible, proposals for development should provide for the development of these greenroutes. Proposals for the development of 'greenroutes' shall be subject to appropriate assessment requirements in accordance with the Habitats Directive. No development shall be permitted that would have adverse impacts (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites. While certain parts of the 'greenroute' network are likely to be implemented in the short term, certain parts are considered to be a more long term aspiration. Implementation of 'greenroutes' is subject to the available funding and further design and feasibility studies. Some sections may also be delivered as part of proposals for the development of zoned land.*

It is considered that these provisions, along with many other in the Draft Plan, provide significant protection for nature corridors such as the Three Trouts, and a specific new designation for this corridor in the CDP is not warranted. The objectives with regard to this corridor can be reviewed and enhanced if necessary in the next G-D-K LAP.

The Draft Plan does however set a wide range of enhanced protections for all watercourse, including (but not limited to):

- CPO 17.12** *To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

- CPO 17.13** *To facilitate, in co-operation with relevant stakeholders, the ongoing identification and recording of locally important biodiversity areas and species in County Wicklow, not otherwise protected by legislation and ensure that consideration is given to these in the development management process.*

- CPO 17.14** *Ensure that development proposals support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses(rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the European network in Wicklow.*

- CPO 17.24** *To ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.*
- CPO 17.25** *Ensure that floodplains and wetlands are retained for their biodiversity and ecosystems services value and resist development and activities that would interfere with the natural water cycle to a degree that would interfere with the survival and stability of these natural habitats.*
- CPO 17.26** *Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban location) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.*
- CPO 13.21** *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*
- CPO 13.22** *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

C2-195

Submission that plan should include a table of existing or potential riverside walks/cycle routes

Suggested Objectives

1. *In partnership with the NPWS, WI, Councils, community groups, landowners and other relevant stakeholders, provide, protect, promote, encourage, develop, maintain, facilitate, manage, increase and improve public access to the inland waterways including rivers, lakes and riparian/waterway corridors in partnership with the NPWS, WI and other relevant stakeholders..*
2. *Recognising the importance of rivers, riparian corridors and buffer zones for their natural amenity and scenic values activities along inland waterways including rivers to facilitate the creation of linear parks, in co-operation with landowners, WI, NPWS, Government Departments, community groups and other councils to develop their infrastructure, quality and amenity. Provide promote, develop, maximise/expand, create and facilitate/accommodate access for suitable walking, cycling tracks/routes, bridle paths and other compatible recreational activities.*
3. *Support and facilitate the development of Greenways and Trails along rivers.*
4. *Provide land adjacent to river and canal banks and lakeshores free from development and reserved/preserved/set aside for public access as an undisturbed buffer zone between new development and river corridors and other water bodies to facilitate the creation of linear parks to accommodate walking/cycling routes that could be linked to the wider network of green infrastructure and any established settlements in their vicinity and to encourage increased public access and recreational*

opportunities.

5. *Take into account any proposal to increase and enhance public access to inland waterways as a condition of any development granted.*
6. *Strengthen the network of waterways at regional level.*
7. *Promote the natural, historic and amenity value of watercourses to address the long term management and protection and strengthen regional links.*
8. *Recognising the importance of inland waterways, both navigable and non-navigable, work with State Agencies, landowners, local communities and other relevant groups/stakeholders to ensure the protection, management, maintenance , preservation, ,conservation, improvement and enhancement of waterbodies and watercourses, rivers, streams, river valleys, lakes, springs and associated undeveloped riparian strips/zones, buffer zones distinctive linear sections of water corridors and the amenity of the shoreline of river corridors, canal and river banks, river and stream valleys and riverine wetland areas, fens wildlife habitats from degradation and damage and the visual impact of dispersed and highly visible development that could adversely affect them by compromising their visual integrity, recreational, amenity, natural heritage, geological historical or landscape character values and the natural characteristics and features and recognise and promote them as natural environmental assets, and maintain them free from inappropriate development to ensure that public use is not prejudiced by incompatible uses. Keep them in an open state and in a natural condition by discouraging land filing culverting or realignment and in certain instances by uncovering existing culverts. Any existing blockages to permeability such as redundant buildings should be resolved where possible.*
9. *All proposed developments shall be in accordance with the Birds and Habitats Directives and other relevant EC Directives.*
10. *Protect and maintain the amenity and recreational value of walking and cycling routes by prohibiting the intrusion of development along these routes. *Seek to ensure that new development will not have a negative impact on established walking routes and public rights of way along inland waterways. *It would be better if Seek to was omitted.*
11. *Normally only permit development proposals associated with water sports adjacent to waterways (including lakes)where the proposed facilities are compatible with existing use of water including non-recreational uses, which will not result in damage to important features of archaeological heritage or Natura Sites, can be satisfactorily integrated into the landscape or will not have an unacceptable impact on visual or environmental amenities especially in areas of high amenity or scenic importance.*
12. *As water sports cover a wide range of activities from tranquil uses such as sailing, canoeing, rowing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying demands.*
13. *Adopt bye laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities within one year of the adopt of the Plan.*
14. *When considering development applicants relating to activities such as the use of jet-skis and power boats have regard to the recommendations of any national guidelines which may come into force with respect their potential impacts on nature conservation.*
15. *In areas adjacent to inland waterways, lakes, canals, rivers, where planning permission is sought, the applicant must ensure that full public access to waterways is retained or conditions may be attached requiring retention of this access to facilitate creation or extension of walking/cycle routes.*
16. *Adopt a regional approach to the protection of watercourses in co-operation with neighbouring counties.*
17. *Require that development along rivers set aside land for pedestrian routes that could be linked to established settlements.*
18. *The line of development within river valleys shall be strictly controlled so as to maintain the integrity of the natural topography. The maintenance of natural river banks shall be required to be without physical or visual encroachment.*
19. *Potential applicants will ensure that full public access to lands along waterways which are in private ownership is maintained.*
20. *Protect, enhance and improve existing public rights of way and, where possible, provide additional access to inland waterways including lake shores, river banks, through the acquisition of land for public rights of*

way and parking and lay-by facilities, through agreement with existing landowners. *You should add: or by the use of compulsory powers*

- 21. Reserve land adjacent to canal and river banks and other waterbodies to promote and facilitate the creation of waterside linear parks to link with existing parks and open spaces and to facilitate the provision of walking/cycling routes along canals and watercourses.*
- 22. Identify flagship projects for the River Liffey Valley from Celbridge to Ballymore Eustace as recommended in the report "Towards a Liffey Valley Strategy".*
- 23. Investigate the feasibility of creating a pedestrian link between the Liffey Valley, the Wicklow Mountains and the Wicklow Way in consultation with the Wicklow County Council as recommended in the report "Towards a Liffey Valley Park Strategy".*
- 24. Protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of Liffey and Dodder valleys.*
- 25. Ensure that development won't prejudice the creation and development of uninterrupted and coherent parklands including local and regional walking and cycling routes.*
- 26. Promote, extend, develop and facilitate the provision of increased access to lakes and lakeshores to extend public walking and cycling routes.*
- 27. Maintain the amenity value of major lakes and their environs by restricting and regulating development that would prejudice use of these areas.*
- 28. In partnership with the NPWS, WI and other stakeholders facilitate public access to wetlands and support and protect the recreational and amenity potential of wetlands.*
- 29. Protect, conserve, preserve, manage and enhance wetlands (including fens) from infilling, fragmentation, degradation and protect and conserve their quality, character and features. Resist development (including land reclamation) which would destroy, fragment and degrade wetlands, coastal wetlands, estuarine marshland and by controlling adjacent development by the use of buffer zones.*

This is very extensive list of suggested new objectives, and it has been carefully considered. Overall it is considered that the Draft Plan (in a range of chapters, not just chapter 17) addresses all of these matters, but perhaps not to the detail and to the extent as the submitter desires, but nonetheless it is considered that they are addressed to the degree required by the Planning Act, various guidelines and the prescribed bodies responsible for these areas, as evidenced by their submissions. Therefore no change is recommended.

Chief Executive's Recommendations

No change

Topic	Soils & Geology	
ID	Name	Summary of issues raised
C2-195 https://consult.wicklow.ie/en/submission/ww-c2-195	Roger Garland	<p>The following suggestions are made</p> <ul style="list-style-type: none"> - CPO 17.33 and 17.34 should be moved to a new sub-section 'peatlands' - New objectives should be added in this new sub-section <ul style="list-style-type: none"> i. <i>co-ordinate the continuing development of strategic walking routes, trails and other countryside recreational opportunities'.</i> ii. <i>Plan and prepare for the future use of large industrial cutaway bog sites when peat harvesting finishes as there is potential for the development of amenities.</i> iii. <i>Protect, conserve and manage the character, appearance, heritage and amenity values of peatland landscapes by promoting high environmental standards in conjunction with the BnM, NPWS, Coillte, IPCC and NGOs.</i> iv. <i>The Council recognises the importance of raised bogland as a major natural, archaeological and amenity resource and will liaise with the relevant Government departments and NGOs to try to secure the conservation of original peatland areas.</i> - New sub-section should be included on 'Eskers' with the following objectives <ul style="list-style-type: none"> i. <i>Increase cycling and pedestrian access and maintain esker heritage.</i> ii. <i>Protect, preserve and conserve the landscape and natural heritage and geo-diversity values of esker systems from inappropriate development.</i> iii. <i>Applications for quarrying activity in proximity to eskers and have regard to their potential to impact on the landscape, the environment and amenity value designated status of the eskers and conserve them from inappropriate development.</i> iv. <i>Ensure that any plan or project affecting eskers are adequately assessed with regard to their potential impact on the environment.</i>
C2-274 https://consult.wicklow.ie/en/submission/ww-c2-274	West Wicklow Environmental Network	<p>The plan should include an objective to encourage nature-based solutions in response to the climate emergency, including the restoration of peatlands.</p>

Chief Executive's Response

Peatlands

The Draft Plan addresses protection and management of peatlands via CPOs 17.33 and 17.34. It is not considered necessary to create a new plan section for existing objectives that fall acceptably under the heading they already have of 'soils and geology'. With respect to walking routes and recreation, it is considered that the objectives of the draft Plan, across a range of chapters, already address this goal. With regard to the additional objectives suggested, Wicklow does not have large industrial cutaway bogs, so this is not relevant. It is considered that objective CPO 17.33, which relates to the National Peatlands Strategy, as well as the various

objectives through the plan, particular in Chapter 17, address the other suggestions made. Therefore no change is recommended.

Eskers

Eskers are long ridges of stratified sand and gravel, resulting from glaciation. It is considered that the objectives of the Draft Plan set out under this heading provide appropriate and adequate protection to locations of geological significance or heritage value, as identified by the GSI and shown / listed in the plan, and therefore no change is recommended.

Chief Executive's Recommendations

No change

Landscape, Views & Prospects		
ID	Name	Summary of issues raised
C2-6 https://consult.wicklow.ie/en/submitmission/ww-c2-6	Senan Sexton	Request that the landscape classification in the area around 'Sexton's Garden Centre' in Glen Of The Down be removed from the landscape classification 'Area of Outstanding Natural Beauty'. (Note: This submission also has requests with regard to tourism zoning and this is dealt with in Section 3.3.11 of this report)
C2-101 https://consult.wicklow.ie/en/submitmission/ww-c2-101	Greystones Tidy Towns	'Urban Areas' have poor ambition in the context of the biodiversity and climate crisis. Wicklow County Council needs a plan for the management of important ecological areas within urban areas.
C2-195 https://consult.wicklow.ie/en/submitmission/ww-c2-195	Roger Garland	This submission set out a number of detailed suggestions for new / amendments to objectives relating to landscape, views and prospects, which would not be possible to summarise. All are addressed in the assessment to follow.
C2-196 https://consult.wicklow.ie/en/submitmission/ww-c2-196	Save Wicklow's Ancient East	This is a lengthy and detailed submission that makes the case that the area around Kilranelagh Hill near Baltinglass should be changed landscape category from 'Area of High Amenity' to 'Area of Outstanding Natural Beauty' for the following reasons: <ul style="list-style-type: none"> - it was 'down-graded' in error in the 2016 CDP as sensitivity analysis shown that it was fell into the medium to high sensitivity category - inadequate explanation / justification for this change in designation was provided when the change was made in 2016 - the change is not justified given the uniqueness of the Baltinglass hillfort complex location in this area. - Leaving the designation as 'Area of High Amenity' will leave this area open to inappropriate development.
C2-268 https://consult.wicklow.ie/en/submitmission/ww-c2-268	Justin Ivory	In relation to the Bray Mountains AONB, the SAAO covering Bray Head should be extended to include all this mountains group and that the Bray Mountains become a Regional Park

Chief Executive's Response

Glen Of The Downs

This request was made during the course of the previous development plan and was carefully evaluated, and no change was recommended by the Chief Executive, such advice being accepted by the members. At the time the area in question was inspected / surveyed and an analysis of the landscape sensitivity of this area was carried out using the principles set out in guidance documents, and it was considered that the impact of the N11 on the landscape in this area is very limited with lands close to the route on either side being of a highly scenic value and of high environmental / ecological sensitivity, and therefore the lower vulnerability landscape designation 'corridor area' should be narrow and limited to the road and its immediate edges. There have been no material changes to the landscape or landscape character assessments principles in the intervening period which would alter this assessment.

The existing landscape designation for this area is therefore considered appropriate and is not recommended for amendment.

C2-101

The 'urban area' landscape classification is not an ecological or biodiversity related classification; the plan provisions relating to ecology / biodiversity apply equally to 'urban' areas as any other landscape classification. Therefore no change is recommended.

C2-195: Suggested objectives

1. *Provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes.*

The County Development plan is a land-use and spatial planning framework; it is not an 'outdoor recreation' action plan; it cannot 'provide' or 'manage' access, especially to private lands. It may set out objectives and standards where development is proposed by public or private actors. Therefore it is not recommended to include an objective along these lines.

2. *Preserve, maintain, enhance important landscapes and protect the amenity value, visual integrity of upland areas. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Ensure that development will not materially interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts (including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have particular regard to the potential impacts of development on sensitive upland areas and consider the difficulty of establishing and maintaining screening vegetation.*

It is considered that this goal is already provided for in the draft plan objectives; therefore no change is recommended.

3. *Preserve the status of traditionally open/unfenced landscapes including commonages and other hill land.*

This is already provided for in the draft plan objectives (CPO 18.14 refers); therefore no change is recommended.

4. *Protect, conserve, preserve, maintain, safeguard, identify and enhance the visual integrity,, scenic quality, general amenity and the visual quality of areas of intrinsically important and outstanding, highly sensitive, designated, natural, unspoilt and open landscapes, scenic areas, areas of high amenity and the environs of archaeological or historic sites(named) from intrusive, inappropriate, injurious or unsympathetic new, or additions to, existing developments and reinforce their character and promote their distinctiveness by prohibiting development where it could unduly impinge or impact on or be detrimental to such landscapes or would be injurious to, or detract from natural amenities or introduce incongruous landscape elements.*

It is considered that this is already adequately addressed for in the draft plan objectives; therefore no change is recommended.

5. *Adopt a regional approach to the protection of the landscape in co-operation with neighbouring counties.*

The CE would welcome the production of a national or regional landscape character assessment to ensure improved consistency between county approaches to landscape classification and protection. It would be outside the scope of this County plan to do this and no change is therefore recommended.

6. *In areas of high landscape sensitivity the design and location of proposed development will be critical.*

Agreed, and it is considered that the provisions of the Draft Plan ensure this. No change is therefore recommended.

7. Suggest that a new sub-section be added: **'Fencing of Hitherto Open Land'** and the following text / objectives provided:
- i. *It is a requirement of the Planning Regulations 2001 Art 9(l)(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 or other place of natural beauty or recreational utility, requires planning permission. Wire fencing constitutes visual pollution and destroys the "away from it all" feeling which makes upland areas such an attraction. There has been a large increase in the amount of new fencing in upland areas. 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. Traditional hill-sheep farming rarely required fencing, but since the introduction of AEOS, sheep-farmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of AEOS without impinging on access for walkers and other recreational users.*
 - ii. *As new fencing of land open to or used by the public during the ten years preceding is not exempt development in accordance with Art 9(l)(a)(x) of the Planning and Development Regulations the following criteria will be used when considering/assessing planning applications for new fencing of hitherto open land : Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm. 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. Stiles or gates at appropriate places will be required. Barbed-wire will not be used for the top line of wire.*
 - iii. *As fencing may have a cross-county dimension it is important that this development plan should be in conformity with those in adjoining counties.*

This proposal has been considered carefully and the CE does not agree that this is appropriate for inclusion in the Development Plan. Where unauthorised development occurs, the Council will use its powers under the Planning Acts to take action if deemed appropriate and necessary. Therefore no change is recommended.

C2-196: Kilranelagh Hill area

It is agreed that the landscape value of this area has been underestimated, and it is recommended that the landscape designation be amended from 'Area of High Amenity' to 'Area of Outstanding Natural Beauty'.

C2-268: Bray Head SAAO

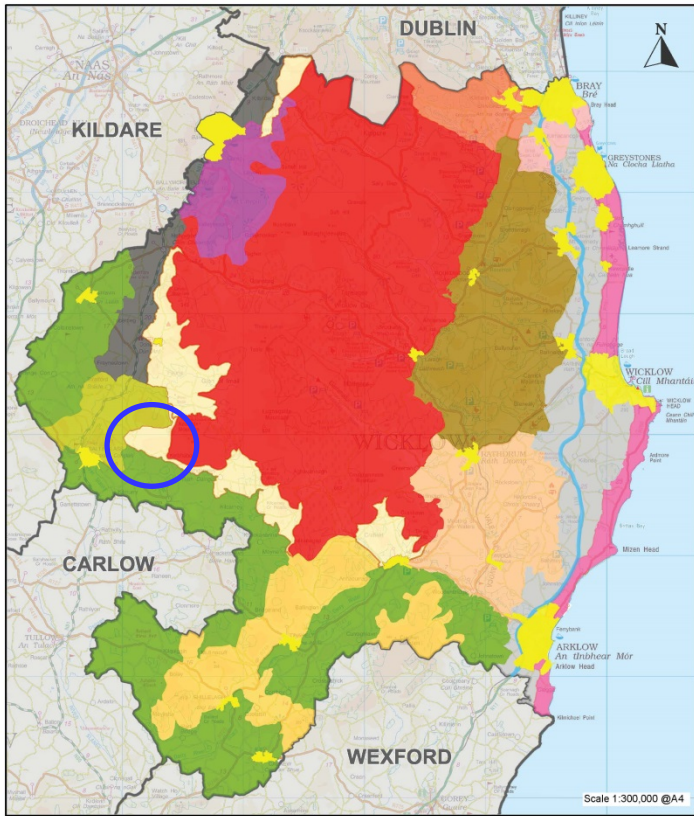
The designation of area as 'Special Amenity Area' under Section 202 of the Planning Act is a separate process to the preparation a County Development Plan; therefore there is no scope within this process to make such designation. The making of a SAAO is a matter for the members, either on their own instigation or under the direction of the Minister. Very specific criteria must be fulfilled for a SAAO designation to be considered appropriate, and it is not evident that the sites suggested would qualify.

Chief Executive's Recommendations

Amend the Plan as follows:

Volume 1, Chapter 17

Amend Maps 17.09A, 17.09B, 17.09C



<p>Natural Heritage & Biodiversity</p> <p>Map No. 17.09A</p> <p>Wicklow Landscape Category Map</p>	<p>Legend</p>		<p>DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2021-2027</p> <p>Wicklow County Council Planning Department</p> <p>© Ordnance Survey Ireland. All rights reserved Licence number 2021/35CCMA/Wicklow County Council</p>
	<ul style="list-style-type: none"> The Mountain Uplands (1 - ACNB) The Blessington Lakes Area (2 - ACNB) The Bray Mountains Group (3 - ACNB) The North Eastern Valley / Glensree (4 - ACNB) Coastal Areas (ACNB) North East Mountain Lowlands (1 - AHA) South East Mountain Lowlands (2 - AHA) 	<ul style="list-style-type: none"> Southern Hills (3 - AHA) Ballinglass Hills (4 - AHA) Transitional Lands (5 - AHA) Corridor Area West Corridor Area East Rolling Lowlands Urban Areas 	

Change area marked from 'Area of High Amenity' to 'Area of Outstanding Natural Beauty'.

Section 3.3	Volume 1
Section 3.3.18	Chapter 18

Topic	Green Infrastructure Policy & Approach	
ID	Name	Issue raised
C2-88 https://consult.wicklow.ie/en/submitmission/ww-c2-88	Benjamin Mullen (Irish Architects Declare)	<ul style="list-style-type: none"> - Lengthy submission regarding the integration of the 'Green Factor Approach' into planning policy. The 'Green Factor Approach' is an ecological planning tool which aims to mitigate the effects of construction by maintaining sufficient levels of green infrastructure and enhancing the quality of this green infrastructure - This approach has been used in a number of large cities across the world. Examples of cities are provided in the submission. - Green factor targets can be set for sites calculated by dividing green area by site area
C2-195 https://consult.wicklow.ie/en/submitmission/ww-c2-195	Roger Garland	<ul style="list-style-type: none"> - NPO 22 should be referenced in this chapter. - Suggest that CPO 18.6 is relocated to Chapter 19
C2-235 https://consult.wicklow.ie/en/submitmission/ww-c2-235	Wicklow Greens	<ul style="list-style-type: none"> - Concerns expressed regarding the NPF provisions and NSOs regarding environment, the climate and biodiversity emergencies, and the intrinsic value of natural heritage - Issues expressed regard the <i>Strategy for the Future Development of National & Regional Greenways</i> (DoTTS 2018). Request that the Draft plan includes a provision under this section that '<i>An EIA must be undertaken before the commencement of any other planning for a greenway. The entire planning process must be carried out with a biodiversity officer taking the lead in all decision-making. Materials used to construct greenways must be sympathetic to the local ecology.</i>' - Request the inclusion of a new goal 'Goal 10' after Goal 9 in Section 18.2: Goal 10 '<i>An EIA must be undertaken before the commencement of any other planning for a greenway. The entire planning process must be carried out with a biodiversity officer taking the lead in all decision-making. Materials used to construct greenways must be sympathetic to the local ecology. All greenways must prioritise the conservation and enhancement of natural heritage, and the regeneration of depleted ecosystems.</i>'
C2-265 https://consult.wicklow.ie/en/submitmission/ww-c2-265	Luggala Estate Ltd	<p>Green infrastructure development should be lead from the onset of planning with the principles of conservation, enhancement and regeneration of ecosystems; not focused on movement of people.</p>
C2-263 https://consult.wicklow.ie/en/submitmission/ww-c2-263	Eoin LLeuwellyn	<p>Objective 18.3 should be enhanced to require new development to address, as much as reasonably possible, best practice sustainable solutions and a sustainable site design, with emphasis on addressing how existing natural features of the site will inform sustainable design, by exploring the potential for the integration of existing natural features of merit such as watercourses</p>

Chief Executive's Response

Section 18.0 of this chapter sets out in detail what exactly is meant by and encompassed by the term 'Green Infrastructure'; these are derived directly from higher order strategies and guidelines relating to this area. Any issues raised in the submissions with the concept and role of 'green infrastructure' would not therefore be within the scope of this plan to address.

Section 18.1 goes on to detail the statutory policy and context underpinning the chapter and the GI strategy / objectives, and provides details of, RSES and LECP objectives. A concern raised and suggestions made in C2-235 relate to these separate strategy documents and therefore it is not within the scope of the CDP to make amendment to these sections.

Section 18.3 of this chapter sets out and describes the interrelationships between green infrastructure and land use planning, and the role of land use planning in contributing to the protection, management and enhancement of urban, peri-urban and rural environments.

Section 18.6 sets out a number of Green Infrastructure objectives which are considered to adequately protect promote, and enhance green infrastructure within the County:

CPO 18.1 *To recognise the importance and contribution of Green Infrastructure for the maintenance of biodiversity and ecosystem services, ensuring that the region and county will be better able to adapt and respond to climate change issues.*

CPO 18.2 *To protect existing green infrastructure resources and to facilitate, in consultation with relevant stakeholders, the development of green infrastructure that recognises the benefits that can be achieved with regard to the following:*

- *provision of open space amenities,*
- *sustainable management of water,*
- *protection and management of biodiversity,*
- *protection of cultural heritage, and*
- *protection of protected landscape sensitivities.*

CPO 18.3 *New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment.*

CPO 18.4 *To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, European sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.5 *To identify and facilitate the provision of linkages along and between green / river corridors within the county and adjoining counties to create inter connected routes and develop riverside parks and create linkages between them to form 'necklace' effect routes including development of walkways, cycleways and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

- CPO 18.6** *To promote and facilitate the development of coastal paths linking up with existing recreational paths/strategic walkways/cycleways, creating new linkages between coastal sites and inward linkages to settlements and green spaces in built up areas and extensions to existing facilities where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*
- CPO 18.7** *To facilitate the development of green bridges / wildlife crossings over existing physical transport barriers to repair fragmentation of the green infrastructure network caused by such grey infrastructure developments.*
- CPO18.8** *To require the integration of green infrastructure principles and inclusion of native planting schemes in all development proposals in landscaped areas, open spaces and areas of public space.*

Submission **C2-88** is a lengthy and detailed submission which gives examples of the use of the 'Green Approach' in large cities throughout the world. The Green Approach with its calculation method for green infrastructure does appear to be a successful solution and useful calculation tool but it would appear to be more appropriate at a regional or national level for large cities. No change is therefore recommended on foot of same.

Sustainable and nature based solutions in the design of new development is required by a number of objectives and design standards of the Draft Plan, and it is considered that CPO 18.3 is already sufficiently clear and strong that this is required. Therefore no change is recommended.

With respect to C2-195, it is agreed the NPO 22 should be referenced in this chapter. It is considered that CPO 18.65 is appropriately located in Chapter 18 which addresses recreational use of natural resources, and therefore no change is recommended.

Chief Executive's Recommendations

Amend Draft Plan as follows:

Chapter 18, Section 18.1

In addition, a number of NPF National Policy Objectives address green infrastructure directly:

NPO 22	Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.
NPO 58	Integrated planning for Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
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.

GI Objectives – Recreational Use of Natural Resources		
Topic	GI Objectives – Recreational Use of Natural Resources	
ID	Name	Issue raised
C2-85 https://consult.wicklow.ie/en/submit/ww-c2-85	Ruth Prendeville	There is currently great work being done across Wicklow to provide amenities for outdoor recreation, but sadly horse riders are completely abandoned on all of these plans. A search of the Green Infrastructure document showed up not a single mention of horse or equestrian in the entire document. Wicklow has a large community of horse riders that are not being considered as part of the Draft Plan. This needs to be remedied as part of the amended document.
C2-195 https://consult.wicklow.ie/en/submit/ww-c2-195	Roger Garland	<p>The following changes are suggested:</p> <ul style="list-style-type: none"> - CPO 18.11 & 18.12: Suggest that these should be repositioned in Chapter 11 Tourism and Recreation - CPO 18.13: Suggest that this should be repositioned in Chapter 6 - CPO 18.14: Suggest this should be repositioned in Chapter 17 Natural Heritage & Biodiversity - CPO 18.18: Suggest this should be repositioned in Chapter 11 <p>With regard to SAAOs, the following objectives are suggested;</p> <ul style="list-style-type: none"> - Protect and enhance the amenity of the Bray Head Special Amenity Area in accordance with the Order and implement the Management Plan in consultation with all relevant stakeholders. - Actively propose the designation of the Little Sugar Loaf as a Special Amenity Area and seek an Order to that effect as per section 202 of the Planning and Development Act 2000(as amended) and undertake a feasibility study to report on other areas considered worthy of designation, to report within two years of the adoption of the Plan.
C2-227 https://consult.wicklow.ie/en/submit/ww-c2-227	Wicklow IFA	Concerns with respect to dog control, inadequacy of car parking facilities, and control of litter and camping
C2-229 https://consult.wicklow.ie/en/submit/ww-c2-229	Wicklow PPN	Need to conserve and protect existing amenity routes / areas e.g. the Murrough, Cliff Walk

Chief Executive's Response

C2-85: Horse Riding

This issue has also been raised under the 'Tourism & Recreation' chapter of the Draft Plan, and is evaluated in more detail in Section 3.3.11 of this report. It is recommended in this regard that a number of the objectives in Chapter 11 and 18 be amended to address this issue (see below)

C2-195: Objectives

The CE is satisfied that the objectives set out in this section of the plan are appropriately located in the plan, and similar and complementary objectives are included in Chapter 6 and 11 where necessary. Therefore no change is recommended.

C2-195: SAAOs

Objective CPO 18.15 already addresses the implementation of the Bray Head SAAO; therefore no change is recommended.

The possible designation of the Sugarloaf as a SAAO has already been considered by the members of WCC and rejected. It is no longer an objective of the plan. No further areas are currently being considered or evaluated for SAAO designation. No change therefore recommended.

C2-227

It is an objective of the plan to facilitate access to amenity areas, which is obviously subject to the agreement of landowners/stakeholders (see Objectives CPO 18.9, 18.10)

The provisions of the Draft Plan explicitly support the improvement of infrastructure and facilities for tourists / visitors, as set out for example in Objectives CPO 18.9, CPO 11.24, 11.26, 11.28 of Chapter 11. The individual actions of members of the public with regard to illegal parking, dog control or littering and camping without landowners permission are outside the remit of the County Development Plan.

C2-229

The objectives of the Draft Plan aim to support and facilitate the ongoing use and protection of existing amenity areas / routes, in particular Objectives CPO 18.2, 18.4, 18.6, 18.9, 18.10, 18.11, 18.13.

Chief Executive's Recommendations

Amend the plan as follows:

Volume 1

Chapter 11

- CPO 11.29** In conjunction with Fáilte Ireland, to support the development of Bray, Wicklow-Rathnew, Arklow, Greystones, Blessington, Baltinglass, Enniskerry, **Kilcoole, Newtownmountkennedy**, Rathdrum and Tinahely/ Shillelagh/ Carnew (South West Wicklow) as tourism hubs.
- CPO 11.34** To support the development of a strategic national network of **walking, cycling, horse riding and water-based** trails.
- CPO 11.37** To protect and enhance existing and support the development of new, walking, cycling **and horse riding** routes / trails, including facilities ancillary to trails (such as sign posting and car parks) and the development of linkages between trails in Wicklow and adjoining counties. In particular, to encourage and facilitate:
- on-road cycling routes across the Wicklow Mountains (in particular across the Sally Gap) and along coastal routes;
 - the development of new **walking-route trail** from Bray Head, via the Sugarloaf Mountains, joining up with The Wicklow Way;
 - **hill walking** trails in West Wicklow;
 - the development of a lakeshore **walk trail** around the Vartry reservoir;
 - the development of a **walking-route trail** along the disused Great Southern and Western Railway line (Naas to Tullow branch) through Dunlavin and Baltinglass subject to consultation and agreement with landowners;
 - the development of a coastal route from Bray to Arklow as well as links between this potential route and the coast road;
 - The Wicklow Way and St. Kevin's Way (as permissive waymarked routes).
 - The Wicklow to Glendalough "pilgrim walk" incorporating ancient wells.
 - 'Mountains to the Sea' amenity route incorporating Glendalough, Laragh, Annamoe, Roundwood, Newtownmountkennedy and Kilcoole-Newcastle.
 - The development of an amenity and active travel **walking-and-cycling** route between the Bray Harbour area northwards to the Dun Laoghaire Rathdown administrative area to

provide for future connection to the proposed Woodbrook DART station.

Chapter 18

- CPO 18.5** To identify and facilitate the provision of linkages along and between green / river corridors within the county and adjoining counties to create inter connected routes and develop riverside parks and create linkages between them to form 'necklace' effect routes including development of walkways, cycleways, **bridleways** and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.
- CPO 18.6** To promote and facilitate the development of coastal **paths trails** linking up with existing recreational **paths/strategic walkways/cycleways trails**, creating new linkages between coastal sites and inward linkages to settlements and green spaces in built up areas and extensions to existing facilities where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.
- CPO 18.11** To support the development of greenways, blueways and other access routes along natural corridors while ensuring that there is no adverse impact on the flora and fauna, biodiversity or water quality of natural assets.
- In particular, to support the development of existing and examine the feasibility of new walking, **and** cycling, **horse riding and water based routes and** trails along the following routes:
- from Bray Head, via the Sugarloaf Mountains, joining up with The Wicklow Way;
 - the extension of the 'Blessington Greenway' walk around the Phoulaphuca reservoir;
 - the expansion of a lakeshore walk around the Vartry reservoir;
 - the extension of the old Shillelagh branch recreational trail - railway walk from Arklow to Shillelagh;
 - the development of a route along the disused Great Southern and Western Railway line (Naas to Tullow branch) through Dunlavin and Baltinglass.
 - **the development of a coastal route from Bray to Arklow as well as links between this potential route and the coast road;**
 - **the Wicklow Way and St. Kevin's Way (as permissive waymarked routes).**
 - **the Wicklow to Glendalough "pilgrim walk" incorporating ancient wells.**
 - **'Mountains to the Sea' amenity route incorporating Glendalough, Laragh, Annamoe, Roundwood, Newtownmountkennedy and Kilcoole-Newcastle.**

Topic	Public Rights-Of-Way	
ID	Name	Summary of Issues raised
C2-4 https://consult.wicklow.ie/en/submit/ww-c2-4	James Scott	Existing PROW-7 listed in the plan (Kilcoole Mass Path) should be extended from the Kilquade Road to the Drummin area, linking up with Blackberry Lane (Drummin Mass Path).
C2-32 https://consult.wicklow.ie/en/submit/ww-c2-32	Kilcoole Walkways	<ul style="list-style-type: none"> - Existing PROW-7 listed in the plan (Kilcoole Mass Path) should be extended from the Kilquade Road to the Drummin area, linking up with Blackberry Lane (Drummin Mass Path) - Ballydonerea path connecting the village to the sea should also be included
C2-269 https://consult.wicklow.ie/en/submit/ww-c2-269	Hannah O'Kelly	<ul style="list-style-type: none"> - Requests that Chapel Lane which runs from the village of Glenealy to the Carrick Mountain is formally recognised as a right of way. - Recent alteration to route in 2015 has meant re-route through private lands.
C2-272 https://consult.wicklow.ie/en/submit/ww-c2-272	James Byrne	<ul style="list-style-type: none"> - Concerns re future potential closure by landowner. - Concerns future development at the entrance may block the right of way.
C2-292 https://consult.wicklow.ie/en/submit/ww-c2-292	John Glynn	<ul style="list-style-type: none"> - Path has been in use for generations.
C2-297 https://consult.wicklow.ie/en/submit/ww-c2-297	Kevin Warner	<ul style="list-style-type: none"> - Commends WCC draft plan on admirable, appropriate objectives re walking routes in draft plan and including some rights of way in plan. - However significant lack of rights of way in comparison to other countries and counties. - Lack of adequate safe walking facilities - 'Walking Vision' for County needed which should include safe footpaths and pathway along the coast
C2-298 https://consult.wicklow.ie/en/submit/ww-c2-298	Niall Leonach	<ul style="list-style-type: none"> - Council should recognise importance of registering/protecting PROW's - Legal obligation under Roads Act - Sustainable tourism opportunity - Safe access - 7 ROW in County vs 51 in DLR - 110 PROW's identified in 1986 - Population increase requires more PROW's
C2-158 https://consult.wicklow.ie/en/submit/ww-c2-158	Friends of the Murrough	<p>A number of rights of way should be included in the Plan.</p> <ul style="list-style-type: none"> - Killougher Lane to the beach Ballybla - Access to the Murrough from Tinakilly house - Black castle to Glen Turn beach with extension along the Lighthouse road to link up with Old Dunbur Road loop (PROW 4) - Access from R750 to Magheramore beach.
C2-195 https://consult.wicklow.ie/en/submit/ww-c2-195	Roger Garland	<p>Suggest that this plan section be re-positioned either in Chapter 7 or as an additional chapter.</p> <p>Suggest inclusion of the following text:</p> <p><i>1. Public Rights of Way have existed over the centuries and constitute an important recreational amenity. They enable the enjoyment of</i></p>

		<p><i>high quality landscape, natural and archaeological heritage and provide links to rivers lakes, bogs, forests and places of natural beauty.</i></p> <ol style="list-style-type: none"> <i>2. A PROW or highway is a physically defined route over which the public have a right of passage even if the route is not in public ownership. It is described as "a user as of right" and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission from the landowner. The most common characteristic of a PROW is that it follows a defined route which may be sub-divided amongst different branches.</i> <i>3. The listing and mapping of public rights of way will preserve Public Rights of Ways for recreational purposes.</i> <i>4. Section 14 of the Planning and Development Act 2000 sets out the formal process for designating rights of way in development plans. The scope of these statutory provisions is grounded on identification of existing routes over which PROWS are deemed to exist. The inclusion of PROW objectives for their preservation provides greater protection for such routes under development management provisions of planning legislation whilst also restricting the scope of certain exempt development.</i> <i>5. The listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of the failure of walking tourism to reach its full potential in this country.</i> <i>6. The above list is not exhaustive. The omission of a right of way from this list shall not be taken as an indication that such a right of way is not a public right of way. The public right of ways mentioned in the Plan are based on evidence of their existence and validity.</i> <p>Suggest a significant number of new objectives / maps with respect to PROWs that would not be possible to summarise but are assessed in the section to follow.</p> <p>Submit plan should include additional Public Rights of Way with accompanying maps:</p> <ol style="list-style-type: none"> 1 The route from Killoughter Lane to the beach 2 The route from the Black Castle to Glen Turn Beach 3 The access to Magheramore Beach from the R750 4 Chapel Lane in Glenealy to the boundary of Coillte's land
<p>C2-300 https://consult.wicklow.ie/en/submission/ww-c2-300</p>	<p>Wicklow Planning Alliance</p>	<p>Public Rights of Way fulfil an important function and note the Planning Regulator's comments that there are not enough Rights of Way in Wicklow's plan. Offer full support to Friends of the Murrough submission identifying new paths and support others, including Keep Ireland Open, who may be proposing that existing walks are properly designated as Rights of Way</p>
<p>Chief Executive's Response</p>		
<p>General</p> <ol style="list-style-type: none"> 1. Section 10(2)(o) of the PDA 2000 in summary requires Planning Authorities to identify and include objectives in their County Development Plans, for the preservation of <u>existing</u> public rights of way [PROWs] which have 		

access to places of natural beauty/recreational utility, by marking such routes on maps and indicating their location-description of their character on a list therein. This statutory provision does not equate with the 'registration of rights of way' which is provided for under PART 8 of the Land and Conveyancing Law Reform Act 2009 with respect to other forms of easements including Private Rights of Way.

2. A legal definition of a PROW as an easement of means of passage from the Judgment of the Irish Supreme Court in the seminal 2013 'Lissadell Estate' case together with some defining characteristics is provided in 18.5 of the Draft Wicklow CDP.
3. In accordance with the consistent guidance provided in Irish PROW cases, the essence of any public right is that it is either of ancient origin, has been granted by statute or at some stage [including contemporary] been dedicated to use by the general public [not a specific category of the public] by the owner of the lands over which the route passes and the public has accepted that dedication. Such dedication may be implied or expressed i.e. verbally communicated or written.
4. Local historical customary routes such as mass paths and estate roads do not in all cases equate with the essential legal principles to establish or declare that a particular route-way/trackway/lane is a PROW.
5. Planning Authorities have powers to create new PROW on existing or new route-ways under Sections 206-207 of the PDA 2000.
6. Regardless of whether or not an alleged public amenity route is or is not the subject of an objective for preservation in a Development Plan, a Planning Authority has powers to enforce the removal of any enclosure/blocking by the erection of fences/locked gates/walls on such route-ways.
7. Where a Planning Authority proposes in a Development Plan to include for the first time the preservation of a particular route-way as a PROW, it is required to serve a notice of such a proposal on any owner-occupier of the land over which the PROW exists.
8. In accordance with Section 14(7) (a) of the PDA 2000, the non-inclusion of a particular route-way for preservation as a PROW in a Development Plan, shall not affect the existence or validity of the possible status of that route as a public right of way.
9. In accordance with the appeal provisions of Section 14(4) of the PDA 2000, two of the existing PROWs in Section 10.38 of the current Wicklow CDP namely PROW 5 [Southern end of the Bray to Greystones Cliff Walk] and PROW 6 [Murrough pathway, from Tinakelly/Broadlough area to Newcastle Beach] are the subject of an appeal to the Wicklow Circuit Court by Còras Iompair Éireann. That case was withdrawn from the Court List in 2019 by CIE with liberty to re-enter it.
10. A growing awareness and understanding by Wicklow County Council of the legal complexities and associated potential for litigation by first, second and third parties regarding the listing of particular route-ways [non-public roads] for preservation as public rights of way by means of an objective in Development Plans; during the intervening years since the adoption of the 1998 Draft CDP which had a circa 100 routes listed as PROWs; means that a more cautious and evidence based approach is now taken by the Planning Authority in this area of preservation of such forms of easements.

The current and Draft CDP provides a list of 7 PROWs; it is accepted that there are likely more PROWs in the County in addition to those listed in the current / Draft Plan, and this list is not intended to be a complete or definitive list of PROWs with reference to point 8 above. The Plan can only list existing PROWs rather than creating new ones [see points 1 and 5 above]. There must be sufficient certainty that a legal PROW already exists for it to be included, as failure to ensure that evidence may open the inclusion to legal challenge. The CE must be satisfied that adequate information or evidence has been submitted in submissions with respect to a particular means of passage to allow him to recommend to include it for preservation as a PROW.

The OPR has recently audited PROW provisions across the Country, and the OPR found that Wicklow to be performing better than many Councils in its PROW provisions in the current Wicklow CDP.

The objectives set out in Chapter 18 of the draft plan support the identification of further public rights or way [objective CP0 18.20] and the development of greenways, blue-ways and amenity access routes throughout the County during the lifetime of this plan which may be incorporated into it by way of a variation or consideration at its statutory review. All of the submissions made to this process (as summarised above) will be considered should

such a further review be initiated.

Kilcoole – Drummin Mass Path

While it is accepted that there is a long standing amenity route from the Kilquade Road to the Farrankelly Road, and thereafter from the Farrankelly Road to Drummin Lane – Blackberry Lane-its junction with the N11, this is a 'mass path' which is not automatically confer PROW legal status. In the absence of any submitted evidence by/on behalf of the owners of the land holding over which two sections of mass paths traverse, that they have respectively dedicated those defined route ways for use by the general public 'as of right' [i.e. freedom for any member of the public to use without restriction or notice to/permission from those landowners]; the CE is not satisfied that sufficient grounds exist for the inclusion of those sections of historical mass paths for preservation in Table 18.3A [i.e. listed for preservation as PROW].

During the preparation of the 2016-2022 Wicklow CDP none of the respective owners of the eastern section of this overall Mass Path from Main Street Kilcoole to the Kilquade road [L-1042] raised any objection to the inclusion of this route for preservation as a PROW in that Plan and by inference the Planning Authority deemed that they dedicated their respective sub-sections of that existing route as a PROW. Subsequent to the adoption of that Plan the owners of the only unfenced part of that route [at its western end between St Patricks River and the Kilquade Road confirmed through liaison with WCC such dedication subject to an agreement that, WCC erect a wooden post and rail fence to enclose its open boundary [the other boundary is a mature field embankment-hedgerow boundary] in the interests of clarity and security. Such fencing works were duly completed by WCC during 2017.

Ballydonarea path

While it is accepted that there are amenity routes from the village of Kilcoole to the seaside and back along a series of rural paths and through farmlands, improved in recent years with the cooperation of landowners, this does not automatically make same a public right-of-way.

No expressed evidence of dedication by the owners of the landholdings over which this pathway traverses to the general public as a PROW has been submitted [see point 3 above].

The CE is not satisfied that adequate information or evidence has been submitted in these submissions to substantiate its inclusion in Table 18.3A/preservation as a PROW exists. Therefore it is not recommended that it be listed in the CDP.

Glenealy/Carrick Mountain

Investigations by WCC under planning files pertaining to the single dwelling house site through which that short route of circa 50m runs, noted that there has been public access available between the end point of the public road L10963 and the Coillte forest [subject to An Coillte bye laws for public recreational use] at Carrick Mountain for many years. That route remains open to public usage as facilitated by open pedestrian openings in the gateways at each of its respective ends.

The re-positioning of that roadway from its former alignment through the central part of the front garden of the subject residential site to an alignment straddling its western boundary hedgerow is authorised by planning permission.

No express evidence of dedication by the owners of the landholdings over which this pathway traverses to the general public as a PROW has been submitted [see point 3 above].

The CE is not satisfied that adequate information or evidence has been submitted in that submission to substantiate its inclusion in Table 18.3A/preservation as an existing PROW. Therefore it is not recommended that it be listed in the CDP.

Killoughter Lane to the beach Ballybla

This laneway leads from the R761 to the Murrough coastline in Ballybla/Clonmannon at the former Killoughter

Railway Station via an unguarded pedestrian crossing on the Dublin to Rosslare Railway line. No expressed evidence of dedication by the owners of the landholdings over which this pathway traverses to the general public as a PROW has been submitted [see point 3 above].

It is deemed that it is outside of the statutory powers of Wicklow Council to include a pedestrian crossing over a railway line in a Development Plan objective for preservation as a public right of way. As a consequence one of the established case law developed characteristic criteria that a public right of way must provide access to a public place is not fulfilled in this instance as Killoughter Lane terminates at the railway cross gateway.

The CE is not satisfied that adequate information or evidence has been submitted in that submission to substantiate its inclusion in Table 18.3A/preservation as an existing PROW. Therefore it is not recommended that it be listed in the CDP.

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.

The creation of new PROW routes does not come within the scope of the Development Plan preparation/adoption functions of Local Authorities in accordance with Section 10(2) (o) of the PDA 2000 as advised in point 1 above. Therefore this proposal cannot be considered as part of this CDP preparation/adoption process.

The extending of PROW 2 [Wicklow Cliff Walk] from its current looped southern end, by developing link to the R.750 to the west either on the Lighthouse private Road or along the adjoining land in the ownership of WCC.

Same response as the one to the preceding Rathnew to Murrough coastline also applies here.

The continuation of the existing PROW 4 along the rear of Seafield housing estate on an existing laneway.

The existing description of this PROW in Table 10.3.8 and its illustration on the associated Map no. 10.12A confirm that such provision already exists and thus there are no grounds for such an amendment.

Access from 750 [Brittas Bay Road] to Magheramore Beach.

No expressed evidence of dedication by the owners of the landholding(s) over which this pathway traverses to the general public as a PROW has been submitted [see point 3 above].

Previous investigations by WCC under a planning enforcement file of that laneway found that it is registered for private rights of way easements and did not identify any evidence this route met the essential common law criterion to constitute a public right of way set out in point no.3 above.

The CE is not satisfied that adequate information or evidence has been submitted in that submission to substantiate its inclusion in Table 18.3A/preservation as an existing PROW. Therefore it is not recommended that it be listed in the CDP.

Walking Vision

The idea of a 'walking vision' for the County is an interesting one which may be more appropriately considered by the Roads and Transportation or Community Cultural and Social Development department of the Council, as well as Wicklow Tourism, as a stand-alone project.

Submission C2-195

The suggested additional text has been carefully considered. However, it is considered that the text already set out in the Draft Plan essentially says the same as the suggested text and is adequate in its description of PROWs and the legal provisions regarding same. Therefore no change is recommended.

Suggested objectives:

1. *Existing Public Rights of Way shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments.*

Where a known PROW exists on any land for which permission is being sought to develop, it is a normal part of the development management process to evaluate the impact (if any) of the proposed development on any known PROW and to require proposals to address any such impact, which normally includes measures to protect and maintain the existing PROW. However, in the interest of clarity, it new objective is recommended to address this issue (to follow).

2. *Identify and map, on an ongoing basis, public rights of way and incorporate them in the Plan by way of a variation. Where appropriate links to established public rights of way in adjoining counties will be identified.*

While this would be desirable, and is already supported by CPO 18.20, there are limited resources / expertise available to carry out such a programme on an ongoing basis, and therefore it is not recommended that this be included as an objective of the plan. No change is therefore recommended.

3. *In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational importance, the coast, uplands, seashores, lakeshores, river banks, forests, heritage and scientific sites, areas of historic, archaeological and recreational importance and National Monuments, to create a meaningful network. Promote their greater use. Provide linkages from built up areas to the countryside and the coast and link with public rights of way in adjoining counties.*

This is already provided for in Objective CPO 18.20. No change is therefore recommended.

4. *Ensure the provision of, and improvement to signposting and way marking on all public rights of way.*

The plan supports such activities and improvements, but the delivery of such would be an operational and funding matter, and outside the remit of the CDP. No change is therefore recommended.

5. *Designate Pilgrim Paths as public rights of way.*

6. *Identify mass paths and routes to holy wells, mass rocks and penal mass stations and consider designating them as public rights of way.*

Pilgrim paths, mass paths etc are not necessarily legally automatically public right-of-way. The CE would be happy to include any in the list of PROWs were sufficient evidence submitted regarding the claim. No change is therefore recommended.

7. *Encourage the provision, for the common good, of a network of public Rights of Way to traditional outdoor amenities, including heritage sites and features of archaeological interest, national monuments, mountains, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, places of natural beauty and other natural amenities.*

The draft Plan, through a range of objectives in a range of chapters, would already support this goal. No change is therefore recommended.

8. *Council recognises the importance of promoting and supporting the preservation, protection, enhancement, maintenance and improvement, for the common good, of all public rights of way particularly those giving/providing access to seashores, mountains, uplands, lakes, water corridors river banks, archaeological sites and National Monuments, geomorphological features of heritage value, and other places of natural beauty or recreational utility/activity by ensuring that development doesn't impinge thereon.*

It is recommended that a new objective be added to the plan that addresses this suggestion.

9. *Prohibit development that might have a negative effect on public rights of way and keep them free from obstruction, particularly those at seashores, mountains, lakeshores, along inland waterways riverbanks or other places of natural beauty or recreational activity and take legal action if necessary, to prevent any attempt to close them off.*

Where a known PROW exists on any land for which permission is being sought to develop, it is a normal part of the development management process to evaluate the impact (if any) of the proposed development on any known PROW and to require proposals to address any such impact, which normally includes measures to protect and maintain the existing PROW. However, in the interest of clarity, a new objective is recommended to address this issue (to follow).

10. *Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way.*

This is not considered necessary to state in the plan, given the objectives already included and recommended for addition (see below) which clearly supports the maintenance and improvements of PROWs.

11. *Development will not be permitted where a public right of way might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrate that the level of amenity is maintained by:*

- i. *the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;*
- ii. *Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.*
- iii. *the diverted route is of at least equal character and convenience.*

12. *Where, in the interests of proper planning and development, the extinguishment of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative.*

13. *The Council will utilise its relevant statutory powers to preserve as practicable the character of listed public rights of way for amenity purposes.*

11-13: Additional objective is proposed (see below) that will address these suggestions.

14. *Protect and promote greenways and consider designating them as public rights of way.*

Greenways are not necessarily legally automatically public rights-of-way. In reality the majority are developed either after the land is acquired by the Council or another state agency, or with the legal agreement of the landowner. The CE would be happy to include any in the list of PROWs were sufficient evidence submitted regarding the claim. No change is therefore recommended.

15. *Preserve and maintain existing public rights of way in order to link amenities.*

The Draft Plan, through a range of objectives in a range of chapters, would already support this goal. No change is therefore recommended.

Chief Executive's Recommendations

Amend the plan as follows:

Chapter 18: Public Rights of Way Objectives

Add new objective

CPO 18.XX The Council recognises the recreational and heritage conservation importance of the preservation, protection, enhancement, maintenance and improvement, for the common good, of public rights of way providing

access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational utility by ensuring that new developments do not materially restrict or block the routes [pathways/trackways/laneways] of those PROWs. Developments will not be permitted where the established recreational utility or otherwise of a PROW would be compromised or lost altogether, unless specific proposals are made by the developer as part of a planning application to:

- (a) Develop a new route-way to replace the route-way of the existing PROW in full or to realign a section of such a route-way, in manner that ensures that new route-way/realigned section of route-way is of similar character, capacity and function of the route/part of a route of the PROW that it is to replace;
- (b) Appropriate legal procedures have been undertaken to extinguish the existing PROW [or part thereof] and to establish an entirely new route way or a realigned section of the existing route of a PROW.

Greenways / Blueways		
Topic	Greenways / Blueways	
ID	Name	Issue raised
C2-74 https://consult.wicklow.ie/en/submitmission/ww-c2-74	Derek Larney	The surface of the Blessington greenway should be smooth tarmac which would make it more accessible and more enjoyable. There should be adequate waste facilities along the route.
C2-212 https://consult.wicklow.ie/en/submitmission/ww-c2-212	Newtown 2050	<ul style="list-style-type: none"> - A feasibility study has been submitted for a 'Mountains to the Sea' Greenway. This is a lengthy study that considers the feasibility of developing a critical infrastructure of trails throughout north east Wicklow. - The group wish to influence how a greenway is designed so they can be seen as infrastructure between towns.
Chief Executive's Response		
<p>C2-74 These observations are noted. Standards for greenways are set out in a number of DTTAS guidelines including (but not limited to) the '<i>National Strategy for the Future Development of National and Regional Greenways</i>' and '<i>Greenways and Cycle Routes Ancillary Infrastructure Guidelines</i>' and these are the standards to which the Blessington Greenway is being designed. The design details of the Blessington Greenway are at an advanced stage and such inputs/suggestion would be more appropriate for the public consultation process for the project (Part 8) as such details would not be normally included in a high level strategy document like the CDP.</p> <p>C2-212 The Draft Plan explicitly supports the 'Mountains to the Sea' amenity route in CPO 11.37 (Chapter 11). As recommended earlier in this part of the report, it is recommended that the plan be amended to also reference this objective in CPO 18.11.</p>		
Chief Executive's Recommendations		
No change		

Section 3.3	Volume 1
Section 3.3.19	Chapter 19

Topic		Legislative & Strategic Context	
ID	Name	Issue raised	
C2-253 https://consult.wicklow.ie/en/submit/mission/ww-c2-253	Wind Energy Ireland	Section 19.1 the draft Plan includes a sub-section dedicated to the 'National Marine Planning Framework' (NMPF). It is noted that this section should be updated following the launch of the NMPF in July.	
C2-267 https://consult.wicklow.ie/en/submit/mission/ww-c2-267	RWE Renewables Ireland	References to the 'Marine Planning and Development Management Bill 2019' should be updated to reflect that this is now the 'Maritime Area Planning Bill 2021' (MAP Bill).	
C2-199 https://consult.wicklow.ie/en/submit/mission/ww-c2-199	DP Energy & Iberdrola Renewables		
C2-195	Roger Garland	NPO 41a should be referenced in this chapter.	

Chief Executive's Response

The comments are noted. References to the National Marine Planning Framework and Maritime Area Planning Bill will be updated.

NPO 41a can be referenced in this chapter.

Chief Executive's Recommendations

Amend the Plan as follows:

Chapter 19, Section 19.1

National Planning Framework (NPF)

The NPF recognises that our coastal areas play a variety of roles, across a number of sectors and are an important asset for future development of the Country. It identifies that sustainable utilisation of Ireland's marine resources, particularly in the nearshore, is dependent to a significant degree on how we manage our resources on land, and that there are many shared aims and overlapping areas of co-ordination and activity between marine spatial planning and land-use planning.

Common Aims	<ul style="list-style-type: none"> ▪ National Planning Framework and Maritime Spatial Plan. ▪ Spatial expression of national policy; national guidance and priorities. ▪ Strategic decision making and coherent development consent framework. ▪ Sustainable, forward looking, long term use and management of areas. ▪ Co-ordination of Departments and Sectoral issues in a plan-led manner. ▪ Consistency between maritime and terrestrial planning in areas of common interest. ▪ Coherent transboundary planning.
Areas of Overlap for	Sectoral: Community Development & Public Consultation; Economic

Co-ordination	<p>Development; Transport – Ports and Harbours; Energy – Electricity & Renewable Energy; Fishing; Aquaculture & Mariculture; Social and Culture; Tourism & Leisure; Flood Protection; Extraction; Enabling Infrastructure; Health & Safety; Communications</p> <p>Environment: Sustainable Use of Resources; Climate Change Adaptation; Water Quality; Coastal Erosion & Accretion; Protected Sites and Environmentally Sensitive Areas; Flooding; Biodiversity; Landscape and Seascape</p> <p>Governance: Regulation and Licensing: Consent process for onshore and offshore development and activities; Responsibilities for managing activities in areas of land-sea interaction</p> <p>Data: Research including spatial data management; cumulative effects; evidence base; socio-economic profiles</p>
NPO 41a	Ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality.

National Marine Planning Framework (NMPF)

The NMPF, **launched in July 2021**, is a national plan for Ireland's maritime area, setting out over a 20 year horizon, how we want to use, protect and enjoy our seas. **The NMPF details how all marine based human activities will interact with each other in an ocean space that is under increasing spatial pressure, ensuring the sustainable use of our marine resources to 2040.** The NMPF sits at the top of the hierarchy of plans and sectoral policies for the marine area. The plan has been informed by existing sectoral plans and will, in turn, be used to inform future cycles of those plans in an ongoing feedback loop. It provides a coherent framework in which those sectoral policies and objectives can be realised. It will become the key decision-making tool for regulatory authorities and policy makers into the future in a number of ways including decisions on individual consent applications which will have to secure the objectives of the plan, similar to the way that terrestrial plans form part of the decision-making tool-kit in the on-land planning process.

'Towards a Marine Spatial Plan for Ireland – a roadmap for the development of Ireland's first marine spatial plan' was published by the Government in December 2017. It sets out four broad stages in the development of the plan:

- ~~Stage 1, of which the Roadmap formed a central part, was the start-up or activation phase during which the Government's proposed approach to developing MSP was announced and initial contact made with stakeholders. This ran until end 2017;~~
- ~~Stage 2, the main development stage, commenced in Q1 2018 and ran until early 2020. It involved preparation and publishing for public consultation the Draft NMPF and associated environmental reports;~~
- ~~Stage 3 will be the finalisation phase during which the Draft NMPF and associated environmental reports will be amended as required based on the feedback received in the public consultation. The final NMPF and associated environmental reports will be prepared for submission to Government and adoption by the Oireachtas before forwarding to the European Commission ahead of the March 2021 deadline set out under the Directive;~~
- ~~Stage 4 is implementation, monitoring, enforcement and review commencing on adoption of the NMPF.~~

~~The draft NMPF was published in late 2019, and following public consultation, work is ongoing to finalise the framework.~~

The County Development Plan must be consistent with the approved NMPF, with common policy areas including renewable energy, electricity networks, coastal and flood defences, fishing and aquaculture, ports and harbours, public access, tourism and recreation, protected sites and species, seascape and landscape. When dealing with an application in the maritime area it is important to refer to the NMPF as a key policy document along with any other relevant government guidance / policy.

~~Marine Planning and Development Management Bill 2019~~ Maritime Area Planning Bill 2021

This legislation intends to put in place a comprehensive and coherent planning system for the entire Maritime Area. This Bill seeks to ~~establish in law a new regime for maritime~~ areas, streamline¹ existing arrangements to allow for a single consent principle (eliminate the duplication of development management processes for activities or developments that are currently assessed under both the foreshore and planning regimes with the introduction of a single process administered by local authorities / An Bord Pleanála). One of the main features will be to extend the existing planning permission functions of coastal local authorities to the outer limit of a newly defined nearshore¹.

~~The Bill has a focus on marine forward planning, with the introduction of statutory marine planning guidelines and to ensure decisions are taken in a manner that secure the objectives of the NMPF. It also provides for transitional arrangements including, inter alia, a future development management pathway for offshore renewable energy projects and for a system of designation of Strategic Marine Activity Zones.~~

The constituent elements of this system are: (1) Forward Planning; (2) Development Management; and (3) Enforcement. The Bill also intends to establish a new agency, Maritime Area Regulatory Authority (MARA) to undertake certain consenting and enforcement functions.

CPO 19.1 To review and update the County Development Plan if necessary to ensure that it is consistent with the following:

- the National Marine Planning Framework; ~~following its adoption~~, and
- the ~~Marine Planning and Development Management Act~~ Maritime Area Planning Bill (following its enactment).

CPO 19.2 To work with the Department of Housing, Planning and Local Government and other relevant government departments and bodies on marine planning with particular reference to the following areas;

- the implementation of the National Marine Planning Framework (~~following its adoption~~);
- the implementation of ~~any future Marine Planning and Development Management Act~~ Maritime Area Planning Bill (~~following its enactment~~) in so far as it relates to the duties and functions of the Planning Authority,
- the designation of the nearshore area for County Wicklow,
- the preparation of any sub-regional plans for the maritime area and nearshore area.

¹ Part 2 of the Bill provides for the designation of a new nearshore area in which coastal local authorities will exercise certain planning and enforcement functions.

Topic		Local Context & Strategy
ID	Name	Issue raised
C2-253 https://consult.wicklow.ie/en/s/ubmission/ww-c2-253	Wind Energy Ireland	The final paragraph of the sub-section entitled 'Marine Economy / Blue Economy' states ' <i>There is a significant opportunity for Wicklow to take advantage of the Offshore Wind Sector and any associated spin offs such as on-shore 'operations and maintenance' facilities and the creation of 'local offshore wind enterprise zones'.</i>
C2-267 https://consult.wicklow.ie/en/s/ubmission/ww-c2-267	RWE Renewables Ireland	Request to amend this section to include reference to other onshore infrastructure associated with the construction, operation and decommissioning of large-scale offshore wind farms including but not limited to: temporary construction compounds; temporary lay-down areas for wind farm components; assembly areas for wind farm components; underground cabling from point of cable landfall at coast to point of connection; onshore grid connection points and port & harbour infrastructure.
C2-199 https://consult.wicklow.ie/en/s/ubmission/ww-c2-199	DP Energy & Iberdrola Renewables	
Chief Executive's Response		
<p>Reference to on shore infrastructure to facilitate off-shore wind is adequately provided for in CPO 16.2:</p> <p>CPO 16.2 <i>To facilitate and support the development of off-shore wind energy projects insofar as onshore facilities such as substations/connections to the grid may be required and the development of Operations and Maintenance (O&M) bases as may be required.</i></p> <p>It is therefore not considered necessary to amend this section to include associated works.</p>		
Chief Executive's Recommendations		
No change		

Topic		MSP & CZM Objectives
ID	Name	Issue raised
C2-158 https://consult.wicklow.ie/en/s/ubmission/ww-c2-158	Friends of the Murrough	The 'Friends of the Murrough' cannot support the development of a new port along the Murrough. They have concerns regarding environmental impacts of the future development of the area.
C2-195 https://consult.wicklow.ie/en/s/ubmission/ww-c2-195	Roger Garland	<i>This is a detailed submission which suggested a number of new objectives for this chapter. These would not be possible to summarise, but all are addressed in the assessment to follow.</i>
C2-229 https://consult.wicklow.ie/en/s/ubmission/ww-c2-229	Wicklow PPN	Sea Bins should be provided.
C2-253 https://consult.wicklow.ie/en/s/ubmission/ww-c2-253 C2-267 https://consult.wicklow.ie/en/s/ubmission/ww-c2-267 C2-199 https://consult.wicklow.ie/en/s/ubmission/ww-c2-199	Wind Energy Ireland RWE Renewables Ireland DP Energy & Iberdrola Renewables	Request to amend CPO19.2 that the commitment in the introductory paragraph is extended to work also with 'renewable energy developers' Request that CPO 19.8 and CPO 19.9 be expanded or alternatively a new objective created to acknowledge the key role that offshore renewable energy development off the Wicklow coast has in helping Ireland achieve its renewable energy targets.
C2-293 https://consult.wicklow.ie/en/s/ubmission/ww-c2-293	Kilcoole Residents & Community Development Association	The Draft Plan makes insufficient references to Kilcoole with respect to coastal zone management; Kilcoole is excluded from the series of 12 coastal cells, yet Delgany is included in a cell.
Chief Executive's Response		
<p>The Murrough</p> <p>While the Draft Plan (in Chapter 10) sets out the following objectives for the enhancement of port / marine activities at Wicklow, there is no objective within the draft to develop a new port at the Murrough:</p> <p>CPO 12.61 <i>To promote and facilitate through appropriate transport planning and land-use zoning the expansion of port activities at Wicklow and Arklow. In particular, to support the development of a Port Access Road at Arklow, providing access to Arklow south quay area and a possible deep water harbour facility at Roadstone south of Arklow.</i></p> <p>CPO 12.62 <i>To promote and facilitate through appropriate transport planning and land-use zoning the expansion or development of recreational facilities and marinas at Bray, Greystones, Wicklow and Arklow harbours.</i></p>		

CPO 12.63 *To support the potential for facilitating offshore renewable energy development at Wicklow and Arklow ports.*

There are however a range of objectives in the Draft Plan, including **CPO19.22** (Chapter 19) as well as those set out in Chapter 17, regarding the protection of the Murrough area:

CPO 19.22 *No development will be permitted that has the potential to adversely affect the conservation objectives of the Murrough Wetlands SAC, The Murrough SPA, Wicklow Head SPA, or Wicklow Reef SPA either directly, indirectly or cumulatively.*

In the event that a concept / project is developed for a new / significant expanded port in this area, the objectives of the Draft Plan, as well as the environmental protection provisions of national and EU law, would require to be considered and addressed in detailed. It is therefore not considered necessary to amend this section.

Sea Bins

Sea Bins are devices used to collect waste from the water of ports, harbours and marinas. The use of such equipment would be an operational matter for the harbour and port authorities, and not a matter for the CDP.

CPO 19.2

With regard to CPO 19.2, this objective is referring to regulatory authorities and therefore it is not considered appropriate in this instance to include reference to renewable energy developers.

CPO 19.8 & 19.9

It is not recommended to amend CPO 19.8 and 19.9 as is suggested having regard to the importance of having objectives that protect the coast, regardless of the type of development that is proposed.

Coastal Cells

The approach to defining coastal cells has for many plans been to only include those areas between the sea and the nearest town to the west (e.g. Kilcoole, Newcastle) **other than** where the town directly adjoined the coast. In those cases objectives are limited to one objective, which refers one back to the objectives in that relevant LAP / Town Plans. As Kilcoole does not adjoin the coast directly, the town itself is not included in the coastal cell. There is no 'disadvantage' arising by not including Kilcoole town in the cell, as the majority of objectives relate to the management of activities in the sensitive *rural* coastal areas and not to urban development within the cell. Therefore no change is recommended.

Suggest additional objectives (C2-195)

1. *Provide, support, actively promote, maintain, protect, improve and enhance public access to the coast, beaches, seashore, coastal heritage and scenic landscapes in co-operation with landowners, relevant stakeholders and local groups and with statutory and relevant organisations for recreational activities including walking and cycling. Examine the designation of traditional walking routes thereto as public rights of way. Where feasible, develop walkways/cycleways between the coast and green spaces in built-up areas.*

It is considered that this aim is already addressed in the plan provisions, in particular in the objectives set out in Chapter 18 (such as CPO 18.13) and therefore no further change is recommended.

2. *Work to protect beaches, within dunes and in other vulnerable areas manage and control car parking and vehicular movements.*

It is considered that this aim is already addressed in the plan provisions, in particular via Objectives CPO 19.5, 19.7, 19.8, 19.9, 19.10, 19.11, 19.13, 19.14, 19.15 and therefore no further change is recommended.

3. *Proposals for tourism development in coastal areas must demonstrate that there will be no negative impacts on amenities or the integrity of the natural environment.*

It is considered that this aim is already addressed in the plan provisions, in particular via Objectives CPO 19.4, 19.7, 19.8, 19.9, 19.11, 19.13 (Chapter 19), CPOs 11.1, 11.4, 11.42, 11.47, 11.48, 11.49 (Chapter 11) and via the wide range of objectives in Chapter 17, and therefore no further change is recommended

4. *Prohibit mineral extraction along the coast, particularly in proximity to estuaries, exceptional circumstances, where it can be demonstrated that there will be significant adverse impact on the environment, visual amenity, heritage or the conservation objectives of Euro Sites.*

It is considered that this aim is already addressed in the plan provisions, in particular via Objectives CPO 19.7, 19.8, 19.9, 19.13, 19.14 (Chapter 19), CPOs 17.4, 17.5, 17.6, 17.7, 17.8, 17.12, 17.14, 17.24, 17.32 (Chapter 17) and therefore no further change is recommended

5. *Prohibit development of facilities for fishing and leisure developments where the siting of such installations and their supporting infrastructure could cause landscape and environmental degradation or instability, have adverse effect natural heritage or designated sites or detract from the visual amenity of an area or public access to beaches.*

It is considered that this aim is already addressed in the plan provisions, in particular via Objectives CPO 19.7, 19.8, 19.9, 19.11, 19.13, 19.14 (Chapter 19), CPOs 17.4, 17.5, 17.6, 17.7, 17.8, 17.12, 17.14, 17.24, 17.35, 17.36, 17.37, 17.38 (Chapter 17) and therefore no further change is recommended

6. *Introduce bye-laws restricting or prohibiting jet-skiing and water skiing.*

This is outside the remit of the Development Plan and therefore no change is recommended.

7. *Protect established rights of way to coastal areas.*

This is already addressed in this report under Chapter 18.

8. *In assessing proposals for Water Sports Development ensure that the following criteria are satisfied: that proposals are fully compatible with existing use, will not result in damage to nature conservation or archaeological features, can be fully integrated into its seascape landscape, or will not have an unactable impact on visual amenity or important scenic areas, or unduly restrict access.*

It is considered that this aim is already addressed in the plan provisions, in particular via Objectives CPO 19.4, 19.7, 19.8, 19.9, 19.11, 19.13 (Chapter 19), CPOs 11.1, 11.4, 11.42, 11.47, 11.48, 11.49 (Chapter 11) and via the wide range of objectives in Chapter 17, and therefore no further change is recommended

Chief Executive's Recommendations

No change

Section 3.3	Volume 1
Section 3.3.20	Chapter 20

Topic	Monitoring	
ID	Name	Issue raised
<p>C2-162 https://consult.wicklow.ie/en/s/ubmission/ww-c2-162</p> <p>C2-218 https://consult.wicklow.ie/en/s/ubmission/ww-c2-218</p>	<p>Delgany Community Council</p>	<p>It is suggested that the monitoring section be rewritten and include an objective that:</p> <p><i>"WCC will establish a dedicated Biodiversity Planning and Development function to monitor, plan and develop our biodiversity. Within 90 days, this function will set the first smart targets for short term (1-10 years) and long term (up to 100 years) biodiversity planning and development for County Wicklow. It will set a new Zoning type 'Zoned for Biodiversity Development'"</i></p>
<p>C2-300 https://consult.wicklow.ie/en/s/ubmission/ww-c2-300</p>	<p>Wicklow Planning Alliance</p>	<ul style="list-style-type: none"> - Little attention is paid to monitoring how well the plan works in achieving its objectives. It is not good enough to rely on reference to the Strategic Environmental Assessment, which may provide useful baseline data but is too complex to provide the necessary checklist. A range of simple indicators need to be adopted that the public can easily understand. - The level of carbon emissions produced by developments in the county are one of the key indicators required and we note that Epson are currently working on guidelines to make this possible. This Plan needs an objective to adopt Epson's guidelines as soon as they become available. - Indicators to measure the loss of biodiversity are available at the National Biodiversity Indicators initiated by the Department of Arts, Heritage and the Gaeltacht, National Parks and Wildlife Service - A recent internal Departmental review of the National Biodiversity Action Plan criticised the overall lack of progress with biodiversity plans and targets in Ireland due to the structure of the plans themselves, in particular, the lack of smart targets. - WPA propose that the monitoring section be rewritten and include an objective to establish a dedicated Biodiversity Planning and Development function to monitor, plan and develop our biodiversity. - Other simple indicators of the Wicklow County Development Plan could be <ul style="list-style-type: none"> ▪ Homeless figures/social housing completions ▪ Number or % of homes availing of the SEI Better Energy Homes and the Warmer Homes Schemes for disadvantaged households ▪ Number of houses completed to Passive House Standard or A3 minimum BER rating ▪ Compliance to the Water Framework Directive in terms of water supply quality and waste water treatment ▪ Number of new business start-ups ▪ Number of community renewable energy projects ▪ Number of farms in the Bord Bia Origin Green Programme ▪ Number of certified organic farms/growers ▪ Area under biodiversity designation ▪ High speed broadband coverage

<p>C2-307 https://consult.wicklow.ie/en/submit/ww-c2-307</p>	<p>Eleanor Mayes</p>	<ul style="list-style-type: none"> - It is not always clear how it is intended that the objectives of the Draft Plan will be delivered. In this regard, it could be useful if Chapter 20 of the Plan, dealing with Implementation and Monitoring, were to include a summary tabulation of development standards and other criteria, with cross-referencing to the relevant Chapters of the Wicklow County Development Plan. This could help to ensure that development occurs in an orderly and efficient manner, having regard to the objectives of Wicklow County Development Plan. - Chapter 12 of Fingal Development Plan 2017-2023, dealing with Development Management Standards, provides an example of how consideration of proposals can be progressed in a range of different identified development types. This chapter summarises the Fingal Development Plan rationale and objectives, and provides a useful starting point and check-list for prospective developers, and may also facilitate pre-planning consultations. This template may be useful to Wicklow County Council in finalising Wicklow County Development Plan 2021-2027. - There is some duplication of issues and objectives that are relevant to a number of different Chapters of the Draft Plan cross-referencing could be checked again before the Plan is finalised, to ensure consistency.
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Chief Executive's Response

The Council will continue to use all of the resources available to it to properly implement and monitor the provisions of the plan.

Where objectives relate to the delivery of infrastructure or services by state agencies, including the Council, the Council's various departments are committed to utilising their resources to securing the delivery of the infrastructure, to seeking out funding for programmes and projects and to working with other agencies and stakeholders who may have a significant role in service delivery.

For the most part, the provisions of the plan are implemented through the application of the objectives and development standards in the assessment of development applications. This happens on a day-to-day basis, and the application of the objectives / standards will depend on the type of applications made. The Council has no control over the number and type of application that may be received, so it is not possible to precisely state or predict how and when certain objectives / standards will be applied.

Chapter 12 of the Fingal plan referenced is their section setting out development standards, which are set out in the Draft Wicklow CDP in Appendix 1. The documents address similar matters, and set out design and development standards for a range of development types. It is possible that the submitter who raised this issue was not aware of the existence of the Wicklow CDP appendices.

With respect to 'duplication' it is accepted that there is some limited duplication, as not all objectives fit neatly into one 'heading'. However this is not considered extensive / wide spread and no changes are considered to be warranted.

The Development Plan is land-use and spatial planning framework, which cannot direct the establishment of a new function, which would be an operational and funding matter. This suggestion may be more appropriate for the next iteration of the County Biodiversity Action Plan and the Biodiversity and Climate Action SPC.

Chief Executive's Recommendations

No change

Section 3.4	Volume 2
Section 3.4.1	Introduction to Level 4 Plans / Introduction to Level 5 Plans

Topic	Action Areas	
ID	Name	Issue raised
C2-177 https://consult.wicklow.ie/en/submission/ww-c2-177	Billy Timmins	Where developers are required to provide additional requirement as part of the Action Areas e.g. the provision of a community centre, the total cost and additional cost per unit should be it estimated and provided to members / the public before the submissions to the Draft Development are debated at a meeting of the Council. It is important to know if these additional requirements are dependent on agreement by different property owners as if so this may prohibit or delay their development.

Chief Executive's Response

'Action Areas' are included in some plans where larger scale development is targeted, that will require significant new infrastructure to support same and may significantly increase demands on existing town services if built. Action Area objectives set out these infrastructural requirements at the outset, so that it is clear at the plan-making stage (to the members, the public and landowners) what is going to be expected of developers. Otherwise, this may only become apparent at a much later stage, after detailed service and social / community infrastructure capacity assessments are undertaken as part of the planning application process. Therefore Action Area planning also aids developers.

The concept of developers of larger scale developments making additional / special contributions (either financial or in kind) towards community infrastructure is not new, and indeed as set in 'Housing for All', the Government's new housing strategy, a new system of Land Value Sharing (LVS) is being developed, which involves securing a proportion of the value uplift of a development site, tracked from a point of zoning or designation, to a point of planning permission, and may include specific mechanisms to facilitate land assembly for the provision of communal infrastructure.

The use of Action Areas in Level 4 and 5 settlements has however been carefully re-considered, and it is recommended that amendments be made to minimise locking multiple landowners together to deliver certain infrastructure / facilities, as this can present problems if not all stakeholders are interested in progressing land development. Therefore it is recommended that amendments to Action Areas are made as follows:

Baltinglass: Split AA1 into 2 'Special Local Objectives' (SLO) area
Ashford: Change AA1 into SLO and amend boundaries

Chief Executive's Recommendations

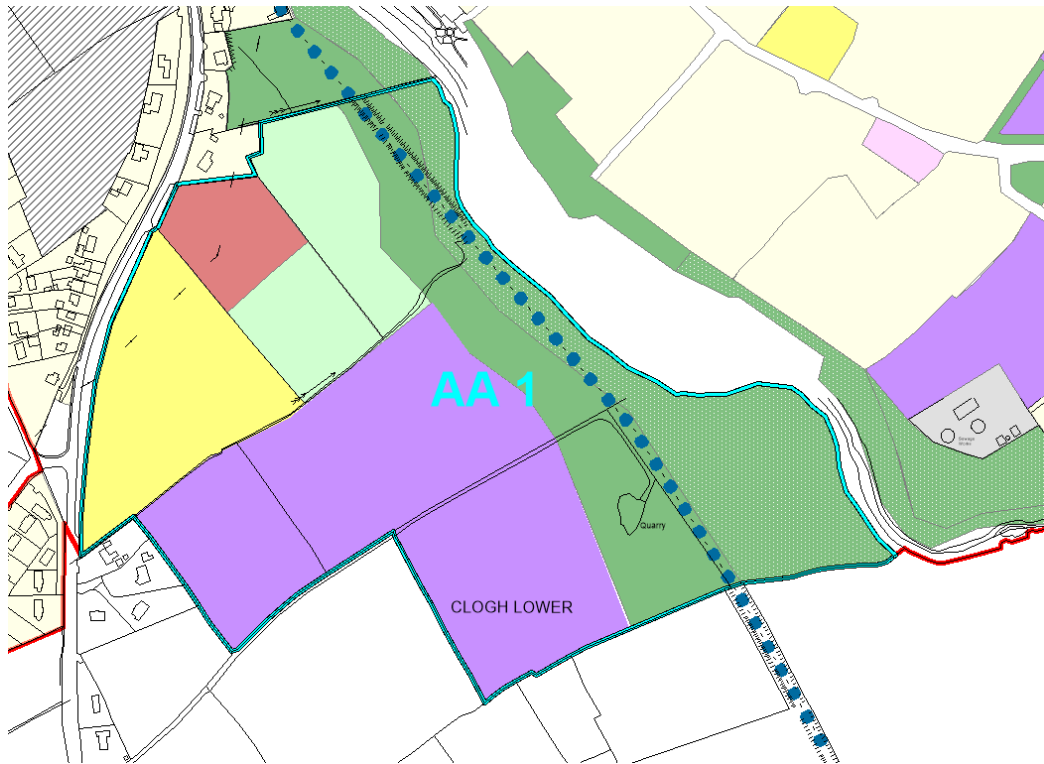
Amend Draft plan as follows:

Volume 2

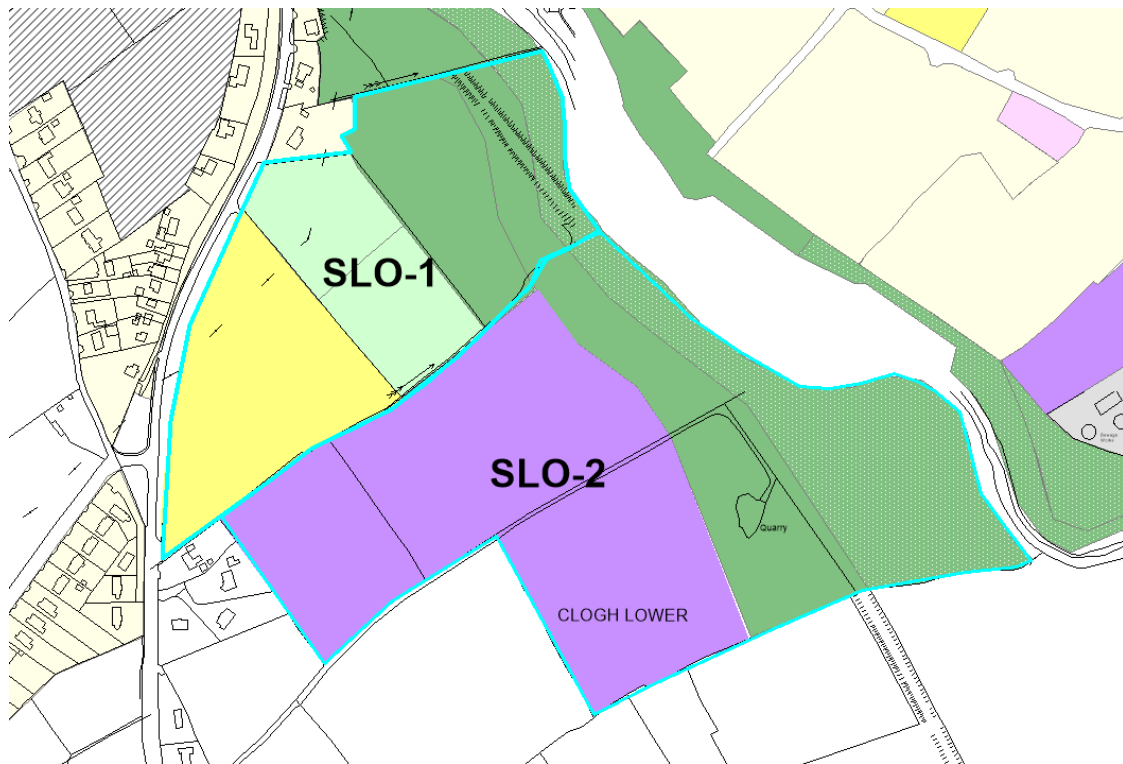
Amend Baltinglass (Level 4) and Ashford (Level 5) plan as follows:

Baltinglass

Change from:



Change to:



Amend the text as follows:

(this text also integrates changes recommended on foot of other submissions, particularly that of the OPR)

~~2.9 — Action Area Plan~~

~~Action Area 1~~

~~This Action Area is located on lands west of the River Slaney, accessed off the N81 national secondary route. The subject lands measure c. 30ha and include:~~

- ~~c. 3.8ha zoned for new residential development~~
- ~~c.1.3ha zoned for mixed use~~
- ~~c. 3.4ha zoned for Active Open Space~~
- ~~c. 4.4ha zoned for Open Space (OS1)~~
- ~~c. 6ha zoned as passive open space (OS2)~~
- ~~c. 10.5 zoned for employment development~~

~~Permission was granted in 2019 for 55 housing units on part of the lands zoned for 'new residential'. Any further applications for permission or amendments to the parent permission in this action area plan shall comply with the provisions of this updated town plan.~~

~~This action area plan shall be developed in accordance with the following criteria:~~

- ~~The residential element of the action area shall be designed and laid out in a manner which addresses the N81 national secondary route, providing for an open space green area adjoining the western boundary.~~
- ~~Only a single vehicular access point shall be permitted into this action area. The internal road network serving this area shall be designed so as to provide a spine route off the N81 between the residential — open space sector and employment zones.~~
- ~~The mixed use zone shall be reserved for the development of a discount foodstore.~~
- ~~No further permission shall be granted in AA1 unless accompanied by a programme for the delivery of a active open space zone of not less than 2ha and an amenity park on the land zoned 'OS1' and dedicated to the public along the river. The developer shall be responsible for landscaping of this area and providing suitable access and lighting / furniture and for safeguarding the integrity of the route of the old railway line as part of a possible longer amenity route.~~
- ~~Developments adjoining the designated open spaces shall be so designed and units so orientated as to allow for passive supervision and easy access to the open spaces; in particular, no structures shall back onto open spaces and residential open spaces shall be designed where possible to flow into the larger open space areas.~~
- ~~The development of the action area shall ensure adequate protection and enhancement of the open space and conservation area adjoining the River Slaney.~~

2.9 Specific Local Objectives

SLO-1

This area is located on lands west of the River Slaney, accessed off the N81 national secondary route. The subject lands measure c. 10ha and include c. 3.8ha zoned for new residential development and 6.25ha zoned for open spaces use (AOS, OS1, OS2).

Permission was granted in 2019 for 55 housing units on part of the lands zoned for 'new residential'. Any further applications for permission or amendments to the parent permission in this SLO area shall comply with the provisions of this updated town plan.

This SLO shall be developed in accordance with the following criteria:

- The residential element of the action area shall be designed and laid out in a manner which addresses the N81 national secondary route, providing for an open space green area adjoining the western boundary.
- Access into these lands shall be so located and designed as to provide for access from the N81 into SLO-2;
- No further permission shall be granted in SLO-1 unless accompanied by a programme for the delivery of an active open space zone of not less than 2ha on lands zoned AOS and an amenity park of not less than 3ha on the land zoned OS1' and dedicated to the public along the river, which shall be laid out and designed in such a way as to safeguard the integrity of the route of the old railway line as part of a possible longer amenity route.
- Developments adjoining the designated open spaces shall be so designed and units so orientated as to allow for passive supervision and easy access to the open spaces; in particular, no structures shall back onto open spaces and residential open spaces shall be designed where possible to flow into the larger open space areas.
- The development of the action area shall ensure adequate protection and enhancement of the open space and conservation area adjoining the River Slaney.

SLO-2

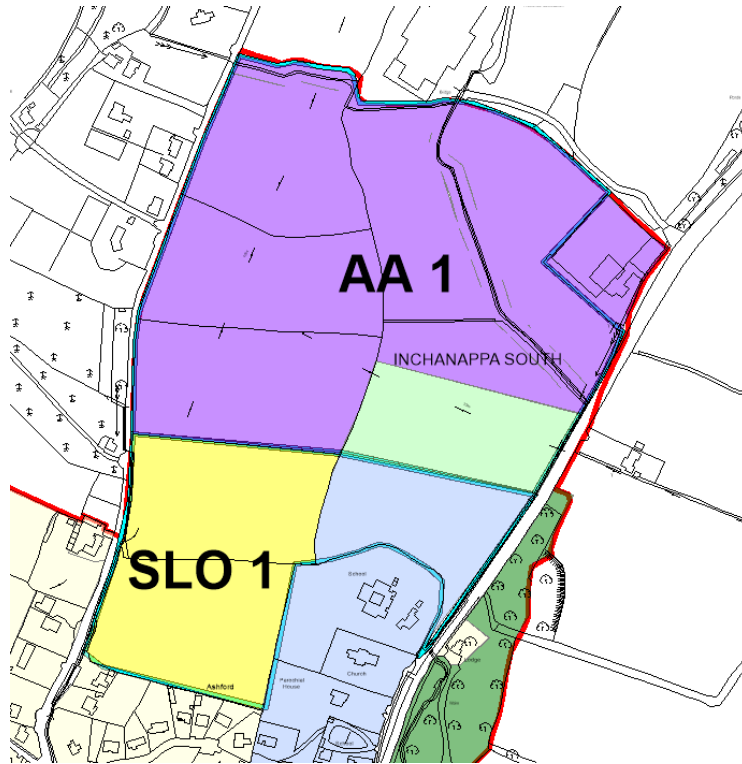
This area is located on lands west of the River Slaney, proximate to the N81 national secondary route. The subject lands measure c. 18ha and include c. 10.5ha zoned for employment use, and 7.5ha zoned for open space uses (OS1 and OS2).

This SLO shall be developed in accordance with the following criteria:

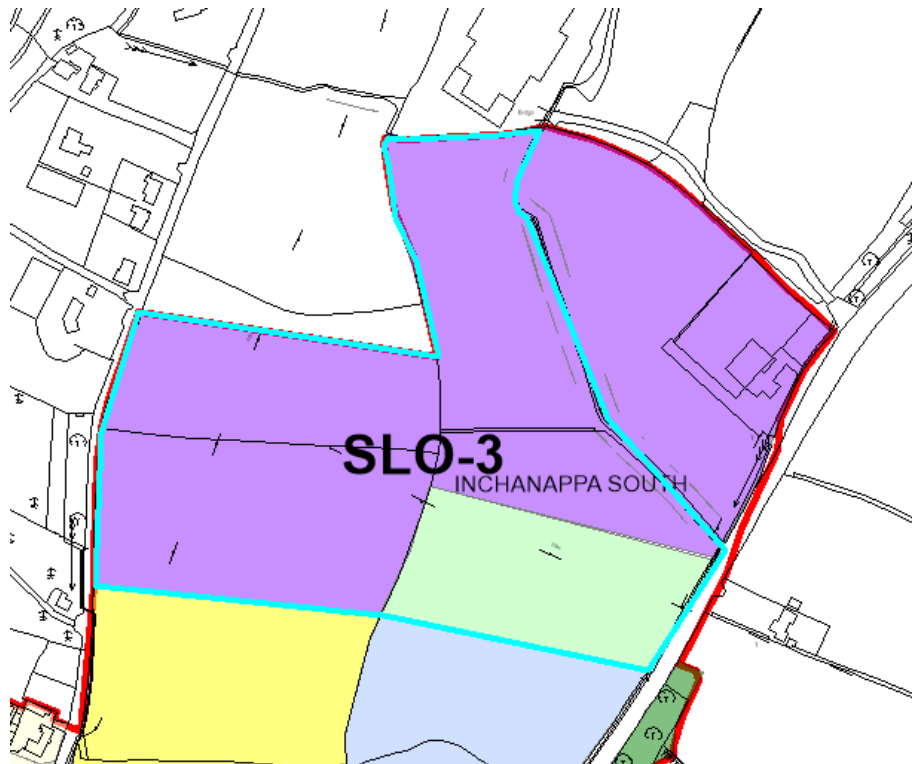
- Access into these lands shall be via SLO-1 unless a suitable alternative from the N81 is determined which does not prejudice access to SLO-1
- No permission shall be granted in SLO-2 unless accompanied by a programme for the delivery of an amenity park of not less than 3ha on the land zoned 'OS1' and dedicated to the public along the river, which shall be laid out and designed in such a way as to safeguard the integrity of the route of the old railway line as part of a possible longer amenity route.
- Developments adjoining the designated open spaces shall be so designed and units so orientated as to allow for passive supervision and easy access to the open spaces; in particular, no structures shall back onto open spaces and development open spaces shall be designed where possible to flow into the larger open space areas.
- The development of the action area shall ensure adequate protection and enhancement of the open space and conservation area adjoining the River Slaney.

Ashford

Change from



Change to:



Revised SLO area has a single landowner, and therefore Action Area not required. Amend text to reflect revised boundaries as follows:

Action Area 1 SLO-3

This ~~Action Area~~ SLO area is located on lands at Inchanappa South, west of the existing Glanbia premises and north of Ashford national school. The overall action area measures c. ~~16.5ha~~ 10.5ha, as shown below. This action area shall be delivered as an employment and community open space zone in accordance with the following criteria:

- Development of these lands shall provide a new public road linking the R764 to the R772, which will service the development of the employment zoned lands.
- Any buildings proposed along the eastern boundary of this action area shall address the R772 and be of a high-quality design and finish providing for both hard and soft landscaping in order to provide an attractive northern entrance to the town of Ashford.
- The existing stream running through these lands shall be incorporated in the overall design and layout of the action area, but it shall be left in a natural condition with a minimum set back of any development (including landscaped areas) of at least 30m on both sides.
- A minimum area of 2ha shall be developed as a sports ground (the location shown below is for indicative purposes only with the overall layout subject to detailed design), including the laying out of pitches and the construction of appropriate parking and changing room facilities. The future management/maintenance arrangements and use of this facility shall be agreed with Wicklow County Council prior to the commencement of its use.
- Only 50% of the proposed employment lands may be developed prior to the completion of the required sports facilities.

Section 3.4	Volume 2
Section 3.4.2	Baltinglass

Topic	Town Centre	
ID	Name	Issue raised
C2-48 https://consult.wicklow.ie/en/s-ubmission/ww-c2-48	Ann Naughton	Would like to see: <ul style="list-style-type: none"> - a town architect appointed to restore the town centre with shop fronts returned to original shopfronts; - trees planted to line the streets and the square - a green areas with flowers in the town centre and areas of the town paved with a walking route along the Slaney River - an area made for a market

Chief Executive's Response

The CE is committed to the improvement of Baltinglass town centre, and this is fully supported by the provisions of the Draft Plan, including (but not limited to):

Chapter 5:

CPO 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10, 5.11, 5.12; which support regeneration
CPO 5.5 ; which supports the development of markets
CPO 5.6 which sets out the goals for Baltinglass regeneration as:

Key projects including making Baltinglass a hub for south-west Wicklow. This includes restoration of the Courthouse and re-use as a new library and heritage hub and the conversion of the library into a Digi-hub, restoration of the courthouse courtyard for use as an event / market space, enhance amenities in the town centre including age friendly seating and an informal play space, regularisation of parking and improved pedestrian facilities and safety measures. Develop the huge potential of Baltinglass Hillfort complex.

CPO 5.17-20: which support heritage led regeneration programmes

In addition, the following objectives are set out in the draft Baltinglass Town plan,

BALT6 *To work with the local community and other stakeholders to design, secure funding for and implement significant improvements to the town centre including but not limited to:*

- *the provision of mechanisms to slow traffic through this area;*
- *the provision of safer pedestrian access over the River Slaney;*
- *alterations to the layout of the road carriageway and on-street car parking to allow for the provision of new or improved pedestrian and cycling facilities and additional pedestrian crossing points;*
- *the creation of new civic spaces at suitable locations and in particular around Market Square and Weavers Square;*
- *improved hard and soft landscaping and tree planting, lighting, seating and other street 'furniture';*
- *the improvement of safety and appearance of key junctions, in particular the N81 / R747 junction;*
- *the provision of improved facilities for public transport providers and users, including improved access to bus stops (particularly crossing points for passengers), shelters, covered bicycle parking, information points with maps, routes, timetables, real-time information and designated taxi ranks at / near the bus stops on Main Street;*
- *The provision of bicycle parking and electric car charging points.*

BALT7 *To support opportunities to create better linkages between the town centre and the river.*

BALT8 *All development proposals in the 'Town Centre' zone shall respect the character and setting of the historic main street including but not limited to protected structures therein and integrate in a satisfactory manner with the existing character and streetscape in terms of massing, rhythm, materials and finishes.*

Funding has been secured under the RRDF programme to start this regeneration programme for Baltinglass and any additional opportunities to secure funding for addition projects will be pursued.

The appointment of an architect would be an operational funding matter and would be outside the remit of this land-use plan.

Chief Executive's Recommendations

No change

Topic	Sustainable Communities	
ID	Name	Issue raised
C2-192 https://consult.wicklow.ie/en/submit/ww-c2-192	Mai Quaid	<ul style="list-style-type: none"> - Significant increase in the number of new dwellings in the town with the construction of the estate at Whitehall, the extension to Whitehall Estate, the apartment block at the river and the conversion of the unused commercial premises (4) at Edward street to residential, the 54 houses at the new Health centre, the apartments in the re-vamped Convent building and the planning permission for 94 more dwellings off the N81. - However, with the exception of the new Health Centre there has been no growth in facilities in the town. There have been no improvements to shopping facilities, no improvements to transport service, no bus shelters, very little employment and a reduction in financial services. - Despite the Government's policy of extending internet connectivity to the whole country parts of Baltinglass have no reliable service as yet. - There are no x-ray services in the newly opened health centre. - New major employer is needed in the town.
Chief Executive's Response		
<p>The Draft Development Plan includes a wide range of objectives to support the development of community facilities throughout the County.</p> <p>The community facilities hierarchy model, as shown in Chapter 7, Table 7.1, provides a list of the social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however, the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal. The CE is committed to the enhancement of those community services that are within the Council's remit, the sources or additional / new funding, and to working with other state agencies to strive to enhance services.</p>		

Table 7.1 Community Facilities Hierarchy Model

COMMUNITY FACILITIES HIERARCHY MODEL	
LEVEL 1 – SETTLEMENTS WITH POPULATION RANGE 15,000 – 30,000	
Multi-purpose Community Resource Centre Regional and Local Indoor Sports and Recreation Facilities Swimming Pool/Leisure Centre Youth Centre Athletics Track and Field Facilities Arts and Cultural Centre Local Multi-Purpose Community Space/Meeting rooms	Outdoor Water Sports Facilities (where applicable) Neighbourhood Parks and Local Parks Outdoor (full size) Multi-Use Games Areas – Synthetic/ Hardcourt Playground(s) Playing Pitches Alternative/Minority Sports Facilities Open Space/Urban Woodlands/Nature Areas Library
<i>Acceptable rural catchment commuting time by car: 30 min</i>	
LEVEL 2 – SETTLEMENTS WITH POPULATION RANGE 7,000 – 15,000	
Multi-purpose Community Resource Centre Sport & Recreation Centre Swimming Pool/Leisure Centre Youth Resource Centre Local Multi-Purpose Community Space/Meeting Rooms Outdoor Water Sports Facilities (where applicable) Neighbourhood and Local Parks	Outdoor Multi-Use Games Areas – Synthetic/ Hardcourt Playground(s) Playing Pitches Alternative/Minority Sports Facilities Open Space/Urban Woodlands/Nature Areas Library Arts and Cultural Centre
<i>Acceptable rural catchment time by car: 15 mins</i>	
LEVEL 3 – SETTLEMENTS WITH POPULATION RANGE 2,000 – 7,000	
Community/Parish Hall Multi-purpose Community Space/Meeting Rooms Local /Town Park (s) and Open Spaces/Nature Areas Outdoor Multi-Use Games Area – Synthetic/ Hardcourt	Playgrounds Playing Pitches Library
<i>Acceptable rural catchment commuting time by car: 10-15 mins</i>	
LEVEL 4 – SETTLEMENTS WITH POPULATION RANGE < 2,000	
Community/Parish Hall Open Spaces/Play Areas	Outdoor Multi-Use Games Area – Synthetic/ Hardcourt Playing Pitches
Acceptable rural catchment commuting time by car: 5-10 mins	

This is not to say that an area cannot benefit from greater provision of community facilities and support for this is also provided for in the draft plan under the following objective:

CPO 7.3 *To support and facilitate the delivery and improvement of community facilities in accordance with the 'Hierarchy Model of Community Facilities' prepared under the Development Levy Scheme (under Section 48 of the Planning and Development Acts) (as set out on Table 7.1 of this chapter). While the above 'Hierarchy Model of Community Facilities' provides an extensive list of community infrastructure, the Council recognises that needs may differ from area to area over time and therefore it is recognised that additional community infrastructure needs may arise and such facilities will be facilitated where considered appropriate.*

In addition, the draft plan set out enhanced obligations on developers of larger scale housing developments to show that infrastructure including social / community facilities is or will be adequate to meet the needs of new residents through that preparation and submission of a Social Infrastructure Audit. Where deficiencies in infrastructure are identified, proposals will be required to address same before permission will be considered.

Adequate land is zoned in the draft Baltinglass Plan to cater for the needs of Baltinglass and the surrounding areas in terms of community facilities, retail and employment. The Draft Plan puts in place a robust land-use and development framework to support the enhancement of existing or development of new retail, employment and other services. With regard to x-ray or other specific health services at the new health centre this would be a matter for the HSE.

The Draft Plan fully supports and encourages the enhancement of improved communications infrastructure, as set out in CPO16.31

Chief Executive's Recommendations

No change

Topic	Sports Infrastructure	
ID	Name	Issue raised
C2-30 https://consult.wicklow.ie/en/submitmission/ww-c2-30	Marion Mc Nally	There is no suitable purpose built multi - sport complex in Baltinglass.
C2-35 https://consult.wicklow.ie/en/submitmission/ww-c2-35	Baltinglass Bulldogs Basketball Club	Baltinglass Bulldogs basketball club and local area require a purpose built multi-purpose sports campus that would act a central hub for the Basketball Club as well as multiple other sports, clubs and societies. The club currently train and play out of Scoil Chonglais. However, the club has grown by 67% in 4 years with a total of 215 children. The projected annual growth is 15%. As a result the club is struggling to provide sufficient training hours & match times for all teams.
C2-80 https://consult.wicklow.ie/en/submitmission/ww-c2-80	Eoghan McCarthy	Request to rezone land for a multi-sport indoor and outdoor community facility. Of particular relevance is an area of land owned by the Council currently zoned as enterprise/employment off the L7276 adjacent to Whitehall and which is on the same site as the newly announced Fire Station development. This area also backs onto the existing town park, where there are plans for further development of walkways, which would link well and compliment a community sports facility.
C2-81 https://consult.wicklow.ie/en/submitmission/ww-c2-81	Noelle Buckley	
C2-106 https://consult.wicklow.ie/en/submitmission/ww-c2-106	Eileen McDermott	
C2-108 https://consult.wicklow.ie/en/submitmission/ww-c2-108	Baltinglass Bulldogs Basketball Club (Peter Walsh)	
C2-120 https://consult.wicklow.ie/en/submitmission/ww-c2-120	Sandra O'Reilly Sheena Moran	
C2-148 https://consult.wicklow.ie/en/submitmission/ww-c2-148	Michelle Sweeney	
C2-192 https://consult.wicklow.ie/en/submitmission/ww-c2-192	Mai Quaid	

<p>C2-107 https://consult.wicklow.ie/en/submit/c2-107</p> <p>C2-177 https://consult.wicklow.ie/en/submit/c2-177</p>	<p>Billy Timmins</p>	<p>Some of the WCC lands zoned employment at Lathleere should be zoned for sports and tourism a sports complex.</p>
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Chief Executive's Response

There are ample undeveloped lands within the Baltinglass Draft Plan boundary which may be suitable for a sports campus / community facility. While the provisions of the Draft Plan would allow for the development of community use on lands zoned for 'Employment' use, such a use would be most suited to identified CE or AOS zones, and that Draft Plan sets out provision for both.

It is recommended that the plan be amended to include an objective in the Baltinglass Plan to facilitate the development of a multi-purpose sports campus in Baltinglass; however it is not recommended at this time that the Council owned lands be identified as the preferred location, as (a) no analysis has been carried to determine that this is in fact the optimal location in the town, and (b) the need to maintain adequate lands for new employment creation must be considered.

Chief Executive's Recommendations

Amend the Draft Plan as follows:

Volume 2, Baltinglass Town Plan

Section 2.6 Social & Community Development

Add new objective

BALT XX To support and facilitate the development of a multi-purpose sports campus in Baltinglass.

Topic		Retail
ID	Name	Issue raised
C2-97 https://consult.wicklow.ie/en/submitmission/ww-c2-97 C2-104 https://consult.wicklow.ie/en/submitmission/ww-c2-104 C2-192 https://consult.wicklow.ie/en/submitmission/ww-c2-192	Deirdre McCormack Jane Nolan Mai Quaid	<ul style="list-style-type: none"> - Support the development of a large supermarket in Baltinglass. - The town's population and surrounding areas has grown substantially in the past 20 years. - Local residents have set up a Facebook page specifically to lobby for the construction of a large grocery store within the town. At present there is a Supervalu and Spar in the town. The vast majority of residents currently commute to Carlow to their local Aldi. This is a 40+km round trip which is far from ideal.
C2-107 C2-177 https://consult.wicklow.ie/en/submitmission/ww-c2-107 https://consult.wicklow.ie/en/submitmission/ww-c2-177	Billy Timmins	More suitable commercial zoned lands are required for retail enhancement.

Chief Executive's Response

The draft Baltinglass Town Plan (Section 2.5) acknowledges that the current retail offer is not sufficient. The provisions of the Draft Plan support that enhancement of retail in the town, and are ample lands zoned 'town centre' within the Baltinglass settlement boundary that would be suitable for the development of a supermarket.

It is vital that any such new retail development is appropriately located in the town centre; rural towns have struggled in recent years to retain vibrancy, partly due to the development of new supermarkets outside of town centres. Baltinglass town centre is an attractive centre but there are a number of vacant properties and there is potential to significantly enhance vitality and viability. This will be a significant challenge if out of town retail development were considered to address the retail deficiencies.

Research has found that there is a mutually beneficial relationship among retailers if they are located close together. Customers will be influenced by ease of access. If a new supermarket is located at the edge of town it is likely that customers will shop at this one store and bypass the town centre. However, if that supermarket is located in the town centre, customers are likely to combine their trip to that supermarket with other shops thereby creating a mutually beneficial relationship. This should be encouraged in Baltinglass in order to protect the town centre from decline.

Out of town retail development would undermine the role of Baltinglass town centre and therefore such development will not be supported as it is contrary to proper planning and sustainable development.

It is considered therefore that the zoning objective provided in the Draft Plan (against the advice of the CE) for an out of centre retail development on the N81 (part of Action Area 1) should be omitted from the plan (see also the submission in this regard from prescribed authorities, in particular the OPR). However, it is

recommended that a new objective should be included in the Baltinglass Town Plan

Chief Executive's Recommendations

Amend the Plan as follows:

Volume 2, Baltinglass Town Plan

Section 2.5 Town Centre & Retail

Add new objective:

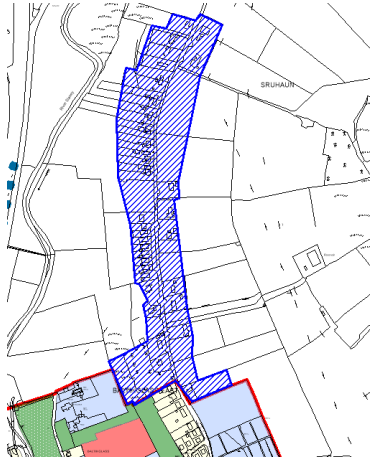
BALTX To facilitate and support the development of a new supermarket on land zoned town centre that will improve the retail offer for Baltinglass and the surrounding area and will support a healthy and vibrant town centre.

Section 2.9 Action Areas

Please see Section 3.4.1 of this report, which sets out the recommended changes to Action Area 1

Topic	Sustainable Transport	
ID	Name	Issue raised
C2-192 https://consult.wicklow.ie/en/submission/ww-c2-192	Mai Quaid	<ul style="list-style-type: none"> - Inadequate bus service to provide a realistic alternative to the car - There is no regular service to the nearest major town (Carlow) to connect with trains, Secondary colleges, a swimming pool, a cinema or a major shopping outlet. - The junction of Belan Street, the N81, Main Street and Edward Street is a major cause of frustration to commuters and other road users. Belan Street is now the main link route for HGVs travelling to the ferryport from the Midlands and for those from Dublin looking to avoid using the M50 and M11. - Bawnogue lane is being used as an alternative route and is inadequate to cater for traffic. Serious safety concerns as this lane is commonly used by walkers and cyclists. This lane is inadequately lighted. Part of the lane has no street lighting. - Lack of road markings.
Chief Executive's Response		
<p>The importance of better public transport is acknowledged and the draft plan includes objective to support this. However, the delivery of public transport is not a function of the local authority. Wicklow County Council will continue to actively engage with the National Transport Authority (NTA) regarding the roll out of the Connecting Ireland Rural Mobility Plan.</p> <p>The Draft Town Plan recognises the need to improve traffic safety and traffic flow within the town and includes objectives to support this. Wicklow County Council will continue to actively engage all relevant stakeholders (TII/NTA) regarding enhancing the performance of the N81 / R747 junction for all road users. The regional importance of this junction to the South West Wicklow area is noted due to its linkage to the M9 and the wider motorway, national and regional road network.</p> <p>Wicklow County Council acknowledges the popularity of Bawnogue Road for recreational walking and cycling and will continue to actively engage all relevant stakeholders (NTA) regarding accessing funding to improve facilities for vulnerable road users. Deficiencies in public lighting will be addressed as part of these processes.</p> <p>The short fall of road markings within the urban core will be addressed in conjunction with works to regenerate the urban core of Baltinglass.</p>		
Chief Executive's Recommendations		
No change		

Topic		
Tourism & Recreation		
ID	Name	Issue raised
C2-192 https://consult.wicklow.ie/en/submitmission/ww-c2-192	Mai Quaid	<ul style="list-style-type: none"> - Shortage of tourist accommodation in the area. - There is limited public access to the River Slaney which inhibits its benefit to the community. There are areas which could be converted to create viable public amenities, which to date have been ignored
C2-107 https://consult.wicklow.ie/en/submitmission/ww-c2-107 C2-177 https://consult.wicklow.ie/en/submitmission/ww-c2-1977	Billy Timmins	Lands should be zoned for tourism projects
Chief Executive's Response		
<p>The Draft Plan, including the Baltinglass Town Plan, includes a range of objectives (for example CPO 11.10 to CPO 11.19) that aim to support and facilitate the delivery of new tourist accommodation and projects. Tourism developments are supported and facilitated in a wide range of zones types within the plan area and therefore there is no shortage of zoned lands for possible tourism development.</p> <p>There are a number of vacant or underutilised buildings and sites within the town centre which may provide opportunities for tourist accommodation. The objectives included in the Draft Plan support such development.</p> <p>The lack of access to the Slaney is noted, and the draft plan sets out a number of objectives that would support projects to enhance accessibility and use of the riverine areas, subject of course to careful consideration of any impacts having regard to the SAC designation (in particular BAL11, the Action Area objectives and the objectives of Chapter 11 and 18)</p>		
Chief Executive's Recommendations		
No change		

Topic	Zoning	
ID	Name	Issue raised
C2-149 https://consult.wicklow.ie/en/submit/ww-c2-149	Joseph Germaine	<p>Request is made that 6 acres located on Main Street Baltinglass be rezoned from 'Town Centre' to 'Recreation & Tourism' (<i>no map supplied with the submission</i>)</p> <p>It is indicated in the submission that a previous application for hospitality and glamping pods on the lands was unsuccessful due to zoning.</p>
C2-201 https://consult.wicklow.ie/en/submit/ww-c2-201	Stephen O'Kelly	<p>Submitter indicates that his family owns lands along the Sruhaun Road. Requests that zoned land be re-instated for infill residential development. In support of this request it is put forward that the phased development of these lands, with setback requirements, would allow for the improvement of the Sruhaun Road, which is becoming busier and coming under increase pressure with the growth of the town.</p> <p>It addition it is put forward that the lands are serviced, is close to the town, and should not be denied zoning when there is a housing crisis.</p> <div style="text-align: center;">  </div> <p>(Map show lands zoned in current plan, omitted from Draft Plan)</p>
C2-107 https://consult.wicklow.ie/en/submit/ww-c2-107 C2-177 https://consult.wicklow.ie/en/submit/ww-c2-1977	Billy Timmins	<ul style="list-style-type: none"> - OP1 should exclude the Fire Station; it provides valuable parking and the ownership of lands is in question. - The dezoning of infill residential along Sruhaun Road will prohibit improved safety improvements as requirement to set back entrances will not happen.
C2-207 https://consult.wicklow.ie/en/submit/ww-c2-207	Catherine Murphy	<p>Submitter indicates that she owns lands along the Sruhaun Road. Requests that the residential zoning be re-instated.</p> <p>In support of this request it is indicated that the land is serviced and permission was granted previously to a planning member thereon.</p>
C2-224 https://consult.wicklow.ie/en/submit/ww-c2-224	Kevin Wade	<p>Requests that zoned land at Sruhaun be re-instated for infill residential development. In support of this request it is put</p>

wicklow.ie/en/s-ubmission/ww-c2-224		<p>forward that there is a need to develop this road to improve road safety since it is only link from the NE section of Baltinglass to the N81, would improve access to the capital region, address traffic congestion in the town centre and provide a more direct route for emergency services.</p>
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Chief Executive's Response

A key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land. The sequential approach specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped serviced lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The urban form of Baltinglass and pattern of development has been analysed. This analysis determined the need to capitalise on the potential of the town centre and focus the greatest amount of development within the existing built up area for this development plan.

In addition, ensuring consistency with the NPF and new Core Strategy has required a review of the extent of residential zoning in the town.

C2-107, C2-177, C2-201, C2-207, & C2-224: Sruhaun Road

Sruhaun Road is a narrow rural road that is characterised by ribbon development. Road width, pedestrian / cyclist facilities and public lighting are deficient along much of this road, and the road is not suitable in its current condition, even with set-backs being required for new development, for more intensive development, and indeed the ad-hoc 'upgrade' of this road to provide for an 'alternative' access route out of Baltinglass is not supported having regard to the deficiencies in the road network beyond the previously zoned area.

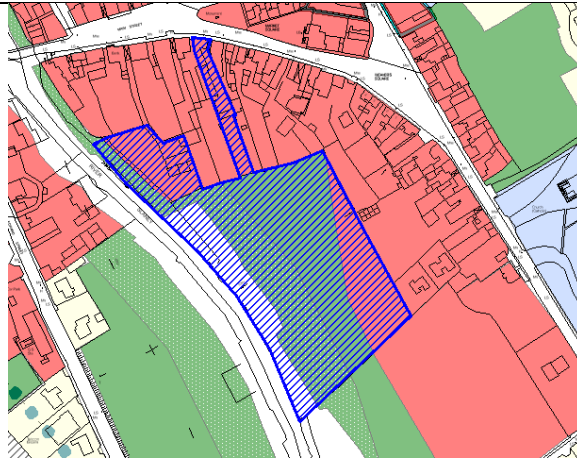
Ribbon development such as that which has occurred on the Sruhaun Road is not considered sustainable planning, according with the principles of sequential and compact development at set out in the NPF and Ministerial guidelines. There no change is recommended.

C2-149

With regard to the request to re-zone land from 'town centre' to 'tourism and recreation' it should be noted that the town centre zoning affords a broad range of uses including tourism and recreation and therefore this zoning should not be an impediment to tourism development.

In terms of the previous planning application which appears to relate to the area in question (*PRR 20/518, indicative map shown below*), it should be noted that this application site was located on lands zoned 'Town Centre' and 'Open Space', and was recommended for refusal on the basis of:

- The development being a material contravention of the 'open space' zoning, not the 'town centre' zoning
- The potential for adverse impacts in the Slaney River SAC
- Potential traffic hazard
- Possible conflict with the achievement of the 'Action Area' objectives for the lands
- Potential adverse impacts on built heritage having regard to the proposal to demolish an historic building in the town centre to facilitate the development.



A change in zoning of the lands from 'town centre' to 'tourism and recreation' would not address these issues. Therefore no change is recommended.

OP1

This site is identified as a re-development opportunity, having regard to its location to its fully serviced location in the town centre and its currently under-utilised status, which presents an opportunity to provide for more intensive residential or commercial use at the best location in the settlement, having regard to the compact growth and sequential development principles espoused in the NPF and Ministerial guidelines. The designation or reservation of such lands for surface car parking is no longer considered an optimal or acceptable use of serviced town centre lands, if we are to revitalise our town centres and get more people living in them. Issues around ownership are not a matter for the CDP. Therefore no change is recommended.

Chief Executive's Recommendations
No change

Section 3.4	Volume 2
Section 3.4.3	Newtownmountkennedy

Topic	Overall Strategy / Residential Development	
ID	Name	Issue raised
C2-246 https://consult.wicklow.ie/en/submission/ww-c2-246	Newtownmount-kennedy Town Team	<ul style="list-style-type: none"> - The community is in agreement with the proposed vision and development strategy as set out in the draft plan to ensure a high quality living environment for existing and future residents. Would like to see Nature extending through the Main Street and Sustainable Growth being referred to in the vision and strategy for our town - People in this community are worried about climate change and believe that a County Development Plan should deliver Climate Action. - Believe that the ingredients are here in Newtownmountkennedy for it to become a 'model' town; a test bed for other towns in Ireland that aspire to becoming carbon neutral. Town team have entered an EU wide Smart Village competition to assist into smart town economy. Request WCC recognition and assistance with this ambition. - Lucky to have forestry so close to the Main Street and appreciate that the Draft Plan is supporting the development of a "Green Spine" centrally in the town. This is an important characteristic of our town and it should be noted on the overall vision that the future development strategy should incorporate and prioritize nature along with development. - Newtownmountkennedy due to recent large development has a young population. High on priority of aspirations is to become more carbon neutral. The community is part of the SEAI Sustainable Energy Communities scheme and is currently working on our Energy Masterplan. We would like to see the vision "<i>Facilitate a transition to a low carbon settlement</i>" prioritised, moved up the list and be extended to facilitate a low carbon settlement through incentivising sustainable enterprises and supporting sustainable infrastructure. - The community welcomes the proposed adjustment and reduction in the residential zoning as part of this plan; if our town plan is to comply with the national strategy, the number of new units that can be built in the next ten years is less than stated. It is very concerning to discover that permission has already been granted for our entire allocation of units up to 2031 - The focus on development around the Town Centre to generate economic activity is welcome but threatens the function of the Main Street. Any new Town Centre development will require access and our Main Street is overloaded with junctions and parking. A Main Street Plan needs to be agreed with the residents and property owners as part of the County Plan - One of the main concerns is traffic. Understand the logic to the RN zoned lands in AA1 but are concerned that the additional increase in traffic this will put on the Fishers Junction will require phasing restrictions until the capacity of the junction has been established. This junction is currently congested in peak times and unsure as to

		<p>how the junction will be refurbished and function once opened to Wicklow Hills. This junction will potentially have to cater for the entire town to filter out to the N11. Any additional burden on this junction will need to be considered in this context</p>
<p>C2-302 https://consult.wicklow.ie/en/submission/ww-c2-302</p>	<p>Craig Bishop</p>	<p>The growth target proposed in the Draft plan is significantly above that recommended by central and regional authorities. Existing planning consents in Newtownmountkennedy would allow for the population of the town to exceed the 2031 target; further development are in the pipeline which could result in a 100% increase in population. The plans targets jobs growth of 1,100 jobs in the next 10 years. However most of this is planned for a peripheral greenfield site, 1.5km from the town centre on the far side of the N11. The total number of people working in Newtown in 2016 was 1,112. The plan proposes to double the number of people employment in the town in the next 10 years.</p> <p>This development strategy would substantially increase car use and goods transport on the N11; increase carbon footprint and undermine achievement of climate objectives; undermine social fabric of community; and redirect growth and resources away from primary growth centres of Bray and Wicklow town ND other Level 4 towns.</p> <p>The SEA is a mitigation exercise – not a climate plans, it does not address measured aimed at decarbonisation for example.</p> <p>Following suggestions for consideration for the plan strategy:</p> <ul style="list-style-type: none"> - Stick to the growth parameters set out in higher plans; concentrate growth in growth centres, resist disperse growth in hinterland area - Prioritise climate action; environmental growth over economic growth - Address legacy over zoning - Rethink future of 'self-sustaining towns' - Social impact assessment of growth should be carried out.
<p>Chief Executive's Response</p>		
<p>In accordance with the NPF, where a settlement is not designated a growth town, population growth should not exceed 30%. Having regard to the 2016 population of Newtown of 3,552, this would allow for growth up to c. 4,620 by 2031.</p> <p>However the housing / population growth resulting from completed / commenced developments in the town is already in breach of this NPF objective. The Core Strategy of the Draft Plan therefore provides for growth in exceedance of this (c. 70%) in order to reflect the reality on the ground.</p> <p>It is likely that the growth rate could exceed even this rate, taking into account extant permissions as yet uncommenced and the fact that permission will need to be still considered on town centre infill sites, in order to achieve the goal of revitalising the town centre, in particular the promotion of new development on vacant sites along the Main Street. This outcome is acknowledged in the plan, and gives rise to the overall development strategy set out in the draft plan for the town, which is to de-zone any previously zoned residential lands where no permission has been granted or no development has commenced, and to focus on regeneration of the town centre. In this regard, further zoning changes are recommended on foot of these and other submissions, particularly those from the prescribed authorities (<i>see Sections 3.1 and 3.2 of this report</i>), which are set out below.</p> <p>The CE acknowledges that this level of growth could result in infrastructural and societal challenges, and if the</p>		

developments already underway or permitted could be paused or phased, this would allow a better chance of resources / infrastructure being delivered on phased basis to match population growth in a more measured and sustainable manner. However, no mechanism is available to stall or slow a permitted development, should that development be proceeding fully in compliance with the permission granted. Careful monitoring will be required of housing and population growth in the town during the lifetime of the plan to allow the Council (and other state agencies such as the Dept of Education, Irish Water, NTA etc) to identify resources / investment needs as they arise.

Every effort has been made in this new draft plan to address climate concerns resulting for example from over-development / unsustainable development patterns, such as excessive sprawl into the undeveloped lands surrounding the town core, car dependency etc. Opportunities to de-zone surplus to needs greenfield lands have been taken; the plan aims to redirect growth into the town core where the most sustainable form of development is feasible; it addresses green infrastructure issues by identifying and protecting new / expanded open areas, green corridors etc; and has a focus on improvement of active and sustainable forms of transport. In addition, the Draft Plan explicitly supports the development of the town as a 'Sustainable Energy Community' and encourages developments that are neutral / low emission, integrate renewable technology or involve local renewable energy production (Objective NK19).

The Draft Plan overall sets out a wide range of objectives and goals with respect to climate action and biodiversity, however the development plan itself is not the climate or biodiversity action plan for the County; it embodies the land-use elements of high level climate action and biodiversity plans, and as it becomes clearer how land-use and spatial planning interacts with climate action goals, land-use plans can be amended and improved. With respect to 'decarbonisation', this is an evolving area and a consistent methodology for the implementation of Decarbonisation Zones by way of regulations and guidance from the Department, the Regional Assembly and the Climate Action Regional Offices (CARO) is awaited. . In its work in establishing a decarbonisation zone in Arklow, Wicklow County Council will be sourcing, collecting and analysing all available and relevant data to establish the 'carbon footprint' of the settlement and this project will be utilised as a learning exercise for establishing what data is available and necessary to establish such baselines, and to develop a plan to reduce carbon footprint. Should an acceptable methodology be developed from this study that can be applied across other towns, it will be possible to develop a decarbonisation plan for Newtown in the future.

With respect to nature, forestry etc, the enhancement of green infrastructure, green links / amenity routes, parks and open areas is a clear overriding aim of the new plan, as evidenced by the enhanced open space zoning provision and objectives. The 'greening' of the town is fully supported by the plan.

With respect to the vision / strategy for the town centre / Main Street, the CE and Council is committed to enhancing this area (as is explicitly set out in the Draft Plan) and has recently been allocated funding under the RRDF to address key issues in the town centre, including but not limited to:

1) *Main street enhancement to improve public realm and address traffic management issues in the centre of town including:*

- *Measures to reduce speed*
- *The regularization of parking spaces within the town*
- *The provision of all day park and ride facility*
- *The realignment of kerbs and footpaths*
- *The provision of safer cycle and pedestrian ways*
- *Gateways at either end of the town*
- *The creation of town centre 'plaza' (to link up with the park / plaza already in situ on the west side of the Main Street)*

2) *Enhanced and safe access to and from the town centre involving:*

- *Creating linkages between existing and new housing estates and the town centre encouraging social*

interaction, walking and cycling

- *Creating safe walkways and cycle ways to and from the local schools enabling increased cycling and walking and the 'Walking Bus' model of travel*

3) *Public space with the creation of new focal points within the town*

- *The purchase of land on the east side of the Main Street for the provision of a park extension to the planned main street 'plaza', with planting, seating and play features and enabling community events*
- *The lands in question are characterised by a river and wooded area, and the ruins of a former Mill are located thereon; therefore there is significant potential with respect to flood management, biodiversity and heritage protection in the purchase and appropriate development of these lands.*

4) *Community facilities in:*

- *The refurbishment and extension of the community centre*
- *A sports and recreational hub in all-weather pitch and running track*

Plans to deliver on these elements are now in train.

With respect to employment, the employment strategy is not to redirect jobs growth away from other towns, but rather the jobs growth targeted is intended to provide for jobs for residents of Newtown and the immediate surrounding area, and separate and higher levels of jobs growth are targeted for Bray, Wicklow Town etc. However in light of the concerns raised in this and other submissions particularly those from the prescribed authorities (see Sections 3.1 and 3.2 of this report), with respect to the location of some of the employment zoned land at AA2, it is recommended that AA2 be omitted from the plan (see more detail to follow). This will mean that jobs growth will be focused around the town core and south at Moneycarroll, which would allow for the higher levels of active travel by Newtown residents.

With regard to the 'Smart Village' programme, as set out in 'Smart Villages and Rural Towns in Ireland' (National Rural Network 2021):

"The EU Action for Smart Villages initiative was launched by the European Commission in 2017. Although there is no legal definition of a 'smart village' within EU legislation, Smart Villages (and Smart Rural Towns in an Irish context) are rural areas and local communities which build on, and enhance, their existing strengths and assets through creative thinking and by embracing innovation to create desirable places for rural people to live and work. In creating a Smart Village, community groups and individuals often overcome local challenges by exploring and implementing practical and tangible solutions. In particular, rural communities explore how local services, such as health, social services, education, energy, transport and retail, can be enhanced and sustained through the deployment of Information and Communication Technology (ICT) tools and community-led actions and projects. As such, whilst digitisation is key to the creation of a Smart Village, social innovation is also paramount i.e. thinking smartly to create vibrant and sustainable rural communities. The concept of Smart Villages therefore is not prescriptive and there is an acknowledgment that there is 'one size fits all' model that can be applied universally"

In this regard, and particularly as it is unclear how exactly the programme might be delivered in Newtown, it is considered that the wide ranging provisions of the overall draft Plan and the Newtownmountkennedy Plan would support any projects that might arise from a 'Smart Village' type programme. Therefore no change is recommended.

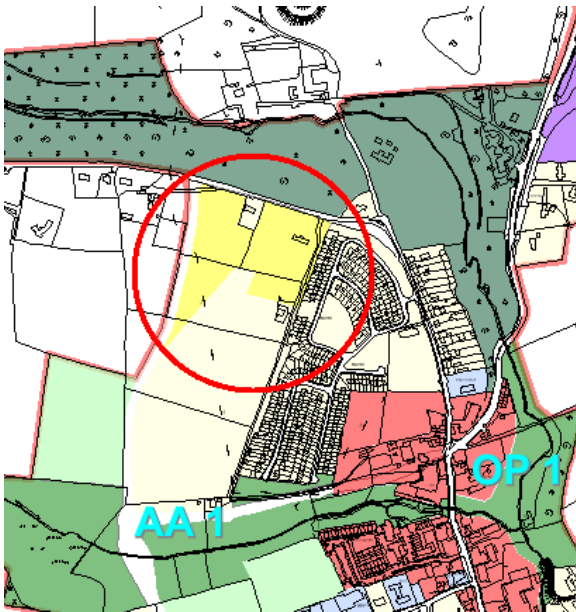
Chief Executive's Recommendations

Amend Draft Plan as follows:

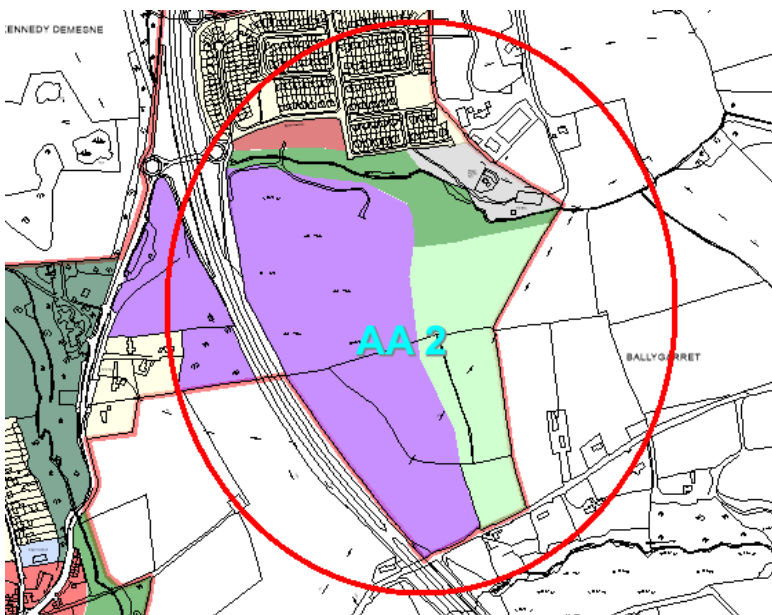
Volume 2

Amend the Newtownmountkennedy Town Plan as follows

1. Omit 'New Residential' zoning from lands located north of Season Park and zone land 'SLB – Strategic Land Bank'.



2. Omit Action Area A2



3. Make any 'consequent' changes to text associated with these zoning changes

Topic		Town Centre / Retail
ID	Name	Issue raised
C2-246 https://consult.wicklow.ie/en/submit/ww-c2-246	Newtown-mountkennedy Town Team	<ul style="list-style-type: none"> - The community supports the objectives laid out in NK8, NK9, NK10 and NK11. - The majority of existing retail units in the town centre are of similar size and design which are best suited to cafes, takeaways, hairdressers etc. Need to see larger size units available to support alternative enterprises such as a restaurant. Ask that an additional objective be added to require TC development to provide for larger scale alternative commercial units. - Within this scale see a need for live/ work units where small businesses can buy and live above. Would request that WCC consider a rates reduction for any business with a sustainable mandate being accommodated anywhere in Newtownmountkennedy be able to avail of a 50% reduction in rates for 3 years. - Town centre opportunity site welcomed (OP1) Newtownmountkennedy is in need of a public park central in the town. The proposal to link the Parkview Plaza functionally and visually with the OP1 site is supporting the community's vision of a town with a central "Green Spine" to nurture physical, social and mental health for all ages in our community. There is enormous potential to link this park along the river to both the small woods by Coillte and further down the Kilcoole Road.
Chief Executive's Response		
<p>With regard to the delivery of 'larger scale units' in the town centres, often this is challenging to achieve due to the scale and urban grain of a town centre; however at larger redevelopment sites where more flexibility in design / format is available, the Plan would fully support the delivery of all sizes of town centre appropriate buildings and uses. Without adequate evidence to support a policy <i>requiring</i> larger units, it is possible such a prescriptive requirement might inhibit or affect redevelopment, which is acutely needed particularly on town centre vacant sites. In addition, even where smaller units are proposed and built initially, there would be no impediment in principle to units being amalgamated if that was what the market demanded. Therefore no change is recommended in this regard.</p> <p>The support for the development of an enhanced green spine with connections to other amenity areas is noted.</p> <p>Rates are not within the remit of the CDP.</p>		
Chief Executive's Recommendations		
No change		

Topic	Employment	
ID	Name	Issue raised
C2-246 https://consult.wicklow.ie/en/submission/w-c2-246	Newtownmount-kennedy Town Team	<ul style="list-style-type: none"> - Support Objective set out in Section 1.1.3 'Introduction to Level 4 Towns' to '<i>Support a shift towards low carbon and climate change resilient economic and enterprise activity, reducing energy dependence, promoting the sustainable use of resources and leading in the Smart Green Economy</i>'; but think it should have higher priority - The NK2 lands at Moneycarroll should be amended to provide for 'sustainable' employment / enterprise and should include a high percentage of tree planting. It is important that all entrances to the town are attractive. It would detract from the objective of healthy placemaking if an industrial style development on this site. By restricting the development to sustainable enterprises it would support the town's aspirations to become carbon neutral and also likely to be a less industrial style development. Propose the wording of NK2 be amended as follows NK2 Moneycarroll: <i>To encourage and facilitate the development of lands zoned E1 at Moneycarroll (north and south of the existing business park) for employment and enterprise development. Given the prominent, 'gateway' location of the E1 lands to the north of the existing business park located on the regional road, development will need to be phased; lands to the south being developed first. Any development of these lands shall be of the highest architectural quality</i> - AA2: this land was zoned to include industrial development in 2002. In the 19 years since then the uptake of land for industrial development has been a fraction of that zoned. The evidence is there for all to see - this land is no longer needed for industrial development and should be de-zoned. Another mechanism for funding a road from Kilcoole to the N11 needs to be found; this one hasn't worked.
C2-302 https://consult.wicklow.ie/en/submission/w-c2-302	Craig Bishop	<p>The town has a legacy of large number of unbuilt industrial sites, 20 years ago large tracts of lands (35ha) were designated for industrial development, yet only 4ha has been developed. How 1,100 new jobs are to be created is unclear.</p> <p>The existing jobs ratio needs to be treated with caution, at less than 50% of the workers in Newtown live within 5km radius, and almost a quarter are from outside the county. On this basis setting aside large tracts of farm land for 1,100 jobs will provide jobs for a minority of people living in the area. In the event these jobs were established, they would be for workers resident in other area that would commute to the town.</p>
Chief Executive's Response		
<p>The economic development objectives set out in Section 1.1.3 'Introduction to Level 4 Towns' are highest level strategic objectives that apply to economic development in Level 4 towns such as Newtown – there is no higher 'priority' available for this objective.</p>		

The 'jobs ratio' is the ratio of the number of jobs located in a town compared to the number residents workers in that town. It is not a measure of how many resident workers work in their own town. It is an accepted measurement of the employment strength of a town, but it is correct that it does not take account of the numbers leaving and entering the town for work. However as set out in the RSES, a jobs ratio of 70%+ is an indicator of strong economic function, and a larger number of jobs in any location will improve the possibility of residents being able to work in their own town.

The jobs growth target while high is based on the concept of increasing the existing job ratio in the town by 25%. In 2016, the job ratio in Newtown was relatively high at 78%, and the goal set out is to increase this to 97%. On balance, it is considered that this level of job ratio growth is possibly not realistic or appropriate, especially as the jobs ratio at 78% is already considered to be at a very high and likely at an optimal level.

On that basis, it is considered that the goal should be to maintain the existing acceptable jobs ratio, rather than grow it to the level set out in the draft plan; and given the population target set out in the draft plan, this would require jobs growth in the region of 500 new jobs (giving overall total jobs in 2031 of c. 1,600). As a follow on from this it is recommended that AA2 employment lands be dezoned.

With respect to NK2 (Moneycarroll), the employment zoning of these lands would support *sustainable* employment types, but does not prescribe exactly what may be built on the lands in order to ensure that the most flexible approach is taken to encourage the highest level of new employment development as possible. There are a wide range of objectives and development standards in the plan that will ensure that new developments take the most sustainable form possible and address climate and biodiversity concerns. With respect to the sequence of development, it is considered illogical to develop lands from the periphery inwards (which is what is suggested 'south-to-north') and this is therefore not supported. Landscaping standards for new employment developments are set out in the Draft Plan already. Therefore no changes are recommended.

Chief Executive's Recommendations

Omit AA2 and make any 'consequent' changes to plan associated with this zoning change

Topic	Infrastructure	
ID	Name	Issue raised
C2-130 https://consult.wicklow.ie/en/s/ubmission/ww-c2-130	Muireann Dalton	<p>Suggests:</p> <ul style="list-style-type: none"> - Park and ride facility beside Texaco to alleviate traffic - Link from Kilcoole to Newtownmountkennedy needs to be implemented. - Roads footpaths need to be upgraded to support additional traffic - Electric car points for the town - Improved public transport
C2-209 https://consult.wicklow.ie/en/s/ubmission/ww-c2-209	Catriona Bowtell	<ul style="list-style-type: none"> - Concerns expressed regarding road safety along Church Road from Season Park to Main Street at Fishers junction - Development of lands at Season Park with final section of western link road will increase traffic volume. - No footpaths or lighting at area around the Coillte forest.
C2-246 https://consult.wicklow.ie/en/s/ubmission/ww-c2-246	Newtown-mountkennedy Town Team	<p>Note: <i>This is a lengthy a detailed submission on the topic of transport and traffic in Newtown that would not be possible to summarise fully here. The interested reader is advised to consider the entire original submission</i></p> <p>This submission raises concerns in relation to</p> <ul style="list-style-type: none"> - Traffic movements from the northern end of the Western Relief Road (when completed) from Season Park to Fisher’s junction - The removal of the road objective through Coillte forest from Season Park to Regional Road - The design of the permitted new entrance into Wicklow Hills at this junction - Significant new development permitted or in preparation will add significant to congestion of Main Street and undermine ‘placemaking’ goals - Phasing conditions should be placed on new development to ensure road infrastructure is provided before units re occupied - Cycle / pedestrian link to Kilcoole vital - Traffic movements and traffic safety around schools road – Wicklow Hills (suggestions for improvements made) - Suggest park and ride around the Texaco garage; suggest an Electric Bus running from here through Kilcoole to Greystones Dart station on a loop. - Request Objective NK5 be amended as follows: NK 5 To improve the principal access routes and junctions linking Newtownmountkennedy town centre to strategic transport corridors and surrounding tourist attractions <i>in a phased way in line with development</i> <p>With respect to water infrastructure, concerns raised about pumping station capacity and regarding foul smells. Suggest no further development should proceed until this pumping station is upgraded to carry the capacity required into the future.</p>

Chief Executive's Response

With respect to the objective in previous development plans for a new road from Season Park, through forestry and onto the regional road near the Garda station, a careful examination of the cost and benefit / need accruing from this road objective was carried out as part of the plan preparation. While the financial cost of building such a road would be high (€1-2m), the significant environmental cost was considered the key rationale for omitting this objective – this road would require considerable forestry removal (which would run contrary to climate and biodiversity goals), would require significant cut-and-fill (which is damaging to natural water flow patterns / drainage) , would require a bridge over watercourse which would likely adversely impact on water quality and would require the production of stone, sand, cement, asphalt and other carbon emitting products to build the road. In addition, the construction of such a major route would require amenity users to cross a major road to avail of the amenity of the forest to the west of the road. This was balanced against the possible benefit arising from the construction of the road i.e. that it would carry traffic emanating from the northern part of AA1 to the regional road without having to use the Season Park Road and Fisher's junction. Having regard to the predicted amount of traffic, the recommendation in this report to reduce the amount of land zoned for housing in this area, the availability of a direct route into the town centre from this part of AA1 (the central connection, already designed and permitted), and the possibilities for upgrading of the Season Park Road, it was deemed that the cost did not outweigh the benefits, and that this road could no longer be justified.

With regard to the permitted design of the central route from AA1 to Fisher's junction, this design has been considered by WCC and An Bord Pleanala to meet all current road design and safety criteria and has permission.

The Council is committed to enhancing safety of all routes throughout the settlement, particular those with deficiencies, that carry the most traffic or have the highest existing or potential use by pedestrians / cyclists. As set out earlier in this report, the Council has secured RRDF funding to carry out more detailed assessment of the traffic safety issues along the Main Street and side streets, and the Council is committed to implementing measures once identified. It is also intended (as set out in Objective CPO 12.3) that a detailed 'Area Based Transport Assessment' study will be carried out for Newtown within the lifetime of the Plan, which will survey, assess and identify further improvements as necessary.

The Draft Plan (both the Newtownmountkennedy Plan and Chapters 11, 12 and 18 of Volume 1) clearly set out unequivocal support for the enhancement of walking and cycling infrastructure and for the development of green / amenity routes through the town, and longer range routes to Kilcoole – Newcastle. In addition, the Council will shortly commence the roll out of a significant new 'Active Travel' programme which will identify and fund improvements to pedestrian and cycling infrastructure throughout the County, and will look closely at links to schools, routes between towns, and connections to public transport services. All of the issues raised in these submissions will be brought to the attention of the Active Travel programme.

It is agreed that development should be phased to match infrastructure capacity and enhancement, and this is required by Objective CPO 6.20, and the Development & Design Standards set out in Appendix 1.

With respect to park-and-ride facilities, the Draft Plan explicitly supports the concept of same (NK17) but does not specify a location. Such facilities these can only work with the support of the transport agencies in order to ensure public bus services utilise same; at this time the NTA does not envisage or have plans for a park-and-ride in Newtown. However, should this change, the plan provisions would support and facilitate such a development, including at the location suggested.

With regard to the pumping station, such stations (which are managed by Irish Water) must comply with stringent environmental standards, which would include odour control. Should any issues arise, they should

be brought to the attention of IW or the EPA.

Chief Executive's Recommendations

No change

Topic		Sports / community development
ID	Name	Issue raised
C2-127 https://consult.wicklow.ie/en/s/ubmission/ww-c2-127	Newtownmount-kennedy Area Sports Development	<ul style="list-style-type: none"> - Inadequate sports facilities at present within the town for the soccer clubs. - No changing facilities at pitches or lighting - Multi use sports complex needed for the town - Support and investment needed.
C2-130 https://consult.wicklow.ie/en/s/ubmission/ww-c2-130	Muireann Dalton	<ul style="list-style-type: none"> - Secondary school needed to serve the area; area zoned CE opposite Rossmore ideal. - Community green spaces , public park needed, allotments - Community facility needed to house the scout troop and a youth centre/café. - Community centre needs to be supported, expanded and refurbished.
C2-275 https://consult.wicklow.ie/en/s/ubmission/ww-c2-275/observation#attachments C2-273 https://consult.wicklow.ie/en/s/ubmission/ww-c2-273	Anna Kalinina	<ul style="list-style-type: none"> - Newtownmountkennedy Community Clean Ups volunteer formed during lockdown to clean the streets. - Need for state trained operatives to do litter picking - Currently no help from WCC - Local businesses should be legally responsible - Increased rubbish bins required on streets.
C2-246 https://consult.wicklow.ie/en/s/ubmission/ww-c2-246	Newtownmount-kennedy Town Team	<ul style="list-style-type: none"> - Additional CE zoned lands welcomed - The AOS as part of AA2 could address the shortfall in active open space if it had greenway access. For this AOS to be functional it will be reliant on greenway access from the Main Street. Without it use of the space will be reliant on car journeys. - The community has seen no activity with this site in recent times that would indicate it may be developed in the near future. The communities' needs as identified through this draft plan are urgent and we do not feel that these lands represent the solution. - The town needs to see community amenities realised phased in line with development so that needs are met and we have the means to build a healthy happy community. Whilst there are permissions granted to construct an additional 600 homes there is currently no plan in place which will provide for community amenities. Need to see central lands identified, purchased and a plan in place to provide amenities which will be constructed in line with development. - It is requested that lands zoned 'Employment' at Moneycarroll be rezoned to AOS
Chief Executive's Response		
<i>(Please also see Section 3.3.7 of this report)</i>		
Key existing social / community facilities are identified and evaluated in the crafting of all local plans insofar as is feasible, including an evaluation of schools, sports facilities, open spaces etc, and where deficiencies are identified, objectives including zoning of lands for certain purposes are integrated in plans. More detailed assessment of		

particular localised needs, such as sports / recreation, or community space needs are carried out by the Council's Community, Cultural and Social Development directorate, as and when needed and funding is available. Similarly more localised analysis of schools and childcare is carried out by the Dept of Education and the County Childcare Committee. The Council will strive to carry out further surveys / assessments, particularly in the area where services / infrastructure appear to be coming under pressure.

Social infrastructure audits at a more localised level are thereafter required for large scale housing applications, which has been the norm for some time and is a requirement of the current CDP. The key changes in this Draft Plan relate to the scale of application that would trigger the need for a SIA, more clarity about the scope of a SIA and the documentation required to be submitted therewith.

The Draft Development Plan includes objectives to support the development of community facilities throughout the County. The community facilities hierarchy model, as shown in Chapter 7, Table 7.1, provides a list of the social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however, the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal.

Sports grounds

The draft plan makes provision for over 27ha of zoned active open space land for sports use, as well as over 21ha of open space for more casual play, parklands etc. The Council is committed to working with the community to secure funding to develop new facilities for existing or new sports clubs.

Education

The draft Plan makes provision for ample zoned land to enhance existing and build new schools, including a secondary school. However the delivery of such facilities is a matter for the Department of Education.

Community Centres / facilities

The draft plan makes provision for objectives and land zoning that would support and facilitate the development of improved or new community centres / buildings.

Waste Management

The support, training or funding of community waste management / clean up programmes would be outside the remit of the CDP and would be a matter for the Council's Waste Management division.

AOS zoning at Moneycarroll

The draft Plan makes ample provision of AOS zoning and therefore it would be difficult to justify changing the zoning of land zoned for 'Employment' use to open space use especially where there is an ongoing need for new employment creation. Therefore no change is recommended.

AA2

The concerns about the accessibility of AA2 are noted and having regard to this and other submissions, it is recommended that AA2 in its entirety be dezoned.

Chief Executive's Recommendations

Omit AA2 and make any 'consequent' changes to plan associated with this zoning change

Topic	Heritage	
ID	Name	Issue raised
C2-246 https://consult.wicklow.ie/en/submission/ww-c2-246	Newtown-mountkennedy Town Team	<p><i>(Note: this submission is accompanied by a lengthy and detailed proposal for additional TPOs in Newtown. See Section 3.3.17 in this regard)</i></p> <ul style="list-style-type: none"> - Draw attention to the old Flour Mill downstream of Kilcoole Road bridge - Seek protection of the old mill at Valle Pacis - Propose the following amended text: <i>It is an objective of this plan to support the development of riverine walks along these watercourses to form a linked network of routes connecting the town centre park to Coillte to the north-west, Kilcoole to the north-east and Newcastle to the south and to support Tree Preservation orders along these water courses with the aim of maintaining a continuous wildlife thoroughfare from the sea to the uplands national park.</i> - Protected views along the Main Street to the east should be extended. - NK23: Popular loop walks around the town should be identified and developed as part of green corridors
Chief Executive's Response		
<ul style="list-style-type: none"> - The existence of the old flour mill is noted but at this time it is not a Protected Structure nor recorded on the NIAH. It would appear that the original structure has been substantially altered over the years so it is unclear whether it would be justified to add same to the RPS. This however can be considered when the next review of the RPS is commenced. - The Old Mill at Ville Pacis is a protected structure - It is considered that the tree preservation / protection provisions of the Draft Plan (CPO 17.18-17.23) are comprehensive and robust and therefore it is unnecessary to add the text suggested. Therefore no change is recommended. - The protected view from the Main Street to the east is located at the centre of town, at the river valley and is a key vantage point to the east. For the most part there are structures along the east side of the street so there are no other significant view points from the street to the east. The submission does not specify exactly where the additional listed view should be. Therefore no change is recommended. - The loop walks detailed in the submission for the most part include routes along public roads, either on footpaths or along the road carriageway in more rural locations and the construction of footpaths at these location is requested. It is not considered necessary or appropriate to identify same as they are 'public' routes; the construction on new footpaths along public roads would be a funding and operational matters, the plan supports such projects. Therefore no change is recommended. 		
Chief Executive's Recommendations		
No change		

Garden Village AA2		
Topic	Name	Issue raised
C2-79 https://consult.wicklow.ie/en/submission/w-c2-79	Siobhan Griffith	<ul style="list-style-type: none"> - The existing sewerage treatment Plant for Garden Village should be decommissioned and any further development would need a new treatment plant - Mixed Use zoning should be removed. Preference for residential and open space to mixed use zoning - No retail units needed facing Garden Village court - Concerns regarding possible antisocial behaviour/smells from retail development - Extra traffic in Garden Village leading to concerns for pedestrian safety - Safe pedestrian links to Newtownmountkennedy needed - More details and location of link road at Ballyronan interchange should be shown. A new access road from the N11 should be located away from the existing estate. - Reduction of wasteland/green area full of flora/fauna - No details have been provided of what the landscaped park look like and who will maintain it.
C2-102 https://consult.wicklow.ie/en/submission/w-c2-102	Jane Foley	
C2-138 https://consult.wicklow.ie/en/submission/w-c2-138	Patty O'Malley	
C2-139 https://consult.wicklow.ie/en/submission/w-c2-139	Aidan Coughlan	
C2-144 https://consult.wicklow.ie/en/submission/w-c2-144	Garden Village Residents Association	
C2-161 https://consult.wicklow.ie/en/submission/w-c2-161	Joan Flynn	
C2-202 https://consult.wicklow.ie/en/submission/w-c2-202	Helena Plower	
C2-197 https://consult.wicklow.ie/en/submission/w-c2-202	Sarah Ridgway	
C2-246 https://consult.wicklow.ie/en/submission/w-c2-246	Newtown-mountkennedy	Any development of AA2 lands should be conditioned to provide a permanent sewerage station for the Garden Village Residents. This

.wicklow.ie/en/submission/w-c2-246	Town Team	should be outlined on the plan.
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Chief Executive's Response

Having regard to the concerns expressed in these submissions, as well as those raised in other submissions particularly those of the prescribed bodies, it is recommended that AA2 zoning be omitted entirely.

The key reasons for the AA2 zoning were:

- The need for further employment land in the town
- The need for additional sports land
- The provision of shops and services for the residents of Garden Village having regard to their 'dislocation' from the town centre
- The delivery of a new link road from the N11 to the Kilcoole Road

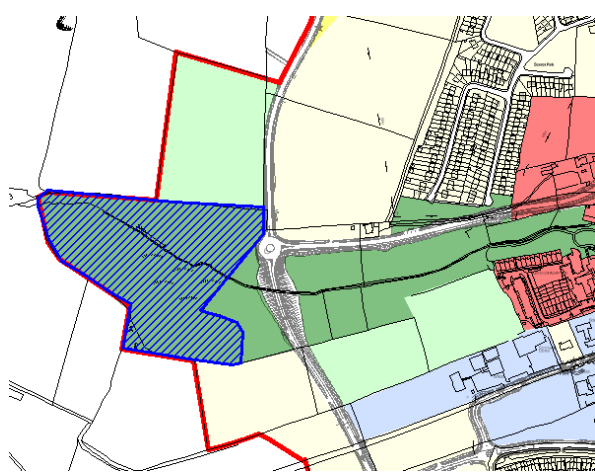
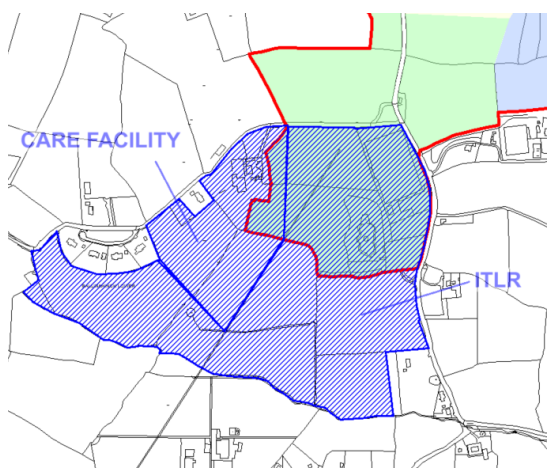
In these regards, it is considered that (a) there are sufficient lands zoned for employment and OS uses around the town core, and locating such uses at Ballyronan, at some remove from the majority of residents, may only increase unsustainable car usage to access same; (b) there appears to be concerns expressed by residents of Garden Village with regard to the development of a retail / service development at this location, and (c) the necessity or optimality of a route at this location has not been confirmed; in this regard, the Council will be commissioning a study to look at options for accessing south Kilcoole from the N11 as part of the Greystones - Delgany – Kilcoole ABTA, but until this is done, the evidence supporting this Ballyronan route is not available.

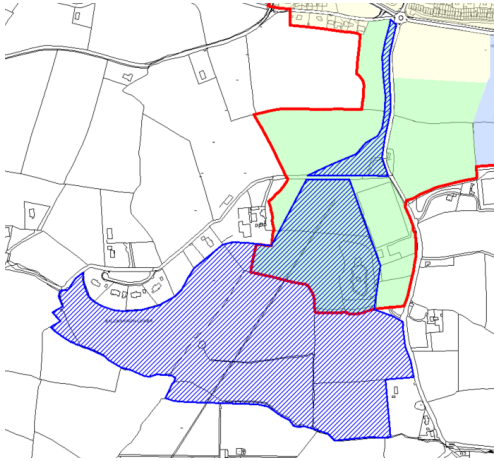
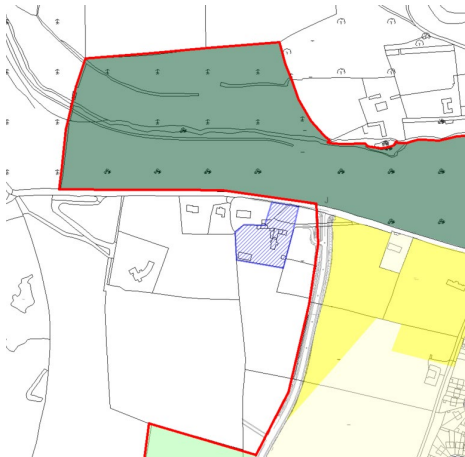
With regard to the wastewater treatment plant in this area, the decommissioning of same or otherwise would be a matter for Irish Water and the plan provision could not direct any particular course of action in this regard. Therefore no change is recommended in this regard.

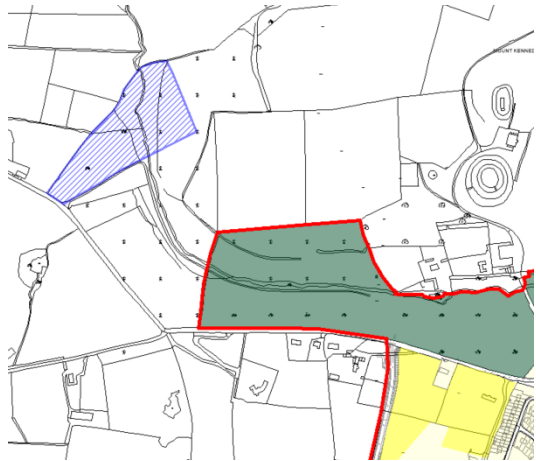
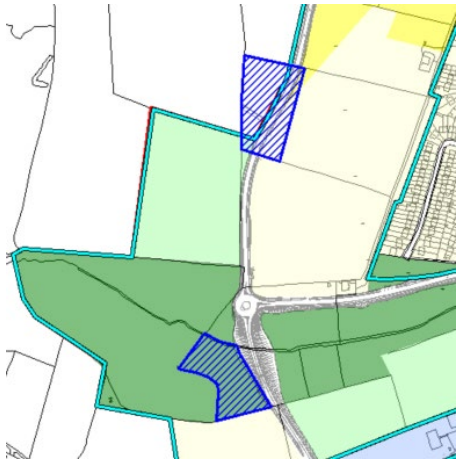
With regard to road / footpath connection from Garden Village to Newtownmountkennedy centre, the plan explicitly supports and facilities such improvements (NK5)

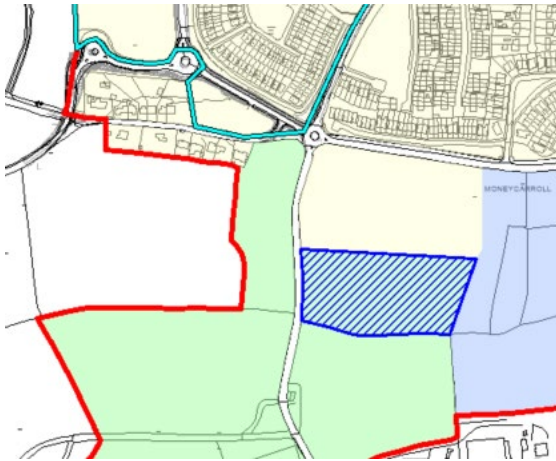
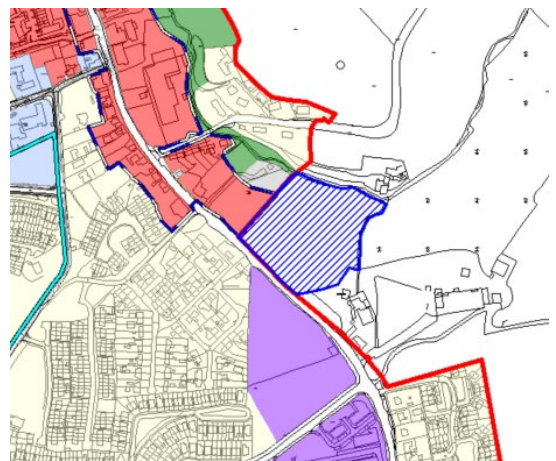
Chief Executive's Recommendations

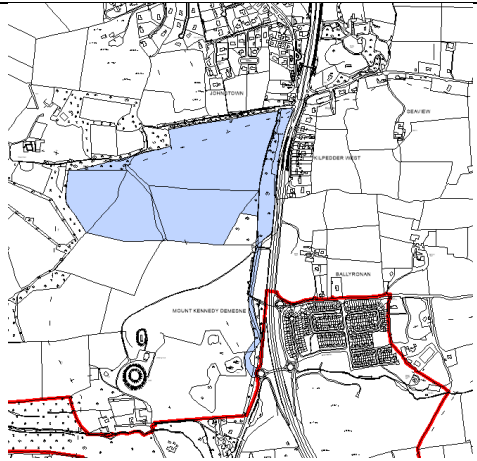
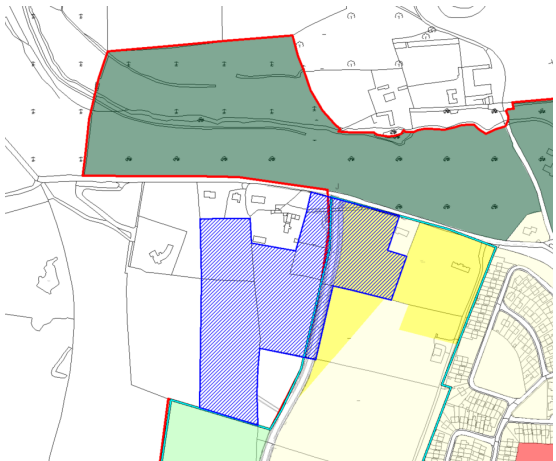
No change

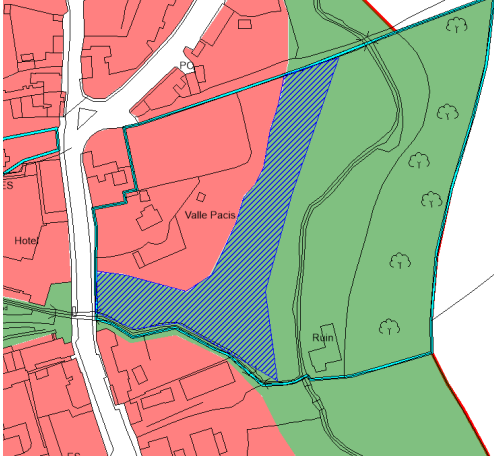
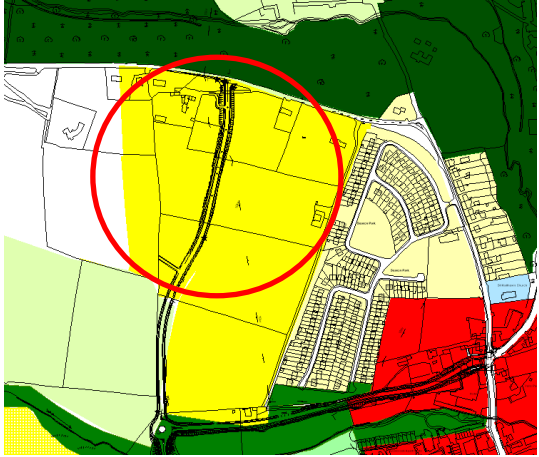
Topic	Zoning	
ID	Name	Issue raised
C2-53 https://consult.wicklow.ie/en/submission/w-c2-53	Donald & Barbara Ogilvy-Watson	<p>Submission relates to lands measuring c. 5.75ha (as shown indicatively on map below), which is proposed for OS zoning in the Draft Plan. It is requested that c. 1.7ha of the land (south-western part) be zoned for 'nursing home' use.</p> <p>It is put forward that there is market interest in the development of a nursing home at this location; there is no assigned site for a nursing home in the Draft Plan; services available; lands close to town centre; development would provide for passive supervision of park area; would provide employment</p> 
C2-287 https://consult.wicklow.ie/en/submission/w-c2-287	William Burke	<ul style="list-style-type: none"> - Owner of lands zoned Integrated Tourism/Leisure in the 2016/2011 CDP (Map 07.03) - Owner of lands zoned for residential care facility in the 2016 CDP (Map 08.01) - Requests zonings are retained to bring employment tourism and community facilities to Newtownmountkennedy. 
C2-286 https://consult.wicklow.ie/en/submission/w-c2-286	Paul Staunton	<ul style="list-style-type: none"> - Owner of lands zoned Integrated Tourism/Leisure in the 2016/2011 CDP (Map 07.03) - Owner of lands zoned for residential care facility in 2016 (Map 08.01) - Requests that these lands, (proposed to be Active Open space

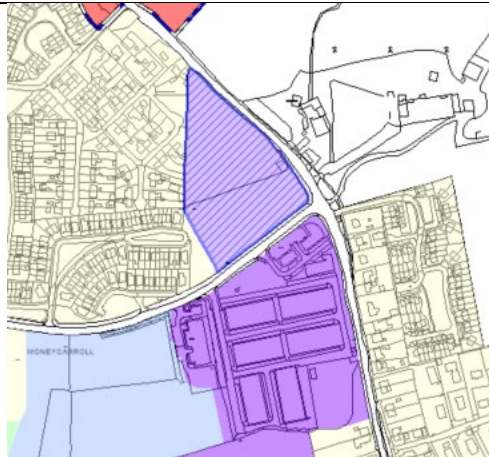
		<p>in the Draft CDP 2021-2027) be amended to RN New Residential</p> <ul style="list-style-type: none"> - Significant portion of lands previously proposed to be zoned residential and omitted pending a Newtownmountkennedy LAP in 2018 that did not happen. - Lands appropriately located within Newtownmountkennedy for residential development. - Site is already brownfield in nature with works carried out under 10/2223 and €1million paid in development contributions - Not suitable for use as Active Open Space - Should residential use not be considered appropriate, previous zoning for tourism and recreation complex should be reverted to. - Additional lands required to meet with housing stock targets. 
<p>C2-284 https://consult.wicklow.ie/en/submission/w-c2-284</p>	<p>Paul Kavanagh</p>	<ul style="list-style-type: none"> - Site at Season Park Farmhouse was zoned R1 in the 2008 Newtownmountkennedy Local Area Plan. - Request to retain the residential zoning of 0.6ha landholding - Adjacent to the Newtownmountkennedy relief road - Ideal location for residential land, good access to services - Proposed use of land as retirement / step down housing ideally located at edge of town. - Currently not on mains sewer but has potential to be. 

<p>C2-283 https://consult.wicklow.ie/en/submission/w-c2-283</p>	<p>Paul & Grace Kavanagh</p>	<ul style="list-style-type: none"> - Refers to lands zoned 'Forestry' in 2008 LAP, which are not zoned in the Draft CDP - Requests the lands are zoned for a specific STEAM (Science, Technology, Engineering, Arts and Maths) project; large indoor and outdoor environmental awareness activity centre. - Sketch design with layout concept submitted. 
<p>C2-281 https://consult.wicklow.ie/en/submission/w-c2-281</p>	<p>Tower Homes</p>	<ul style="list-style-type: none"> - Identify two areas of land in their ownership that were previously zoned R1 and R2 in the 2008 LAP - Request that these lands remain residential - Lands are serviced, on distributor road, adjacent to open space and in close proximity to town centre. - Landowner has contributed to provision of wastewater infrastructure under serviced lands initiative 2001. 
<p>C2-279 https://consult.wicklow.ie/en/submission/w-c2-279</p>	<p>Rockfield New Homes Springmount Ltd.</p>	<ul style="list-style-type: none"> - Identifies an area of land in their ownership that was previously zoned R1 in the 2008 LAP - Request that these lands remain residential - Will provide affordable housing - Lands are serviced; abut existing residential lands on distributor road. - Close proximity to town centre and employment zoned lands. - Landowner has contributed to provision of wastewater

		<p>infrastructure under serviced lands initiative 2001.</p> 
<p>C2-278 https://consult.wicklow.ie/en/submission/w-c2-278</p>	<p>Pauline Short</p>	<ul style="list-style-type: none"> - Identifies area of land in their ownership that was previously zoned R3 in the 2008 LAP - Request that these lands remain residential for high density affordable units - Lands are serviced, on a transport corridor adjacent to wastewater pumping station, adjacent to town centre and employment zoned lands. - Landowner has contributed to provision of wastewater infrastructure under serviced lands initiative 2001. 
<p>C2-217 https://consult.wicklow.ie/en/submission/w-c2-217</p>	<p>Quanta Capital</p>	<p>Request to extend the Newtownmountkennedy settlement boundary to include lands which are zoned for employment (Map 09.01) in the Draft Plan.</p>

		
<p>C2- 115 https://consult.wicklow.ie/en/submission/w-c2-115</p>	<p>Dwyer Nolan Developments Ltd</p>	<ul style="list-style-type: none"> - Request that lands at Season Park to be zoned RN in the CDP - Currently zoned R1 in the 2008 NTMK LAP. - Site will be served by new distributor road. 
<p>C2-245 https://consult.wicklow.ie/en/submission/w-c2-245</p>	<p>Robert Ashe, Charlotte de Grey, Bernard Doyle</p>	<p>This submission relates to lands at Valle Pacis, on the east side of the Main Street in the town centre of Newtownmountkennedy, measuring c. 3.27ha. In the draft plan, the lands are proposed for TC and OS zoning.</p> <p>It is requested that an area measuring c. 0.65ha be changed from OS to TC. It is put forward that the change in zoning from TC (in previous plan) to OS (draft plan) is not consistent with the development plan justification test for town centre zoned lands; and that town centre zoning is appropriate on lands that may be subject to flooding in accordance with the Flood Risk Management Guidelines.</p> <p>In addition, it is put forward that the indicative flood risk areas set out in the Draft Plan cannot be confirmed in the absence of a site specific flood risk assessment, which any application on the lands would be subject to.</p>

		
<p>C2-246 https://consult.wicklow.ie/en/submission/w-c2-246</p>	<p>Newtownmount-kennedy Town Team</p>	<ul style="list-style-type: none"> - Lands marked AA1 including current SHD area, should be de-zoned immediately pending proper infrastructure (<i>no map supplied, but appears to relate to area marked in Map A below</i>) - AA2 lands (Garden Village) should be de-zoned, no development has occurred in many years. Concerns that pumping station is at capacity, any AA2 development requires a permanent treatment plant - AOS identified in AA2 are not suitable without greenway access from the town. - Lands shown in Map B below should be amended to AOS  <p style="text-align: center;">Map A</p>



Map B

Chief Executive's Response

The boundary and residential zoning provisions for Newtownmountkennedy were reviewed having regard to the new housing targets for self-sustaining towns, the need to deliver compact growth and limit sprawl. There is substantial residential development occurring in the town at present. This needs to be balanced with the overriding objective to ensure sustainable growth and the creation of a sustainable self-sustaining community. The amount of land zoned for residential development must be balanced with the capacity of the town and community facilities to absorb growth. The Planning Authority is also required to adopt a sequential approach in determining appropriate or optimal land to zone and the extent of the plan boundary.

C2-287/C2-286: Burke / Staunton

These lands have been partially zoned for active open space (AOS) and are now partially outside of the settlement boundary. It is considered that the lands are surplus to the requirements of the development needs of Newtownmountkennedy for this development plan and therefore cannot be justified for inclusion within the plan boundary. The lands are too removed from the existing built up area, and there is ample zoned lands for both residential and Community and Educational purposes at more appropriate locations closer to the town centre. Adequate lands have been zoned to meet the housing stock requirements within the lifetime of the development plan. The proposal would not accord with the sequential approach to land zoning.

While some groundworks may have occurred many years ago on foot of a extant permission, the lands cannot be considered brownfield sites, as they are not previously developed, derelict lands used for industrial or commercial purposes.

It should be noted that tourism and community developments may be considered in rural areas outside of settlement boundaries under the provisions of the plan (subject to certain criteria being fulfilled) and therefore 'zoning' is not necessary to develop such a project. Therefore no change is recommended.

C2-284 Kavanagh

As set out above, there are adequate lands zoned for new residential development within the revised plan boundary and therefore there is no justification for addition zoning at this location, at an unserviced location. Therefore no change is recommended.

C2-283 Kavanagh

These forested lands are located outside of the built up, serviced envelope of Newtownmountkennedy and having regard to the principles already set out above, are not considered suitable or appropriate for development zoning as part of the Newtownmountkennedy plan. The rural tourism / rural development

objectives of the Draft Plan are suitably crafted to allow for appropriate and sustainable rural based educational / tourism development should such a project come forward that meets the plan criteria for such use. Therefore no change is recommended.

C2-281 Tower Homes

Having regard to need to reduce the amount of land zoned for residential development and make development more compact, the zoning all lands on the western side of the Western Distributor Road were reviewed as this road would form a natural western boundary to the growth of the town.

In this regard, it was considered necessary to remove the residential zoning from both of these parcels; in the case of the more southern site, given their location adjoining the OS zone it was considered most optimal to amend the zoning to OS to enlarge the park areas. With respect to the more northern site, the part of these lands located on or within the distributor road are retained in the plan boundary, while that part located to the west of the road is omitted.

This approach is considered reasonable to meet the requirements of the revised development strategy for the town and therefore no change is recommended.

C2-279/C2-278/C-115

It is considered that the lands are surplus to the requirements of the development needs of Newtownmountkennedy given the revised population and housing targets, and therefore cannot be justified for residential zoning. No change is therefore recommended.

C2-217 Data Centre

The lands are zoned for data centre employment use in the current (2016) CDP, and none of the County Development Plans preceding that (i.e. 2010, 2004, 1999) showed these lands as being within the boundary of Newtownmountkennedy. In the 2008 Newtownmountkennedy LAP, the LAP map showed these lands as have a County Plan zoning of AG*¹ which was the CDP zoning that applied to those lands at that time (in the 2004 CDP).

The lands in question are located north of the proposed Newtownmountkennedy plan boundary the lands in between comprising open farmland associated with the protected structures Mount Kennedy House and Bellfield House and their attendant grounds. These lands are not zoned for development. The lands directly adjoin the Kilpedder village boundary and in spatial terms are most closely connected to Kilpedder than to Newtown.

It is not clear what, in spatial planning terms, would be achieved by extending the Newtown plan boundary to encompass these lands, with unzoned lands in between; not including these lands in the Newtown plan boundary has no impact on the proposed zoning which is a stand-alone zoning. Therefore no change is recommended.

C2-245 Ville Pacis

It is not accepted that the lands in question pass the plan-making 'Justification Test' and therefore can or should be zoned for 'town centre' uses. In order to evaluate this claim in more detail, a fresh zone specific plan-making 'Justification Test' has been carried out, and this is set out in the addendum to this report – **'Addendum II to the SFRA'**.

Approximately 85% of the lands in question fall within Flood Zones A and B. The plan-making Justification

¹ AG* had the following objective: To provide for agricultural uses with an option for the life of the plan to provide for a business, office, science and technology park set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage.

Test is failed for these lands as the development of these lands is not essential for the regeneration of this town centre, particularly as there are a number of other areas within the town centre that are not at risk of flooding, that are just as suitable for town centre type uses.

While a small area of land zoned 'Open Space' in the Draft Plan is identified in the SFRA as being within Flood Zone C, taking into account

- Alluvial soil mapping from the GSI, which shows this area as overlain with alluvium, indicative of past flood events (see map below)
- Information provided by the landowner in their submission that there are 'springs' in this area.

it is considered that 'OS' is the most appropriate use.

C2-53

The lands in question were zoned for residential development in the previous development plan and were omitted from the Draft Plan having regard to the revised Core Strategy population and housing targets. In addition, it was considered an opportunity presented itself to enlarge to the park area in the interest of the community and nature / water quality conservation.

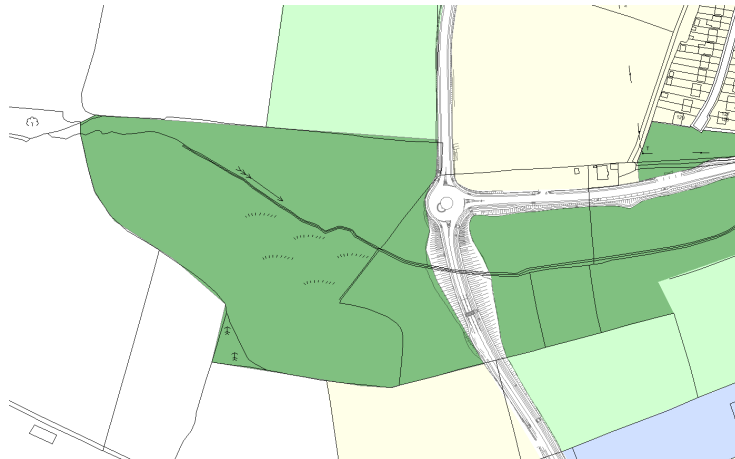
It is considered that there may be merit in the proposal, subject a significant set back from the watercourse, and the remaining lands within the submitters ownership being developed as a public parkland, connected to other parkland being developed by the adjoining landowner. It is recommended that this requirement be embodied by a new SLO (Specific Local Objective) area, encompassing the entire landholding.

Chief Executive's Recommendations

Amend Plan as follows:

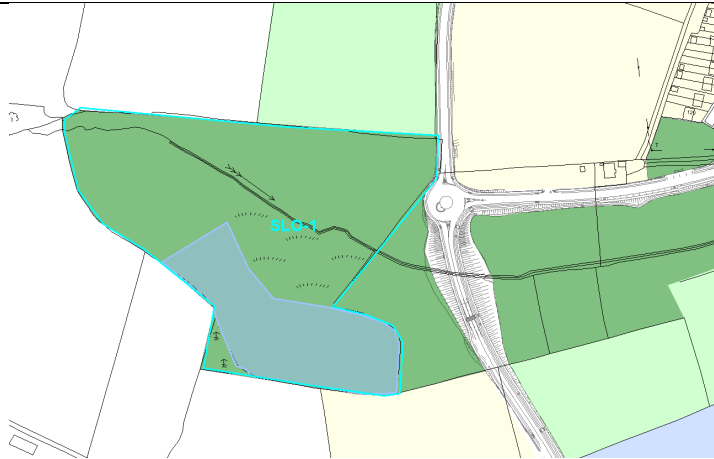
Volume 2: Newtownmountkennedy Plan

Change from:



Change to:

Add new SLO, 5.7ha in area, within which c. 1.6ha zoned for CE 'Community & Education'



Add new text:

SLO-1

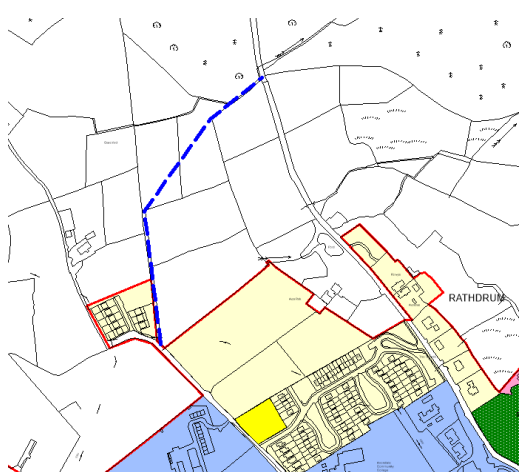
This SLO is located to the west of the new distributor road, adjoining land identified for a future parkland along the river. This SLO measures c. 5.7ha and shall be developed as an Open Space and Community development in accordance with the following criteria:

- Not less than 4ha shall be laid out and dedicated to the public as public parkland, in conjunction with the design for the adjoining development;
- A maximum area of c. 1.6ha on lands zoned CE may be developed for nursing home use
- The design of any such development shall integrate into the parkland setting and shall provide for passive supervision of the parkland area; where any access roads are required across land zone OS they shall be so designed as to allow the park, and users of same, to flow safely across;
- No construction may commence on the nursing home until this park is completed and open to the public.

Section 3.4	Volume 2
Section 3.4.4	Rathdrum

Topic	Social & Community Development	
ID	Name	Issue raised
C2-183 https://consult.wicklow.ie/en/s-ubmission/ww-c2-183	Karen Kelly	The planning permission granted for the Social and Economic Community Centre is welcomed. This will have a massive positive impact on the community and should be prioritised for delivery.
Chief Executive's Response		
The comments with regard to the community centre are noted.		
Chief Executive's Recommendations		
No change		

Topic	Heritage	
ID	Name	Issue raised
C2-183 https://consult.wicklow.ie/en/submission/ww-c2-183	Karen Kelly	The Special Area of Conservation should be retained with stronger wording/action plans to ensure that no further intrusion can happen from surrounding residents and businesses. The plan allows for development of housing, tourism etc & believe the wording here should be more prescriptive to protect this area of natural heritage. This woodland area should remain in public ownership for residents and visitors to enjoy for years to come without the threat of erosion due to residential and commercial developments.
Chief Executive's Response		
<p>There are a number of objectives in Volume 1, Chapter 17 Natural Heritage & Biodiversity to support the protection of the SAC. These include:</p> <p>CPO 17.5 <i>Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan.</i></p> <p>CPO 17.6 <i>Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats Directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.</i></p> <p>SACs have particular protection under law, via the Habitats Directive. All of the plan provisions have been screened and so crafted as to avoid adverse impacts on the SAC, and no zoning or other development is proposed therein or close by. The boundary of the Draft Plan, compared to the previous plan, provides for a much wider buffer zone between the SAC and zoned land, and all zoned but undeveloped lands previously zoned in the intervening area are proposed to be de-zoned in the new plan.</p> <p>The plan has no role in issues of ownership; it should be noted that much of the SAC is not actually in public ownership.</p> <p>Therefore no change is recommended.</p>		
Chief Executive's Recommendations		
No change		

Topic		Roads & Transportation
ID	Name	Issue raised
C2-7 https://consult.wicklow.ie/en/submit/mission/ww-c2-7	Brian Dwyer	It is requested that fresh road markings and warning signs be installed on the bends on the R752 just before Glanbia.
C2-183 https://consult.wicklow.ie/en/submit/mission/ww-c2-183	Karen Kelly	<ul style="list-style-type: none"> - Rathdrum has a serious traffic problem that needs to be addressed immediately to ensure residents and visitors can easily progress through the Main Street. The CDP references longer term plans but short term 'quick wins' approach should be started to work in parallel with longer term plans. - Objective RT7 should be revised to ensure that any new developments along the Laragh Road factor in an appropriate new road layout to alleviate any added congestion to existing roads in the town centre and surrounding areas. This new road would also alleviate traffic congestion at the Community College and town centre (<i>sketch supplied showing route suggested</i>) 

Chief Executive's Response

The draft Plan recognises that there are traffic related issues in many settlements, particularly the larger settlements and those where significant new development has recently occurred or is in train, like Rathdrum.

In order to clearly identify the problems and develop the correct solutions, whether that be new roads as suggested or otherwise, the Council will be commissioning studies during the lifetime of this plan:

CPO 12.3 *In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy, (namely Bray and environs, Wicklow – Rathnew, Arklow, Greystones – Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy) and any other settlement where it is deemed necessary by the Planning Authority and utilise these assessments and plans to inform land use and investment decisions.*

Although it is not known if such a study will identify this route as necessary, under Objective RT7, developments along Union Lane are required to ensure that they do not impede the possible development of such a route. The Draft Plan does not provide for (i.e. zone for) any further development along the Laragh Road and therefore no similar objective is required at this location.

Road signage / marking

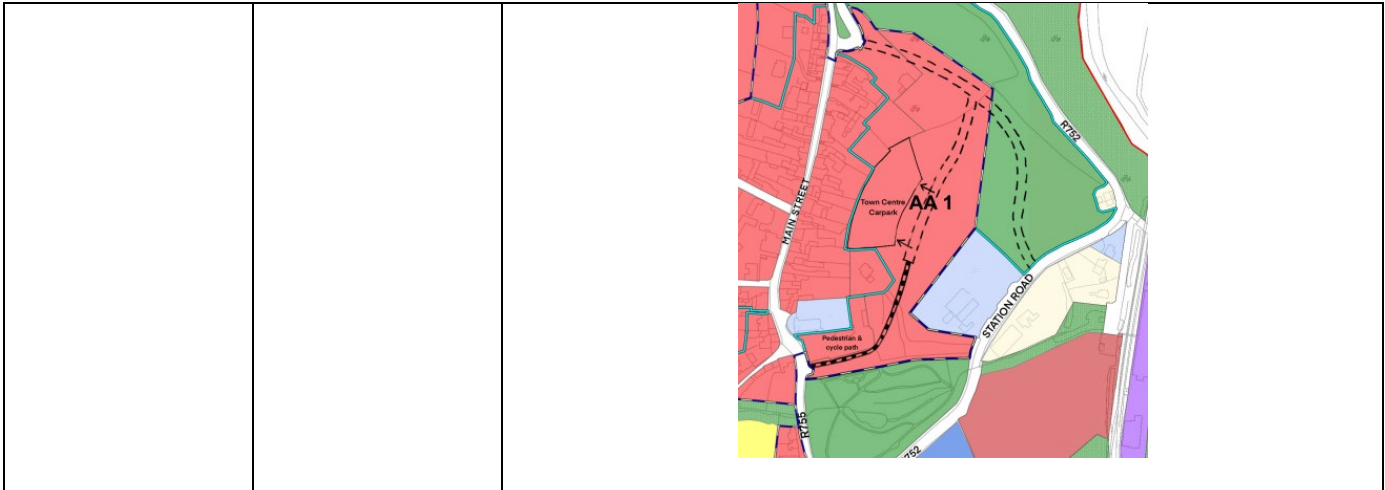
This is not a matter for the County Development Plan but rather a Road Safety matter for the District Engineer.

Chief Executive's Recommendations

No change

Topic		Retail
ID	Name	Summary of issues raised
C2-7 https://consult.wicklow.ie/en/submission/ww-c2-7	Brian Dwyer	It is requested that lands near the funeral home be zoned to attract the potential development of a supermarket.
C2-183 https://consult.wicklow.ie/en/submission/ww-c2-183	Karen Kelly	A new build supermarket is needed. It is considered that the prescriptive wording about this being only in the town centre eliminates the opportunity for a new build supermarket at the industrial site which is only a short distance from the town centre; the wording should be revised to accommodate this.
Chief Executive's Response		
<p>There are ample undeveloped or brownfield lands in the town centre that may be suitable for a new supermarket. The requirement that it be located in the town centre is deliberate to ensure that the vitality and viability of the town centre, particularly the Main Street, is not undermined.</p> <p>The draft plan makes provision for the possibility of retail development on employment zoned lands at Corballis beside the funeral home (Objective RT6: Subject to compliance with the Retail Planning Guidelines and the sequential test, lands zoned for new employment (E – Employment) at Corballis Upper may be considered for the development of a supermarket). However the Office of the Planning Regulator considers that this objective is contrary to the sequential approach, as stipulated in the Retail Planning Guidelines (2012), and has requested its removal.</p>		
Chief Executive's Recommendations		
<p>It is recommended that the retail objective in Rathdrum be removed from the plan as follows:</p> <p>Section 4.4 Economic Development & Employment Objectives</p> <p>RT6 — Subject to compliance with the Retail Planning Guidelines and the sequential test, lands zoned for new employment (E — Employment) at Corballis Upper may be considered for the development of a supermarket.</p>		

Topic	Action Area Plans	
ID	Name	Issue raised
C2-236 https://consult.wicklow.ie/en/submission/ww-c2-236	Rathdrum Development Association	<p>Request text for Action Area 1 is amended as follows (red text shows proposal)</p> <p>Action Area 1 Lands to the east of Main Street</p> <p>The development of these lands provide an opportunity to provide a new 'street' to the east of the Main Street, (the design of which shall be determined following detailed survey consideration of options and public consultation), fronted by a mix of shops and residences; this street should form a complete loop from the Main Street with pedestrian and vehicular access from the Main Street to the north (R755) and the Station Road to the south (R752). Pedestrian/ cycle lane access to the Main Street will complete the loop through the Parnell Memorial Park. The new town centre car park should be located to the west of the New 'Street' and to the east of the Main Street (as indicated on the AA1 map). This is the preferred location in the town for any larger scale retailing, such as a new supermarket. Any development proposals shall include a reservation of land along the rear boundaries of properties on the Main Street to ensure future access could be provided; all of these measures could contribute to the reduction of cars and car parking from Main Street, thereby improving its overall character and level of amenity.</p> <p>Objectives AA1</p> <ul style="list-style-type: none"> ▪ To provide for a mix of uses capable of accommodating retail / commercial / community development; ▪ A 'town centre' type density will be required to be achieved across the TC zone of the site; a site coverage of at least 50% and a plot ratio of at least 1:0.5 will be expected; ▪ A new street shall be provided linking the northern and southern ends of the Main Street and new uses should form active frontage along same, with vehicular and pedestrian access via the R755 to the north and the R752 to the south. Pedestrian / cycle lane access shall also be provided through the Parnell Memorial Park to the southwest. ▪ The lands to the west of the new street shall generally be reserved for commercial / retail /community uses; the Planning Authority may phase and / or restrict residential development to ensure this element is delivered; ▪ A new town car park shall be provided to the west of the "new street" and to the east of the Main Street, as part of any development proposals; ▪ Any development located to the immediate east of existing properties of the Main Street should be so laid out as to facilitate the future development of these backlands and the possibility of the creation of new pedestrian and the possibility of the creation of new pedestrian links through to the Main Street;

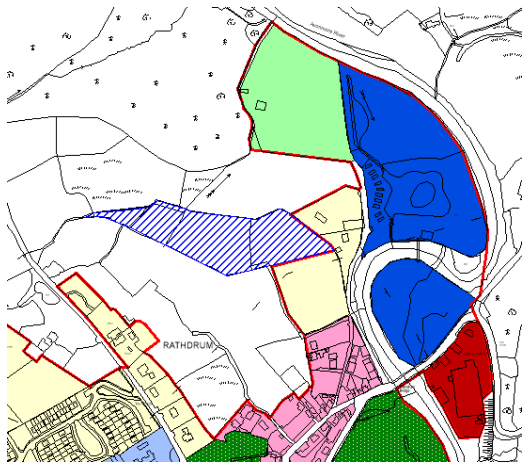
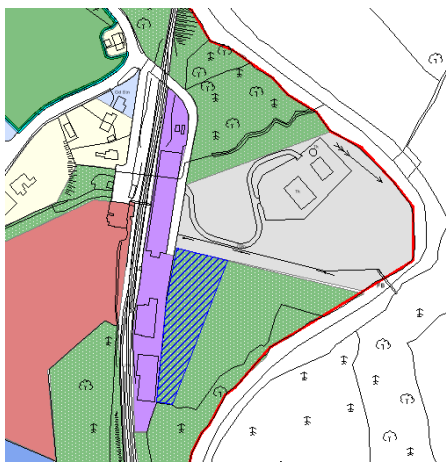


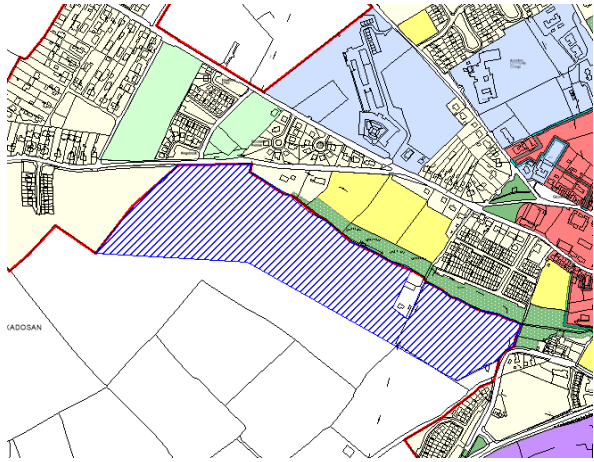
Chief Executive's Response

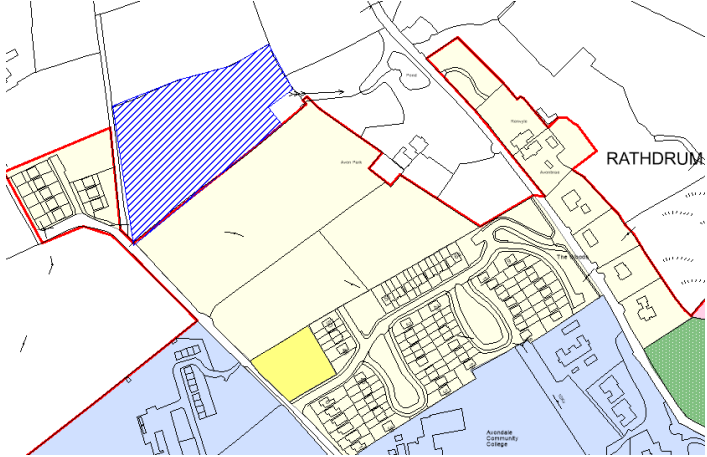
It is considered that the text in the Draft Plan adequately provides scope for the suggestions made in the submission. The additional text proposed is very specific and may limit alternatives. Therefore the suggested changes are not supported.

Chief Executive's Recommendations

No change

Topic	Zoning	
ID	Name	Issue raised
C2-13 https://consult.wicklow.ie/en/submit/mission/ww-c2-13	Padraig Smith	<p>Request settlement boundary is amended and lands measuring c. 2.7ha (shown indicatively on map below) be zoned for low-medium density residential development. It is put forward that these lands are accessible and serviced; located adjacent to Killian's Glen.</p>  <p>The map shows a settlement boundary in Rathdrum, Wicklow. A large area of land, outlined in red, is currently zoned in various colors (green, blue, yellow, pink, red). A specific area of approximately 2.7 hectares is highlighted with blue hatching, indicating the lands proposed for low-medium density residential development. The area is adjacent to Killian's Glen.</p>
C2-183 https://consult.wicklow.ie/en/submit/mission/ww-c2-183	Karen Kelly	<p>Inadequate land zoned for Community and Educational (CE) uses taking into account the projected population growth (2480 by 2031). The Community College has been extended with the loss of outdoor space e.g. basketball courts.</p> <p>Rathdrum needs a robust, long-term plan to address educational needs; this should include a green field site to future proof the educational needs of the town, the CDP should be amended to reflect this.</p>
C2-230 https://consult.wicklow.ie/en/submit/mission/ww-c2-230	Laurence Pierce (Property) Ltd.	<p>Request that land measuring c. 0.47ha (as shown indicatively in blue hatching on map below) be rezoned from OS2 'Passive Open Space' to 'Employment' to facilitate the expansion of the existing wool insulation business which located in the Railway Business Park on the adjoining lands. Submission is accompanied by an 'ecological appraisal' of proposal.</p>  <p>The map shows a specific plot of land, approximately 0.47 hectares, highlighted with blue hatching. This land is currently zoned as OS2 'Passive Open Space'. It is located adjacent to the Railway Business Park, which is shown in grey. The surrounding area includes green fields and other residential or commercial plots.</p>
C2-280 https://consult.wicklow.ie/en/submit/mission/ww-c2-280	Regan Construction	<p>Request settlement boundary is amended and lands previously zoned 'Residential' and 'Open Space' be re-instated (c. 12.5ha, shown indicatively on map below). It is put forward that lands have potential to</p>

mission/ww-c2-280		<p>provide affordable housing, lands are serviced, are adjacent to Rathdrum centre, will provide needed open space and link road, close to transports services (railway).</p> 
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<p>C2-288 https://consult.wicklowlow.ie/en/submission/ww-c2-288</p>	<p>Redmond Construction</p>	<p>Request that lands measuring c.1.85ha (shown indicatively on map below) be zoned of land for residential development. It is put forward that the land is adjacent to the 45 houses at Oak Springs which is currently under construction by the submitter, developer is anxious to maintain workforce upon completion of that development, committed to developing the site; services available. .</p> 
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Chief Executive's Response

The boundary and residential zoning provisions for Rathdrum have been carefully reviewed having regard to the new housing targets for self-sustaining towns, the need to deliver compact growth and limit sprawl. There is substantial residential development occurring in the town at present. This needs to be balanced with the overriding objective to ensure sustainable growth and the creation of a sustainable self-sustaining community. The amount of land zoned for residential development must be balanced with the capacity of the town and community facilities to absorb growth. The Planning Authority is also required to adopt a sequential approach to zoning and in determining the extent of the plan boundary.

C2-13, C2-280, C2-288

These lands are surplus to the requirements of the development needs of Rathdrum having regard to the Core

Strategy population and housing targets for Rathdrum and therefore cannot be justified for inclusion within the plan boundary.

There is substantial residential development occurring in the town at present. While these sites may be adjoining areas currently under construction, there are alternative sites that are located within the built up area that need to be prioritised prior to extending the boundary further onto greenfield land. Therefore no change is recommended.

C2-230

The subject lands are located on a sloping green bank below the existing employment area (originally developed on a ridge along the railway line, as the railway yard); the demarcation of the existing employment area respects the existing contours and the town’s historic boundary. The proposed zoning would result in development sprawling and encroaching onto a visually sensitive greenfield area along the river valley, and the impact of development at this location would be compounded by the nature of the use and development sought (large warehouse). It is considered that development at this location will unduly impact on the visual and natural amenities of the area and therefore is not recommended. There are ample undeveloped lands zoned for employment within the plan boundary.

Community & Education (C2-183)

The concerns raised with regard to land zoned for community and education area noted. However, it is considered that there are ample lands zoned within the Rathdrum plan which could be used for community and education purposes. There is a large plot of land zoned for Community & Education in Corballis Upper (R755) near the GAA grounds. The Council are actively consulting with the community on uses for this land. It is also noted that community and education facilities are generally permitted on a variety of land use zonings including town centre of which there are ample lands available.

The Department of Education were consulted as part of the Development Plan process and it has not identified the need for additional lands in Rathdrum. The submissions received from the Department (<https://consult.wicklow.ie/en/submission/ww-c2-256>) noted the following:

‘The town is served by three mainstream primary schools and one post-primary school. At primary level it is anticipated that the existing schools can meet the requirements arising from the increased population. At post-primary level, taking into account a planned extension to the existing school, it is anticipated that it will be able to meet requirements arising from the increased population’.

Chief Executive’s Recommendations

No change

Section 3.4	Volume 2
Section 3.4.5	Ashford

Topic	Heritage	
ID	Name	Issue raised
C2-307 https://consult.wicklow.ie/en/s-ubmission/ww-c2-307	Eleanor Mayes	<p>With regard to the identification of Passive Open Space OS2, and to Draft Ashford Town Plan Heritage Objective ASH11, it is submitted that to assist in the implementation of the Natural Heritage and Biodiversity Objectives of the Draft Ashford Town Plan and of the Draft Wicklow County Development Plan:</p> <ul style="list-style-type: none"> - the woodland area on steeply sloping ground to the south of the River Vartry, the woodland and treelines along the River Vartry including the wooded island in the River Vartry, - woodland and treelines along and adjoining the Killiskey Stream, and - treelines in Ballymacahara, <p>should be included in the Schedule 17.05 A & and Maps 17.05 of trees hedgerows and woodlands referred to in CPO 17.18 (Chapter 17, Draft Wicklow County Development Plan), and included as a natural heritage objective in the Draft Ashford Town Plan, and shown on Ashford Map No. 2, which could then be re-named "Draft Ashford Town Plan Cultural and Natural Heritage and Biodiversity Objectives".</p>

Chief Executive's Response

This submission is requesting that Tree Preservation Orders (TPOs) be made for trees at identified locations along the River Vartry, along the Killiskey Stream and at Ballymacahara (Schedule 17.05 A is a schedule of existing TPOs); no maps provided.

The process for making TPOs is a separate process to the CDP review process, although the two are being run concurrently. The Planning Authority has already identified existing TPOs that it has determined require amendment, as well as trees / groups of trees not currently subject to TPO but warranting same. This list was heavily influenced by previous submissions made by members of the public / landowners over the last 5 years. The trees detailed in this submission were not previously brought to the Council's attention in this regard.

In order to consider further TPOs, it would be necessary to initiate a fresh process under Section 205(5) of the Act which entails:

- Detailed assessment the trees / groups of trees concerned by qualified arborist / similar professional; the assessment of trees / groups of trees for possible TPOs involves detailed assessment of the trees / groups of trees in question, under a number of criteria including but not limited to condition, retention span, relative public visibility, known or perceived threat to the tree(s), and other factors. Each and every tree / group of trees requires to be fully and individually assessed before a TPO should be made;
- Careful consideration of said assessment and determination, in accordance with the criteria set out under the Act, if said trees / groups of trees fulfil the criteria for possible TPO. The legal provisions for making a TPO state *"If it appears to the planning authority that it is expedient, in the interests of amenity or the environment, to make provision for the preservation of any tree, trees, group of trees or woodlands, it may, for that purpose and for stated reasons, make an order with respect to any such tree, trees, group of trees or woodlands as may be specified in the order"*.
- Amenity is the essential requirement of a TPO. This generally refers to the visibility of the tree and the extent it can be seen by the public. The impact of the tree or trees is also an important consideration.

This would include their size, future potential, rarity, cultural or historical value, or their contribution to the character or appearance of the landscape or local area. As well as amenity, the planning authority are also required to consider the expediency of making a TPO, having regard to the amenity importance of the trees and the degree of risk to which they are considered to be exposed.

- Publication maps / details, formal notification to landowners, and a further consultation period.

It would not be possible to complete such a process within the time scales of this stage of plan making. In particular, time would be required to tender for a suitably qualified professional to carry out this work, and to allow the assessment to take place which would likely take many months.

It is recommended that after the adoption of this Plan in 2022, as part of the implementation programme, further consideration is given to these proposals with a view to determining if it is appropriate to initiate a new Section 205(5) process.

Chief Executive's Recommendations

No change

Topic	Infrastructure	
ID	Name	Issue raised
C2-307 https://consult.wicklow.ie/en/submission/ww-c2-307	Eleanor Mayes	<ul style="list-style-type: none"> - Service Infrastructure Objective ASH8 (to provide for a new through road linking the R764 to the R772 through and serving employment lands designated as Action Area 1), it is noted that this objective has been in place since 2008, but remains to be implemented. Existing road infrastructure capacity, safety and sightline issues, and pedestrian safety issues and concerns have been brought to the attention of Wicklow County Council repeatedly since 2008, as traffic volumes have increased, and the number of residents wishing to walk safely to the village has increased substantially arising from recently completed housing, and the current housing construction totalling c. 300 new dwellings in Ballinahinch and in SLO1 lands. - Since no indicative mapping of the new through road linking the R764 and R772 is included in the Draft Plan, it is requested that Wicklow County Council takes responsibility for the identification of a route, and subject to public consultation, provides a plan and seeks/provides funding for the implementation of Service Infrastructure Objective ASH8 - Planned implementation of ASH8 will provide this essential transport infrastructure, to facilitate the proper development of the AA1 zoned lands, and to facilitate the proper development of the adjoining Community & Education and Active Open Space zoned lands, and to improve the safety and sustainability of pedestrian, cyclist, and vehicular traffic within and through Ashford.
C2-294 https://consult.wicklow.ie/en/submission/ww-c2-294	Ashford Community Group, Tidy Towns group & Rathmore Holiday Home	<p>This submission is with regard to pedestrian and public transport links for the town. It is set out that there is a particular need for pathways and bus stops to link the town and the Rathmore Holiday Village which is currently home for people seeking international protection. Links to the Film studios and Applegreen service station is also needed. Potential new bus stop locations are proposed.</p>
Chief Executive's Response		
<p>C2-307</p> <p>It was initially envisaged that this road would be delivered by private developers as part of the development of AA1, but no development proposals have as yet come forward. The pressing need for the new road link hasn't arisen until recently with the construction of significant new housing in Ballinahinch, but it is acknowledged that this project must be progressed in the short to medium term.</p> <p>The Council is committed to utilising all resources available to it to secure this objective within the lifetime of the new plan.</p> <p>C2-294</p> <p>The Draft Plan (both the Ashford Plan and Chapters 11, 12 and 18 of Volume 1) clearly set out unequivocal support for the enhancement of walking and cycling infrastructure. In addition, the Council will shortly commence the roll out of a significant new 'Active Travel' programme which will identify and fund improvements to pedestrian and cycling infrastructure throughout the County, and will look closely at links to schools, routes between towns, and connections to public transport services. All of the issues raised in these submissions will be brought to the attention of the Active Travel programme. It is not within the remit of the Plan to specify bus stop locations or public transport routes as this would be matter for the NTA.</p>		
Chief Executive's Recommendations		
No change		

Topic	Development in flood risk areas	
ID	Name	Issue raised
C2-20 https://consult.wicklow.ie/en/s/ubmission/ww-c2-20	River Vartry Protection Society	<ul style="list-style-type: none"> - Land located on the R763 proposed as new residential should not be built on as they are landlocked and are located on the floodplain. - Mt. Usher Gardens is downstream of this and would be flooded in a high river without this absorption. There are photos from one winter of this area under 50cm of water. - The lands should be designated as green space as the current green space is not sufficient for good practice flood management.
C2-307 https://consult.wicklow.ie/en/s/ubmission/ww-c2-307	Eleanor Mayes	<ul style="list-style-type: none"> - It is submitted that the Draft Ashford Town Plan Specific Objectives Section 2.1 statement with regard to flooding in the Vartry catchment "<i>the Vartry river...rarely experiences serious flood events</i>" is not consistent with the current Flood Risk Management Plan (OPW, 2018). - The Ashford Town Plan Area as mapped in the Draft Wicklow County Development Plan 2021-2027 lies entirely within the flood risk Ashford and Rathnew Area for Further Assessment (AFA), as mapped in Appendix GB of the Flood Risk Management Plan (OPW, 2018). Flood Protection measures have been identified within Ashford and currently relate to the Killiskey Stream, with the objective to "<i>Progress the development of a Flood Relief Scheme for Wicklow AFA and Ashford & Rathnew AFA (Code IE10-IE-AFA-100124-0910- M33)</i>". In accordance with the requirements of the EU 'Floods' Directive, the PFRA, flood maps and Plans will be reviewed on a six-yearly cycle. - Issues for note during AFA 10 project-level assessment in Ashford include: A small stream (Ballycurry watercourse) which was not modelled in CFRAM but has been identified as giving rise to a risk that needs to be addressed. This is the stream that arises in Ballycurry, crosses under the R764 road and flows along the eastern side of the R764 before crossing under the R764 / former R763 junction in a stone built culvert and flowing south to enter the River Vartry. - With regard to Climate Change Adaptability, the current Flood Risk Management Plan (OPW, 2018) states that "<i>An assessment of climate and catchment changes shows Wicklow, Ashford and Rathnew to be highly vulnerable to the increases as modelled in the mid-range and high end future scenarios</i>". - The Vartry River catchment is unusual in having a major water abstraction via the Vartry Reservoir, combined with an absence of recent hydrometric information that could have informed the current Flood Risk Management Plan (OPW, 2018). Two new gauging stations are now in place on the River Vartry, and hydrometric data should be available to inform the next cycle of flood risk mapping. The final 2018 flood risk mapping was based on modelling and shows a somewhat reduced flood risk area in the Ashford area, as compared with the draft mapping {see Figure 1 below}. The draft mapping would assumedly have been largely based on anecdotal and other records of flooding that occurred during Hurricane Charlie on 25th and 26th August

		<p>1986, on 16 August 2008, and during more recent flood events. The draft OPW mapping seems to have been used in the 2016 - 2022 indicative flood zone mapping (Map 3, Ashford LAP). It is submitted that, following the precautionary principle, the draft mapping should continue to be considered to represent more likely flood risk scenario - at least until the next cycle of flood risk mapping is available for consideration.</p> <ul style="list-style-type: none"> - The Ballycurry watercourse is a permanently watered stream that arises in the Ballycurry area, and is a tributary of the River Vartry. Stream water levels rise rapidly in response to local heavy rainfall events, and the stream is liable to overflow its banks at the R763/R764 junction, causing flooding along the R764 down towards the R764 roundabout Junction with the R772, and into River Walk, Ashford. These sudden flash floods on the Ballycurry stream occurred on at least two occasions during the winter of 2015/16, and the stream came close to overflowing its banks at the R763/R764 junction in early 2021. - The Ballycurry stream is also liable to be backed up by high water levels in the River Vartry during more generalised heavy rainfall events in the Vartry catchment. The most recent of these combined flood events was in July 2012, during which the grounds of The Old Forge were flooded and sandbags to protect the house were provided by Wicklow County Council. During Hurricane Charlie, there was extensive flooding in Ashford, including the dwelling at The Old Forge which was flooded, and presumably also the Ashford telephone exchange (located within the grounds of The Old Post Office, and located at a similar level to The Old Forge; - The Killiskey stream is also liable to flood, and OP1 zoned lands {see Map No. 1, Ashford Town Draft Plan 2022-2027) are at flood risk as well as being located with the 25m buffer zone adjoining the River Vartry and the Killiskey Stream. It is submitted that any Town Centre development on these lands should continue to be restricted to 'Less Vulnerable' or 'Water Compatible' development as defined in the 'Planning System and Flood Risk Management: Guidelines for Planning Authorities', as indicated in the 2016- 2022 Ashford LAP.
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Chief Executive's Response

A Strategic Flood Risk Assessment was carried out for Ashford as part of the plan SFRA (Appendix 8), which accords with the requirements of Ministerial guidelines. This assessment entailed the compilation of wide range of flooding data and modelling, in the main produced by the OPW following a range of different assessment and studies carried out by them, including PFRA and CFRAMs. No new flood risk maps were 'created' by the Council as part of this process – data from existing sources was collated and presented. Should any question arise about the accuracy of said data that would be a matter to bring to the attention of the OPW.

The flood maps produced as part of the draft plan are not intended to be utilised for any reason other than to ensure that the provisions of the draft plan, in particular development objectives and zoning, do not conflict with flood risk management objectives and will not facilitate development in areas at risk of flooding unless certain stringent criteria are fulfilled.

Ballycurry Stream

With respect to the Ballycurry stream, this is not shown on the Ashford flood maps, as it is not shown on the maps and data prepared by the OPW. This is not to say that no flood risk might arise from same, and the SFRA and the draft plan are clear that areas not specifically identified as being within Flood Zones A and B may still experience flood risk and where development is proposed in such areas, the SFRA sets out the following requirements:

“Where a site is within Flood Zone C but adjoining or in close proximity of a watercourse, there could be a risk of flooding associated with factors such as future scenarios (climate change) or in the event of failure of a defence, blocking of a bridge or culvert. Risk from sources other than fluvial and coastal must also be addressed for all development in Flood Zone C, including groundwater flooding and/or flooding associated with stormwater deficiencies, restrictions or blockages.

A statement from a competent person stating that the development will not contribute to flooding within the relevant catchment or be at risk from 'other' sources of flooding will be required with all small developments of areas of 1 hectare or less. For larger developments, an appropriately detailed Flood Risk Assessment will be required.

As a minimum the flood impact assessment should be undertaken which will screen out possible sources of flood risk and where they cannot be screened out it should present mitigation measures. For developments in Flood Zone C, the most likely mitigation measure will involve setting finished floor levels to a height that is above the 1% AEP fluvial event or 0.5% AEP tidal flood event level, with an allowance for climate change and freeboard, or to ensure a step up from road level to prevent surface water ingress. Design elements such as channel maintenance or trash screens may also be required. Evacuation routes in the event of inundation of surrounding land should also be detailed.

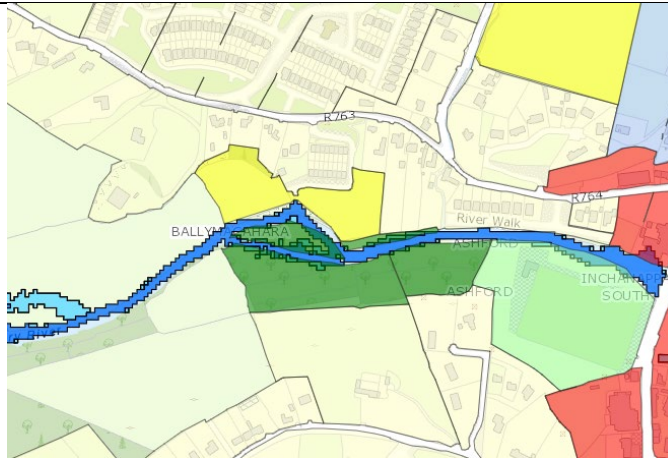
The impacts of climate change should be considered for all proposed developments. This is particularly important for development near areas at risk of tidal flooding. A development which is currently in Flood Zone C may be shown to be at risk when an allowance for sea level rise is added to the extreme (1 in 200 year) tide. Details of the approach to incorporating climate change impacts into the assessment and design are provided in Section 4.5.4”.

Killiskey Stream

The Killiskey Stream is identified in the SFRA as liable to flooding. Proposed land uses (zoning) along the stream have been tested to establish their suitability for zoning given the level of risk present. A more detailed assessment of the OP2 area is set out in the SFRA Addendum to this report. Only a small portion of OP2 is located in an area at risk of flooding (Flood Zone B), and given that the zoning does not proscribe what use can be made of the lands and where on the lands development must occur, there is scope to provide for development on lands not deemed to be at risk of flooding or for less vulnerable uses on lands when moderate risk is presented.

Residentially Zoned lands at R753

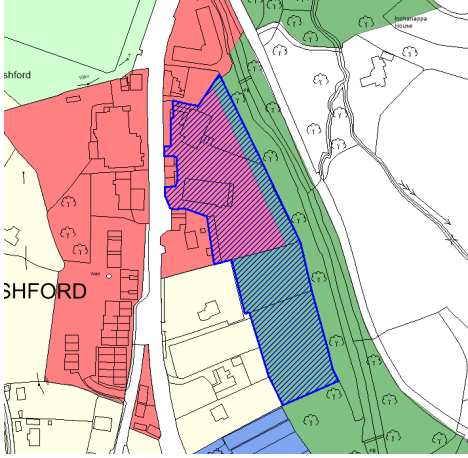
The SFRA has predicted that the subject lands are not within Flood Zones A or B and therefore should not be excluded from zoning based on flooding concerns. The map below shows that the zoning does not encroach onto the flood zones.

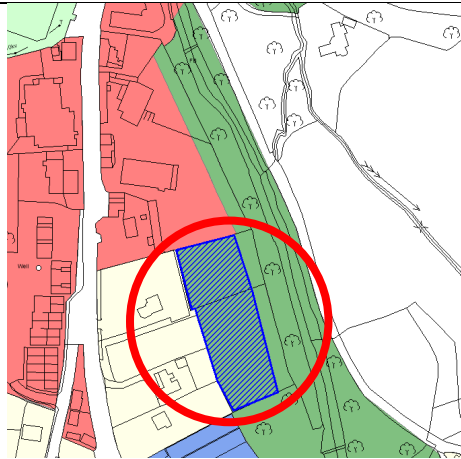


As regards concerns with regard to the land being landlocked, the land can be accessed from the R763 via housing development to the north – these are Council owned lands and the housing development already in situ is Phase 1 of a larger development on the lands.

Chief Executive's Recommendations

No change

Topic		
Town Centre Development & Zoning		
ID	Name	Issue raised
C2-55 https://consult.wicklow.ie/en/submit/ww-c2-55	Tack Packaging Ltd.	<p>It is requested that lands to in the centre of Ashford (shown hatched in blue on map below), which are proposed for TC (Town Centre) and OS (Open Space) zoning, be re-zoned to all 'TC' use, to provide for mixed use development with retail, office/creative media industry (associated with the film studio), specialised accommodation and potential tourism uses.</p> <p>It is put forward that having regard to the more detailed CFRAM flood risk assessment carried out, the lands are not deemed to be at risk of flooding.</p> 
Chief Executive's Response		
<p>It is correct that the updated SFRA does not show that these lands are at risk of flooding. Therefore there is potential to increase the zoned area without giving rise to new / increased risk. Having regard however to the location along the Vartry, and the provisions of Objective CPO 17.26 which seeks to maintain undeveloped corridors / buffers along watercourses of at least 25m, it is recommended that only the additional area shown on the map to follow be considered for a change in zoning.</p> <p>These fields are located to the rear of dwellings and they are not considered optimal for commercial uses. It is considered therefore that a change in zoning to 'town centre' should include a caveat that this part of the opportunity site only be permitted for residential or residential-compatible uses.</p>		
Chief Executive's Recommendations		
<p>Amend plan as follows:</p> <p>Volume 2, Level 5 Plans</p> <p>Ashford Town Plan.</p> <p>Amend map as follows: Change zoning of area marked from 'OS' to 'TC'</p>		



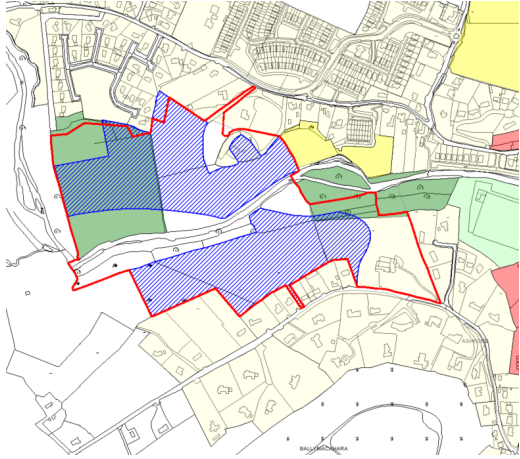
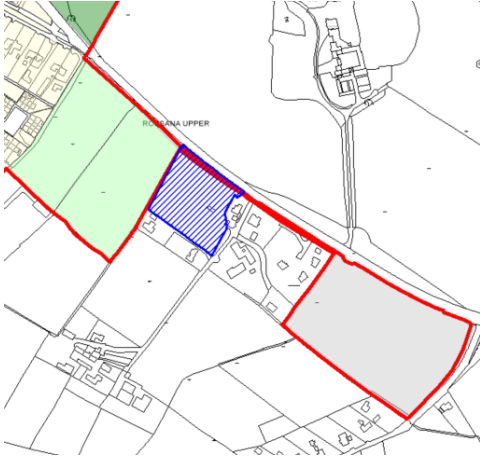
Amend text as follows:

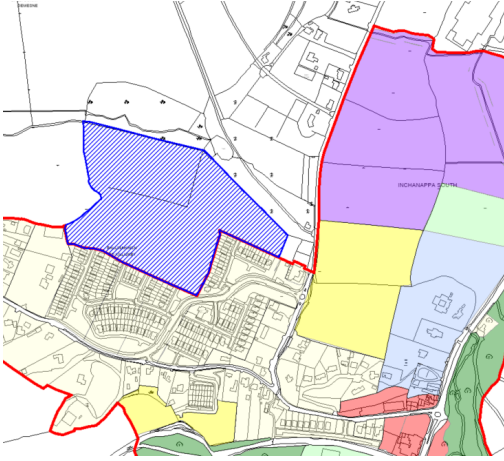
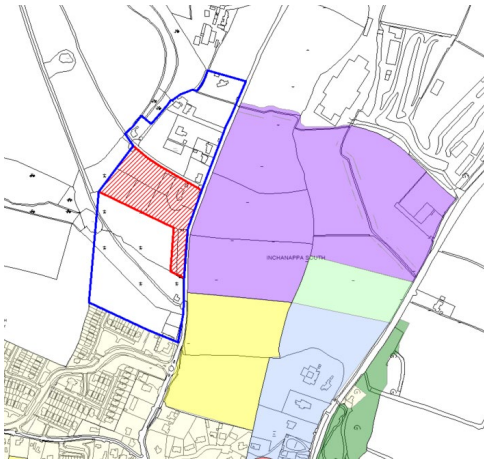
OP 1: The Mart Site

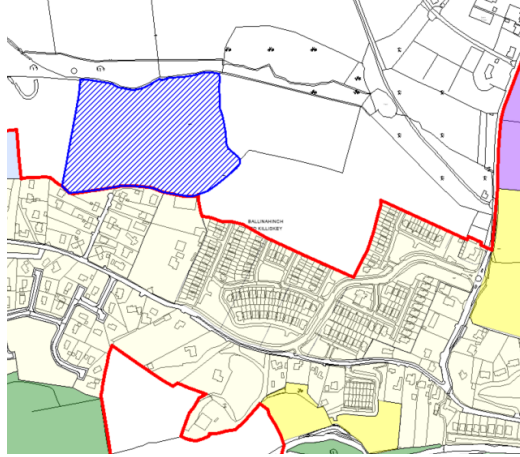
This site measures ~~0.98ha~~ 1.5ha and provides an opportunity to develop a large area of back lands within the town centre of Ashford, while maintaining / providing a new street fronting building.

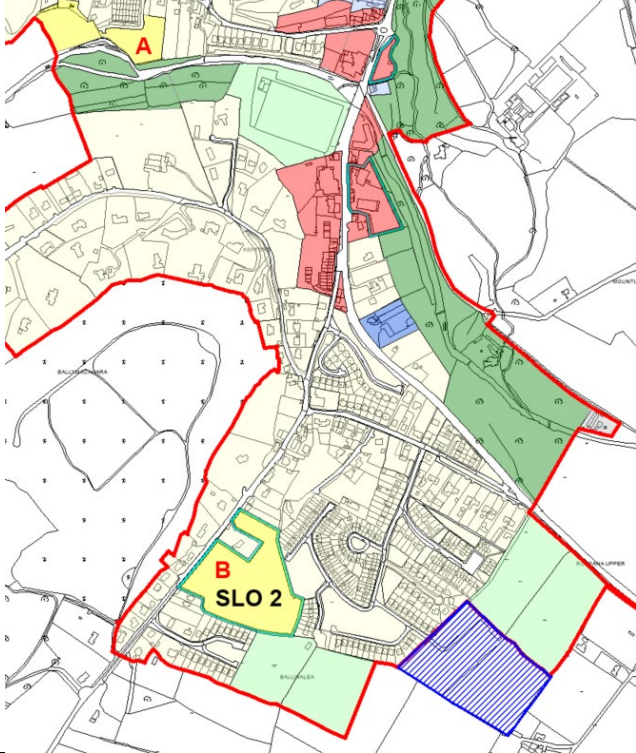
Objectives

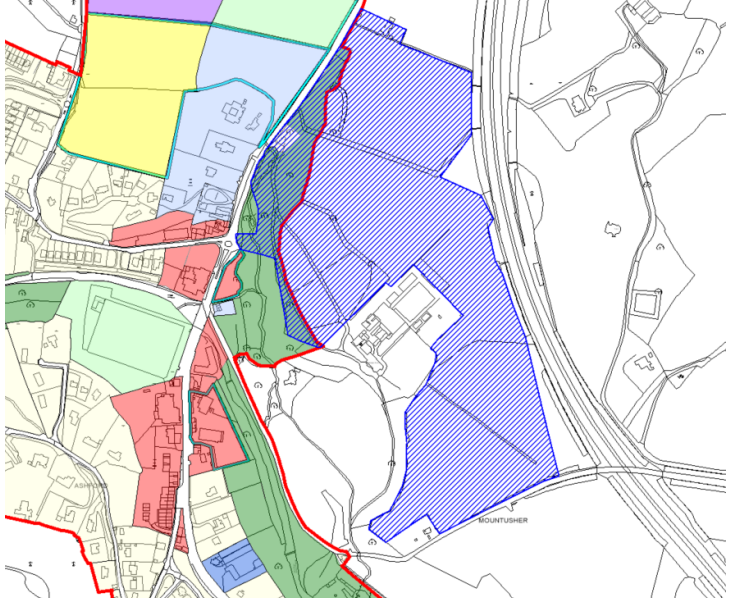
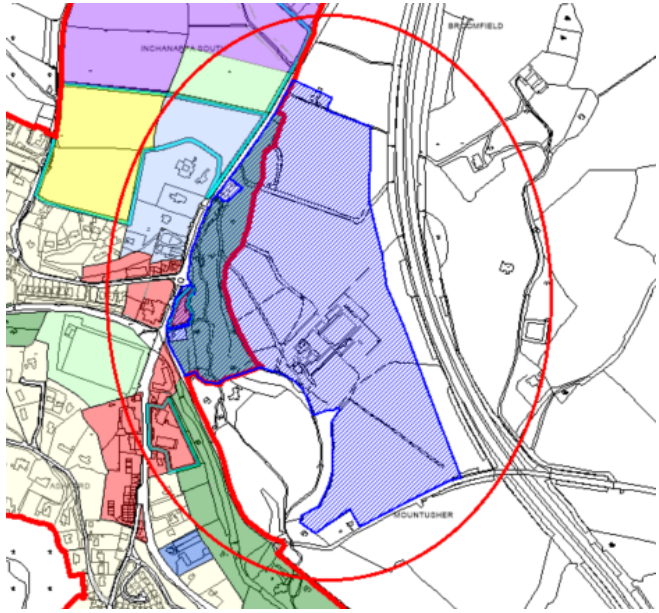
- To provide for a mix of uses capable of accommodating retail/commercial/residential development. The development of the northern half of the site should provide for an active retail street frontage with ancillary retail units to the rear centred around a hard and soft landscaped public square/civic space.
- **The area to the rear of existing dwellings on the southern part of the site (c. 0.5ha) shall be reserved for residential or residential-compatible uses only and shall not be permitted for any commercial purposes.**
- The overall development proposal for the site shall include a detailed landscaping plan. The proposed landscaping plan shall place a specific emphasis on the eastern and southern boundaries of the site in order to screen the proposed development site from Mount Usher Gardens.

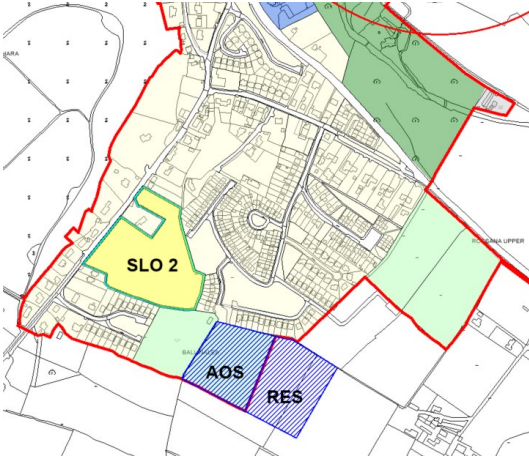
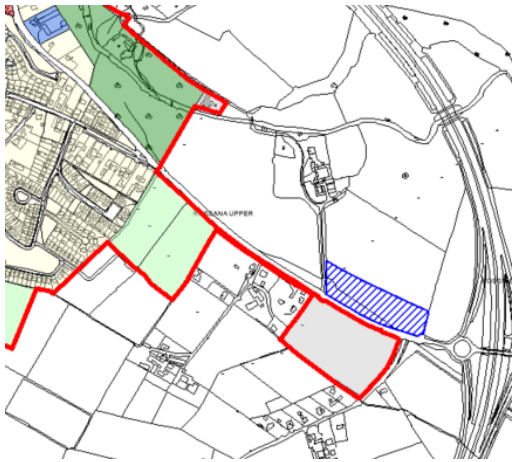
Topic	Residential Development & Zoning	
ID	Name	Issue raised
<p>C2-10 https://consult.wicklow.ie/en/submission/w-c2-10</p>	<p>Tyrrellstown Development Project Ltd</p>	<p>It is requested that lands measuring c. 25ha (61 acres) to the west of Ashford (as shown below) be zoned for new development comprising residential, community, education, employment, sporting and open space uses for the following reasons:</p> <ul style="list-style-type: none"> - to provide for c. 15.6ha for residential use (as shown on map below in orange) at 20-28/ha in order to meet the population targets of the 2016 CDP which have not been achieved; - to provide for a range of needed community facilities and infrastructure including parkland, walkways, new school site, new playing pitch, a business centre, crèches, civic / community building and the potential for new link road providing potential bypass of Nun’s Cross Bridge 
<p>C2-92 https://consult.wicklow.ie/en/submission/w-c2-92</p>	<p>Ger Byrne</p>	<p>It is requested that land currently zoned “RE-Existing Residential” (measuring c. 1.24ha as shown indicatively on map blew) which is proposed to be de-zoned under the new plan be re-instated.</p> 

<p>C2-117 https://consult.wicklow.ie/en/submission/w-c2-117</p>	<p>Moffash Ltd</p>	<p>It is requested that the land shown on the map below (c. 8.8ha) be zoned for new residential development, for the following reasons:</p> <ul style="list-style-type: none"> - to ensure continuity of supply of zoned land; - support compact growth; - support existing services and infrastructure; - support more connected, sustainable and vibrant town centre. 
<p>C2-173 https://consult.wicklow.ie/en/submission/w-c2-173</p> <p>C2-211 https://consult.wicklow.ie/en/submission/w-c2-211</p>	<p>Gerry Daly</p>	<p>It is requested that the plan boundary for Ashford be amended to include 10 properties along the west side of the R764 currently outside plan boundary (shown in blue below c. 2.2ha), and the lands marked red within this area below are zoned for low – medium density residential, on the following grounds:</p> <ul style="list-style-type: none"> - would allow area to be linked to Ashford - this road requires safety improvements - would allow for a pleasant entry into the settlement - would allow for infill housing - need for wider range of density types in Ashford - water and sewerage within metres of boundary  <p>(Note: maps / photos submitted with the submission do not show the exact boundaries of the proposed extension so this map is indicative only)</p>

<p>C2-222 https://consult.wicklow.ie/en/submission/w-c2-222</p>	<p>Charles & Lucy Tottenham</p>	<p>It is requested that lands measuring c. 5.26ha as shown indicatively on map below be zoned for residential use The submission indicates that the lands can be accessed with a new road from the Roundwood to Ashford Road and that the lands are no longer suited for agriculture due to being surrounded by houses.</p> 
<p>C2-260 https://consult.wicklow.ie/en/submission/w-c2-260</p>	<p>Kingsbridge Design & Consultancy</p>	<p>It is requested that lands at Ballinalea (measuring c. 3.65ha as shown indicatively on the map below) retain their existing residential zoning. In support of this request it is put forward that</p> <ul style="list-style-type: none"> - lands are currently zoned - lands are approx 500m from town centre; - Current SHD application with An Bord Pleanala on the site for 117 houses. - Previous permissions granted for residential development on the site. - Given history of site and current planning status it is unreasonable to de-zone the lands. - De-zoning would be contrary to the NPF, RSES and overall development strategy for Ashford. - Other sites in Ashford are proposed for residential zoning (marked A and B on map below) that have never been developed, had multi residential applications or may be at risk of flooding near a protected structure; if the Council are compelled to zone less lands they should choose lands where no development interest has been shown.

		
<p>C2-220 https://consult.wicklow.ie/en/submission/w-c2-220</p>	<p>O'Dwyer Real Estate Management</p>	<p>It is requested that lands measuring c. 23ha (as shown indicatively on map below) be included in the plan boundary and zoned for new residential.</p> <p>In support of this request it is put forward:</p> <ul style="list-style-type: none"> - the lands have a positive planning history and realistic expectation that the lands be consistently and logically zoned since 2006 - the development plan process is required to ensure 'certainty' and consistency of approach as associated with investment, infrastructure and local development expectations - the provisions of the Draft Development Plan Guidelines recognise the need to ensure sufficiency of zoned land to support adequate supply, and the provision of zoning 'headroom' above Core Strategy targets - The central location of these lands provide for a logical sustainable pattern of growth in close proximity to school, retail, community facilities and the R.772.

		
<p>C2-234 https://consult.wicklow.ie/en/submission/w-c2-234</p>	<p>Beakonshaw Ltd.</p>	<p>It is requested that lands measuring c. 20ha (as shown indicatively on map below) be included in the plan boundary and zoned for new residential use.</p> <p>This detailed submission sets out the previous planning / zoning history of these lands and requests that the development objectives for the land in the current County Development Plan are retained.</p> <p>In support of this request it is put forward:</p> <ul style="list-style-type: none"> - Land has been identified for zoning since 2001; development of the lands is therefore an established, continuous development objective of Wicklow County Council for the past twenty years; - No rationale for the removal of zoning objectives has been given in the Draft Plan; - Lands are accessed by regional road and water services are available. 

<p>C2-277 https://consult.wicklow.ie/en/submission/w-c2-277</p>	<p>Pat Stevens</p>	<p>It is requested that lands measuring c. 4ha as shown indicatively on the map below be zoned for New Residential (2.02ha) and Active Open Space (1.8ha) uses as per current Ashford Plan. It is put forward that the lands are accessible, central and will provide active open space and affordable housing for Ashford.</p> 
<p>C2-301 https://consult.wicklow.ie/en/submission/w-c2-301</p>	<p>John Wilding</p>	<p>It is requested that lands shown indicatively on the map below be zoned for low density residential use.</p> 
<p>C2-306 https://consult.wicklow.ie/en/submission/w-c2-306</p>	<p>Ashford GAA</p>	<p>Support is expressed for C2-10 by Tyrrellstown Development Project Ltd. It highlights an agreement between the latter company and Ashford GAA Club to provide a pedestrian link through their existing club grounds to access Main Street. In return that company will provide the club with a new playing pitch. All other aspects of that mixed use residential/business/childcare/education and recreational proposed zoning are supported for its wide ranging benefits for the community of Ashford as a growing town.</p>
<p>C2-307 https://consult.wicklow.ie/en/submission/w-c2-307</p>	<p>Eleanor Mayes</p>	<p>Supported housing would be appropriate for inclusion in any development proposals for OP1 (Mart site)</p>

Chief Executive's Response

Ashford is a Level 5 settlement which is identified for modest growth. The Core Strategy provides for an average growth rate of c. 25% between 2016 and 2031 in Level 5 settlements (which is considered appropriate given their small size and infrastructure), which is the equivalent of c. 130 dwellings. The Draft Plan provides more than adequate zoned lands to meet this growth target, even allowing for 'headroom' i.e. zoning over and above that needed to meet the target in the case of land not being brought forward for development or services issues arising at some locations. The lands that are proposed for residential zoning are those that are most proximate to the town centre and available infrastructure.

The zoning of excessive greenfield land, or land that is beyond existing underdeveloped zoned lands, will undermine the Plan's objectives to consolidate existing settlements, encourage regeneration and deliver compact growth.

The boundary for Ashford was reviewed having regard to the new housing target, the need to deliver compact growth and limit sprawl. The Planning Authority is also required to adopt a sequential approach in determining the extent of the plan boundary.

Lands to the west of Ashford C2-10

These lands are surplus to the requirements of the development needs of Ashford for this development plan and therefore cannot be justified for inclusion within the plan boundary.

In the new draft plan, no changes are proposed to this zoning other than the removal of the 'SLB Strategic Land Bank' lands. These were omitted as they are not needed at this time for either zoning or banking having regard to the new long term population and housing growth targets set out for Ashford, and it was considered unfair to include them as SLB when they are unlikely to be needed, if at all, until at least post 2031. In particular in accordance with the NPF and RSES, settlements such as Ashford should not be targeted to grow by more than 30% over the 2016-2031 period, and having regard to the number of housing units constructed and permitted since 2016 in Ashford, this 30% limit has already been considerably breached.

Therefore notwithstanding the benefit that might accrue to the town via the other uses proposed, there simply is no need for this quantum of new houses (15.6ha / c. 300-435 houses) and to allow for such would both conflict with the NPF and RSES but also adversely affect the town by reason of over development and degradation of scenic setting.

It should also be noted that the land proposed for the school site, a new additional playing pitch for Ashford GAA club, the possible future link road and some of the new residential development is located on the open space land of the Bramble Glade housing estate so legally designated via the taking in charge process and a Section 38 agreement and is restricted to the open space use of the residents; it is not clear if this legal status has changed such that it would allow for the development proposed. This restriction has been repeatedly brought to the Planning Authority's attention by the residents during previous development plan consultations.

The proposed civic / community site is not supported being located on the most elevated and sloping part of the lands, on the Mount Alto / Ballymacahara road which is limited in width, alignment and pedestrian / cycling facilities. This is not considered a suitable location for such a use, which should be located in the town centre, at an accessible and serviceable location.

The proposed Nun's Cross 'by-pass' could not be achieved through the development of these lands, as such road would require sections of the road to be outside this landholding.

Therefore no change is recommended.

C2-92,C2-117, C2-222, C2-277, C2-301

The CE is satisfied that there is an adequate quantum of residentially and recreational zoned land in Ashford to facilitate the projected growth targets for the lifetime of the plan and therefore the additional residential zoning proposed in these submissions is not supported and no change is recommended.

These lands are surplus to the requirements of the development needs of Ashford for this development plan as per the Core Strategy and therefore cannot be justified for inclusion within the plan boundary and zoning for residential use

The residentially zoned land of Ashford was reviewed having regard to the new housing targets for small towns, the need to deliver compact growth and limit sprawl. The Planning Authority is also required to adopt a sequential approach in determining the extent of residentially zoned lands within the plan boundary.

Therefore no change is recommended.

C2-173, C2-211

The extension of the plan boundary / zoning of land is not a guarantee of the delivery of road safety improvements along the R764. Such local road improvements may be separately addressed if deemed necessary via the Wicklow MD annual programme. No change is therefore recommended.

C2-220, C2-234 (Inchanappa)

The proposed lands (formerly SLO1 and Strategic land Bank) in the Ashford Town Plan in the Volume 2 of the 2016-2022 CDP were omitted as they are not needed at this time for either zoning or banking having regard to the new long term population and housing growth targets set out for Ashford in the new Core Strategy, , the need to deliver compact growth and limit sprawl. The CE is satisfied that there is an adequate quantum of residentially and recreational zoned land in Ashford to facilitate the projected growth targets for the lifetime of the plan and therefore the additional residential zoning proposed in these submissions is not supported and no change is recommended.

C2-260 (Ballinalea)

Notwithstanding the planning history of the site, it is located at the edge of Ashford and as stated above the Planning Authority is required to adopt a sequential approach in determining the extent of residentially zoned lands within the plan boundary. There are more suitably centrally located lands available for residential development closer to the town.

With regard to the land identified in this submission, which it is suggested are less optimal with respect to flood risk and development potential than the submitted site this site, Site A has been shown via the SFRA to not be in Flood Zones A or B, is owned by the Local Authority which fully intends to develop the land; and with respect to Site B, these lands are an infill site surrounded on all sides with housing compared to the submission site which is at the periphery of the developed area. It should be noted that the provisions of this plan would not affect the status of any planning permission if granted. Therefore no change is recommended.

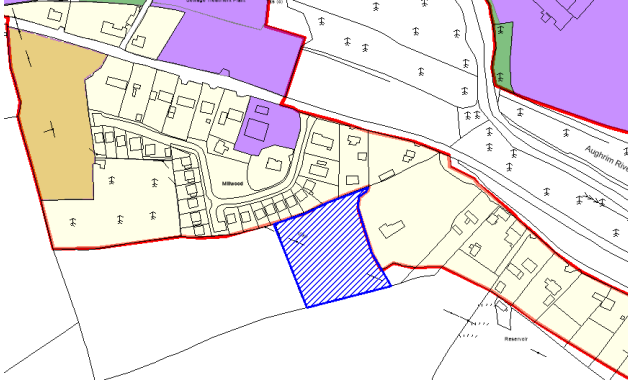
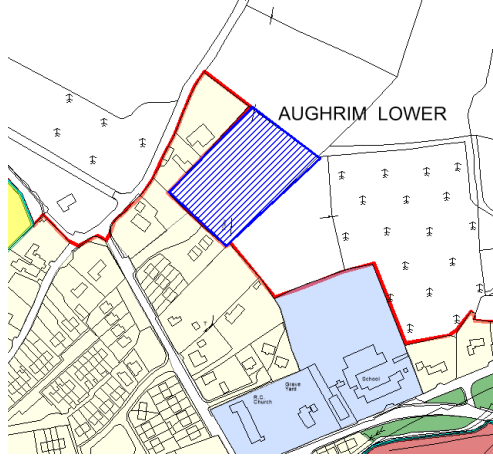
OP1 (Mart)

The 'Town Centre' zoning of this site would allow for the development of housing, supported or otherwise. It would be a matter for the landowner to come forward with proposals in this regard; it would not be appropriate to designate the lands for a particular type of housing type / tenure only without adequate justification. Therefore no change is recommended.

Chief Executive's Recommendations

No change

Section 3.4	Volume 2
Section 3.4.6	Aughrim

Topic		Residential Zoning
ID	Name	Issue raised
C2-34 https://consult.wicklow.ie/en/s/ubmission/ww-c2-34	B Laide	<p>It is requested that lands measuring c.0.8ha (as shown indicatively below) are zoned for residential use.</p> <p>In support of this proposal it is put forward that:</p> <ul style="list-style-type: none"> - Aughrim is now designated a rent pressure zone and this should be a welcome development - Members of the owner's family have expressed an interest in developing dwellings on the lands. 
C2-289 https://consult.wicklow.ie/en/s/ubmission/ww-c2-289	S Leeson	<p>It is requested that the previous zoning of lands (c. 0.87 ha, as shown indicatively below) that are proposed to be de-zoned under the Draft Plan be re-instated (previously zoned residential).</p> <p>In support of this proposal it is put forward that:</p> <ul style="list-style-type: none"> - the lands are in proximity to the town area - the presence of an existing roadway and footpath to the site boundary - site is walking distance of school, church and town centre - development would integrate with existing residential development adjoining these lands - water and sewage are existing adjacent to the entry 

Chief Executive's Response

The boundary and residential zoning provisions for Aughrim were reviewed having regard to the new housing targets for small towns set out in the new Core Strategy, the need to deliver compact growth and limit sprawl. The Planning Authority is required to adopt a sequential approach in determining the extent of the plan boundary and appropriate location of zoning.

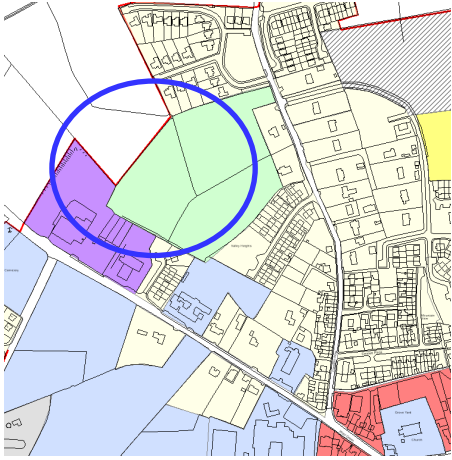
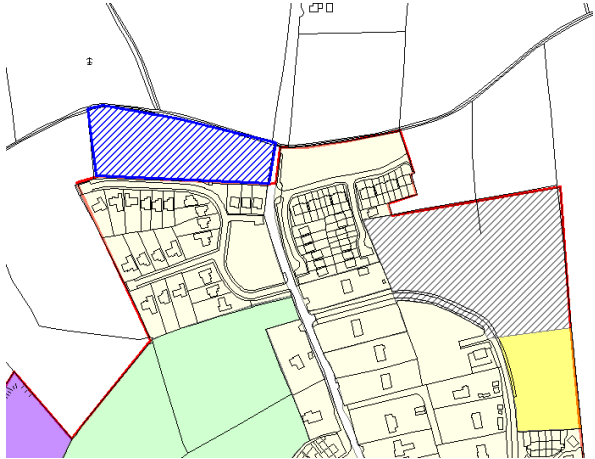
The CE is satisfied that there is an adequate quantum of land zoned for New Residential use within the new Draft Plan for Aughrim to satisfy the proposed growth targets as set out in the new Core Strategy for the town over the life time of the plan. Therefore there is no justification or need for the zoning of the subject lands, or the reversion to the zoning provisions of the previous plan.

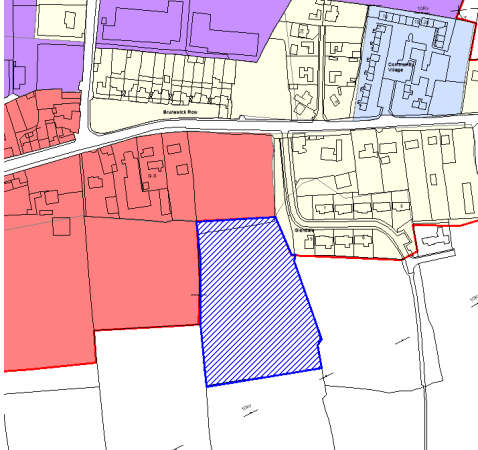
No changes are therefore recommended.

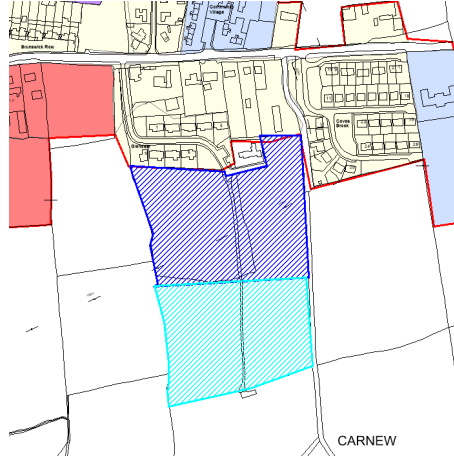
Chief Executive's Recommendations

No change

Section 3.4	Volume 2
Section 3.4.7	Carnew

Topic	Residential Development & Zoning	
ID	Name	Issue raised
C2-68 https://consult.wicklow.ie/en/submit/mission/ww-c2-68	David Quinn	<p>Requests that land measuring c. 4.2ha that is proposed to be zoned 'Active Open Space' in the Draft Plan be zoned for 'Residential Use' at 15/ha and for 'Community & Education' (which is the zoning under the current plan). <i>Note: No map supplied with submission but from description appears to be the land shown indicatively on map below.</i></p> <p>It is put forward that this zoning is desired to provide for much needed family homes in the area, including social / affordable housing.</p> 
C2-152 https://consult.wicklow.ie/en/submit/mission/ww-c2-152	Pride in Carnew	<p>The submission seeks that all existing residential zonings as per the 2016-2022 Wicklow County Development Plan for Carnew should be maintained.</p>
C2-188 https://consult.wicklow.ie/en/submit/mission/ww-c2-188	Michael Kinsella	<p>Requests that lands measuring c. 1.2ha zoned 'OS' in 2016 plan (shown indicatively on map below), and proposed for omission from town plan boundary in Draft Plan, be zoned for part 'Residential' and part 'Open Space' use. It is put forward that the 'OS' lands would be provided by the landowner as an amenity park to the Council / residents.</p> 

<p>C2-215 https://consult.wicklow.ie/en/submitmission/ww-c2-215</p>	<p>Brian & Colm Buttle</p>	<p>It is requested that the zoning of land (c. 2ha as shown indicatively on map below) currently zoned 'R20 Residential 20/ha', which is proposed to be de-zoned under the Draft Plan be re-instated to zone 'RN New Residential'.</p> 
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<p>C2-219 https://consult.wicklow.ie/en/submitmission/ww-c2-219</p>	<p>Alexander Hill</p>	<p>It is requested that land (c. 3ha as shown hatched in dark blue on the map below) previously zoned 'SLB Strategic Land Bank' which is proposed to be de-zoned under the new plan is re-instated and zoned RN 'New Residential'</p> <p>and</p> <p>Request that lands (c. 2.5ha, shown hatched in light blue on map below) which are currently not within the settlement boundary to be included within the boundary and zoned 'SLB Strategic Land Bank'</p> <p>It is put forward in support of this request that</p> <ul style="list-style-type: none"> - The land is an extension of the existing housing estate; - The landowner has invested in a pumping station, sewage mains, surface water, water mains and roadways on the lands to accommodate permitted houses under previous expired permissions (06/5346 & 12/6222 which were not constructed). 
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Chief Executive's Response

The boundary and residential zoning provision for Carnew were reviewed having regard to the new housing targets for small towns, the need to deliver compact growth and limit sprawl. The Planning Authority is required to

adopt a sequential approach in determining the extent of the plan boundary and appropriate location of zoning.

The CE is satisfied that there is an adequate quantum of land zoned for 'New Residential' and 'Community & Education' use within the new Draft Plan for Carnew to satisfy the proposed growth targets as set out in the new Core Strategy for Carnew over the life time of the plan. Therefore there is no justification or need for the zoning of the subject lands, or the reversion to the zoning provisions of the previous plan. Furthermore, it is not recommended that additional lands be zoned 'SLB' as there is no certainty that such lands would be needed for development in the short to medium term.

No changes are therefore recommended.

Chief Executive's Recommendations

No change

Topic	Heritage	
ID	Name	Issue raised
C2-152 https://consult.wicklow.ie/en/submission/ww-c2-152	Pride in Carnew	A walking heritage trail from Carnew to Shillelagh via Tomacork should be developed. This would be a great addition for the local community and also would be a great addition for attracting tourism.
Chief Executive's Response		
<p>The provisions of the Draft Plan would support the development of such a trail, in particular the following objectives:</p> <p>Chapter 11 Tourism: CPO 11.1, 11.29, 11.30, 11.34, 11.35, 11.37, 11.41, 11.45</p> <p>Chapter 18: CPO 18.4, 18.9, 18.10,</p> <p>Carnew Town Plan: CAR3, CAR5</p> <p>Therefore no change is recommended.</p>		
Chief Executive's Recommendations		
No change		

Topic	Tourism	
ID	Name	Issue raised
C2-152 https://consult.wicklow.ie/en/submit/mission/ww-c2-152	Pride in Carnew	Suggests that the castle in Carnew should be bought under CPO and opened to the public. Suggests that the derelict HSE site should be purchased and a replica cottage from 1847 be built on the site to commemorate the famine due to local historical significance.
Chief Executive's Response		
<p>The provisions of the Draft Plan fully support the development of heritage related tourism projects (for example CPOs 11.7, 11.39). However, it is not within the remit of the Plan to specify that certain structures / sites will be purchased and developed by the Council, as this would be a funding and operational matter. Therefore no change is recommended.</p>		
Chief Executive's Recommendations		
No change		

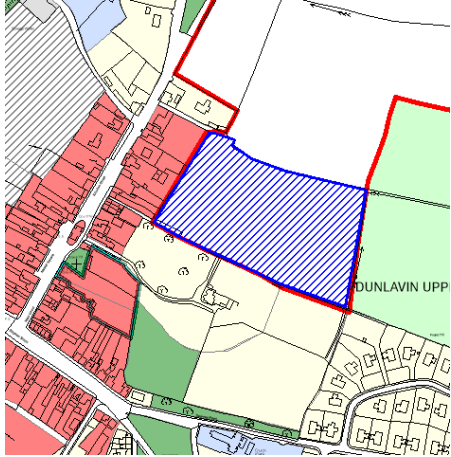
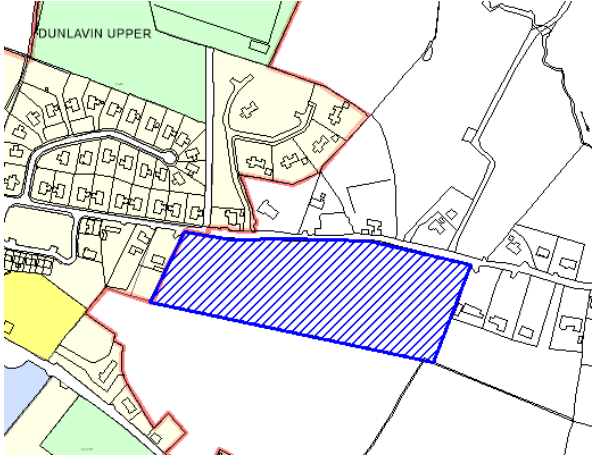
Topic	Services / Infrastructure	
ID	Name	Issue raised
C2-152 https://consult.wicklow.ie/en/submit/mission/ww-c2-152	Pride in Carnew	Street lighting should be upgraded to LED, public outlets should be provided for seasonal lighting use (Christmas lights), repair works should be done on the up lights in the footpath outside of the Castle wall; footpaths should be reduced in width to provide for greater parking provision.
Chief Executive's Response		
<p>The Draft Plan, in a range of objectives (particularly those set out in Chapters 5 and 12), fully supports the enhancement of the public realm and services in town centres.</p> <p>The delivery of town specific localised improvements, such as the ones suggested in this submission, would be an operational and funding matter, most properly addressed through the Municipal District ; each MD has a programme of desired works to be carried out in that area which are delivered according to priority and funding available, agreed with the MD members each year. Therefore no change is warranted to the Draft Plan in this regard.</p>		
Chief Executive's Recommendations		
No change		

Section 3.4	Volume 2
Section 3.4.8	Dunlavin

Topic		
Economic Development & Employment		
ID	Name	Issue raised
C2-150 https://consult.wicklow.ie/en/submission/ww-c2-150	Dunlavin & District Forum	It is suggested that a more focused objective is required in relation to DUN6 (support for tourism development). The objective should focus on community engagement with the provision of guidance and support from professionals with expertise in the area.
Chief Executive's Response		
It is not within the remit of the CDP, which is a land-use framework, to provide professional guidance and support with respect to tourism projects. This type of service would be provided by County Tourism agencies or Fáilte Ireland. Therefore no change is recommended.		
Chief Executive's Recommendations		
No change		

Topic		
Services		
ID	Name	Issue raised
C2-150 https://consult.wicklow.ie/en/submission/ww-c2-150	Dunlavin & District Forum	<ul style="list-style-type: none"> - There is not a clear objective concerning the provision of a water supply. - Regarding DUN10 consideration should be made to the reduction of speed limits along the Sparrow Road to which the objective refers
Chief Executive's Response		
<p>The water supply in Dunlavin is from a well / spring. This supply has been deficient for many years and not adequate to accommodate any new significant development. Irish Water has undertaken improvement works at this source and treatment plant which has allowed for enhanced capacity, sufficient to allow the granting of permission for 40 houses in 2018. It is estimated that there may be capacity for up to another 100 additional dwelling units at this time, but this will be kept under review. The Council will continue to work with Irish Water to enhance water services in the area.</p> <p>The consideration of speed limits is not within the remit of the County Development Plan. The provisions of the Draft Plan (particular the objectives set out in Chapter 12) fully support the delivery of localised road safety improvements.</p>		
Chief Executive's Recommendations		
No change		

Topic	Heritage	
ID	Name	Issue raised
C2-150 https://consult.wicklow.ie/en/submission/ww-c2-150	Dunlavin & District Forum	Request the inclusion of the three fire hydrants within Dunlavin in the Record of Protected Structures.
Chief Executive's Response		
<p>Reference has been made within the Draft Plan to the hydrants and their importance; p146 under the heading of Dunlavin Architectural Conservation Area (ACA):</p> <p><i>"The Buildings in the ACA represent an eclectic mixture of styles, sizes and uses which greatly add to the town's architectural heritage interest, as do historic features such as granite kerbstones and water hydrants".</i></p> <p>The identification of these items in the ACA description recognises their contribution to the architectural heritage of the area, and affords them protection from destruction or removal. This is considered suitable and adequate protection for these items and no change to the RPS is recommended.</p>		
Chief Executive's Recommendations		
No change		

Residential Development & Zoning		
Topic	Name	Issue raised
C2-116 https://consult.wicklow.ie/en/submitmission/ww-c2-116	Thomas Roche	<p>Request that lands (c. 3.6ha) previously zoned for housing but omitted from Draft Plan be re-instated, as shown on map below. It is put forward that given the significant investment in Dunlavin WWTP in recent years, there needs to be the possibility of this investment being used.</p> 
C2-150 https://consult.wicklow.ie/en/submitmission/ww-c2-150	Dunlavin & District Forum	<ul style="list-style-type: none"> - Lack of water supply is a concerning issue for the provision of houses and will lead to people leaving the area. - The Council should consider the needs of all the community when it comes to housing options inclusive of the types of accommodations are built and purchased by the Council as part of its overall social housing provision.
C2-175 https://consult.wicklow.ie/en/submitmission/ww-c2-175	Liam Burke	<p>Request that land (c. 3.6ha shown indicatively on map below) be included in settlement boundary and zoned residential for low density self-serviced sites. It is put forward in support of this request that the lands are located within 500m of the town centre, are close to amenities such as sports grounds and schools.</p> 

Chief Executive's Response**C2-116 / C2-175**

The boundary and residential zoning provisions for Dunlavin were reviewed having regard to the new housing targets for small towns, the need to deliver compact growth and limit sprawl. The Planning Authority is required to adopt a sequential approach in determining the extent of the plan boundary and appropriate location of zoning.

The CE is satisfied that there is an adequate quantum of land zoned for New Residential use within the new Draft Plan for Dunlavin to satisfy the proposed growth targets as set out in the new Core Strategy for the town over the life time of the plan. Therefore there is no justification or need for the zoning of the subject lands, or the reversion to the zoning provisions of the previous plan.

No changes are therefore recommended.

C2-150

The water supply in Dunlavin is from a well / spring. This supply has been deficient for many years and not adequate to accommodate any new significant development. Irish Water has undertaken improvement works at this source and treatment plant which has allowed for enhanced capacity, sufficient to allow the granting of permission for 40 houses in 2018. It is estimated that there may be capacity for up to another 100 additional dwelling units at this time, but this will be kept under review. The Council will continue to work with Irish Water to enhance water services in the area.

The Council's strategy and programme for the development and purchase of housing by the Council, including the types, sizes and tenures of housing, is set out in the Council's social and affordable housing delivery programme, rather than the County Development Plan. Therefore no change to the Draft Plan is recommended on foot of this submission.

Chief Executive's Recommendations

No change

Section 3.4	Volume 2
Section 3.4.9	Tinahely

Topic	Town Centre	
ID	Name	Issue raised
C2-11 https://consult.wicklow.ie/en/submit/mission/ww-c2-11	Obelisk Media Ireland Ltd.	<p>This submission, from a Tinahely resident, is concerned with the future viability and vitality of the town centre, particularly having regard to</p> <ul style="list-style-type: none"> - the impending closure of the Bank of Ireland; - the impact of COVID on town businesses; - the lack of effort / a plan to address business closures both in Tinahely and other towns across south Wicklow; - the draw away from the town centre caused by the out of centre Londis store at Lugduff - the parking problems in the town centre <p>It is suggested that the plan is deficient by not addressing these issues in a meaningful, rather than aspirational, way.</p> <p>This submission questions whether the Action Area 1 Fair Green development is ever going to happen and what is being done to facilitate it.</p>

Chief Executive's Response

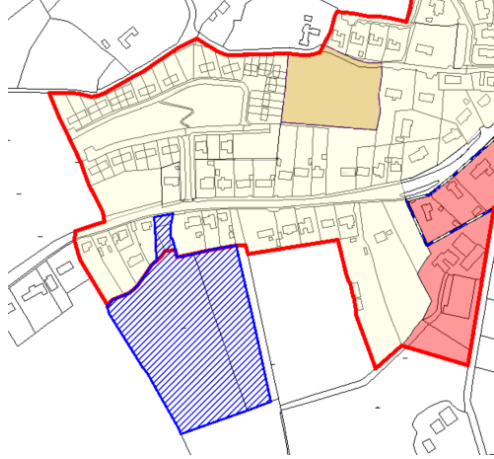
The CE recognises the impacts that business closures, as well as the impact of COVID, have and will have on the local towns and businesses, not just within Tinahely but throughout the wider County. The development plan has policies and objectives that outline and support the need for regeneration and renewal in the face of closures and dereliction especially in the built up areas of our towns. Chapter 5 of volume 1 p121-123 outline the priorities / goals of the development plan when it comes to issues of vacancy, regeneration and brown field development. Similarly in Volume 2 Part 6 specific objectives for Tinahely 6.5 Town Centre & retail sets out objectives for the support of the refurbishment of buildings in the Tinahely area

The development plan does not dictate / control what development *will* happen, but rather its purpose is to put in place a framework that *facilitates and promotes* appropriate development in the right locations. The Fair Green lands are considered the most suitable in the town centre for compact development and the plan puts in place a zoning and development framework to facilitate the development of this land should the landowner come forward with proposals and the necessary services be available. In addition, once all necessary services are confirmed as being available for such a development, the Council will be able to use its powers under the Vacant Sites legislation to encourage development and penalise land banking.

Chief Executive's Recommendations

No change

Topic		Transport/Movement
ID	Name	Issue raised
C2-11 https://consult.wicklow.ie/en/submit/mission/ww-c2-11	Obelisk Media Ireland Ltd.	This submission is concerned with the inadequacy of road and public transport services to / from and in Tinahely, and the lack of integration of existing limited services with other transport links e.g. train services to Dublin. It is suggested that there is no meaningful roads policy in the plan, and the references to the 'Leinster Outer Orbital Route' is not realistic not being part of the Government investment plan and should not be prioritised in the plan. Finally it is suggested that the lack of public transportation and road connectivity places a significant block in the way of any expansion of housing in the town.
Chief Executive's Response		
<p>It is accepted that improved public transport in places away from main transport corridors such as Tinahely should be a priority and is necessary where towns are planned to growth. The development plan provides support through its policies and objectives for enhanced public transport services throughout the County, and these are set out in some detail in Chapter 12 of the plan (and not necessarily in each town plan). However the delivery of such services is not a function of the development plan, but rather the strategies/ plans of the transport service authorities and providers, such as the Department of Transport and the NTA. The Council will continue to work with these agencies to enhance transport infrastructure and as a corollary, will seek to promote development where the best existing transport services are already located and moderate growth in places where services are deficient and unlikely to be significantly enhanced.</p> <p>In this regard, Tinahely is identified for modest growth, in recognition of the limited carrying capacity of the infrastructure, including transport systems, in the area.</p>		
Chief Executive's Recommendations		
No change		

Topic		Community Development & Zoning
ID	Name	Issue raised
C2-121 https://consult.wicklow.ie/en/submit/mission/ww-c2-121	Anthony Murphy	<p>Request that lands currently located outside the boundary of Tinahely measuring 2.9ha (as shown indicatively on the map below) be zoned for the purposes of community and education, to specifically provide for a residential care home.</p> 

Chief Executive's Response

The County Development Plan recognises the importance of Residential Care Homes and supports their provision.

The plan includes the following objectives for the support of the development of residential care homes:

- CPO 7.19** *To facilitate the development of healthcare uses at suitable locations, in liaison with the appropriate health authorities. Health facilities will be considered at all locations and in all zones provided that:*
- *the location is readily accessible to those availing of the service, with a particular presumption for facilities in towns and villages and in areas of significant residential development. Isolated rural locations will not generally be considered except where it can be shown that the nature of the facility is such that demands such a location;*
 - *the location is generally accessible by means other than private car, in particular by public transport services, or by walking/cycling; and*
 - *the location is accessible to those with disabilities.*
- CPO 7.20** *To facilitate the establishment of new or expansion of existing hospitals, nursing homes, centres of medical excellence, hospices, wellness/holistic health centres, respite care facilities or facilities for those with long term illness.*
- CPO 7.22** *To facilitate the development and improvement of new and existing residential and daycare facilities throughout the County.*
- CPO 7.23** *To facilitate the development and improvement of new and existing supported living facilities throughout the County.*
- CPO 7.24** *Residential and daycare facilities shall, in general, be required to locate in existing towns or villages where sustainable mobility is easily achieved, shall be located close to shops and other community facilities required by the occupants and shall be easily accessible to visitors, staff and servicing traffic. Locations outside of delineated settlement boundaries shall only be considered where:*
- *The site is located in close proximity to a settlement and would not comprise an isolated*

development;

- *An alternative site within the settlement boundary is not available;*
- *There are excellent existing or potential to provide new vehicular and pedestrian linkages to settlement services; and*
- *The design and scale of the facility is reflective of the semi-rural location.*

CPO 7.26

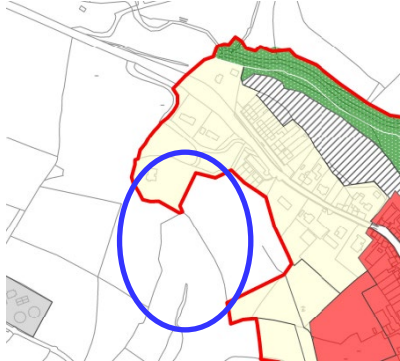
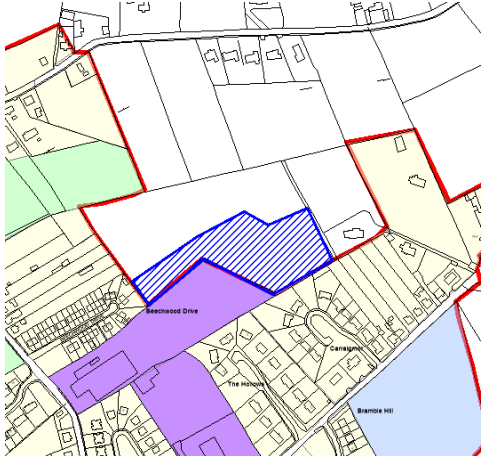
Clinically managed/supervised dwelling units, such as 'step down' (i.e. post-acute care) accommodation or semi-independent housing provided as part of a medical facility, nursing home or other care-related facilities, will be considered strictly only on the following basis:

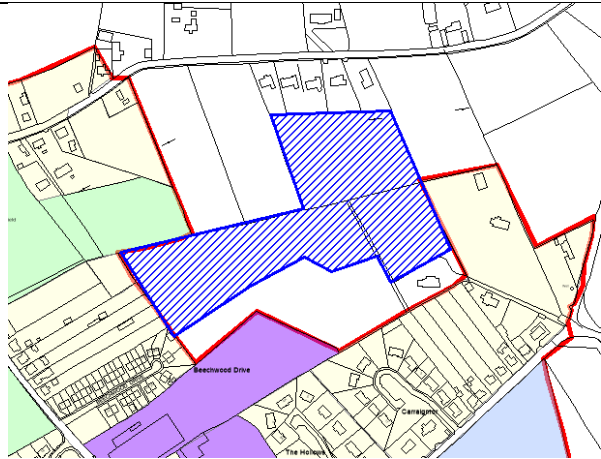
- *The units are associated with an already developed and established medical facility, nursing home or other care-related facilities; the units are held in single ownership with the overall medical / nursing home/care facility; no provision is made for future sale or subdivision; and a strict management agreement is put into place limiting the use of such structures to those deemed in need of medical supervision or care;*
- *The number of such units on any such site shall be limited to 10% of the total number of hospital/ nursing/care home bedrooms unless a strong case, supported by evidence, can be made for additional units;*
- *Such units shall be modest in scale and limited to single bedroom units only and independent facilities such as car parking and gardens shall not be provided to each unit (in order to ensure such units are not rendered suitable for standalone use as private dwellings).*

In accordance with the above objectives, particularly CPO 7.24, 'zoning' is not an essential prerequisite to securing permission for a residential care home, and the draft plan explicitly provides that sites at the edges of settlements, such as this one, may be considered subject to certain criteria being fulfilled. Therefore it is not recommended that the lands be specifically zoned for this use.

Chief Executive's Recommendations

No change

Topic		Residential Development & Zoning
ID	Name	Issue raised
C2-11 https://consult.wicklow.ie/en/submitmission/ww-c2-11	Obelisk Media Ireland Ltd.	<p>This submission identifies that a significant housing issue in Tinahely is the number of vacant homes in the town centre, such as on Barton Street) and the plan fails to address this in a proactive way. It is suggested the Council should work with building owners to return housing stock to normal use and should lobby Government for enhanced powers such as taxation to disincentive to the misuse of potential valuable premises.</p> <p>(It is pointed out that Barton Street is incorrectly labelled at 'Pound Lane' in the plan)</p>
C2-122 https://consult.wicklow.ie/en/submitmission/ww-c2-122	Anthony Murphy	<p>It is requested that the zoning of lands (c. 1.96ha) zoned 'R – Special' (low density) in the previous plan which is proposed to be de-zoned under the new plan, be re-instated. It is put forward in support of this request that the lands are closest lands to the town centre.</p> 
C2-206 https://consult.wicklow.ie/en/submitmission/ww-c2-206	Kieran & Julie O'Keeffe	<p>It is requested that the zoning of land (c. 1.5ha shown indicatively on map below) zoned R15 Residential in the previous plan which is proposed to be de-zoned under the new plan, are re-instated and zoned 'SLB Strategic Land Bank'.</p> 
C2-208 https://consult.wicklow.ie/en/submitmission/ww-c2-208	Margaret O'Keeffe	<p>It is requested that the zoning of land (c. 4.3ha, shown indicatively on map below) zoned 'SLB Strategic Land Bank'; in the previous plan which is proposed to be de-zoned under the new plan, have the SLB zoning re-instated.</p>



Chief Executive's Response

C2-11

The primary role of the development plan is as a land use framework for the development of the County. It is a high level document that has a limited role with regard to the issue of tackling vacancy beyond providing strong policy support for regeneration programmes (such as RRDF), the re-use of vacant buildings, such as can be found in Chapter 5 of the draft plan and in the Draft Tinahely Town plan, and the application of the Vacant Site Levy. These provisions clearly support and encourage the refurbishment and regeneration of buildings in the Tinahely area.

There are various other programmes and agencies directly involved in the effort to tackle vacancy, including the Council's own housing section, which has refurbishment grants available to those who wish to enter into leasing arrangements with the Council.

The Government has recently announced a new taxation measure for tackling vacancy over a wider range of property sizes / types and the Council will assist with this in the identification of applicable properties. The mistaken reference regarding the street name will be amended.

C2-122 / C2-206 / C2-208

The settlement boundary and provisions for residential zoning in Tinahely were reviewed having regard to the new housing targets for small towns, set out in the Core Strategy, the need to deliver compact growth and limit sprawl. The Planning Authority is also required to adopt a sequential approach in determining the extent of residentially zoned lands within the plan boundary.

The CE is satisfied that there is an adequate quantum of residentially zoned land in Tinahely to facilitate the growth targets for the lifetime of the plan, and therefore is no justification, or need given the Core Strategy population and housing growth targets, to zone these lands for new residential development.

In addition, it is not recommended that large tracks of land be zoned 'SLB' when there are no indication that such peripheral greenfield lands will be needed for zoning in the medium to longer term, having regard to the growth parameters for the town, and the available of other undeveloped lands closer to the town centre.

Therefore no change is recommended.

Chief Executive's Recommendations

Amend the Draft Plan as follows

Volume 2, Tinahely Town Plan

5.10 Tinahely Architectural Conservation Area (ACA)

The extent of the Tinahely ACA is outlined on the attached Heritage Map. The character of the ACA is defined as follows:

The ACA contains an important and attractive townscape of well-proportioned stone built town houses, commercial and public buildings dating mainly from the 18th and early 19th centuries, built along the backdrop of the Derry River, at the junction of the Shillelagh-Wicklow and Hacketstown roads.

The character of the ACA is essentially formed by the combination of the traditional urban Irish streetscape of restrained frontages to residential and retail properties, with a number of notable administrative and substantial mill buildings. The traditional streetscape provides a foil to the Market House which is the most outstanding building in the town.

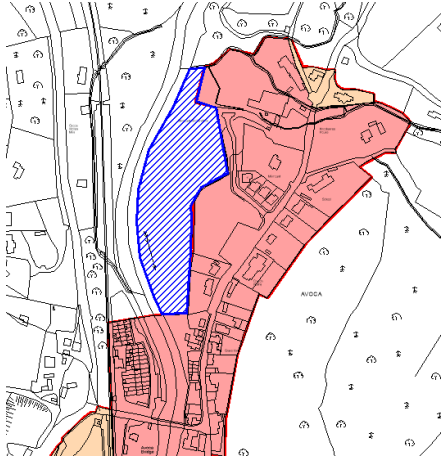
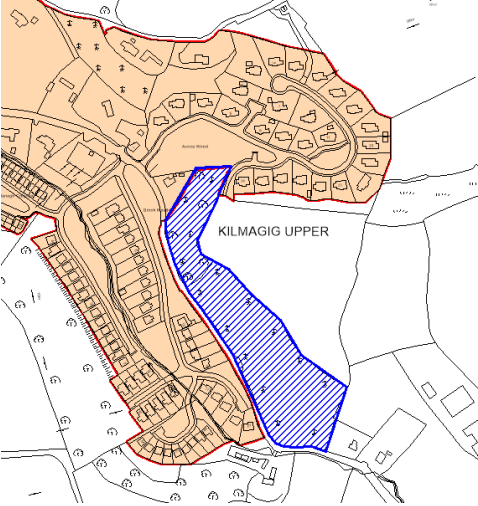
Market Square, with its Market House and Court House, Pound Lane, **Barton Street**, the milling area at the Derry and Tinahely Bridge comprise the main historic area of Tinahely. The buildings fronting onto Market Square are substantial with extensive outbuildings and lands to the rear. They comprise an important "set piece" of small town urban design and planning. Later additions also of importance are the terraced workers' cottages on the Hacketstown Road and the Methodist Church and Manse. In general, the stone built structures of this period are a valuable non-renewable cultural resource that contributes strongly to the cultural identity of the town and merits treatment as a conservation area.

Other features of note, that contribute to the character of the ACA include:

- **Pound Lane Barton Street** predominantly comprising well presented double fronted two-storey houses, mainly with classical detailing around doors and windows;
- The present bank building, a former hotel, is a substantial double fronted five-bay property with a shop frontage inserted into one bay on the ground floor;
- The old Constabulary, situated to the south-west of the Courthouse, with its rounded corner, provides an important stop to the south-west corner of the square. The recent insertion of a modern shopfront diminishes the corner;
- Structures listed on the Record of Protected Structures;
- Victorian style shopfronts.

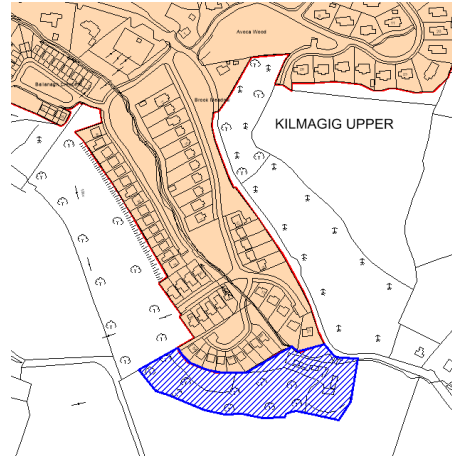
It is important that the character of the town is not eroded by insensitive adaptations or remodelling of façades.

Section 3.4	Volume 2
Section 3.4.10	Avoca

Topic	Zoning	
ID	Name	Issue raised
C2-28 https://consult.wicklow.ie/en/submit/mission/ww-c2-28	Simon Pratt & Ivan Pratt	<p>Request that the boundary of Avoca be extended and the additional lands (c. 2.3ha, as shown indicatively on map below) be zoned 'secondary area'. For low to medium density residential development.</p> <p>It is put forward that these lands were previously located within the development boundary, are close to town and within walking distance of services; permission granted for housing development previously (05/3642, 06/6851); that infrastructure has been put in place to cater for development of the lands.</p> 
C2-38 https://consult.wicklow.ie/en/submit/mission/ww-c2-38	Micheal O Tuathail	<p>Request that the boundary of Avoca be extended by c. 3ha, as shown indicatively on map below). It is put forward that there is a demand for housing in the area, that these lands are partially elevated and well drained with no flood risk.</p> 
C2-194 https://consult.wicklow.ie/en/submit/mission/ww-c2-194	Stuart & Margaret Tyner	<p>Request that the boundary of Avoca be extended and the additional lands (c. 1.6ha, as shown indicatively on map below) be zoned 'secondary area'.</p>

[mission/ww-c2-194](#)

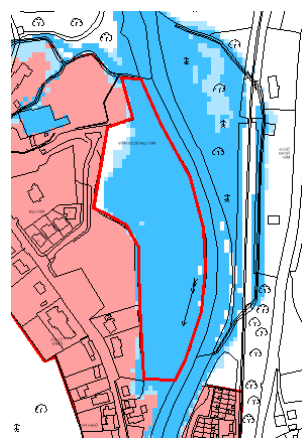
It is put forward the lands comprises a well-integrated infill site, close the settlement centre and provides an opportunity for a small scale residential development; or for tourism related holiday or community development. It is the stated that services would be possible via the Brook Meadow estate.



Chief Executive's Response

The boundary and zoning provisions for Avoca were reviewed having regard to the new housing targets for Level 6 towns, the need to deliver compact growth and limit sprawl. The Planning Authority is required to adopt a sequential approach in determining the extent of the plan boundary and appropriate location of zoning. The CE is satisfied that there is an adequate quantum of land zoned within the new Draft Plan for Avoca to satisfy the proposed growth targets as set out in the new Core Strategy for the town over the life time of the plan. Therefore there is no justification or need for the zoning of additional lands, or the reversion to the zoning provisions of the previous plan.

With respect to **C2-28**, the lands in question are located within flood zones (as shown in the map below) and do not pass the criteria to be considered for residential zoning; to consider the development of new housing in such locations would present an unacceptable risk to the future occupants of such housing. In addition, infrastructure such as sewerage networks, wastewater holding / disposal tanks would be also at risk of flooding and flood damage, and therefore of presenting serious risk to water quality and safety. There are adequate lands available for development outside the flood zone. Accordingly there is no justification for zoning these lands. No change is therefore recommended.

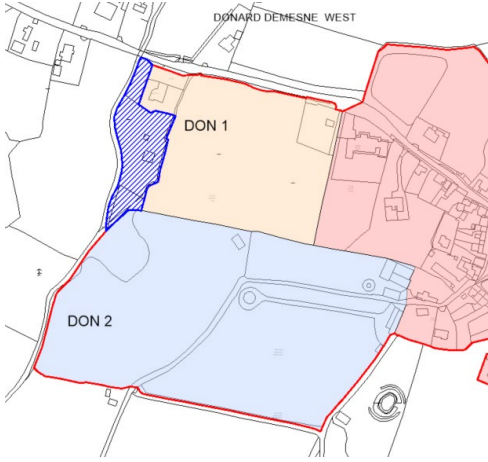


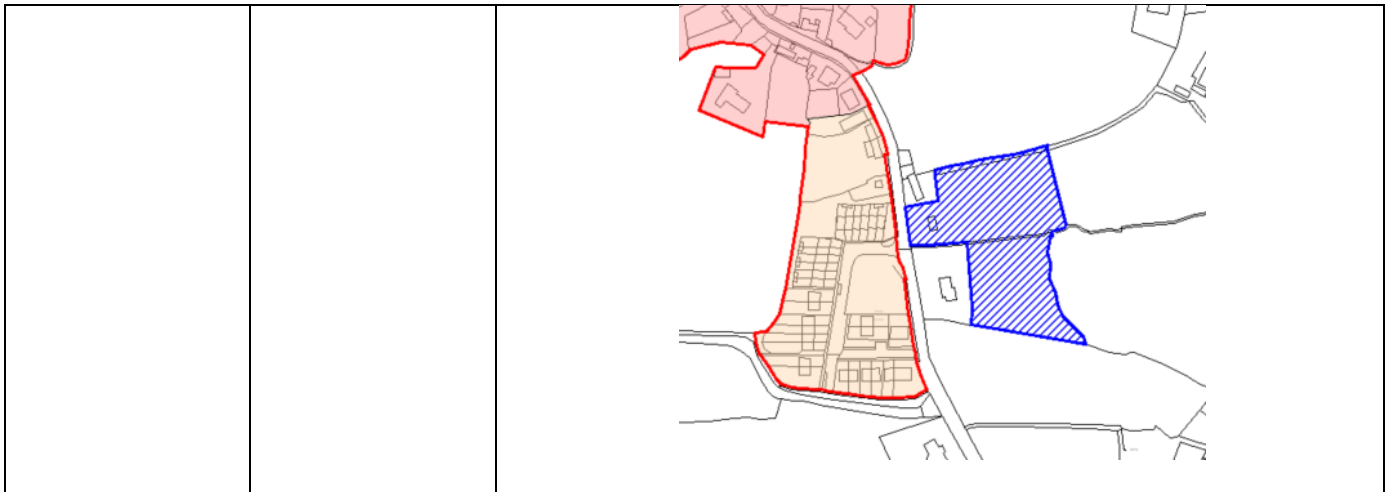
*Subject site outlined in red
Flood Zone A shown in darker blue
Flood Zone B shown in lighter blue*

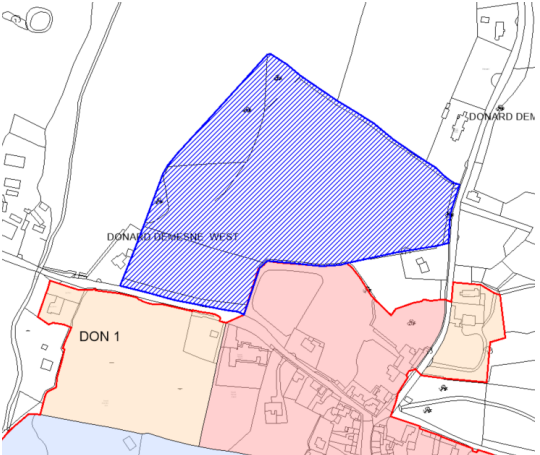
Chief Executive's Recommendations

No change

Section 3.4	Volume 2
Section 3.4.11	Donard

Topic	Zoning	
ID	Name	Summary of Issues raised
C2-3 https://consult.wicklow.ie/en/s/ubmission/ww-c2-3	Declan Hanley	<p>It is requested that the plan boundary be extended in the area shown below (outlined in blue) for the following reasons:</p> <ol style="list-style-type: none"> 1. To ensure any footpaths/street lights and speed limits be extended to/beyond the crèche 2. To give the opportunity to explore the possibility of using existing unused Council land for necessary amenities and recreational areas, such as public playground, bottle bank, car charging area, access route to the GAA field, for tourism uses (view the existing and unique waste water treatment area and the opportunity to advertise Donard as a "green tourist" destination) 
C2-124 https://consult.wicklow.ie/en/s/ubmission/ww-c2-124	David & Geraldine Lawlor	<p>It is requested that c. 0.78ha (as shown indicatively below) be re-instated within the settlement boundary for Donard and zoned for Tertiary Development (as per the current Wicklow County Development Plan). It is detailed that the subject lands have planning permission for 4 houses granted under planning permission Ref: 20/166 and that the site is also the subject of a current planning application Ref: 21/730 for 8 No. houses (which is currently on further information).</p> <p>It is submitted that the subject lands should remain designated as Tertiary Development Zone and within the settlement boundary as the lands are within the speed limits for the town, with public footpath access and connections to water and wastewater facilities along the public road.</p>



<p>C2-174 https://consult.wicklow.ie/en/submit/ww-c2-174</p>	<p>Alan Repco</p>	<p>It is requested that the settlement boundary be extended to include lands shown on map below (c. 6.5ha) and zoned for mixed use and residential development. It is put forward that the site is included within the settlement boundary in the current county development plan 2016.</p> 
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Chief Executive's Response

Lands to west of crèche (C2-3)

- The lands in question are not proposed for zoning (which implies development possible in principle) as the lands are at risk of flooding. In that regard, it is not considered that these lands would be suitable for some of the types of uses suggested, such as bottle banks or car charging areas; however lands at risk of flooding might be considered suitable for passive recreational use and car parking.
- The zoning of land, or its inclusion / exclusion for the plan boundary, even if Council owned, is no guarantee for the provision of community facilities on such lands; that would be depending on funding / resources available to delivery and maintain such facilities.
- The zoning of land, or its inclusion / exclusion for the plan boundary, has no impact on the development footpaths, creation of speed limits etc. These are provided or determined in the basis of traffic safety criteria and funding, and are not tied to the location of the plan boundary.
- The issue of the need for improved access to the GAA lands is noted and the draft plan already includes this as an objective 'DON1 – the provision of a link road from the Irishtown Road to the GAA fields and the caravan park'.
- Therefore no change is recommended.

C2-124 & C2-174

The boundary and zoning provisions for Donard were reviewed having regard to the new housing targets for small towns, the need to deliver compact growth and limit sprawl. The Planning Authority is required to adopt a sequential approach in determining the extent of the plan boundary and appropriate location of zoning.

The CE is satisfied that there is an adequate quantum of land zoned in the new Draft Plan for Donard to satisfy the proposed growth targets as set out in the new Core Strategy for the town over the life time of the plan. Therefore there is no justification or need for the zoning of the subject lands, or the reversion to the zoning provisions of the previous plan.

With regard to the land identified in submission C2-124 it is noted that there is a substantial block of undeveloped greenfield land between the village centre and the subject lands. It is therefore not recommended to extend the boundary out to incorporate the subject lands as this would comprise leap-frogging of lands closer to the centre. The new plan for Donard will not affect any existing planning permissions.

With regard to the land identified in submission C2 – 174, it is noted that these lands comprise a very substantial block of greenfield land and while they are within walking distance of the village centre, they are surplus to the current requirements for Donard having regard to the core strategy targets.

No changes are therefore recommended.

Chief Executive's Recommendations

No change

Section 3.4	Volume 2
Section 3.4.12	Newcastle

Topic	General Objectives	
ID	Name	Issue raised
C2-155 https://consult.wicklow.ie/en/s/ubmission/ww-c2-155/observation-1	Newcastle Biodiversity Group	<ul style="list-style-type: none"> - Concerns raised regarding speeding, traffic and parking management on the Sea Road; possibly of car park should be considered; - Traffic calming measures are needed on the northern approach to the village - The design of new housing and development is a key factor in protecting the character and identity; new development should incorporate the existing buildings and landscape - Newcastle Village is a rural low-lying development featuring vernacular architecture; request that international architecture of a modular style is not used within any of the developments that the skyline is kept low to two storeys; request that developments proposed should reduce the area of hard landscaping within and increase the area of greenspace within the developments to allow for natural soakage of rainwater thus reducing the flooding of local houses in the centre of the village; - Improved childcare facilities needed; - Request that the development plan for Newcastle puts a strong emphasis on the encouragement and facilitation of a remote working hub for the village. -
C2-160 https://consult.wicklow.ie/en/s/ubmission/ww-c2-160 C2-172 https://consult.wicklow.ie/en/s/ubmission/ww-c2-172	Labour Party, Ross Connolly Branch, Greystones Municipal Area	Support the revitalization of the Newcastle town centre through small scale regeneration projects that address dereliction, deliver compact growth and provide remote working space and improve amenities.
C2-182 https://consult.wicklow.ie/en/s/ubmission/ww-c2-182	Newcastle Residents Association	New development increases demand on local services and facilities in the village. The submission includes two proposals to improve the sporting and recreation facilities in the village: <ol style="list-style-type: none"> i. Development of the 1ha plot of Council owned land adjacent to the Community Centre at the southern end of the village (currently has two tennis courts, a children’s playground and a large unused green area). The first proposal is to develop this area and the recreational facilities with the provision of two additional tennis courts, an all-weather bowling green, a 5-a-side football/basketball court, an updated modern children’s playground and outdoor gym equipment. ii. Build on the great success of the 4km Newcastle Heritage Trail that was completed of in 2019 and establish further walkways along the seafront and upland areas on existing public ways in the vicinity of the village.

Chief Executive's Response

Roads & Transportation

The County Development Plan is a strategic and high level policy document regarding future land use and development in the County. It is not its function to list all or any infrastructure works that may (subject to funding) be carried out by the Council during the lifetime of the plan, but rather to focus on strategic infrastructure and infrastructure delivery principles. The delivery of traffic calming / safety works for example is generally delivered through the Municipal Districts in their annual works plans and each MD has a list of desired works to be carried out in that area which are delivered according to priority and funding available, agreed with the MD members each year. In addition, Wicklow County Council was allocated over €7m by the NTA in 2021 for sustainable transport / mobility projects, including the provision of cycling lanes and footpaths and the Roads & Transportation Directorate are working on the detailed plans for such improvements.

It would not therefore be possible or appropriate to specify which local works would be carried out during the lifetime of the plan as this would limit the flexibility and decision making for the MD / Transportation teams. In addition, it would not be practical to list all such works, in the development plan. These road safety enhancement requests will be brought to the attention of the MD / Roads project teams.

The provisions of the Draft Plan, as set out in both Chapter 12 and the Newcastle Town Plan explicitly support the delivery of safety measures, in particular:

Newcastle Town Plan:

1. *Improve and provide roads, footpaths and cycleways where required and at the following locations:*
 - *the realignment of the junction of Sea Road/R761;*
 - *at the junction of the L5050 and the R761 and along the L5050 between the town centre and St. Francis School;*
 - *along the R761 from the L5050 to the north of the town;*
 - *along the L5550 (Sea Road) from Hunters Leap/the boat repair yard to the R761;*
 - *along Leamore Lane from the town centre to the plan boundary.*
2. *Improve the R761 through the town centre in accordance with the principles and guidance set out in DMURS to provide more public space for vulnerable road users and to calm traffic.*
3. *To facilitate the provision of pedestrian and cycling linkages within and between existing and new housing/mixed use development throughout the settlement.*

Chapter 11: CPO 12.11, CPO 12.30, CPO 12.46, CPO 12.34, CPO 12.50.

The Council is committed to utilising its resources to secure the implementation of these objectives. No change is recommended.

Social / community services

The suggestion regarding the possible improvement of community facilities are noted and welcomed; the provisions of the Draft Plan (both the in Newcastle Plan and Chapter 7 of Volume 1) would fully support such enhancements; the delivery of such would however be an operational and funding matter, and the suggestion will be brought to the attention of Council's Community, Cultural and Social Development Department, which is responsible for this area. No change is recommended.

Remote working

Remote working and the development of co-working hubs is explicitly supported in the Draft Plan, in particular in Objectives CPO 9.7 and 12.6. Therefore no change is recommended.

Regeneration

The regeneration and revitalisation of town and villages centres is explicitly supported and promoted in the Draft Plan. It is an objective of the Newcastle plan '*To promote the renewal and regeneration of the town centre*'. In addition, Chapter 5 of the Draft Plan sets out a very wide range of objectives to similarly support, facilitate and promote regeneration programmes and projects throughout the County, including in Newcastle, where the goal is to '*revitalise the centre of these settlements through small scale regeneration projects that address dereliction, deliver compact growth, provide remote working space and improve amenities*'.

Therefore no change is recommended.

Design

Development and design standards set out in Volume 3 of the draft plan address standards and requirements for new housing within the County, including Newcastle. The very first part of these standards sets out the key principles of good design, which emphasises the need for consideration of context and distinctiveness, and the need to complement existing development and character:

Overarching requirements

The aim of these standards is to ensure that all new developments in County meet the highest standards of quality design and amenity, contribute to the creation of beautiful and healthy places, address urgent climate change concerns and protect and complement existing amenities and character.

1.1 Key principles of good design

These are the key factors that will be evaluated in the assessment of any development proposals:

- 1. Context: How does the development respond to its surroundings?*
- 2. Connections: How well is the new development / site / neighbourhood connected?*
- 3. Inclusivity: How easily can people use and access the development, and can it meet the needs of all in society?*
- 4. Variety: How does the development promote a good mix of activities?*
- 5. Efficiency: How does the development make appropriate use of resources, including land and energy?*
- 6. Distinctiveness: How do the proposals create a sense of place?*
- 7. Layout: How does the proposal create people friendly streets and spaces?*
- 8. Public realm: How safe, secure and enjoyable are the public areas?*
- 9. Adaptability: How will the buildings cope with change?*
- 10. Privacy / amenity: How do the buildings provide a high-quality amenity?*
- 11. Parking: How will the parking be secure and attractive?*
- 12. Detailed design: How well thought through is the building design?*
- 13. Climate Change: How does the design address climate change considerations?*

A 'Design Statement', which is an outline of a proposal's context and aims, and how it responds to its surroundings and meets Development Plan objectives should be submitted for all applications of 500+sqm commercial development or applications of 20+ residential units and may be requested by the Planning Authority at its discretion for other types and scales of development.

In addition, the Objectives and Design Standards of the Draft Plan address in detail what is required with respect to management of rain / surface water, including SUDs and other natural measures to limit run-off into water courses: Chapter 14 and Section 2.2 of the Development & Design Standards set out these requirements.

Therefore no change is recommended.

Walkways / amenity routes

The provisions of the Draft Plan fully support the enhancement of existing and development of new amenity routes; Objectives 11.34, 11.37, 11.41, 11.42, 18.4, 18.5, 18.6, 18.9, 18.10, 18.13 refer. No change is therefore recommended.

Chief Executive's Recommendations

No change

Topic	Biodiversity	
ID	Name	Summary of issues raised
C2-155 https://consult.wicklow.ie/en/submit/mission/ww-c2-155	Newcastle Biodiversity Group	<p>The aim of the newly formed Biodiversity Group is to conserve and protect the rich and diverse flora and fauna while also undertaking community projects to enhance biodiversity and increasing awareness with residents while also giving them skills to use in their private gardens.</p> <p>It is requested that:</p> <ul style="list-style-type: none"> - Trees in Newcastle should be retained; that Newcastle Residents Association and Biodiversity Group are consulted before any trees or hedgerows are removed; - Distinct mature trees that are located within identified development zones be protected under Section 205 (details of particular trees included in the submission); - No weed killer containing glyphosate is used in any Council lands in the townland and its use is discouraged in existing and future developments particularly those close to the river; - within the buffer zone placed at 10m from the Newcastle River native Irish hedgerow of hawthorn, blackthorn and elder tree should be planted, also allowing any wild native plants to grow within the hedge. - only native trees plants be planted along the river green corridor; - No walkway be created beside the river as human interference will occur and damage wildlife; any walkway be 10m+ from river - Lighting be designed to protect insect and wildlife populations; should be kept to a minimum; implementing practical guidelines like the guidelines in the Dark Sky report 'Best Practice Public Lighting' is essential - The design of street lighting be 'traditional' instead of more modern posts and fittings; - The environment and water quality of the Newcastle River be protected and improve from human actions that would interfere with biodiversity; the river is under pressure from development and is subject to dumping/pollution; and has suffered unexplained fish kills; - An independent person with a river management background be appointed to monitor any development near the river to ensure it is being protected; - More attention is paid to the river and sea areas in relation to planning applications; - Planting in all new developments to have biodiversity at the forefront; to have rainwater harvesting system to protect the river from polluted run-off; that surface water from roads not enter the river

Chief Executive's Response

The objectives of the Draft Plan, particularly those set out in Chapter 17, address all of the areas of concern raised under this heading. In particular:

- Tree protection is addressed in CPOs 17.18-17.23. It is not within the remit of the CDP to require community groups to be notified prior to the removal of any tree or hedgerow; it is the case that the law does allow for tree / hedgerow removal on urban lands, without the need for felling licences / permits separate to the permission process. The CDP provisions cannot alter the national law in this regard. No policy objectives can

override national statute / regulations. The provisions of the Draft Plan do however explicitly promote and encourage retention of mature trees and hedgerows in development proposals (Section 1.3 of the Development & Design Standards refers).

- The process for making TPOs is a separate process to the CDP review process, although the two are being run concurrently. The Planning Authority has already identified existing TPOs that it has determined require amendment, as well as trees / groups of tree not currently subject to TPO but warranting same. This list was heavily influenced by previous submissions made by members of the public / landowners over the last 5 years. These amendments / proposals were detailed in the Draft Plan on table 17.05B. These proposals for further TPOs had not been brought to the attention of the Planning Authority before now.

In order to do consider further TPOs, it would be necessary to initiate a fresh process under Section 205(5) of the Act which entails:

- i. Detailed assessment the trees / groups of trees concerned by qualified arborist / similar professional; the assessment of trees / groups of trees for possible TPOs involves detailed assessment of the trees / groups of trees in question, under a number of criteria including but not limited to condition, retention span, relative public visibility, known or perceived threat to the tree(s), and other factors. Each and every tree / group of trees requires to be fully and individually assessed before a TPO should be made;
- ii. Careful consideration of said assessment and determination, in accordance with the criteria set out under the Act, if said trees / groups of trees fulfil the criteria for possible TPO. The legal provisions for making a TPO state *"If it appears to the planning authority that it is expedient, in the interests of amenity or the environment, to make provision for the preservation of any tree, trees, group of trees or woodlands, it may, for that purpose and for stated reasons, make an order with respect to any such tree, trees, group of trees or woodlands as may be specified in the order"*.
- iii. Amenity is the essential requirement of a TPO. This generally refers to the visibility of the tree and the extent it can be seen by the public. The impact of the tree or trees is also an important consideration. This would include their size, future potential, rarity, cultural or historical value, or their contribution to the character or appearance of the landscape or local area. As well as amenity, the planning authority are also required to consider the expediency of making a TPO, having regard to the amenity importance of the trees and the degree of risk to which they are considered to be exposed.
- iv. Publication maps / details, formal notification to landowners, and a further consultation period.

It would not be possible to complete such a process within the time scales of this stage of plan making. In particular, time would be required to tender for a suitably qualified professional to carry out this work, and to allow the assessment to take place which would likely take many months. It is recommended that after the adoption of this Plan in 2022, as part of the implementation programme, further consideration is given to these proposals with a view to determining if it is appropriate to initiate a new Section 205(5) process.

- The Council's management of its land, in terms of use of weed killer would be an operational issue, more relevant to the Council's Biodiversity Plan, and outside the remit of the CDP.
- The lands along the Newcastle River are not in the management of the Council and therefore the Council would have no role in the carrying out of planting in this area. With respect to planting / landscaping that might occur where the lands adjacent to the river are subject to development, the Draft Plan sets out clear requirements with respect to landscaping plans which are proposed to be enhanced via an amendment recommended in this report (see below)
- The draft Plan provisions require the implementation of 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland' including the maintenance of undeveloped riparian strips in a natural state (CPO 17.26 refers). Any proposals for development along the Newcastle River will be required to

implement these provisions.

- The provisions and objectives of the Draft Plan (set out in Chapter 15) aim to ensure that external lighting is designed in such a way as to not cause excessive light spillage / pollution in order to protect the amenities of properties and wildlife. The CE is happy to recommend an amendment to enhance standards in this regard (see below). The issues raised with respect to the design of street lighting will be brought to the attention of the infrastructure Directorate responsible for street lighting improvements.
- While the Draft Plan sets out that construction managers will be required to be appointed to implement 'construction and demolition management plan' where they are required by condition, it is recommended that this be enhanced to ensure that such management plans more explicitly address environmental / ecological protection as well. Please see proposed amendment below.

Chief Executive's Recommendations

Volume 3

Appendix 1 Development & Design Standards

1.3 Protecting Nature & Biodiversity

Landscaping and biodiversity enhancement plans shall generally be required for new developments, particularly but not limited to those on greenfield sites, and shall be submitted with the planning application. These plans shall highlight existing landscape natural features (such as trees, hedgerows, verges, watercourses etc) to be retained and enhanced, and detail new landscaping and biodiversity enhancement measures including (but not limited to) species, number, size and location of new planting, the provision of swift bricks / boxes or towers, bat boxes, etc. and measures to protect ecological corridors, water courses etc. The plan should put an emphasis on the use of native species where possible. Planting schemes shall take account of future maintenance requirements. All landscaping design and management shall be pollinator friendly. ~~They should~~ generally according with the planting and maintenance approach set out in the Pollinator Friendly Planting Code of the All-Ireland Pollinator Plan.

Volume 3, Appendix 1

1.4.4 Light Pollution

Applications for permission which include the provision of new street lighting or significant on site / on building lighting shall be accompanied by a certificate from a suitably qualified professional in the field confirming that all lighting has been so positioned and designed to eliminate or mitigate impacts on adjoining properties, particular residences (light trespass) or on the night (sky glow).

The design of lighting in new development shall integrate a hierarchy of light intensity zones to ensure that environmental impact is minimised as far as possible particularly in areas proximate to ecological corridors.

Regard shall be taken of Guidance Notes for the Reduction of Light Pollution (Institute of Lighting Engineers, 2000), 'Guidance Note for the Reduction of Obtrusive Light' (ILP 2021) and 'Guidance Note 9: Domestic Exterior Lighting' (ILP 2019).

Volume 3, Appendix 1

1.4.6 ~~Waste &~~ Construction Management

~~All development will be required to comply with the provisions of Waste Management Acts and Regulations;~~

All construction sites shall be appropriately managed to ensure that environmental emissions are strictly controlled.

Where necessary (such as for larger scale developments or developments in ecologically sensitive areas) this will be enforced by requiring (by planning condition) the agreement and implementation a 'construction ~~and demolition~~ management plan', which should set out, at a minimum, the various best practice construction measures/mechanisms that will be put in place during the construction phase to avoid, or mitigate, the impacts of: construction traffic, waste, noise, lighting, dust, storm water run-off etc, on adjoining residences and properties, on existing biodiversity, public roads, etc.

~~which will set out detailed measures to manage waste arising from the construction activity.~~

~~In drawing up such plans, developers should have regard to DoEHLG guidance publication 'Best Practice Guidelines on the preparation of Waste Management Plans for Construction and Demolition Projects' (2006) as may be amended and revised.~~ In particular, such plans will set out:

- Construction programme for the works
- Hours of operation
- A traffic management plan
- Noise and dust mitigation measures ~~(including details of a truck wheel wash at the site entrance~~
- Details of construction lighting
- Waste minimisation and management plan, including recycling / re-use of waste where possible (in accordance with circular economy principles);
- Measures for the protection of natural features, including (but not limited to) mature trees and hedgerows, protected species, ecological corridors and watercourses

A Construction Manager will be required to be appointed to liaise directly with the various sections of the ~~Planning~~ Local Authority.

Topic	Flooding	
ID	Name	Issue raised
C2-155 https://consult.wicklow.ie/en/submit/mission/ww-c2-155	Newcastle Biodiversity group	<ul style="list-style-type: none"> - Strong environmental concern in the village with respect to the threat of flooding, considering the vulnerability of Sea Road and the village - Heavy flooding occurred in some low lying areas in 2015; some sections of the village are prone to frequent flooding - The Newcastle River needs to be managed and protected; current climate crisis means flooding will only get worse if action is not taken - Request the implementation of the recommendations in the OPW flood risk management plans, including planned investment measures for managing and reducing flood risk. - Request natural coastal defences adjacent to the village - Request flood maps are updated to include areas prone to flooding to the north of the village on R761 - Request that the zoning of land that has been identified as being at a high or moderate probability of flooding (flood zones A or B) be in accordance with the requirements of the Flood Risk Management Guidelines and the 'justification test for development plans'; that applications for new developments or significant alterations/extension to existing developments in an area at risk of flooding follow the 'sequential approach' as set out in the Flood Risk Management Guidelines; that an appropriately detailed flood risk/drainage impact assessment is required with all planning applications, to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site), considering all sources of flooding. - Request that WCC ensures the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SUDS Policy to ensure surface water runoff is managed for maximum benefit. Request that proposed developments meet the design criteria of each of the four pillars of SuDS design - Water Quality, Water Quantity, Amenity and Biodiversity. - Request the promotion of the use of green infrastructure as landscape features in new developments to provide storm/surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions. For developments adjacent to the river, request that any structures (including hard landscaping) must be set back from the edge of the watercourse in accordance with the guidelines in 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland.
Chief Executive's Response		
<ul style="list-style-type: none"> - The provisions of the Draft Plan, particular Objectives CPO 14.01 and 14.05 explicitly support the delivery of flood protection / management schemes by the OPW in the County; the funding and delivery of schemes however by the OPW is a matter for the OPW; - The provisions of the Draft Plan fully support the protection and enhancement of natural coastal defences (CPOs 14.04, 19.5, 19.7, 19.9, 19.12, 19.15 refer) - As set out in the Draft Plan and SFRA, the flood maps are indicative of fluvial and coastal flooding only and it 		

is accepted that there may be areas that have experienced past flooding or may be vulnerable to flood risk now or in the future not shown on the indicative flood maps, arising from pluvial (surface water) or groundwater sources, or from the failure of drainage system and other man-made infrastructure. The flooding experienced on the R761 is not fluvial or coastal; therefore it is not recommended that maps be changed. The Draft Plan and SFRA clearly states that even in areas when no risk of fluvial or coastal flooding is identified (Flood Zone C); localised flooding from sources other than rivers and the coast can still occur and may need to be taken into account at the planning application stage.

With respect to remedying flooding problems such as at the locations detailed in C2-155, these are localised issues that generally are a result of pluvial flooding or failure of infrastructure and would be matters for the local MD rather than the CDP.

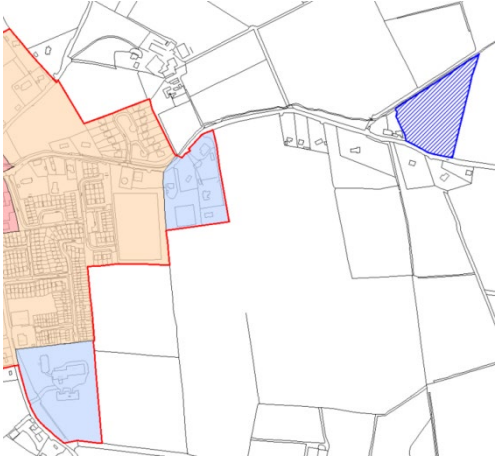
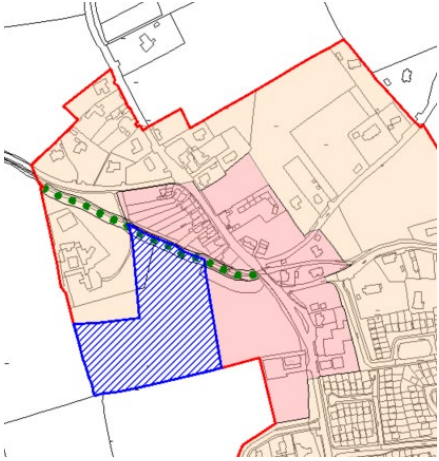
- A detailed SFRA in accordance with the Flood Risk Management Guidelines has been undertaken for the Draft Plan, including the Draft Newcastle Plan; including a plan-making 'Justification Test'. On this basis on this analysis, it has been identified that there are areas within the Newcastle plan boundary that are in flood zones A and B; the draft plan set out explicitly how application for development within such areas are to be treated. As set out in the Draft Plan:

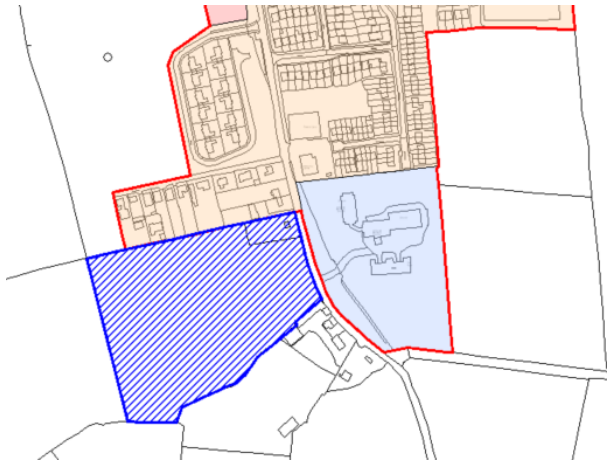
Flood Risk Assessment 'Level 6 Mitigation Objective'

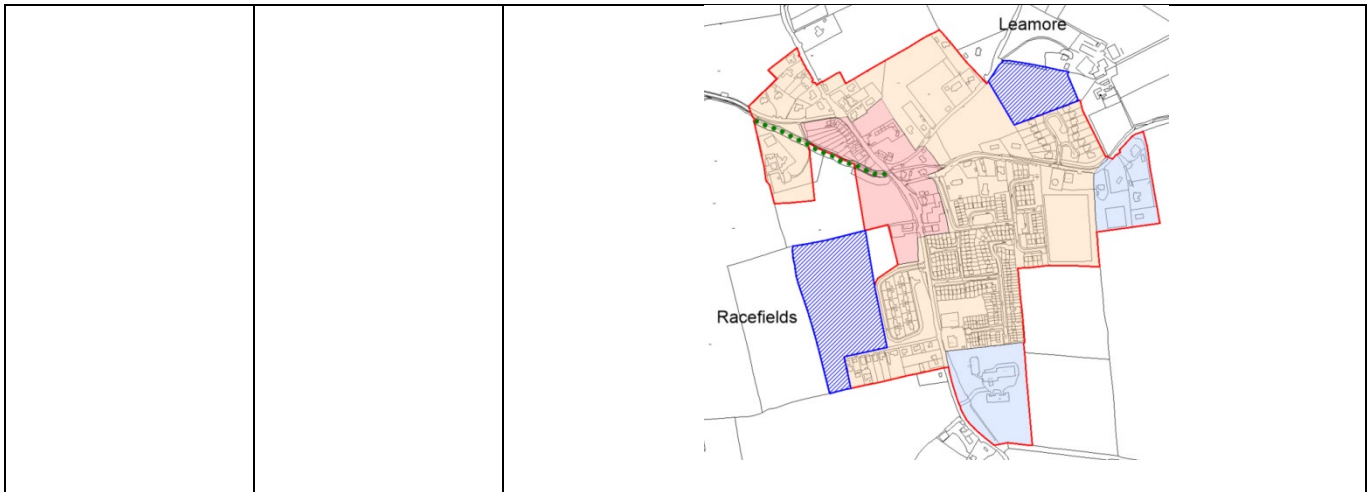
To restrict the types of development permitted in Flood Zone A and Flood Zone B to the uses that are 'appropriate' to each flood zone, as set out in Table 3.2 of the Guidelines for Flood Risk Management (DoEHLG, 2009). The planning authority may consider proposals for development that may be vulnerable to flooding, and that would generally be inappropriate as set out in Table 3.2 of the Guidelines, subject to all of the following criteria being satisfied:

- *The planning authority is satisfied that all of the criteria set out in the justification test as it applies to development management (Box 5.1 of the Guidelines) are complied with.*
- *The development of lands for the particular use is required to achieve the proper planning and sustainable development of the settlement, and complies with at least one of the following:*
 - (i) *The development is located within the 'primary lands' and is essential for the achievement of the 'vision' or for the achievement of a specific objective for these lands.*
 - (ii) *The development comprises previously developed and/or under-utilised lands/sites,*
 - (iii) *There are no suitable alternative lands for the particular use, in areas at lower risk of flooding.*
- The Draft Plan sets out a number of objectives and standards that require implementation of SUDs and other measures to management run-off; in particular: CPOs 13.21, 14.06, 14.11, 14.12, 14.13, 14.14, 14.15. It is considered that this matter is fully addressed in the Draft plan and no changes are therefore recommended.
- The Draft Plan sets out a number of objectives and standards in relation to the use of green infrastructure to address run-off and ecological protection, including (but not limited to) CPOs 13.22, 14.02, 14.13, 14.15. The Plan explicitly requires the implementation of 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland in CPOs 14.16 and 17.26. It is considered that these matters are fully addressed in the Draft Plan and no changes are therefore recommended.

Chief Executive's Recommendations
No change

Topic	Zoning	
ID	Name	Issue raised
<p>C2-29 https://consult.wicklow.ie/en/submit/mission/ww-c2-29</p>	<p>Tomás Peare</p>	<p>It is requested that lands measuring c. 2.2ha on Sea Road (as shown on map below) are included in the Newcastle settlement boundary for residential use. It is put forward that the site is well located for housing being proximate to facilities and amenities in Newcastle and is served by public transport.</p> 
<p>C2-40 https://consult.wicklow.ie/en/submit/mission/ww-c2-40</p>	<p>ABBD Developments</p>	<p>It is requested that the Newcastle boundary be extended to include land identified in blue on map below (approx. 2.7ha). It is put forward that</p> <ul style="list-style-type: none"> - these lands were zoned in the previous plan; - part of the lands currently form part of PRR 20/298 (mixed use and housing development) which has been granted by WCC and is on appeal; - the zoning is required to facilitate any redesigns to the permitted development that the Bord may require; the achievement of objectives of the Draft Plan re linear park and commercial units would be difficult to achieve without this area; - those part of these lands that were not part of 20/298 are about to be the subject of a further application; - the lands are serviced. 

<p>C2-214 https://consult.wicklow.ie/en/submit/mission/ww-c2-214</p>	<p>Tom Redmond & Paschal Bermingham</p>	<p>It is requested that the Newcastle boundary be extended to include lands of c. 4.9ha as shown on map below.</p> <p>It put forward that</p> <ul style="list-style-type: none"> - these lands are contiguous to the existing built up area; - the housing targets for Newcastle are too restrictive and will lead to housing shortages and price rises; - some of the lands proposed for zoning on Draft Plan are at risk of flooding; other land proposed for zoning have been zoned for some time but have not been the subject of application for permission; the zoning of this land will translate into houses on the ground; - the landowners would facilitate the upgrade of the heritage walk that runs along the southern boundary of the lands if designated for development. 
<p>C2-251 https://consult.wicklow.ie/en/submit/mission/ww-c2-251</p>	<p>Ardale Property Group</p>	<p>It is requested that the Newcastle boundary be extended to include lands outlined in blue below at Racefield (approx. 4.7ha) and Leamore (approx. 1.9 ha) for residential use.</p> <p>It put forward that:</p> <ul style="list-style-type: none"> - these sites have long established residential zoning going back to 2007; - They are within the built up footprint of Newcastle; - The Racefield site forms part of a larger permitted development of which 12 units are completed; the remainder is under-utilised and vacant; the entrance is constructed and service infrastructure is in place; the zoning would allow for the completion and consolidation of the existing development; it is within walking distance of town centre and services; zoning would comply with sequential approach - The Leamore site is an underutilised site bounded by existing residential development; is within walking distance of town centre and services; lands are closer to the centre than other lands zoned 'tertiary area' in the draft plan; - Ardale is prepared to enter into an agreement with IW to funding upgrades to the WWTP on the basis of these lands being zoned for development.



Chief Executive's Response

Newcastle is a Level 6 settlement which is identified for modest growth. The Core Strategy provides for an average growth rate of c. 15% between 2016 and 2031 in Level 6 settlements (which is considered appropriate given their small size and infrastructure), which is the equivalent of c. 50 dwellings in Newcastle. The Draft Plan provides more than adequate lands within the proposed primary and secondary areas to meet this growth target, even allowing for 'headroom' i.e. zoning over and above that needed to meet the target in the case of land not being brought forward for development or services issues arising at some locations. The lands that are proposed for zoning for such new housing developments (i.e. in primary and secondary development areas) are those that are most proximate to the town centre and available infrastructure.

The zoning of excessive greenfield land, or land that is beyond existing underdeveloped zoned lands, will undermine the Plan's objectives to consolidate existing settlements, encourage regeneration and deliver compact growth.

C2-29

The lands in question are not adjacent to the previous or proposed new Newcastle boundary. The zoning of these lands for development would not facilitate a sequential approach to the extension of Newcastle. This would therefore be contrary to the proper planning and sustainable development of Newcastle. Therefore no change is recommended.

C2-40

The subject lands form part of the Newcastle boundary in the 2016 – 2022 County Development Plan and are zoned secondary development area. The settlement boundary for Newcastle was reviewed having regard to the new population and housing targets for the County and it was determined that the subject lands were surplus to the land needed to meet Newcastle's housing needs. Permission was granted by Wicklow County Council, Reg. Ref. 20298, for 22 houses, 13 apartments and commercial units in January 2021 and this decision is currently under appeal. Part of the land which forms part of this permission has been omitted from the settlement boundary. It is considered reasonable to amend the boundary to include the land which forms part the site under Reg. Ref. 20/298.

C2-214

The boundary for Newcastle has been reduced in size having regard to the new population and housing targets for the County as set out in the core strategy. There is no justification for extending the settlement boundary and including the subject lands. It is noted that these lands do not form part of the boundary in the 2016 County Development Plan. Therefore no change is recommended.

C2-251

The subject lands form part of the Newcastle boundary in the 2016 – 2022 County Development Plan and were zoned secondary development area (Racefield) and tertiary development area (Leamore). The settlement boundary for Newcastle was reviewed having regard to the new population and housing targets for the County and it was determined that the subject lands were surplus to the land needed to meet Newcastle’s housing needs. Therefore no change is recommended.

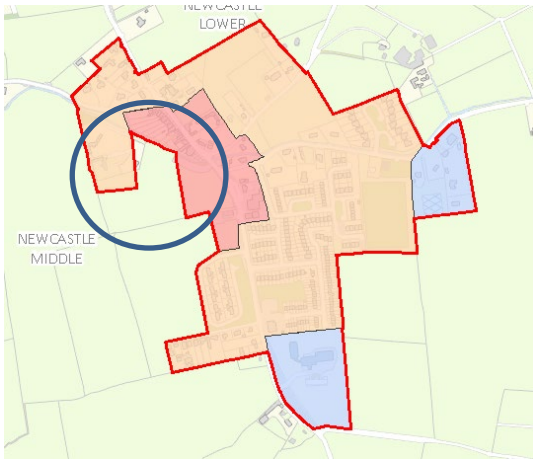
Chief Executive’s Recommendations

Amend Drat Plan as follows:

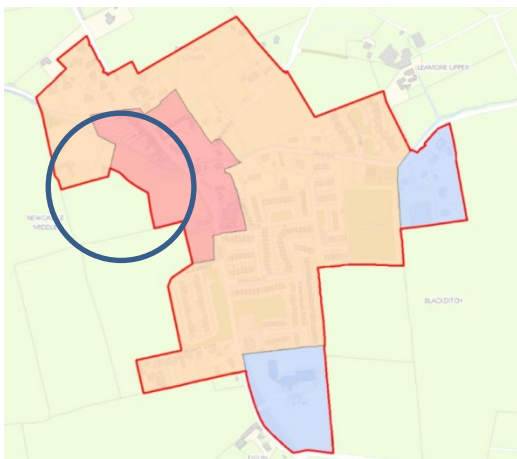
Volume 2: Newcastle Town plan

Amend map as follows:

Change from:



Change to:



Section 3.4	Volume 2
Section 3.4.13	Roundwood

Topic	Roundwood Plan Objectives	
ID	Name	Issue raised
C2-98 https://consult.wicklow.ie/en/submit/ww-c2-98	Roundwood & District Community Council	<p>Housing</p> <ul style="list-style-type: none"> - Small cluster developments are favoured in the village to meet local need; keep density of housing relatively low in order to keep rural feel to the area. - There should be no further housing development in Vartry Heights or Ashwood Local authority estates. - All future development should be mixed, incorporating private, social and affordable housing with associated recreational facilities. - Need flexibility around planning guidelines to allow local young people to settle in the area and build homes rather than moving out. <p>Design</p> <ul style="list-style-type: none"> - The plan should seek to preserve the character of the landscape and provide a focal point where people can appreciate the village and enjoy the view of the reservoir. - The design of any new housing developments should be in keeping with the traditional vernacular architecture of Roundwood village. All utility boxes i.e. electricity substations, etc. should be enclosed in a granite surround or similar. <p>Facilities / Amenities / Infrastructure</p> <ul style="list-style-type: none"> - Park and picnic facilities should be considered for the centre of the town. These facilities along with some shops which are appropriate to the area and provision of adequate parking would encourage tourists to stop and spend some time in the village. - Additional car parking facilities are required for village centre, the playground, at the access points to the Vartry Trails, at the Health Centre and Roundwood National School. - Improvement to the quality and quantity of the water supply. - Improved roads in the Roundwood and district area to ensure the safety of all road users particularly the high volume of road cyclists. Provision for cycle lanes on approach roads especially on the approach roads to Roundwood to help improve traffic flow. - Footpaths from residential areas into the village centre; secure direct access from the village centre to the Vartry Trails. Footpaths from the village centre to the access points of the Vartry Walks. Footpaths to be provided on road sections of the Vartry Walks. - Improved communication network involving the extension of broadband to areas outside the village. - Improve and expand current recycling facilities. - Retain and restore historical and listed buildings in the area. - Identify which buildings or locations are suitable for the provision of a local Visitor Centre, Historical and Arts centre. - Rezone land for recreational purposes in order to provide adequate play, sporting, community and other recreational facilities. - The provision of adequate community crèche and childcare in the area.

<p>C2-221 https://consult.wicklow.ie/en/s-ubmission/ww-c2-221</p>	<p>David Gray</p>	<ul style="list-style-type: none"> - Request for provision of footpath along the R755 from Roundwood to the Derallossory junction, and onwards to Annamoe/Trooperstown (to link with the footpath on the Avonmore Way). - Request for provision of footpath along the R765 across the bridge to link to the Reservoir Trails. This would need parking disincentive to be usable by pedestrians and not blocked by cars. - Request for additional traffic calming, and extension of the 50km/h limit and/ or an additional 60 km/h limit on approached to the village. - Request for additional parking and additional measures to counter illegal parking, to aid traffic flow through the village particularly opposite the current shopping provision.
<p>C2-259 https://consult.wicklow.ie/en/s-ubmission/ww-c2-259</p>	<p>Claire Chambers</p>	<ul style="list-style-type: none"> - With regard to RD2 - Support for the criteria set out in Section 5.3, Roundwood Specific Development Objectives No. 9. - Support for open space for pedestrians between the main street and the eastern edge of the boundary at the reservoir buffer – ‘A ‘village green’ with a minimum width of 15m with hard and soft landscaping, located between the nearer edge of the footpath of the main street to the eastern edge of the plan boundary at the reservoir buffer. No more than 50% of the lands within the objective boundary shall be developed prior to the provision of the village green’. - Permission granted for development (Reg. Ref. 20/1087) which does not incorporate this linear ‘village green’. - Request that point 3 of Objective No. 9 will be reviewed given the likely increase in traffic as a result of permission 20/1087. - It is suggested that a one-way system on the Main Street would reduce traffic congestion on the Main Street.

Chief Executive’s Response

Many of the issues raised in the above submissions are addressed in the objectives contained in Volume 1 of the Draft Plan (various chapters), Volume 2 Level 6 Small Town Plans and in Appendix 1 Development & Design Standards. All efforts have been made in the draft plan to minimise repetition of objectives between Volume 1 and the town plans in Volume 2, unless it was considered necessary to emphasise assets or restate objectives that have particular relevance and importance to that settlement.

The extent of land zoned in Roundwood has been reduced in accordance with the new housing targets set out in the Core Strategy. This will have effect of scaling back / slowing the pace of new residential development in Roundwood during the plan period. It is not considered appropriate to include a condition that would prevent any new housing development in Vartry Heights or Ashwood Local Authority estates.

With regard to new residential development and the design of any new development, there are many objectives in Chapters 5 and 6 of the Draft Plan that will apply to applications for development in Roundwood. These include:

CPO 5.17 *To harness and integrate the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive reuse, recognising its important contribution to placemaking. New development should respect and complement the historic fabric of existing towns and villages – the traditional street patterns, plot sizes, mix of building types, distinctive paving and attractive street furniture.*

CPO 5.18 *To protect, integrate and enhance heritage assets, including attractive streetscapes and historic buildings, through appropriate reuse and regeneration and restrict inappropriate development that would undermine the settlement’s identity, heritage and sense of place.*

CPO 5.21 *To strengthen the urban structure of towns and villages by ensuring that any new development contributes to a coherent urban form, focused on a high quality built environment of distinct character. New development shall incorporate a legible and permeable urban form that protects and compliments the character of the street or area in which it is set in terms of proportion, enclosure, building line, design and by the marrying of new modern architecture with historic structures.*

CPO 6.6 *To require that all planning applications for multi-unit residential development are accompanied by a Design Statement¹. Design Statements shall include a detailed assessment of existing environment and historic character and demonstrate how the design has evolved in response to these underlying characteristics and fabric of the town / village. The Design Statement should address each of the 12 criteria set out in the Urban Design Manual (DECLG May 2009). The layout, access, road widths and open space should be cognisant of town and village character.*

CPO 6.27 *To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to suit the needs of the various households in the county, in accordance with the Design Standards for new Apartments, Guidelines for Planning Authorities (2020).*

The density of new residential development must be in accordance with the density standards set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). The density standards as per the guidelines are set out in Table 6.1 of the Draft Plan.

With regard to Roundwood, the following minimum densities apply:

Small Towns and Villages²

(Kilcoole, Newtownmountkennedy, Baltinglass, Enniskerry, Rathdrum, Aughrim, Ashford, Carnew, Kilmacanogue, Roundwood, Tinahely, Newcastle, Dunlavin, Avoca, Shillelagh, Donard)

- Centrally located sites: 30 – 40 + units per hectare for mainly residential schemes may be appropriate or for more mixed use schemes.
- Edge of Centre Sites: 20-35 dwellings per hectare.
- Edge of small town / village: Densities of less than 15 – 20 dwellings per hectare (as an alternative to one-off housing) as long as such development does not represent more than 20% of the total new planned housing stock of the small town or village.

The Draft Plan acknowledges the water supply capacity constraints. It is noted in the Draft Plan that funding has been sought under Irish Water’s Small Town and Villages Growth programme, part of IW’s investment programme 2020-2024. It is noted that no new development will be permitted unless there is adequate capacity in the water supply system.

Section 5.2 of the Roundwood Plan acknowledges that *‘there is a need to improve the permeability of the existing and emerging settlements by the provision of pedestrian and cycling links throughout the town, and in particular pedestrian links between the town centre and all residential lands and links to amenity routes’*. Section 5.3, Objectives 1 and 2 relate to the provision of new footpaths.

The car parking at the school is inadequate to cater for the needs of staff. The Plan includes an objective to address this:

Objective 8 To provide for additional car parking and a set down area, on the lands across the road from the school

¹ Design Statements may be required for additional formats of development the discretion of the Planning Authority

² These are defined in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) as those with a population ranging from 400 to 5,000 persons.

identified as RD1 on Map 1.

It is noted that the town centre is served by on-street car parking. However the issue of illegal parking, particularly adjacent to local shops, persists. This is therefore an enforcement issue and outside the remit of the plan.

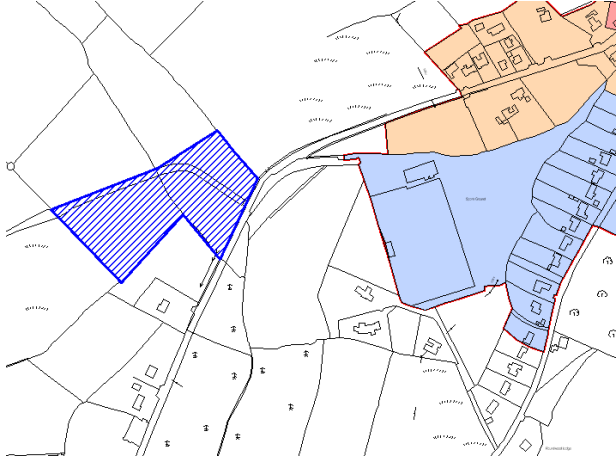
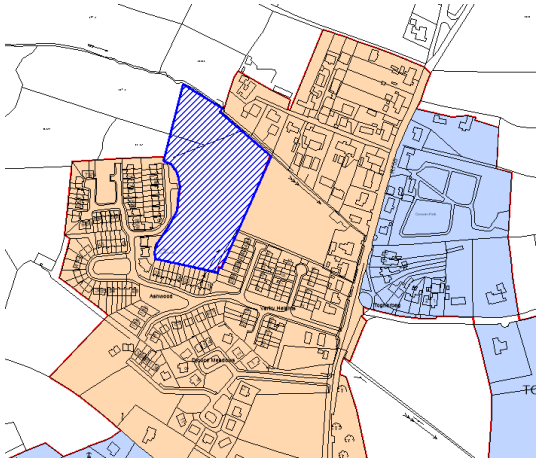
The Plan boundary includes sufficient lands to cater for additional development to serve the needs of Roundwood including the community facilities and social infrastructure. However the delivery of such facilities is outside the remit of the plan.

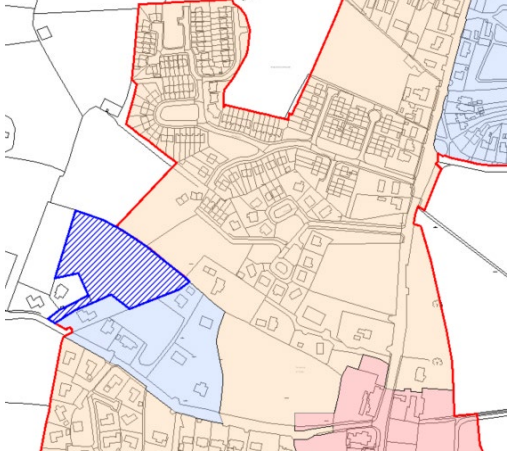
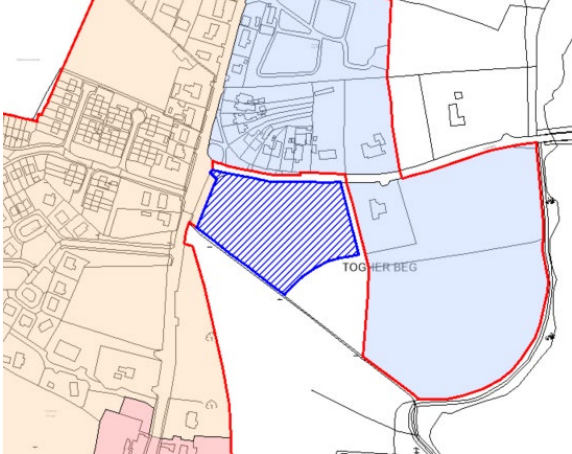
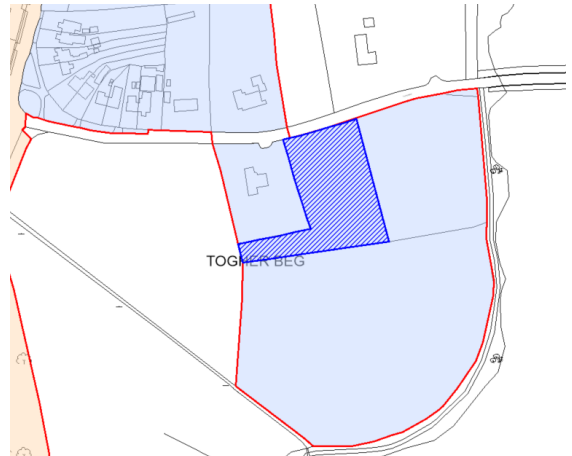
Requests to change the speed limit cannot be addressed as part of the development plan as this is dealt with under separate legislation.

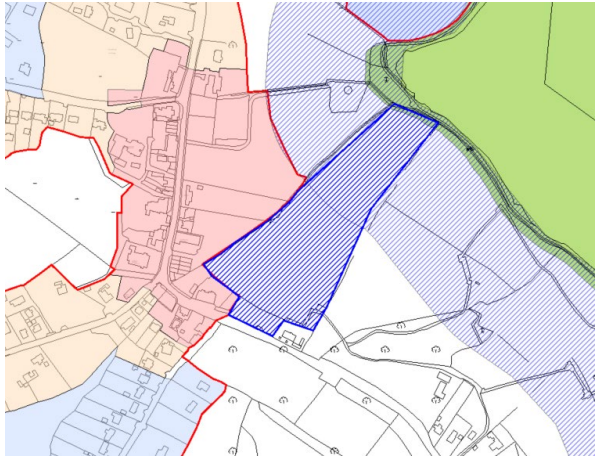
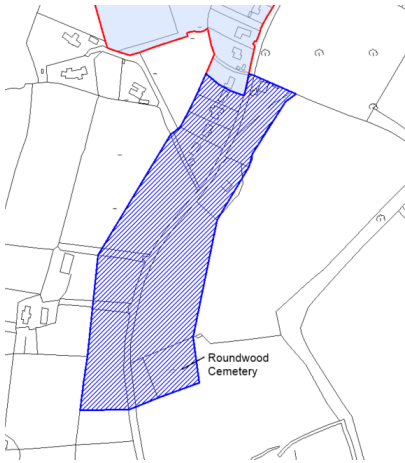
The Draft Plan includes objectives to facilitate improvement to communications infrastructure. However the delivery of broadband infrastructure is not within the remit of the County Development Plan.

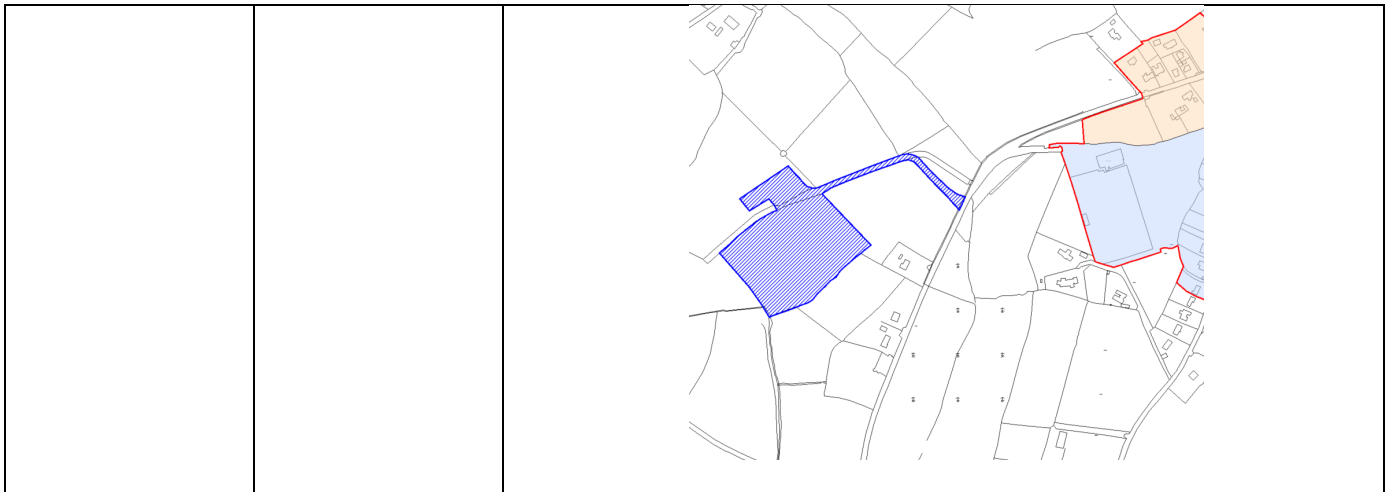
Chief Executive's Recommendation

No change

Topic	Zoning	
ID	Name	Issue raised
<p>C2-91 https://consult.wicklowne/en/submitmission/ww-c2-91</p>	<p>Robert Miller</p>	<p>It is requested that the boundary of Roundwood be amended to include the lands shown on the map below (c. 2.5ha) which were previously included in the settlement boundary. There is permission on part of the lands for two commercial units (PRR 08/999) and these are currently under construction.</p> 
<p>C2-93 https://consult.wicklowne/en/submitmission/ww-c2-93</p>	<p>William Doyle</p>	<p>It is requested that the boundary of Roundwood be amended to include lands shown on the map below (c. 2.2ha) and the lands zoned for residential use.</p> 
<p>C2-94 https://consult.wicklowne/en/submitmission/ww-c2-94</p>	<p>Johnny Doyle</p>	<p>It is requested that the boundary of Roundwood be amended to include lands shown on the map below (c. 1.2ha) and the lands zoned for residential use.</p>

		
<p>C2-96 https://consult.wicklow.ie/en/submit/mission/ww-c2-96</p>	<p>Finbarr Keenan</p>	<p>It is requested that the boundary of Roundwood be amended to include the lands shown on the map below (c. 1.6ha) and the lands zoned for residential use.</p> 
<p>C2-112 https://consult.wicklow.ie/en/submit/mission/ww-c2-112</p>	<p>Ciaran Keenan</p>	<p>It is requested that lands of c. 0.6ha shown on the map below be amended from 'tourism' to 'residential' use for the development of for two houses for family members.</p> 

<p>C2-223 https://consult.wicklow.ie/en/submit/mission/ww-c2-223</p>	<p>Joseph & Ann McDonald</p>	<p>It is requested that the boundary of Roundwood be amended to include lands shown on the map below (c. 4.6ha) and the lands zoned for residential use.</p> <p>The south-western section of the lands (2.7ha) are zoned Secondary Development Area in the 2016 County Development Plan while the remaining lands (1.9ha) at the north-eastern side of the site located within the Vartry Reservoir buffer zone.</p> 
<p>C2-111 https://consult.wicklow.ie/en/submit/mission/ww-c2-111</p> <p>C2-213 https://consult.wicklow.ie/en/submit/mission/ww-c2-213</p>	<p>Brian Power</p> <p>Joe Synnott</p>	<p>It is requested that the boundary of Roundwood be amended to include lands shown on the map below to include the cemetery.</p> 
<p>C2-176 https://consult.wicklow.ie/en/submit/mission/ww-c2-176</p>	<p>Roundwood & District Athletic Club (RADAC)</p>	<p>It is requested that the boundary of Roundwood be amended to include lands shown on the map below at Baltyanima which were previously included in the settlement boundary. The lands are intended to be developed for sports and recreation.</p>



Chief Executive's Response

Roundwood is a Level 6 settlement which is identified for modest growth. The Core Strategy provides for an average growth rate of c. 15% between 2016 and 2031 in Level 6 settlements (which is considered appropriate given their small size and infrastructure), which is the equivalent of c. 50 dwellings in Roundwood. The Draft Plan provides more than adequate lands within the proposed primary and secondary areas to meet this growth target, even allowing for 'headroom' i.e. zoning over and above that needed to meet the target in the case of land not being brought forward for development or services issues arising at some locations. The lands that are proposed for zoning for such new housing developments (i.e. in primary and secondary development areas) are those that are most proximate to the town centre and available infrastructure.

The zoning of excessive greenfield land, or land that is beyond existing underdeveloped zoned lands, will undermine the Plan's objectives to consolidate existing settlements, encourage regeneration and deliver compact growth.

The boundary for Roundwood was reviewed having regard to the new housing target, the need to deliver compact growth and limit sprawl. The Planning Authority is also required to adopt a sequential approach in determining the extent of the plan boundary.

C2-91

With regard to the lands at Togher More (C2-91), it is considered that these lands are too removed from town centre and do not adhere to the sequential approach to land zoning. The change in boundary does not affect the planning permission on the site.

C2-93, C2-94, C2-96

These lands are surplus to the requirements of the development needs of Roundwood for this development plan and therefore cannot be justified for inclusion within the plan boundary.

C2-112

The lands in question are proposed to be included in the Roundwood boundary for the first time in this Draft Plan, but strictly on the basis that this extension was to facilitate tourism use only. On foot on submission from the Regional Assembly and others, it is recommended that this area in its entirety be omitted from the plan boundary having regard to the conflict with environmental protection objectives identified in the SEA of this zoning. Therefore the proposal submitted in this submission is not supported.

C2-223

The subject lands, while proximate to the built up area, comprise a substantial block of greenfield land. The lands are surplus to the development requirements of Roundwood based on the core strategy housing targets. The

pattern of development which has occurred in Roundwood to date is not sufficient justification for including the subject lands. Part of the site is also located within the 200m buffer for the reservoir.

Cemetery (C2-111, C2-213)

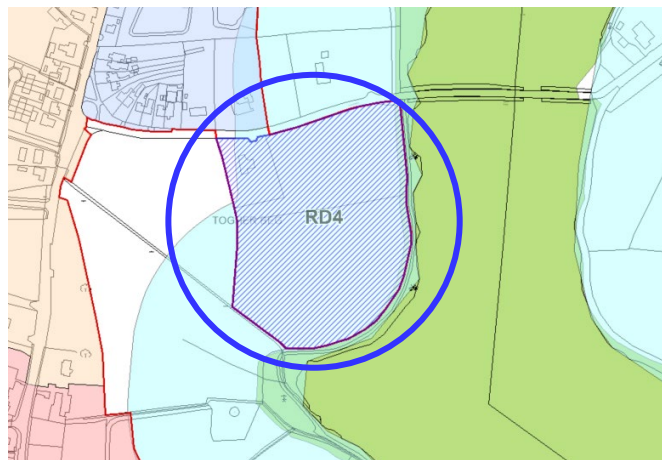
Extending the settlement boundary to include the cemetery is not considered appropriate in the interests of proper planning and sustainable development as the cemetery is not located adjacent to the built up area. There is a substantial block of greenfield land between the built up area and the cemetery. This greenfield land is surplus to the needs of Roundwood and would not be consistent with the sequential approach to zoning land.

C2-176 (RADAC submission)

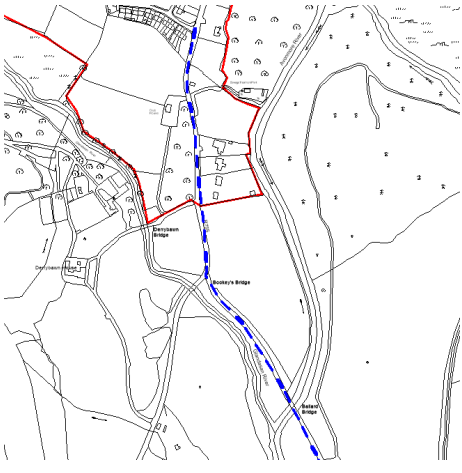
The inclusion of these lands within the settlement boundary would not be consistent with the sequential approach to development as they are not located adjacent to the existing built up area. There is a substantial block of greenfield land between the built up area and the subject lands. Sports and recreation facilities may be considered appropriate on lands outside of settlement boundaries where suitable sites cannot be secured inside the settlement boundary. However, in the interests of proper planning and sustainable development, such facilities should be located within or adjacent to the existing built up area where the greatest number of people can reach them active travel modes (by foot or bicycle). It is noted that the footpath does not extend to this location.

Chief Executive’s Recommendation

In accordance with the recommendations received from the Regional Assembly it is recommended to amend the Roundwood settlement boundary to remove the Tertiary Development Area zoning (RD 4) which encroaches on the 200 m buffer from the reservoir and adjoins a proposed Natural Heritage Area.



Section 3.4	Volume 2
Section 3.4.14	Laragh - Glendalough

Topic	Infrastructure	
ID	Name	Issue raised
C2-119 https://consult.wicklow.ie/en/submit/ww-c2-119	Laragh Glendalough Tidy Towns	<p>It is requested that a footpath be developed from the Green Road on the R755 – L6086 (Ballard Road) to provide safe access to the ‘Neighbourwood’ development scheme in Ballard Forest and the Avonmore Way.</p> 

Chief Executive’s Response

The provisions of the Draft Plan, as set out in both Chapter 12 and the Laragh – Glendalough Land-Use & Tourism Plan support the development of new pedestrian links such as that suggested, in particular:

LG13 *Promote the development of safe and accessible pedestrian and traffic routes, with particular emphasis on improving pedestrian links around the primary development area and between this area and adjoining residential areas, through the development of additional footpaths and crossing points, as appropriate and in consultation with the Roads Section.*

LG14 *Promote the better management of tourist movements in the area so that visitors are encouraged to stop in Laragh village and travel to the attractions at Glendalough in a range of sustainable transportation options. The planning authority will facilitate developments that reduce the amount of car dependent travel movements to the Tourist Attractions Area. The planning authority will particularly promote the following:*

- *The development of a ‘park and ride’ facility for tourists that is located at an appropriate location within the settlement boundary of Laragh village or on lands in close proximity to the settlement boundary. The ‘park and ride’ facility should have links to the Green Road, and any proposal should incorporate screening proposals, to consist of species of native provenance, to minimize visual impact and enhance local biodiversity.*
- *The development of sustainable and high quality transportation links which improve connectivity throughout the area, and in particular, between Laragh village, Glendalough, and the area in the general vicinity of Derrybawn, including new walkways, cycleways, and other appropriate transportation options.*
- *The development of pedestrian and cycle links on the Green Road.*
- *Provide equal access for all, including people with disabilities, to the Glendalough site, Green road and general attractions in Glendalough.*

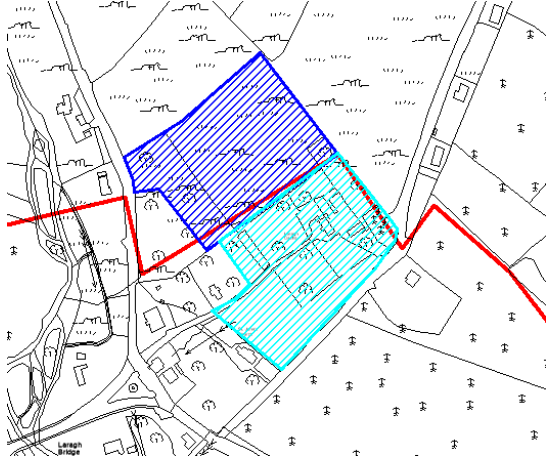
LG17 *Promote the development of pedestrian links between Laragh village, Glendalough and all recreational facilities, where possible, including the Wicklow Way and St. Kevin's Way, and to support the development of longer range pedestrian and cycling routes in the area particular between Laragh and Rathdrum and Laragh and Roundwood.*

The County Development Plan is a strategic and high level policy document regarding future land use and development in the County. It is not its function to list all or any infrastructure works that may (subject to funding) be carried out by the Council during the lifetime of the plan, but rather to focus on strategic infrastructure and infrastructure delivery principles. The delivery of new footpaths for example is generally delivered through the Municipal Districts in their annual works plans and each MD has a list of desired works to be carried out in that area which are delivered according to priority and funding available, agreed with the MD members each year. In addition, Wicklow County Council was allocated over €7m by the NTA in 2021 for sustainable transport / mobility projects, including the provision of cycling lanes and footpaths and the Roads & Transportation Directorate are working on the detailed plans for such improvements. This suggestion will be brought to the attention of the MD / Roads project teams.

It would not therefore be possible or appropriate to specify which local works would be carried out during the lifetime of the plan as this would limit the flexibility and decision making for the MD / Transportation teams. In addition, it would not be practical to list all such works, in the development plan. No change is therefore recommended.

Chief Executive's Recommendations

No change

Topic	Zoning	
ID	Name	Issue raised
C2-252 https://consult.wicklow.ie/en/submit/ww-c2-252	Janet Halpin	<p>This submission refers to lands at Laragh Castle.</p> <ul style="list-style-type: none"> - Submission supports Objective LG6 for the Castle to be developed as mixed used tourist facilities. - Castle is currently a family home and if developed as a tourism offering, the adjoining lands would need to facilitate a one off house - It is requested village boundary be extended (as shown hatched in dark blue on the map below) and this area zoned 'light tourism accommodation' to facilitate camping / glamping / chalets - Make provision in this area for the development of a dwelling for the owners of the Castle, including a relaxation of the 'local need' requirements - Request that Laragh Castle and surrounding outbuildings (area shown hatched in light blue below) should be considered for a special zoning providing uses such as tourism, arts / culture markets, craft industry, visitor attractions, tearooms, fairs etc  <p><i>(Note: Village boundary shown in red)</i></p>

Chief Executive's Response

Laragh is designated a Level 7 village in the County settlement hierarchy and as such only has a boundary with no specific zoning objectives therein. Therefore the request would entail an 'ad hoc' individualised zoning of these two parcels of land (that occupied by the Castle and the proposed extension area)

The provision of the Draft Plan would support the development of tourism related activities within villages, and therefore no particular designation or zoning is needed for the lands around the Castle to facilitate the type of tourism uses envisaged. Therefore no change is recommended in this regard.

With regard to the proposed extension (to facilitate residential and tourism use), having regard to the visual and environmental sensitivity of this area (in very close proximity to the Wicklow Mountains SAC), the need to deliver compact growth and limit sprawl, it is considered that the most sustainable approach is to retain the village boundary at its current position.

It is also noted that the lands within the village boundary (marked in light blue) would appear to have scope to provide for the desired additional family dwelling without undermining the potential for tourism developments, and that the objectives for Level 7 villages would not preclude the granting of permission for a new dwelling to someone already in possession of a dwelling in the village.

Therefore no change is recommended.

Chief Executive's Recommendations

No change

Section 3.5	Volume 3
Section 3.5.1	Development & Design Standards

Section 1.1 Key principles of Good Design		
Topic	Section 1.1 Key principles of Good Design	
ID	Name	Issue raised
C2-300 https://consult.wicklow.ie/en/submission/ww-c2-300	Wicklow Planning Alliance	Facilitating good air quality should be listed as a key factor of 'good design'.
Chief Executive's Response		
<p>The introduction section to this appendix intends to set out the key highest level principles of 'good design' based on the principles set out in the 'Urban Design Manual – Best Practice Guide' (2009). It is noted that 'health' is not included in these guidelines as a good design principle, of which good air quality would be a component. Nevertheless no change is recommended as 'Healthy Environment' including good air quality is addressed directly thereafter in Section 1.4 of this appendix.</p>		
Chief Executive's Recommendations		
No change		

Topic	Section 1.2 Climate Action Section 1.3 Protecting Nature & Biodiversity	
ID	Name	Issue raised
C2-101 https://consult.wicklow.ie/en/submission/ww-c2-101	Greystones Tidy Town	<p>There should be less of a separation and sterilisation of the built environment with that of the natural environment. Such enhanced planning and development practices would require fewer outdoor hard surfaces, more native landscaping integrated with the built environment to support biodiversity through urbanised environments.</p> <p>Embodiments such as native hedgerows, green roofs, vertical landscaping, ponds, integrated swift nesting boxes or bird and bat boxes should be encouraged in new and existing developments and structures. A section in a planning application on supportive infrastructure for biodiversity would assist this objective, underpinned by an addition to this effect in the CDP.</p>
C2-160 https://consult.wicklow.ie/en/submission/ww-c2-160 C2-164 https://consult.wicklow.ie/en/submission/ww-c2-164	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<p>Manicured estates rob children and adults of the opportunity of witnessing nature unhindered. These wilderness areas are important to help educate our children about nature while protecting biodiverse areas. Homes should be allowed larger gardens in which families can grow plants or vegetables, thus increasing carbon uptake in the area.</p>
C2-205 https://consult.wicklow.ie/en/submission/ww-c2-205	Cairn Homes Properties Ltd	<p>Suggest text amended as follows:</p> <p>The retention, wherever possible, of hedgerows and other distinctive boundary treatment will be required. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable <i>as part of a single house development</i>, provision of the same type of boundary will be required of similar length and set back within the site will be required.</p>
C2-235 https://consult.wicklow.ie/en/submission/ww-c2-235	Wicklow Greens	<p>The submission states that the trees and hedgerows are not adequately protected in SHDs.</p>
C2-268 https://consult.wicklow.ie/en/submission/ww-c2-268	Carl & Julia Strickland	<p>With respect to the design of new developments, the following are suggested:</p> <ul style="list-style-type: none"> - a green verge or nature strip should always be included in front of houses and also the perimeter of the site. Current designs passed at planning stage allow house walls to be built up to the edge of the open road. It is poor design and both visually and environmentally. - Creation of wild spaces with fixed paths - The development of walking trails should be integrated into future housing developments that are built on a greenfield sites; that a walking pathway or trail no more than 2ms wide be allowed along the perimeter of the greenfield site. This will ensure an alternative way to travel and take walkers of the road enhance safety. It will also support future walking routes that can be joined with existing or new walking routes.

Chief Executive's Response

It is agreed that enhanced requirements with respect to respecting and enhancing natural areas and natural biodiversity are needed in new developments. It is therefore recommended that Section 1.3 and 1.4.6 of Appendix 1 be amended as set out to follow.

With regard to increasing garden size, this would be challenging having regard to overriding principles to make the best use of serviced urban land, and achieve higher densities, and therefore no change is recommended in this regard. Ultimately how private householders use their gardens, whether for recreation or growing, is a private matter for the landowner. It is recommended however that opportunities for the provision of community gardens in new development be enhanced. It is therefore recommended that Section 8.5 of Appendix 1 be amended as set out to follow.

It may not always be possible to provide for green strips to the front of houses or perimeter pathways in all circumstances; what is more important is the overall quality of the development, the landscaping plans being appropriate, and the maximum conservation of existing natural features and flora.

Hedgerow / natural boundary protection requirements relate to all development types, not just single houses, including high density residential development (and SHDs). Hedgerows are biodiverse and home to many species, and are a key element in the ecological network. Therefore the amendment suggested in C2-205 is not recommended.

Chief Executive's Recommendations

Amend plan as follows

Volume 1, Chapter 7

Section 7.3.3

5. ~~An emerging new form of open space is the use of land for allotments.~~ Interest and activity continues to grow in the use of land for allotments and community gardens. Allotment gardens allow a number of people to cultivate their own vegetables in individual plots/land parcels on lands owned by another private individual or body. The individual size of a plot/parcel ranges between 200-400sqm and often the plots include a shed for tools and shelter. The individual gardeners are usually organised in an allotment association which leases the land from the owner who may be a public, private or ecclesiastical entity, provided that it is only used for gardening (i.e. growing vegetables, fruits and flowers), but not for residential purposes. Unlike allotments which are plots of land that are worked on by individuals or families, a community garden is all about sharing – both the work and the harvest.

Public allotments and community gardens are becoming an increasingly important element of sustainable communities. They have a number of benefits including the promotion of healthy lifestyles, biodiversity and providing a cheaper local and sustainable source of food. The Council supports the provision and wider distribution of such facilities across the County.

CPO 7.48 To support and facilitate the development of allotments, of an appropriate scale, on lands which meet the following criteria:

- land situated within or immediately adjacent to the edge of towns/villages;
- land that is easily accessible to the residents of a particular town or village;
- where an adequate water supply can be provided;
- where adequate road infrastructure and access exists/can be provided; and
- where adequate parking facilities can be provided.

Volume 3

Appendix 1 Development & Design Standards

1.3 Protecting Nature & Biodiversity

Landscaping and biodiversity enhancement plans shall generally be required for new developments, particularly but not limited to those on greenfield sites, and shall be submitted with the planning application. These plans shall highlight existing landscape natural features (such as trees, hedgerows, verges, watercourses etc) to be retained and enhanced, and detail new landscaping and biodiversity enhancement measures including (but not limited to) species, number, size and location of new planting, the provision of swift bricks / boxes or towers, bat boxes, etc. and measures to protect ecological corridors, water courses etc. The plan should put an emphasis on the use of native species where possible. Planting schemes shall take account of future maintenance requirements. All landscaping design and management shall be pollinator friendly. ~~They should~~ generally according with the planting and maintenance approach set out in the Pollinator Friendly Planting Code of the All-Ireland Pollinator Plan.

1.4.6 ~~Waste &~~ Construction Management

~~All development will be required to comply with the provisions of Waste Management Acts and Regulations;~~

All construction sites shall be appropriately managed to ensure that environmental emissions are strictly controlled.

Where necessary (such as for larger scale developments or developments in ecologically sensitive areas) this will be enforced by requiring (by planning condition) the agreement and implementation a 'construction and demolition management plan', which should set out, at a minimum, the various best practice construction measures/mechanisms that will be put in place during the construction phase to avoid, or mitigate, the impacts of: construction traffic, waste, noise, lighting, dust, storm water run-off etc, on adjoining residences and properties, on existing biodiversity, public roads, etc.

~~which will set out detailed measures to manage waste arising from the construction activity.~~

~~In drawing up such plans, developers should have regard to DoEHLG guidance publication 'Best Practice Guidelines on the preparation of Waste Management Plans for Construction and Demolition Projects' (2006) as may be amended and revised.~~ In particular, such plans will set out:

- Construction programme for the works
- Hours of operation
- A traffic management plan
- Noise and dust mitigation measures ~~(including details of a truck wheel wash at the site entrance~~
- Details of construction lighting
- Waste minimisation and management plan, including recycling / re-use of waste where possible (in accordance with circular economy principles);
- Measures for the protection of natural features, including (but not limited to) mature trees and hedgerows, protected species, ecological corridors and watercourses

A Construction Manager will be required to be appointed to liaise directly with the various sections of the ~~Planning~~ Local Authority.

8.5 Residential public open space

Public open space in residential developments shall be provided in accordance with the following standards:

- Public open space will normally be required at a rate of 15% of the site area – areas within the site that are not suitable for development or for recreational use must be excluded before the calculation is made;
- Where a public park is being provided by the same developer (or by a group of developers in a combined Action Area) in close proximity to the residential development site, the public open space provided on site may be reduced to 7.5% of the residential site area, with the remainder being made up in the park;
- The need to provide public open space in town centre developments may be waived, particularly where public amenity space such as a town park or beach is in close proximity;
- Open spaces shall be attractively landscaped through the use of both hard and soft landscaping where appropriate. Open spaces should incorporate existing features and encourage pedestrian use by suitable paving;
- In greenfield developments, subject to the size of the site, a hierarchy of open spaces shall be provided to provide for the different play needs of different age groups. In this regard, all developments shall aim to include:
 - At least one, flat space with dimensions on not less than 20m x 40m, suitable for ball games (trees should only be planted around the perimeter)
 - A number of smaller spaces immediately adjacent to dwellings, with interesting contours and natural features, suitable for play activities of younger children.
 - The layout and orientation of residential developments should maximize the potential for passive surveillance of open spaces - all efforts shall be taken to ensure that all houses are in visual range of one open area.
 - In larger developments (in excess of 1ha), consideration should be given to dedicating part of the residential open space (not exceeding 25% of the total space) to community gardens; at a minimum, landscaping plans will be required to identify a suitable area (in terms of soil type, gradient, light, drainage etc) within the residential open space area that would be suitable for future community garden use by the resident community.

Section 1.4 Healthy Environment		
Topic	Section 1.4 Healthy Environment	
ID	Name	Issue raised
C2-156 https://consult.wicklow.ie/en/submission/ww-c2-156	Dark Sky Ireland	<ul style="list-style-type: none"> - Welcomes the section on light pollution set out in the plan - Light pollution impacting on wildlife - Warm white lighting more environmentally friendly - Recommends that update to ILP guidance on light pollution updated to latest version (GNo1-2021) and includes recommendations of ILP GNO9:2019 ' domestic exterior lighting, getting it right' - Light is not a right , justification should be given for lighting - Assign environmental zones to guide future planning re lighting - Put integrated lighting plan in place - Considered design to entire lit area when installing new lighting/direction of lighting - Control installation of LED advertising
C2-300 https://consult.wicklow.ie/en/submission/ww-c2-300	Wicklow Planning Alliance	<ul style="list-style-type: none"> - Guidance on light pollution should be updated to latest version (GN01-2021) and also include the recommendations of ILP GN09:2019 'Domestic exterior lighting, getting it right' - Recognise that light is not a right, but needs to be justified on each occasion - Installation LED advertising should be strictly controlled at the planning stage and the environment of the lighting should be considered - Carefully consider the design of the entire lit area when installing new lighting - Consider the effect of light at near-horizontal directions such as at 80-90 degrees to a lantern's nadir position as light in these directions is particularly deleterious to the surroundings and propagates into the wider environment, increasing light pollution. - Determine and assign, in conjunction with other stakeholders such as NPWS, environmental zones which will guide future planning including lighting. - Put a lighting plan in place for the county - Move towards the use of "warmer" (lower CCT) lighting which has a lower blue content - Where lighting is deemed necessary look at: (a) hours required. Use timers or motion sensors where appropriate, (b) lighting to illuminate a walkway/path does not need to be tall, low 1m high shielded, bollard lighting is more than enough and reduces level of light pollution

Chief Executive's Response

The provisions and objectives of the Draft Plan (set out in Chapter 15 and supported by the Development & Design Standards) aim to ensure that external lighting is designed in such a way as to not cause excessive light spillage / pollution in order to protect the amenities of properties and wildlife.

Section 1.4.4 of Appendix 1 sets out requirements with respect to light pollution control, which are considered to generally address the issues raised. It is recommended that said standards be updated to include reference to the new standards detailed in submissions.

With respect to the development of a 'lighting plan' for the County, this would be a matter for the Roads & Infrastructure directorate of the Council, who already have a programme in train with respect to street lighting

upgrades. This LED upgrade project takes account of colour rendering and limits the colour temperature of proposed lanterns to 3000K (warm white) for normal situations and 2700K for ecologically sensitive areas. LED lanterns provide a more focused light and reduce the amount of spill lighting more commonly associated with less energy efficient fittings.

Chief Executive's Recommendations

Amend Plan as follows:

Volume 3, Appendix 1

1.4.4 Light Pollution

Applications for permission which include the provision of new street lighting or significant on site / on building lighting shall be accompanied by a certificate from a suitably qualified professional in the field confirming that all lighting has been so positioned and designed to eliminate or mitigate impacts on adjoining properties, particular residences (light trespass) or on the night (sky glow).

The design of lighting in new development shall integrate a hierarchy of light intensity zones to ensure that environmental impact is minimised as far as possible particularly in areas proximate to ecological corridors.

Regard shall be taken of Guidance Notes for the Reduction of Light Pollution (Institute of Lighting Engineers, 2000), 'Guidance Note for the Reduction of Obtrusive Light' (ILP 2021) and 'Guidance Note 9: Domestic Exterior Lighting' (ILP 2019).

All external lighting attached to buildings shall be cowled and directed away from the public roads and adjacent dwellings.

To preserve the character of the night time landscape, roads in rural areas should use the minimum amount of lighting necessary, restricted to critical intersections. Passive measures, such as cat's eyes and reflectorised markings, should be preferred as night time safety guides.

*See also above the recommended amendment to **Section 1.4.6** with respect to lighting construction sites*

Section 1.6 Universal Design & Accessibility		
Topic		
ID	Name	Issue raised
C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125	Blessington District Forum	<ul style="list-style-type: none"> - The Building Regulations Part M determines the Council's responsibility regarding housing for people with disabilities. This sets out the dimensions and construction standards of features that can be used to improve access for disabled people. However, it is widely agreed among disability groups and advocates that Part M is totally inadequate for the needs of people with disabilities. The Disability Federation of Ireland along with a host of others have called for reform of Part M and adopt a future-proofing approach to housing, based on Universal Design principles. Wicklow must include universal design in all future builds. This insure both age friendly and disability friendly housing. - Need to include an assessment of housing needs of people with disabilities and whether the level of universal design set out in any proposed development will appropriately increase the available housing stock for people with a disability in that area, with due regard to the Disability Act 2005.
C2-229 https://consult.wicklow.ie/en/submission/ww-c2-229	Wicklow PPN	All development must be inclusive and accessible to all citizens. Every policy and decision should be accessibility proofed.

Chief Executive's Response

It is agreed that all development should be inclusive and accessible to all citizens. Compliance with the Building Regulations is the key legislation through which this is enforced. The Plan would have no remit in addressing any perceived shortfalls or deficiencies in national regulations.

The Draft Plan addresses the issue of Universal Design / accessible design in a wide range of areas, for example in the following provisions:

Volume 1

Chapter 6 Housing

CPO 6.5 *To require that new development be of the highest quality design and layout and contributes to the development of a coherent urban form and attractive built environment in accordance with the following key principles of urban design:*

- *Strengthening the character and urban fabric of the area;*
- *Reinforcing local identity and sense of place;*
- *Optimise the opportunities afforded by the historical and natural assets of a site / area;*
- *Providing a coherent, legible and permeable urban structure;*
- *Promoting an efficient use of land;*
- *Improving and enhancing the public realm;*
- *Conserving and respecting local heritage;*
- *Providing ease of movement and resolving conflict between pedestrians/cyclists and traffic;*
- *Promoting accessibility for all; and*
- *Cognisance of the impact on climate change and the reduction targets for carbon emissions set out by the Government.*

CPO 6.8 *Support the provision of lifetime adaptable homes that can accommodate the changing needs of a*

household over time and in particular to require that all new residential developments in excess of 20 residential units to provide a minimum 5% universally designed homes in accordance with the requirements of 'Building for Everyone: A Universal Design Approach and the Universal Design Guidelines for Homes in Ireland (2015)¹.

CPO 6.32 To support independent living and facilitate the provision of supported housing (specific purpose built accommodation) for older people and people with disabilities towns and villages. To facilitate the provision of nursing homes, retirement villages, residential care facilities at appropriate locations in towns and villages in the County. These facilities must be well served by infrastructure and amenities including accessible footpaths, local shops and public transport in order to allow the residents to be socially included and to allow better care in the community, independence and access.

Chapter 6 Community Development

CPO 7.4 To recognise the needs of those with disabilities throughout the County and to acknowledge their right to lead as enriching, fulfilling and independent lives as possible. In support of this, all policies, objectives and development standards of this plan have been proofed to ensure that not only do they not impede on the lives of people with disabilities but that they proactively assist and enable them.

CPO 7.8 To promote and support Universal Design whereby all environments and facilities can be used to the greatest extent possible by all people, regardless of age, ability or disability.

CPO 7.9 To require that new social / community buildings provide for on-site child and adult changing facilities as appropriate.

Volume 3 Development & Design Standards

1.6 Universal Design & accessibility

Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability' (National Disability Authority) . This includes streets, parks and public spaces. The design of the built environment can significantly influence a person's ability to have a healthy and active lifestyle or one characterised by limited mobility and high levels of social isolation. Universal Design therefore requires an appreciation of the varied abilities of every person to ensure that places and buildings are designed to meet the needs of all users.

In considering access for those with a disability, the Planning Authority will adhere to the criteria set out in the Building Regulations, 1997, (or as subsequently amended), and other relevant documents, such as:

- "Building for Everyone", National Disability Authority
- "Best Practice Access Guidelines, Designing Accessible Environments", Irish Wheelchair Association 2014
- "Universal Design Guidelines for homes in Ireland", National Disability Authority 2015

'Building for Everyone – A Universal Design Approach' , provides practical guidance on the universal design of buildings, places and facilities and advocate that designing for one group can result in solutions that address the needs of many others. For example:

- 'level entry (step-free) entrances facilitate not just wheelchair users but also people with buggies, people with suitcases or shopping trolleys, people using walking or mobility aids, and people with visual difficulties;
- larger toilet compartments provide easier access to wheelchair users; those with luggage or parcels; parents

¹ National Disability Authority Centre for Excellence in Universal Design

with pushchairs or accompanying small children; those using walking or mobility aids; and larger-sized people

- *clear, well-placed signage that uses recognised symbols or pictograms helps people with reading or cognitive difficulties, and those whose first language is neither English nor Irish’.*

In order to overcome challenges posed by topography or existing built environment constraints, universal design should be considered at the earliest design stages. The design of the built environment should be easy to understand.

Having regard to the current and future demographic trends, proposed developments should be future proofed for an ageing population; the Planning Authority will advocate age-friendly thinking with respect to new developments in the County in particular at pre-planning stage. Developers should consider an Age-Friendly approach, with facilities and materials inclusive of an age-friendly community/society.

It is considered this this issue is comprehensively addressed in the Draft Plan and therefore no changes are recommended.

Chief Executive’s Recommendations

No change

Topic	Section 2 Infrastructure & Services	
ID	Name	Issue raised
C2-128 https://consult.wicklow.ie/en/submit/ww-c2-128	Cairn Plc	<p>Section 2.3 Waste</p> <p>It is suggested that the standards for terraced and courtyard houses be amended as follows: <i>For terraced houses or courtyard type developments (i.e. those developments that include houses with either no / limited private gardens) and apartment developments, communal bin storage and composting areas shall be provided.</i></p> <p>This suggestion is made on the grounds that terraced houses can be provided with suitably designed individual bin stores to the front of houses.</p>
C2-205 https://consult.wicklow.ie/en/submit/ww-c2-205	Cairn Homes Properties Ltd	<p>Section 2.1 Roads & Transport; 2.1.1 Enhancing Sustainable Accessibility</p> <p>Request this requirement be amended as follows: <i>Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.</i></p> <p><i>Where specified by the Planning Authority, aNew significant residential or mixed use development proposals (of which residential development forms a component), may be required to provide a social and community facility/facilities as part of the proposed development in an area or the developer As part of the preparation of a local area plan, it may be required to carry out a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.</i></p> <p><i>New significant residential or mixed use development proposals in a local area plan will require the preparation of shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:</i></p> <p>(a) local services including shops, schools, health care and recreational facilities, and</p> <p>(b) public transport services.</p> <p><i>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages as part of the local area plan preparation."</i></p> <p>Section 2.1 Roads & Transport; 2.1.7 Car Parking</p> <p>Request this requirement be amended as follows: In locations where public transport and parking enforcement are not available, the car parking standards set out in Appendix 1 Table 7.3 shall be taken as a target minimum standard in order to ensure that haphazard unregulated car parking does not occur in the vicinity of the</p>

		<p>development.</p> <p>With respect to bicycle parking, it is suggested that requirement are amended to 1 space per bedroom and 1 visitor space per 5 units (instead of per 2 units)</p> <p>Section 2.1 Roads & Transport; 2.1.11 Set backs from public roads</p> <p>Suggest this table is omitted or revised as it is considered that this is too prescriptive, is contrary to DEMURS and may result in poor layout and lower density development</p>
<p>C2-261 https://consult.wicklow.ie/en/s/ubmission/ww-c2-261</p>	<p>Keith Hutchinson</p>	<p>This submission relates to Section 2.3.5 – facilities for the disposal on inert waste.</p> <p>It is requested that the plan provisions be more direct and less ambiguous; the provision that such facilities will be allowed at ‘appropriate locations’ is non-specific and open to interpretation.</p> <p>It is suggested that specifics of an appropriate location should be:</p> <ul style="list-style-type: none"> - Any location currently below the aquifer is not a suitable location and will not be granted permission. - Any location that has been left unused and has subsequently developed its own biodiverse ecology is not a suitable location and will not be granted permission. - Any location that does not already have a suitable and adequate road infrastructure and capacity for additional HGV traffic accessing the facility is not a suitable location and will not be granted permission. <p>The use of the word 'SIGNIFICANT' in relation to adverse impacts on a designated European site should be deleted and replaced with the word 'ANY'. Under EU regulations, there is an onus on any applicant to prove beyond any reasonable scientific doubt, that their proposed development will NOT have any effect on any European Designated sites.</p> <p>Condition should be imposed that inert facility can operate as an inert facility and no future derogations can be sought to alter the classification of waste being accepted into the facility.</p>
<p>C2-300 https://consult.wicklow.ie/en/s/ubmission/ww-c2-300</p>	<p>Wicklow Planning Alliance</p>	<ul style="list-style-type: none"> - Mobility plans should be required for ALL new residential developments, not only for commercial developments. - An assessment should be required of the impact of traffic created by new residential development on local roads AND N11/M50
<p>Chief Executive’s Response</p>		
<p>Waste</p> <ul style="list-style-type: none"> - The point raised with respect to terraced houses is noted and it is recommended that the text be amended as set out the follow. - With respect to Section 2.3.5, it is considered that the wording and criteria set out in this section are adequate to allow for the proper and correct assessment of such application; the criteria clearly set out that detrimental impacts on ground water (e.g. aquifers), flora / fauna, ecology, heritage etc will not be considered; that significant adverse impacts on European sites will not be permitted and that traffic safety must be addressed. It should be noted that the EU directives do not state that ‘no’ impacts can be tolerated but that rather that <i>no adverse effects on the integrity</i> of the European sites may be permitted. With regard to the nature of inert waste that may be permitted at such sites, this would be a matter addressed and controlled via any permission granted. No change is therefore recommended. 		

Enhancing Sustainable Accessibility

As part of the Local Plan making process, plan level infrastructure assessments are already carried out, and as a result of those assessments, various objectives, including the zoning of land for certain new development, are included in the local plans. This is clearly evident from both the contents of the local plans, but also the various assessments carried out as part of their preparation including an 'asset based assessment' and 'infrastructure assessment' which have both been completed as part of this plan making process.

The amendment suggested by **C2-205** is not considered acceptable however as it removes the requirement for a developer of large scale development to show via various assessment necessary that the proposed development can be accommodated within available transport infrastructure capacities. This is an established part of the development management process and should rightly be continued.

Car Parking

This objectives relates to locations where there are no or limited public transport services (where the majority of longer distance travel will be required to be by car) and no parking enforcement is available and therefore there is a risk of uncoordinated and hazardous on street parking. Therefore adequate private car parking must be provided. No change is therefore recommended.

Bicycle parking

Having reviewed and researched this standard, it is recommended that the standard is amended to 1 space per 5 units.

Set backs

Given that no minimum set back is provided for on urban local roads it is not clear how these standards would affect layout / density. No change therefore recommended.

Mobility management / traffic assessment

As set out in NTA guidance, mobility management plans relate to work sites / collection of work sites; they are not tools generally used for residential development as it would be difficult to bring into effect a traffic and transport management structures for an entire housing estate of different individuals / families with different needs / schedules and there would be no funding mechanism in place to support / deliver shared services.

However, the point is well made that measures are required to encourage more sustainable transportation patterns, and it is considered that the Draft Plan provides a well range of policies and objectives with this goal in mind, for example: the land use zoning principles which will result in more compact development, closer to existing public transport infrastructure; Objectives CPO 6.3, 6.5, 6.7, 6.20 in Chapter 6 and CPO 12.1, 12.2, 12.3, 12.5, 12.11, 12.13, 12.14, 12.15, 12.16, 12.20, 12.21 of Chapter 12.

With respect to traffic impact assessment, Objective CPO 12.31 requires same to be carried out in accordance with the standards set out by the NTA and TII. Objective CPO 12.43 requires assessment of any development with potential to impact on the national road.

Chief Executive's Recommendations

Amend Draft Plan as follows:

Volume 3

Appendix 1

Table 2.4 - Bicycle parking standards

Type of Development	Cycle Parking Standard
Residential units	1 space per bedroom + 1 visitor space per 2.5 units

Section 2.3 Waste

2.3.1 Residential developments

- The design and layout of all individual and multi house developments shall provide for on site waste storage (including recyclables) and composting facilities;
- For traditional housing layouts, this will normally require the inclusion of sufficient space to the side or rear of a dwelling for the storage of waste, including up to 4 wheelie bins (recyclables, glass, organic and residual waste);
- For terraced houses (i.e. those units with no side laneways / gardens) wheelie bin enclosures may be provided to the front of houses, subject to the highest quality of location and design / construction that allows for full enclosure of all bins in such manner that bins are not visible from public areas and do not allow for the emission of odours; such structures must be shown and detailed at the application stage;
- For courtyard type developments and apartment developments (i.e. those developments that include houses with either no / limited private gardens), communal bin storage and composting areas shall be provided;
- In apartment developments, this may be in the form of grouped individual bins in car parking areas or a designated waste building;
- Waste storage areas shall be designed and screened so as not to cause any adverse visual impact on the proposed complex and located so as not cause noise impact.

Section 3 Mixed Use & Housing Developments 3.1.1 Intensity of development (density)		
ID	Name	Issue raised
C2-205 https://consult.wicklow.ie/en/submit/ww-c2-205	Cairn Homes Properties Ltd	<p>Request sentence be omitted '<i>Mono-type building typologies (e.g. two storey or own-door houses only) will not be considered favourably, particularly developments of 100 units or more</i>' on the grounds that there are instances, e.g. where densities of 30 units are acceptable, such typology profile may be acceptable.</p> <p>With respect to table 3.1, a minimum density of 50 units per ha within 500m of a bus stop may be an excessive density, particularly where there is a bus poor service. The density relative to Luas or DART is reasonable. Suggest that Table 3.1 is amended to '<i>...within 500m walking distance of bus stop with a peak hour service every 10 minutes...</i>'</p> <p>In addition, there may be instances where a minimum density of 30 units per ha is more appropriate than 35 units per ha in outer suburban and this is recognised by Circular Letter: NRUP 02/2021 in certain contexts.</p>
Chief Executive's Response		
<p>It is considered that improvements in the variety in house types is required to improve visual diversity and to meet the varying housing needs of all in society. Therefore this objective is considered reasonable and no change is recommended.</p> <p>Table 3.1: This table clearly states that the key to higher density is proximity to a bus stop which is on a 'public transport corridor'. The requirements are based on Ministerial guidelines for 'Sustainable Residential Development in Urban Areas' (2009). While the level of service necessary to be deemed a 'corridor' is not specified, 10 minute frequency is considered unreasonable and unrealistic, and cannot be what is intended by Government policy, as it would preclude nearly all locations in County Wicklow other than in Bray.</p>		
Chief Executive's Recommendations		
No change		

Topic		Section 3 Mixed Use & Housing Developments 3.1.3 Privacy
ID	Name	Issue raised
C2-254 https://consult.wicklow.ie/en/submit/mission/ww-c2-254	Glenveagh Properties	<p>"Appendix 1- Development & Design Standards" states the following in relation to separation distances of rear boundaries: <i>"A separation of 22m will normally be required above ground level between opposing windows serving private living areas (particularly bedrooms and living rooms). However, this rule shall be applied flexibly: the careful positioning and detailed design of opposing windows can prevent invasion of privacy even with short back-to-back distances. Windows serving halls and landings do not require the same degree of privacy as say balconies and living rooms"</i></p> <p>However, Section 6.10 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 sets out revised thinking on this issue, stating: <i>"The emphasis in designing and considering new proposals should be on achieving good quality development that reinforces the existing urban form, makes effective use of premium centrally located land and contributes to a sense of place by strengthening for example the street pattern or creating new streets. While a 22-metre separation distance between opposing above ground floor windows is normally recommended for privacy reasons, this may be impractical and incompatible with infill development. In these cases, innovation and flexibility will essential in the interpretation of standards so that they do not become inflexible obstacles to the achievement of an attractive village and small-town character in new development."</i></p>
Chief Executive's Response		
No conflict is determined between the proposed standard for privacy and the 2009 guidelines – both make reference to the 22m separation guide and the need for a flexible approach.		
Chief Executive's Recommendations		
No change		

Topic	Section 3 Mixed Use & Housing Developments 3.1.5 Car parking	
ID	Name	Issue raised
C2-205 https://consult.wicklow.ie/en/submit/ww-c2-205	Cairn Homes Properties Ltd	<p>These provisions are very prescriptive, contrary to DMURS and are likely to result in design and layout difficulties; suggest text amended as follows:</p> <p><i>In new housing areas, car parking has traditionally been located on site, to the front of houses resulting in a regular 6- 10m set back and regular buildings lines. A variety of parking arrangements will be encouraged. Alternative parking arrangements that avoid this monotonous format should be provided however parking will always be required to be proximate to the dwelling served.</i></p> <p><i>In cases where the front door of a residential unit is directly onto a road that is not suitable for on-street parking (e.g. a main distributor road), car parking shall be located adjacent to a back or side door</i></p>
Chief Executive's Response		
<p>It is considered the text as worded provides for the flexibility desired by the suggested amendment. Therefore no change is recommended.</p>		
Chief Executive's Recommendations		
<p>No change</p>		

is required to be 20 metres from an equipped play space. It is put forward that overly restrictive objectives in the Development Plan work against the creative design solutions which would be supported by standards in the Urban Design Manual (Objective PM31).
While recognised that there is a requirement to ensure that public open space is provided for, it is our view that quality public open space for new residential developments opposed to quantitative amounts of public open space would have a much more positive contribution to areas other than the policy provision which currently exists.

Chief Executive’s Response

Private open space standards

The minimum standards set out for dwellings are considered reasonable and no change is recommended; higher density cannot come at any cost and minimum standards for private amenity space must be maintained to provide for an acceptable standard and quality of housing,

Duplex units

The guidelines quoted do not set out specific standards for duplex units, unless it is inferred from same that duplexes always constitute ‘apartments’. Should these standards be applicable a 3-bed duplex would only require 9sqm private open space. This is not considered reasonable for a unit type that is frequently occupied by family units. The issue with duplex arises where it is above ground floor i.e. located at 1st floor or above, above single level apartment units. In this situation, the private open space of the duplex is a ‘balcony’. It is accepted that it is challenging to provide a balcony of 50-75sqm, which is the standards required in the Draft plan for a 1-3 bed house. It is recommended therefore that the standard be amended, to an appropriate ‘midway’ level as set out to follow.

Public Open Space

Wicklow County Council has an ‘active open space’ policy that was developed by the Community, Cultural and Social Development directorate of the Council following research into national and international standards. These standards are considered reasonable, consistent with higher order guidelines / policy documents, and are especially necessary to uphold with higher densities / smaller units sizes / smaller gardens being considered.

Generally these standards are utilised in the development of zoning provisions in local plans, where it will be made clear how and where any facilities are to be provided. New housing developments are required to devote 15% of the application site area to residential open space associated with that development, and such spaces can make up part of the 0.6ha per 1,000 population of ‘casual spaces’ (such a % being supported by national guidelines). Only in the case of very large scale developments (e.g. projects over 1,000 population), such as Action Areas, are additional requirements for sports pitches, MUGAs etc normally applicable.

The suggestion in submission C2-128 is not considered acceptable and would likely result in too low a provision of useable public open space. Therefore no change is recommended.

Chief Executive’s Recommendations

Amend Draft Plan as follows:

Volume 3

3.1.4 Open space

- Within apartment developments, private and communal amenity space shall be provided in accordance Design Standards for new Apartments (DSFNA) (2018) **as amended and as may be amended in the future.** Care should be taken to ensure that such places receive adequate sunlight and meet the highest safety standards. The front wall of balconies should be made from opaque material and be at least 1m in height.
- Dwellings ~~(including own door duplexes)~~ shall generally be provided with private open space at the following **minimum** rates:

House size	Minimum private open space
1-2 bedrooms	50sqm
3+ bedrooms	60-75sqm

Own door duplexes shall generally be provided with private open space at a minimum rate of 10sqm per bedroom.

It will be expected that private open space provided will exceed these standards whenever possible and such minimum standards will only be acceptable for up to 50% of the units in any development.

Topic	Section 3 Mixed Use & Housing Developments 3.2.4. Greenfield Developments	
ID	Name	Issue raised
C2-205 https://consult.wicklow.ie/en/submit/ww-c2-205	Cairn Homes Properties Ltd	The requirement for a developer to agree a 'vision' out the outset for large scale housing development is arbitrary and introduces unspecified requirements into the development management process. The Development Plan itself should provide the parameters. Therefore suggest the following text is omitted: <i>At the outset, a vision for the area shall be established and agreed with the Planning Authority. This shall set out the 'type' of place that is envisaged, the design ethos and the influences on form and design emerging;</i>
Chief Executive's Response		
This provision is considered reasonable and appropriate for large scale developments and is not a new provision; the development of such 'Design Statements' is encouraged in the various design guidelines going back to 2009 and is very much normal practice in such large scale developments. Therefore no change is recommended.		
Chief Executive's Recommendations		
No change		

Topic		Section 3 Mixed Use & Housing Developments 3.2.5 Use	
ID	Name	Issue raised	
C2-205 https://consult.wicklow.ie/en/submit/ww-c2-205	Cairn Homes Properties Ltd	<p>There is a requirement that significant new residential development separated from the town core will be required to provide retail, commercial and community elements. This introduces a very significant and uncertain requirement for new residential development. This should be determined at the local area plan stage.</p> <p>Suggest the following text be omitted:</p> <p><i>At greenfield locations separated from the town core, where a local area or town plan does not specify otherwise, any significant new residential developments will be required to be accompanied by that quantum of retail, commercial and social/community development necessary to meet the needs of that community.</i></p>	
Chief Executive's Response			
<p>The requirements that localised infrastructure / facilities be provided on greenfield housing estates distant from the town centre (which will be limited in number) is considered reasonable. The requirements for new developments in such locations will normally be specified in local plans (for example through masterplan / action area plan specification in the local plan) and therefore this provision does not bring a high degree of uncertainty. The Planning Authority's requirements in these regards can be easily established through the pre-planning process. No change is therefore recommended</p>			
Chief Executive's Recommendations			
No change			

Topic		Section 3 Mixed Use & Housing Developments 3.2.7 Design Quality
ID	Name	Issue raised
C2-128 https://consult.wicklow.ie/en/submit/ww-c2-128 C2-205 https://consult.wicklow.ie/en/submit/ww-c2-205	Cairn Plc Cairn Homes Properties Ltd	<p>It is suggested that the design standards be amended as follows:</p> <p><i>The maximum size of any greenfield housing development will depend on the size of the town and the requirements of the town plan / local area plan, but shall not be greater than 100 units where only traditional houses are proposed or 200 units where there is a mix of houses and apartments. Any development exceeding this number shall be broken up into a number of distinct 'estates', 'character areas' even if accessed from a shared road, with materially different architectural styles.</i></p>
Chief Executive's Response		
<p>As there is no definition of 'housing character areas' in any guidelines it is not in common use as a replacement for 'housing estate' and therefore it is considered it would be confusing to amend the objective as suggested. Therefore no change recommended.</p>		
Chief Executive's Recommendations		
No change		

Section 3 Mixed Use & Housing Developments 3.2.8 Building Design		
Topic		
ID	Name	Issue raised
C2-128 https://consult.wicklow.ie/en/submitmission/ww-c2-128 C2-205 https://consult.wicklow.ie/en/submitmission/ww-c2-205	Cairn Plc Cairn Homes Properties Ltd	It is suggested that the design standards be amended as follows: <i>"All medium to large scale housing developments shall include a range of house types and sizes, including detached houses, semi-detached, terraces, townhouses, duplexes and bungalows; unless otherwise specified by the Planning Authority,"</i>
Chief Executive's Response		
It is considered that this requirement is necessary to ensure a good range of unit types, particularly at a time where higher density is required, to ensure that developments are not dominated by one or two higher density dwelling typologies. No change is therefore recommended.		
Chief Executive's Recommendations		
No change		

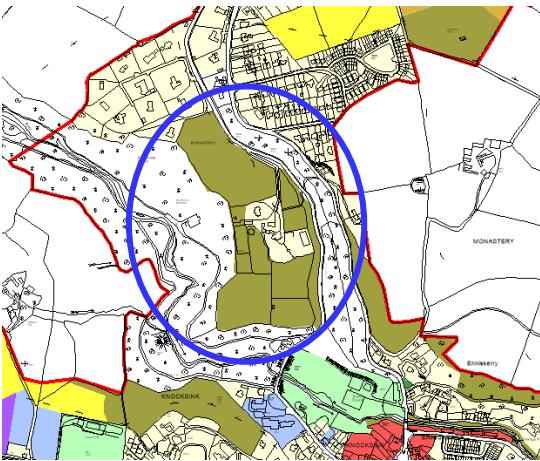
Topic	Section 4 Business, Commercial & Employment Developments 4.3.6 Extractive Industry	
ID	Name	Issue raised
C2-70 https://consult.wicklow.ie/en/submit/mission/ww-c2-70	Roadstone Ltd	<p>Request the following amendment:</p> <p>Conditions attached to permission <i>Where planning permission is granted for the development of a quarry, the following matters may be addressed through application of conditions:</i></p> <p>3. <i>The planning authority will require the developer to lodge a cash deposit as security for the satisfactory restoration of the site.</i></p> <p>Replace the above with: 3. <i>The planning authority will require the developer to lodge a cash deposit, a bond of an insurance company, or such other security as may be determined acceptable by Wicklow County Council, to secure the satisfactory restoration of the site.</i></p>
Chief Executive's Response		
<p>The requirements set out in the Draft Plan are considered reasonable and necessary to ensure the satisfactory restoration of quarry sites.</p>		
Chief Executive's Recommendations		
<p>No change</p>		

Section 3.6	LAP settlements
Section 3.6.1	Bray MD

Note: This part of the report only addresses submissions that raised issues that were specific to the Bray MD areas (as defined by the Bray MD Local Area Plan) and did not fall under one of the chapter topics of the Volume 1 of the Draft Plan.

Topic	Infrastructure (including community / social infrastructure)	
ID	Name	Issue raised
C2-218 https://consult.wicklow.ie/en/submission/ww-c2-66	Delgany Community Council	St. Thomas FET campus in Bray should be prioritised for further development and an Education and Training institute.
C2-268 https://consult.wicklow.ie/en/submission/ww-c2-268	Carl & Julia Strickland	Enniskerry does not have transport infrastructure to meet the development needs currently zoned for. Lands zoned around Enniskerry are all greenfield sites and contravenes the strategic guidelines within the RSES to use infill brownfield sites and public land and to locate development at key nodes of high-quality transport corridors.
Chief Executive's Response		
<p>The future plans for St. Thomas's are a matter for the Kildare – Wicklow ETB and not a matter for the CDP. Should there be any desire on behalf of the ETB, the public or the members to review the zoning of the St. Thomas's and for future alternative uses, this will be dealt with in the next review of the Bray MD LAP.</p> <p>It is accepted that it may be necessary to review the zoning provisions for Enniskerry having regard to the provisions of the NPF, the RSES and this new CDP. This will be addressed in the next review of the Bray MD Local Area Plan.</p>		
Chief Executive's Recommendations		
No change		

Topic		
Enniskerry - Conservation Area		
ID	Name	Summary of issues raised
C2-66 https://consult.wicklow.ie/en/submit/ww-c2-66	Killian Mullett	Expansion of the conservation area in the Enniskerry area is requested to ensure protection of the Knocksink Woods as a Conservation Area and Nature Reserve along its southern border.
C2-235 https://consult.wicklow.ie/en/submit/ww-c2-235	Wicklow Greens	Fassaroe new town is located in an area rich in cultural and archaeological heritage. Recommend that this is drawn on for place names so that the place does not feel unconnected to the landscape and location.
Chief Executive's Response		
<p>The Conservation Area set out in the Bray MD LAP for Enniskerry relates to the EU designated SAC and a buffer zone adjoining same which was established following Appropriate Assessment by environmental consultants and consultation with the NPWS. However, if there is a desire to enlarge same, based on scientific evidence that the enlarged area is needed to ensure the protection and integrity of the SAC, this can be addressed in the next review of the Bray MD LAP.</p> <p>With respect to place names, Section 3.1.3 of the 'Development & Design Standards' (Appendix 1) states:</p> <p><i>It shall be a condition of a planning permission for new housing schemes that the developer will submit a scheme for the naming and numbering of the estate prior to the commencement of the development. The naming of housing estates shall reflect in as far as possible the local context in which it is located. The names of new estates in as far as possible should be in bilingual format or in Irish alone. On approval of the naming of the scheme, the developer will be required to provide nameplates and numbers, as required by the Planning Authority.</i></p> <p>Therefore no change is recommended.</p>		
Chief Executive's Recommendations		
No change		

Topic	Zoning	
ID	Name	Issue raised
C2-77 https://consult.wicklow.ie/en/submission/ww-c2-77	The Leddy Family	<p>This submission relates to the land marked on the map below, with as zoned 'open space' in Bray MD Local Area Plan 2018.</p> <p>The landowners state that the open space zoning is causing trespassers onto the farm who believe the open space zoning means it is open to the public. It is requested that the previous 'agricultural' zoning is brought back for the landholding.</p> <p>The submission states that the farm does not form part of an SAC, is not a nature reserve, passive open space or a buffer.</p> 

Chief Executive's Response

It is unclear how the zoning of land can be attributed as the cause of trespassing, when it is highly unlikely that recreational users would have a copy of the Local Area Plan in use as a walking / recreational guide. It is matter for the landowner to secure their own land from trespass.

These lands are zoned OS2, and falling with the 'conservation area' surrounding the SAC. As set out in the LAP:

There are a number of Natura 2000 sites located in or in close proximity to the plan area. The sites themselves are protected from inappropriate development through the legal provisions of the Habitats and Birds Directives, as well as the Planning Act. Such sites, where they are located within the plan boundary are shown on the heritage map associated with the plan as 'Natura 2000' site and on the land use map as a 'conservation area', which is not a land-use 'zoning' but an objective to signify that these are areas where the goal is to conserve and enhance habitats and attributes for which the site was selected for EU protection.

In a number of locations, there are lands adjoining Natura 2000 sites, which while not being included in the legally designated site, are linked to the site in terms of similar or supporting habitats, water flows or other characteristics which render them important to protect from inappropriate development which may have a direct or indirect effect on the designated site itself. The extent of any such 'buffer zone' has been determined through both desktop and field assessment by the plan team and a professional ecologist, as well as consultation with the National Parks and Wildlife Service. This 'buffer zone' has similarly been identified as being within the 'conservation area'.

The approach to zoning in the 'conservation area' has been as follows:

- 1. No lands within the actual Natura 2000 site have been zoned;*

2. *Where the Conservation Area coincides with existing developed areas, the lands have been zoned for their existing use, which will essentially allow for the continuation of the existing use and its enhancement. Where permission is sought for development in such zones, the purpose of the Conservation Area objective is to flag at the earliest possible stage (which is the adoption of the development plan) that development on such lands may have the potential to give rise to impacts on the Natura 2000 site. In accordance with the provisions of the EU Habitats Directive 1992 and the Planning & Development Act, any proposed development with potential to impact upon a Natura 2000 site shall be subject to an Appropriate Assessment;*

3. *Where the Conservation Area coincides with existing undeveloped lands, the lands will only be zoned for new development where it can be justified that such zoning and development arising therefrom is essential for the area to achieve its development vision and strategic objectives. In accordance with the provisions of the EU Habitats Directive 1992 and the Planning & Development Act, any proposed development with potential to impact upon a Natura 2000 site shall be subject to an Appropriate Assessment;*

4. *Where the Conservation Area coincides with existing undeveloped lands, and the development of these lands is not essential for the achievement of the development vision and strategic objectives for the area, the land will be zoned 'OS2' – passive open space. The only developments that will be considered in such area are those which contribute to the objective of the Passive Open Space zone (detailed in this plan) and that can be shown to not diminish the role and function of such areas, will not result in significant adverse impacts on any EU protected site and will not diminish the biodiversity value of the lands or the ability of plants and animals to thrive and move through the area. Under the provisions of the EU Habitats Directive 1992 and the Planning & Development Act, any proposed development, whether in an area identified as 'conservation areas' or not, with potential to impact upon a Natura 2000 site shall be subject to an Appropriate Assessment.*

Should there be a desire to seek an alteration to these principles and the zoning of this land, this would be dealt with in the next review of the Bray MD Local Area Plan.

Chief Executive's Recommendations
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No change

Section 3.6	LAP settlements
Section 3.6.2	Greystones - Delgany – Kilcoole

Note: This part of the report only addresses submissions that raised issues that were specific to the Greystones – Delgany and Kilcoole areas (as defined by the Greystones – Delgany and Kilcoole Local Area Plan) and did not fall under one of the chapter topics of the Volume 1 of the Draft Plan.

Topic	Public Realm	
ID	Name	Issue raised
C2-160 https://consult.wicklowlow.ie/en/submission/ww-c2-160 C2-172 https://consult.wicklowlow.ie/en/submission/ww-c2-172	Labour Party, Ross Connolly Branch, Greystones Municipal Area	<ul style="list-style-type: none"> - The public realm plans for Greystones-Delgany are aspirational and hope the Council will be able to improve public realms and public safety, improving the access to the sea and developing a public events space. Support the potential of renewable energy to power public lighting and the purchase of smart street furniture, the enhancement of green spaces and biodiversity and harnessing the unique heritage and environmental assets of the area; - In relation to Kilcoole, support the revitalisation of the town centre with the creation of a town square and a civil building as a new focal point of the area with a cultural focus, a public park and improved permeability within the town centre. The development of improved walking and cycling links between the town and the train station, the beach and Greystones will be positive. Addressing the dereliction problem will also be helpful.
C2-218 https://consult.wicklowlow.ie/en/submission/ww-c2-218	Delgany Community Council	Delgany is in the process of a Public Realm Consultation. It is hoped that the village can be prioritised and championed for future investment to realise any suggested improvements in the public realm.
C2-231 https://consult.wicklowlow.ie/en/submission/ww-c2-231	GAP (Greystones Area Planning) Community	Delgany is in the process of a Public Realm Consultation. It is hoped that the village can be prioritised and championed for future investment to realise any suggested improvements in the public realm.
C2-293 https://consult.wicklowlow.ie/en/submission/ww-c2-293	Kilcoole Residents & Community Development Association	Kilcoole suffers from poor public realm, lack of public seating, no significant public spaces; it is being left to the private sector to develop any form of town centre.

Chief Executive’s Response

A Public Realm Plan for Greystones was prepared on behalf of the community in 2020. It is accepted this is ‘aspirational’ and for the most part ‘conceptual’, as that was the nature of the plan commissioned. This plan *may* form the basis for a range of public realm improvement projects, which will be dependent on funding, and development consent (in some cases).

Plans have already been approved for an enhancement scheme for the centre of Delgany and the Local Authority is actively seeking funding for the implementation of these agreed plans. In addition, the Municipal District has an ongoing programme of future works, including a trial one-way system which aims to improve safety and the public realm for all users.

The CE would support the development of a Public Realm Plan in Kilcoole and Council officials are available to

work with the community to sourcing funding and procuring same. In the meantime, the provisions of the existing LAP, which aim to enhance the town centre, public realm and connections, will continue to be implemented. Should these provisions require review / enhancement, this can be addressed in the next review of the LAP. Powers under the Derelict Sites Act and the Vacant Sites Act are activity utilised in Kilcoole to address the vacancy and dereliction issues.

The Council will continue to use its resources to improve town centres, and the Draft Plan set out a wide range of goals and objectives in this regard (Chapter 5).

Chief Executive's Recommendations

No change.

Community & Recreation Facilities		
Topic	Community & Recreation Facilities	
ID	Name	Issue raised
C2-8 https://consult.wicklow.ie/en/submit/mission/ww-c2-8	Ron Adderley	In the interests of fulfilling the plan goals of 'healthy placemaking', and 'climate – biodiversity action', the Council should acquire Charlesland Golf Course to create a 'destination' public park for the area.
C-52 https://consult.wicklow.ie/en/submit/mission/ww-c2-52 C-60 https://consult.wicklow.ie/en/submit/mission/ww-c2-60	Greystones Family Resource Centre	Greystones should have a multi-purpose community centre.
C2-65 https://consult.wicklow.ie/en/submit/mission/ww-c2-65	East Coast Regional Drugs & Alcohol Task Force	Lack of appropriate accommodation for services in the Greystones area.
C2-69 https://consult.wicklow.ie/en/submit/mission/ww-c2-69	Wicklow Triple A Alliance	Lack of appropriate rentable accommodations in the Greystones area.
C2-218 https://consult.wicklow.ie/en/submit/mission/ww-c2-218	Delgany Community Council	<ul style="list-style-type: none"> - Delgany lacks an open, publicly accessible green space. Amenities like Delgany Golf Club are limited to members. There is no playground in Delgany despite the growing population of young families. The village would also benefit from a public park and such a facility could also help to conserve habitat and biodiversity. Consideration should also be given to the creation of community gardens and provision of space for allotments. - The Carmelite site in Delgany is the opportunity for Wicklow County Council to create and sustain a community centre. - Delgany needs identification of and investment in open space and recreational facilities.
C2-249 https://consult.wicklow.ie/en/submit/mission/ww-c2-249	Carina Harte-Holmes	<ul style="list-style-type: none"> - There has been a huge increase in urbanisation from what was a semi-rural area. As a result, there are significant and ever-increasing infrastructural deficits in Delgany/Greystones in relation to key services such as education, health, public transport and road infrastructure; - There were insufficient school places for secondary school children in 2021. Given that the highest cohort of the population in the 2016 Census was our 0-9 years, the problem that has emerged with respect to school places in both primary and secondary schools was already in the pipeline from the 2016 population numbers which means that this crisis could have been averted if planned for in advance. The huge increase in population since 2016 is clearly adding to this problem.
C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231	GAP (Greystones Area Planning)	<ul style="list-style-type: none"> - Both Greystones and Delgany could benefit greatly in more open, publicly accessible green spaces. Delgany is lacking in this regard -

icklow.ie/en/submit/mission/ww-c2-231	Community	<p>there is no playground despite the growing population of young families. The village would also benefit from a public park and such a facility could also help to conserve habitat and biodiversity. Consideration should also be given to the creation of community gardens and provision of space for allotments.</p> <ul style="list-style-type: none"> - The Carmelite site in Delgany should be supported by Wicklow County Council as a community centre. The RSES identifies guiding principles for the creation of healthy and attractive places. The Strategy acknowledges that 'the creation of healthy and attractive places requires ongoing improvements to the physical and social infrastructure of our urban centres'. - In Greystones and Delgany – identification of and investment in further open space and recreational facilities is needed. This is particularly relevant considering the significant increase in the number of people (thousands) who have moved into the areas over the last 5 years.
C2-293 https://consult.wicklow.ie/en/submit/mission/ww-c2-293	Kilcoole Residents & Community Development Association	<p>Wicklow LCDC funded the carrying of a community 'Health Check' for Kilcoole in 2018/2019 (the recommendations of this report are appended to the submission). This raised the need for enhanced community space in Kilcoole to meet the needs of the growing population, as well as additional playing / sports courts and skate-park.</p>
Chief Executive's Response		
<p>The Draft Development Plan includes objectives to support the development of community facilities throughout the County. The community facilities hierarchy model, as shown in Chapter 7, Table 7.1, provides a list of the social and community facilities that are considered necessary in settlements, according to their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however, the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of development proposals. Should a programme (and funding) for the development of a new communities centres / buildings, parks, playgrounds, allotments etc be developed for the area, the provisions of the CDP and the LAP support the delivery of same, and set out standards with respect to suitable locations, design etc</p> <p>In September 2021 the Council commenced survey / community engagement on a 'Community Audit' for the Greystones – Delgany area to more precisely identify the needs of the area.</p> <p>The County Development Plan is a land use framework and while it influences the possible locations for future projects that might be undertaken by the Local Authority or other state agencies, the purchasing of land or properties for the delivery of new infrastructure structure would be dependent on land availability and suitability, resources and funding being made available for the project.</p> <p>With respect to possible future uses and the zoning of lands (such as Charlesland Golf Club, Carmelite Convent), should there be a desire to change or enhance the existing zoning objectives set out in the current LAP for this area, this would be dealt with in the review of the Greystones – Delgany – Kilcoole Local Area Plan.</p> <p>With respect to school provision, the Local Authority works with the Department of Education to ensure that adequate land is zoned for new educational facilities. However, the funding and delivery of new schools is a matter for the Department.</p>		
Chief Executive's Recommendations		
<p>No change</p>		

Topic		Employment
ID	Name	Issue raised
C2-218 https://consult.wicklow.ie/en/submission/ww-c2-218	Delgany Community Council	Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum (RPO 3.5). This objective is extremely important and may require changes to zoning in the LAP. The Greystones-Delgany area has not been successful in attracting high quality employment. This means that it has become a commuter town and car dependent due to the lack of high quality public transport.
C2-231 https://consult.wicklow.ie/en/submission/ww-c2-231	GAP (Greystones Area Planning) Community	Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum. This objective is extremely important and may require changes to zoning in the LAP. The Greystones/Delgany area has not been successful in attracting high quality employment. This means that it has become a commuter town and car dependent due to that lack of high quality public transport.
Chief Executive's Response		
The review of the LAP will include an assessment of employment / economic activities and should amendments to the LAP be part of the solution to addressing same, this can be considered in the new LAP.		
Chief Executive's Recommendations		
No change		

Topic	Amenity Routes	
ID	Name	Issue raised
C2-32 https://consult.wicklow.ie/en/submission/ww-c2-32	Kilcoole Walkways	Suggest establishing a new walkway/cycle path between Lott Lane in Kilcoole and Charlesland
Chief Executive's Response		
<p>The draft plan provides policy support for the delivery of such local infrastructure, including the following objectives:</p> <p>CPO 12.13 <i>To facilitate the development of pedestrian and cycle linkages through and between new and existing developments to improve permeability and provide shorter, more direct routes to schools, public transport, local services and amenities while ensuring that personal safety, particularly at night time, is of the utmost priority.</i></p> <p>CPO 12.14 <i>To facilitate the implementation of local projects which support pedestrian and cyclist permeability, safety and access to schools and public transport.</i></p> <p>CPO 12.15 <i>To support the improvement / development of the inter-urban, strategic pedestrian and cycle route projects as may be identified in Wicklow County Council's Sustainable Transport Plan, as may be amended and updated during the life of the plan.</i></p> <p>The County Development Plan is a strategic and high level policy document regarding future land use and development in the County. It is not its function to list all or any infrastructure works that may (subject to funding) be carried out by the Council during the lifetime of the plan, but rather to focus on strategic infrastructure and infrastructure delivery principles. The delivery of new walking routes / cycle paths such as the one detailed are generally delivered through the Municipal Districts in their annual works plans and each MD has a list of desired works to be carried out in that area which are delivered according to priority and funding available, agreed with the MD members each year. In addition, Wicklow County Council was allocated over €7m by the NTA in 2021 for sustainable transport / mobility projects, including the provision of cycling lanes and footpaths and the Roads & Transportation Directorate are working on the detailed plans for such improvements.</p>		
Chief Executive's Recommendations		
No change		

Roads & Transportation		
Topic	Roads & Transportation	
ID	Name	Issue raised
C2-159 https://consult.wicklow.ie/en/submit/mission/ww-c2-159	Jacqui Horgan	The road structure around Delgany village and Convent Road needs addressing before any further housing developments should be granted permission.
C2-218 https://consult.wicklow.ie/en/submit/mission/ww-c2-218	Delgany Community Council	While other areas have seen improvements in journey times and frequency of services, the journey time between Greystones and the city centre has increased compounded by a reduction in frequency of services. Delgany needs improved links to the DART station in Greystones, including a better and more frequent bus service, and the construction of the proposed Delgany Greenway which would facilitate cycle and electric scooter commuting.
C2-293 https://consult.wicklow.ie/en/submit/mission/ww-c2-293	Kilcoole Residents & Community Development Association	<ul style="list-style-type: none"> - The Draft Plan makes insufficient references to Kilcoole with respect to public transport objectives. Services do not meet current demand. Improved train services are required. Enhanced bus link to Greystones required. - The Plan should include objectives to improve parking facilities at Kilcoole train station, bus links serving it and improved station facilities. Improvement objectives are provided for other train stations in Objective CPO 12.20. - Kilcoole suffers from traffic clogged Main Street, no cycle lanes to schools, no footpath for the last section of Sea Road - Wicklow LCDC funded the carrying of a community 'Health Check' for Kilcoole in 2018/2019 (the recommendations of this report are appended to the submission). This referred document stressed the importance to promoting positive mental health and activity for young people which could be facilitated by the provision of cycle lanes from Newtown to Kilcoole, and the improvement of cycleways from Kilcoole to Greystones.

Chief Executive's Response

The Council is committed to working with the various transport agencies to improve transportation infrastructure in the Greystones – Delgany – Kilcoole area. The Council has recently started work on an 'Area Based Transport Assessment' (funded by the NTA) to analyse existing transportation issues, and to develop solutions.

The improvement of public transport services is not a matter for the CDP, but rather than transport agencies, particularly the NTA. The Draft Plan provides significant policy support for the delivery of improved services by these bodies.

Wicklow County Council has been actively engaged for many years in projects and programmes to address road infrastructure between Delgany centre and Blacklion, in particular the Chapel Road – Blacklion re-alignment, and pedestrian / cycling improvement scheme (CPO recently heard), the Delgany one-way trial scheduled for late 2021 and the Delgany centre accessibility improvement scheme (approved and awaiting funding for construction). The CDP and the LAP provide policy support for future road improvements as may be required.

In accordance with the provisions of the Planning Act and Regulations, Ministerial guidelines and transport standards, the adequacy of the local road network to accommodate new development is carefully evaluated in the assessment of application for new developments.

There is no 'greenway' currently proposed or in development for Delgany; the current LAP makes provision an

'Open Space' zone along as much as the Three Trouts Stream as is undeveloped, and marks the route as an 'indicative greenroute', but this does not comprise an objective or a commitment to 'develop' a greenway. The Delgany Community Council with its own sourced funding recently undertook a feasibility study regarding the delivery of such a greenway, which can be evaluated in the process of the new review of the LAP to determine if it is an appropriate and achievable objective to include in the new LAP and what amendments might be required in the next LAP support same. The actual delivery of any such greenway would be dependent on funding and landowner cooperation.

The provisions of the Draft Plan support the enhancement of facilities at Kilcoole train station and the improvement of links between Kilcoole and Greystones / Newtown, in particular:

CPO 12.12, 12.13, 12.14, 12.15, 12.16, 12.17, 12.22, 12.23, 12.24 (Chapter 12)

CPO 19.12 (Chapter 19)

However it is recommended that some enhancement to objective CPO 12.21 would be appropriate, as set out to follow.

Chief Executive's Recommendations

Amend Draft Plan as follows:

Volume 1, Chapter 12.21

Public Transport Objectives

- CPO 12.21** To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular:
- to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and /or Regional Authority ;
 - to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;
 - to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, **Kilcoole**, Rathdrum, Wicklow and Arklow;
 - to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;
 - to promote car sharing parking spaces at premium locations in car parks;
 - to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;
 - to promote the Luas extension from City West/ Tallaght to Blessington;
 - to encourage the improvement of bicycle parking facilities at all transport interchanges;
 - to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations; and
 - to support the development of bus shelters, that shall incorporate disabled access and bicycle parking facilities where possible.

Topic		
Greystones Harbour		
ID	Name	Issue raised
C2-160 https://consult.wicklow.ie/en/submit/mission/ww-c2-160	Labour Party – Ross Connolly Branch	Historically, Greystones had a fishing industry. It is understood that local fishermen were promised that the new harbour development would accommodate them but this did not materialise. Support the redevelopment of a fishing industry in Greystones and reasonable harbour rates to land their fish.
C2-166 https://consult.wicklow.ie/en/submit/mission/ww-c2-166		The Draft Plan shows no regard for Greystones fishermen. Request that Greystones harbour is not designated as a leisure harbour in the draft Plan.

Chief Executive's Response

The Draft Plan does not 'designate' Greystones Harbour as a leisure harbour. The Draft Plan does not distinguish harbours as either leisure / recreation or 'commercial'. The Draft Plan recognises the multi-functional nature of marine areas including harbours. Section 9.3 (viii) states '*The marine economy is a key enabler of effective economic growth. The maritime sector in Wicklow benefits from a host of assets and activities capable of expansion and development including: shore-side services, shipping services, repair and maintenance, fishing, tourism and leisure, servicing of the off-shore renewable energy industry, maritime financial services etc*'. The County Wicklow Maritime Business Development Group are in the process of developing a Maritime Strategy for County Wicklow Section 9.3 (viii) of the draft Plan notes '*Rapid urbanisation, coastal erosion and the need to accommodate varied needs and interests, have put significant pressure on the coastal area. It is now recognised that there should be a coordinated approach and integration of sectoral interests to achieve the sustainable development of the coastal and maritime area while fostering blue growth*'.

The Draft Plan sets out the following objectives with regard to port / harbour development and commercial and leisure activities therein (such as fishing):

Strategic Objective *To promote the development of the County's sea and river fishing industry, to a scale and in a manner, which maximises its contribution to the County's economic and social well-being on a sustainable basis and which is compatible with the protection of the environment.*

CPO 9.49 *To support the sustainable development of the fisheries and aquaculture industry in co-operation with the Department of Agriculture, Food and the Marine and the Inland Fisheries Ireland. The Council will not permit development that has a detrimental impact on the environment. In particular, development that has a detrimental impact on the environmental/ ecological/ water quality of seas, rivers and streams, will not be permitted.*

CPO 9.50 *To facilitate the provision of infrastructure, which is necessary for the development of the fishing and aquaculture industry. Infrastructure and buildings in coastal or riverbank locations should be located in proximity to existing landing facilities and shall be of a design that is compatible with the area. Any development, which by reason of its nature or scale is detrimental to the character or amenity of an area, will not be permitted. Any development in the coastal zone shall comply with the objectives of this plan, as set out in Chapter 19.*

CPO 9.27 *To support and facilitate existing and future commercial port activities within the County and to resist developments that would undermine the commercial potential of these areas.*

CPO 9.28 *To support and facilitate regeneration and renewal of lands within and adjacent to the County's ports that will serve to diversify and strengthen the role of the ports.*

CPO 12.62 *To promote and facilitate through appropriate transport planning and land-use zoning the expansion or development of recreational facilities and marinas at Bray, Greystones, Wicklow and Arklow harbours'.*

The CDP review is not the correct mechanism for 'correcting' any perceived issues with the Greystones harbour project.

Chief Executive's Recommendations

No change

Topic		Tourism
ID	Name	Issue raised
C2-166 https://consult.wicklow.ie/en/submit/mission/ww-c2-166	Labour Party – Ross Connolly Branch	A hotel is needed in Greystones. Any development should be subject to sensitive and green planning controls.
C2-293 https://consult.wicklow.ie/en/submit/mission/ww-c2-293	Kilcoole Residents & Community Development Association	Wicklow LCDC funded the carrying of a community 'Health Check' for Kilcoole in 2018/2019 (the recommendations of this report are appended to the submission). This referred to the tourism potential of Kilcoole on Ireland's Ancient East route, which could be enhanced by the carrying out of works in the area of Kilcoole Rock – Lott Lane and improved walkways.
Chief Executive's Response		
<ul style="list-style-type: none"> - There is adequate land zoned in the current Local Area Plan for Greystones-Delgany to facilitate a hotel and the provisions of the Draft County Development Plan fully and explicitly support hotel development in major towns such as Greystones. The Draft Plan however has no role in the <i>delivery</i> of such commercial developments. Should it be considered that enhanced provisions / objectives regarding support for hotel development in Greystones are needed, this can be considered in the next review of the LAP. - The tourism potential of Kilcoole is accepted and the provision of the Draft Plan (particularly those set out in Chapters 11 and 18) and of the existing LAP support the development of tourism and amenity projects, including enhanced / new amenity walkways. 		
Chief Executive's Recommendations		
No change		

Topic	Natural Heritage (Note: This should be read in conjunction with Section 3.3.17 of this report, as there is considerable overlap)	
ID	Name	Issue raised
C2-18 https://consult.wicklow.ie/en/submit/mission/ww-c2-18	Delgany Tidy Towns	<ul style="list-style-type: none"> - Request all mature native trees in the Greystones Municipal District (GMD) should be protected by default Tree Preservation Order(s). List of 300+ trees submitted for consideration. - The Three Trout's Stream from source to sea should be named as a 'Wicklow Community Nature Reserve'
C2-101 https://consult.wicklow.ie/en/submit/mission/ww-c2-101	Greystones Tidy Towns	<ul style="list-style-type: none"> - The next Greystones-Delgany-Kilcoole LAP should include areas identified in the 2021 Greystones Biodiversity Action Plan as important area of natural biodiversity in a biodiversity zoning (namely Three Trout's Steam, St. Crispin's graveyard, Kilruddery Deerpark stream, D'Arcy's fields, coastal cliffs rocky shoreline and south beach). - Support the proposed creation of Community Nature Reserve at Three Trout's Steam - Pleased to see a large parcel of land zoned out for Special Zoning Objective in Kilcoole, CPO 17.11, and would like to see many more of these types of zonings especially around watercourses.
C2-163 https://consult.wicklow.ie/en/submit/mission/ww-c2-163 C2-146 https://consult.wicklow.ie/en/submit/mission/ww-c2-146 C2-153 https://consult.wicklow.ie/en/submit/mission/ww-c2-153 C2-159 https://consult.wicklow.ie/en/submit/mission/ww-c2-159 C2-143 https://consult.wicklow.ie/en/submit/mission/ww-c2-143	Anne Keatings Ken Carney James Heggie Jacqui Horgan Keith Scanlon	All recommendations from the Greystones Biodiversity Report should be included in the development plan.
C2-218 https://consult.wicklow.ie/en/submit/mission/ww-c2-218	Delgany Community Council	<ul style="list-style-type: none"> - Identify "Local Nature Reserves and wildlife corridors". While there are Special Areas of Conservation (SAC) in Greystones-Delgany, there are also valuable wildlife corridors which should be identified, named and protected. - A new 'biodiversity' zoning category should be included in the next plan for Greystones - Delgany – Kilcoole which

		identifies areas of important biodiversity identified in the 2021 'Greystones Biodiversity Action Plan' (list provided).
C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231	GAP (Greystones Area Planning) Community	<ul style="list-style-type: none"> - Wicklow County Council should as a matter of priority be identifying "Local Nature Reserves and wildlife corridors". While there are Special Areas of Conservation (SAC) in Greystones/Delgany, there are also valuable wildlife corridors which should be identified, named and protected. - Believe strongly that the significant development in Greystones and Delgany over the last few years has had an adverse impact to local agriculture and unbalanced the local biodiversity in the area. We are seeing a gradual disappearance of habitats for protected species including frogs, newts, owls, bats, red squirrels and other native species as illustrated so clearly in the Greystones Biodiversity action plan 2021 commissioned by Greystones Tidy Towns. The 2021 Greystones Biodiversity Action Plan (BAP) identifies several areas of important natural biodiversity which are examples of Local Biodiversity Areas in the Greystones area. - Support the recommendations these areas be classified as "Biodiversity zones" in both this Draft County Development Plan and the next Greystones-Delgany and Kilcoole Local Area Plan. These biodiversity zones should have a specific focus of sustainable land management with biodiversity and habitat restoration, regeneration, or preservation as its core. - In conjunction with Delgany Tidy Towns and several other local interest groups, support the proposed creation of a Community Nature Reserve to protect the course of the Tree Trouts Stream, which was identified as "the most important area of natural habitat remaining in the Delgany -Greystones area" in the recent Greystones BAP. - A better system for preserving trees is required. Trees also need to be protected from harm during the construction process - numerous beautiful mature eucalyptus, birch, elm and other deciduous trees have been removed. Virtually no mature trees have been retained on the Eastmount and Melwood development sites in Delgany. Mature Trees should not be cut down as a standard without impact assessment made.
C2-249 https://consult.wicklow.ie/en/submit/mission/ww-c2-249	Carina Harte-Holmes	<ul style="list-style-type: none"> - Need to protect visual amenity, wildlife and very mature and beautiful native deciduous trees. Heritage sites in Delgany, such as Kindlestown Castle, have seen the removal of beautiful mature trees. Virtually no mature trees have been retained on the Eastmount and Melwood development sites in Delgany. Given the widespread destruction of beautiful healthy mature native trees, planning permissions for future developments on Chapel/Convent Roads, Delgany, need to have much more tree preservation orders to protect the limited number of remaining mature trees and the wonderful wildlife habitats and ecosystems that they support. - Request that the area of great natural beauty between Redford Cemetery, Templecarrig, up through Coolagad, by Kindlestown Wood, over by the Little Sugar Loaf and down to the Glen of the Downs woodlands be preserved as a "Green Belt".
C2-263 https://consult.wicklow.ie/en/submit/mission/ww-c2-263	Eoin LLewellyn	<ul style="list-style-type: none"> - Raises a number of issues with objectives, zoning and development permitted in Greystones - Delgany, particularly as regards SEA

- carried out for the LAP. Suggest a cessation of all new development not started yet until SEA is re-evaluated and new zoning of land for nature is put in place to rebalance lost park lands. Various suggestions made for new parkland / woodland / wetland / nature zones.
- Suggests Three Trout’s Steam should have enhanced protection and zoning changed from ‘OS’ to new zoning ‘area of biodiverse richness’. Areas close to ABR could be designated ‘areas of potential biodiverse richness’
 - Request that the Three Trouts Stream and adjoining lands and Greystones north beach be designated an area of special amenity under Section 202 of the Act
 - Suggests the development of a rehabilitated ‘riparian way’ starting from Sugarloaf car park, down Red Lane, Glen of the Downs, Three Trouts, and Delgany onto Charlesland and to the sea (detailed proposal document attached to submission). Suggest lands be purchased along said route to ensure connectivity.
 - Request that lands at Greystones North beach (above north beach and either side of Cliff Walk) be purchased to create a nature reserve, from Bray Head SAC to Greystones, to become an extension to the SAC.
 - Suggests the creation of a nature reserve in G-D comprising 6 separate but connected projects.
 - Ground / surface water management solutions suggested for around Three Trouts – Charlesland - Burnaby area; detailed assessment requested.
 - Insufficient provision of public parks and watercourse buffers in area.
 - All trees on the Council’s ‘Part 8 site’ should be retained, and access be provided via Charlesland rather than building a new bridge which would damage green corridor, create light pollution, damage bat habitat.
 - Any future green links along Three Trouts should be outside 30m buffer zone.
 - Suggests the development of a series of linked natural and built heritage sites through Greystones – Delgany area
 - Suggests purchase of lands at Blacklion Greystones for biodiversity rehabilitation, bird / insect habitats, carbon sequestering, natural flood defences

Chief Executive’s Response

(See also Section 3.3.17 of this report)

- While the CDP addresses natural heritage and biodiversity insofar as it intersects with land use and development, and indeed the Draft Plan sets out significant objectives in this regard, it is not the biodiversity plan for the County, and is not a biodiversity ‘action’ plan and is not the Council’s plan for the practical management / maintenance of its land bank. There is a separate ‘Biodiversity Action Plan’ which would be more appropriate for integrating many of the requests / suggestion made in the submissions for example, for example for integrating the findings of the 2021 ‘Greystones Biodiversity Action Plan’ into Local Authority strategy and policy, or integrating enhanced process for the each MD team with respect to land care. In addition, it may be more appropriate to consider the planning implications of this particular report in the next LAP for Greystones – Delgany.
- It is not accepted that the Draft Plan does not adequately address biodiversity and ecosystems or explain their importance. There are in fact a number of chapters and appendices contained in the draft plan directly

addressing this issue and it is considered that the Plan goes as far as it can, given its remit as land-use framework, not a biodiversity plan, to address this area. The 'Development and Design Standards' of the Draft Plan has in fact be recalibrated compared to previous plans to particularly emphasise the importance of protecting nature and biodiversity in new developments, with strong emphasis on enhancing biodiversity, protecting trees even if they are not subject of TPO, protecting hedgerows, etc. Ecological Assessment will be now required when there are concerns regarding potential environmental impacts arising from new development, as well as more detailed landscaping plans, with native and pollinator friendly species.

- Through the implementation of the objectives and standards of the Plan, it is a goal to ensure that valuable and vulnerable biodiversity, particularly that designated for preservation, is not significantly damaged by new development, however it must be acknowledged that the plan is required to facilitate new housing, employment, community development, retail etc and in doing so, natural areas may have to be built upon. The plan must try to balance the competing demands that society places on the lands, in an equitable and sustainable manner.
- Where possible and where data is available to support same, local biodiversity areas (non designated areas) and wildlife corridors are identified in local plans, which has been done in this Draft Plan via the SEA and AA process. Further LAPs will also undergo this process. The Draft Plan clearly sets out a significant number of objectives in relation to the identification and protection of such non-designated areas and corridors (CPO 17.12-17 for example).
- The purchasing of land for the development of nature reserve / nature parks is not a matter for the County Development Plan.
- The designation of area as 'Special Amenity Area' under Section 202 of the Planning Act is a separate process to the preparation a County Development Plan; therefore there is no scope within this process to make such designation. The making of a SAAO is a matter for the members, either on their own instigation or under the direction of the Minister. Very specific criteria must be fulfilled for a SAAO designation to be considered appropriate, and it is not evidence that the sites suggested would qualify. This is matter that could be considered separately by the members of Greystones MD
- The conservation management of European sites (SACs / SPAs) is a matter for the NPWS, which sets the conservation objectives and manages the regulation / permitting regime for activities therein. Objectives 17.4, 17.5, 17.6 and 17.10 support the achievement of these management objectives. Full details of the management objectives for each site are set out in the SEA / AA accompanying the plan.
- The Draft Plan sets out a number of objectives relating to the protection and conservation of European Sites (SACs and SPAs) in particular CPO 17.4, 17.5, 17.6. The SEA and AA accompanying the Draft Plan provides significant information on the conservation objective of all EU sites in potentially impacted by the Draft Plan provisions and it is matter of law that these conservation objectives are considered in the assessment of any possible impacts of EU sites arising from new development. There no change is recommended.
- The special zoning for 'the Rocks' Kilcoole is a 'one-off' zoning added to the plan by the members. Without detailed justification via survey and ecological assessment, it is not recommended to add similar designations in an ad hoc manner in the County. It is considered that the Draft Plan (as with the current and previous plans) provides for a very wide range of protections for environmentally sensitive sites, whether designated / identified or not. No change is therefore recommended.

Tree Protection Objectives

The processes available to protect trees are those set out in statute and the development plan cannot alter same. The Draft Plan (as with the current plan) sets out clear requirements with regard to the retention and protection of tree and hedgerows on development sites, whether subject of TPO or not. It is the case however that the law does allow for tree / hedgerow removal on urban lands, without the need for felling licences / permits separate to the permission process. The CDP provisions cannot alter the national law in this regard. No policy objectives can override national statute / regulations.

While the many suggestions regrading tree protection objectives are noted and welcomed, it is considered that the Development Plan already addresses and supports these goals; some of these desired objectives may be more

suitably included in the next County Biodiversity Action Plan, the impending Tree Management Strategy or future Local Area Plans.

The County Development Plan includes a range of objectives (as are set out in Chapter 17) to protect natural heritage and biodiversity including mature trees. The Plan includes objectives to retain where possible mature trees on development lands. The Plan places a strong focus on compact growth which will limit the amount of greenfield land that is required for new development. However it must be acknowledged that the plan is required to facilitate new housing, employment, community development, retail etc and in doing so, natural areas may have to be built upon. The plan must try to balance the competing demand that society places on the lands, in an equitable and sustainable manner.

County Policy Objectives included in the draft Plan relating to the protection of woodlands, trees and hedgerows:

CPO 17.18 *To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of amenity or the environmental, as set out in Schedule 17.05 A and B, and Maps 17.05 and 17.05A -H of this plan.*

CPO 17.19 *To consider the making of Tree Preservation Orders (TPOs) to protect trees and woodlands of high value, where it appears that they are in danger of being felled.*

CPO 17.20 *Development that requires the felling of mature trees of environmental and/or amenity value, even though they may not have a TPO in place, will be discouraged.*

CPO 17.21 *To discourage the felling of mature trees to facilitate development and encourage tree surgery rather than felling where possible.*

CPO 17.22 *To encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments.*

CPO 17.23 *To encourage the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).*

The zoning of land, including zoning for open space, parks, natural areas, greenbelts etc will be reviewed as part of the review of the Greystones-Delgany & Kilcoole Local Area Plan.

The process for making **Tree Preservation Orders (TPO)** is a separate process to the CDP review process, although the two are being run concurrently. The Planning Authority has already identified existing TPOs that it has determined require amendment, as well as trees / groups of tree not currently subject to TPO but warranting same. This list was heavily influenced by previous submissions made by members of the public / landowners over the last 5 years.

The submissions detailed above are requesting further additional trees are considered for TPOs. These proposals had not been brought to the attention of the Planning Authority before now.

In order to do consider further TPOs, it would be necessary to initiate a fresh process under Section 205(5) of the Act which entails:

- Detailed assessment the trees / groups of trees concerned by qualified arborist / similar professional; the assessment of trees / groups of trees for possible TPOs involves detailed assessment of the trees / groups of

trees in question, under a number of criteria including but not limited to condition, retention span, relative public visibility, known or perceived threat to the tree(s), and other factors. Each and every tree / group of trees requires to be fully and individually assessed before a TPO should be made;

- Careful consideration of said assessment and determination, in accordance with the criteria set out under the Act, if said trees / groups of trees fulfil the criteria for possible TPO. The legal provisions for making a TPO state *"If it appears to the planning authority that it is expedient, in the interests of amenity or the environment, to make provision for the preservation of any tree, trees, group of trees or woodlands, it may, for that purpose and for stated reasons, make an order with respect to any such tree, trees, group of trees or woodlands as may be specified in the order"*.

Amenity is the essential requirement of a TPO. This generally refers to the visibility of the tree and the extent it can be seen by the public. The impact of the tree or trees is also an important consideration. This would include their size, future potential, rarity, cultural or historical value, or their contribution to the character or appearance of the landscape or local area. As well as amenity, the planning authority are also required to consider the expediency of making a TPO, having regard to the amenity importance of the trees and the degree of risk to which they are considered to be exposed.

- Publication maps / details, formal notification to landowners, and a further consultation period.

It would not be possible to complete such a process within the time scales of this stage of plan making. In particular, time would be required to tender for a suitably qualified professional to carry out this work, and to allow the assessment to take place which would likely take many months.

It is recommended that after the adoption of this Plan in 2022, as part of the implementation programme, further consideration is given to these proposals with a view to determining if it is appropriate to initiate a new Section 205(5) process. In addition, other mechanisms may be possible to consider achieving the same tree protection goals, such as strengthen objectives in future LAPs.

Three Trout's Stream

While the desire to enhance the protection of waterbodies, including the Three Trout's Stream, is commended and has the Council's full support, there is no such designation as a 'Community Nature Reserve'. A 'Nature Reserve' is protected under Ministerial order and therefore it would not be possible to so designate Three Trout's via the County Development Plan.

Furthermore, this river corridor is already identified as an important 'green corridor' (and indicative green route) in the Greystones – Delgany - Kilcoole LAP and is zoned in the LAP as 'open space' / 'greenbelt' which provides protection; this protected corridor links directly with the existing Glen Of the Downs SAC. The Draft Plan would support any projects that came forward to enhance or appropriately develop the biodiversity and understanding of this water course.

Greystones – Delgany – Kilcoole LAP objectives (set out below) are clear in that such green routes are a secondary aspiration with protection of biodiversity being the priority:

HER5 *To protect the biodiversity value and associated habitats of water bodies within the plan area in accordance with the objectives as set out in the Wicklow County Development Plan and Eastern River Basin District Management Plan. In considering proposals for development, regard shall be paid to the recommendations set out in Greystones-Delgany Local Biodiversity Area Study (2006). In particular, recommendations relating to the Three Trout's Stream shall be implemented, as deemed appropriate, by the planning authority.*

TS12 *To develop the 'greenroute' network for pedestrian and/or cycling facilities. The proposed indicative 'greenroute' network is indicated on Map B. Greenroutes should be developed with a common scheme of signage and/or markings. Where feasible, proposals for development should provide for the development of these greenroutes. Proposals for the development of 'greenroutes' shall be subject to appropriate assessment requirements*

in accordance with the Habitats Directive. No development shall be permitted that would have adverse impacts (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites.

While certain parts of the 'greenroute' network are likely to be implemented in the short term, certain parts are considered to be a more long term aspiration. Implementation of 'greenroutes' is subject to the available funding and further design and feasibility studies. Some sections may also be delivered as part of proposals for the development of zoned land.

It is considered that these provisions, along with many other in the draft plan, provide significant protection for nature corridors such as the Three Trouts, and a specific new designation for this corridor in the CDP is not warranted. The objectives with regard to this corridor can be reviewed and enhanced if necessary in the next LAP.

The designation of an area as 'Special Amenity Area' under Section 202 of the Planning Act is a separate process to the preparation a County Development Plan; therefore there is no scope within this process to make such designation. The making of a SAAO is a matter for the members, either on their own instigation or under the direction of the Minister. Very specific criteria must be fulfilled for a SAAO designation to be considered appropriate, and it is no evidence that the site suggested would qualify.

The draft plan does however set a wide range of enhanced protections for all watercourse, including (but not limited to):

CPO 17.12 *To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

CPO 17.13 *To facilitate, in co-operation with relevant stakeholders, the ongoing identification and recording of locally important biodiversity areas and species in County Wicklow, not otherwise protected by legislation and ensure that consideration is given to these in the development management process.*

CPO 17.14 *Ensure that development proposals support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses(rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the European network in Wicklow.*

CPO 17.24 *To ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.*

CPO 17.25 *Ensure that floodplains and wetlands are retained for their biodiversity and ecosystems*

services value and resist development and activities that would interfere with the natural water cycle to a degree that would interfere with the survival and stability of these natural habitats.

CPO 17.26

Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban location) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.

CPO 13.21

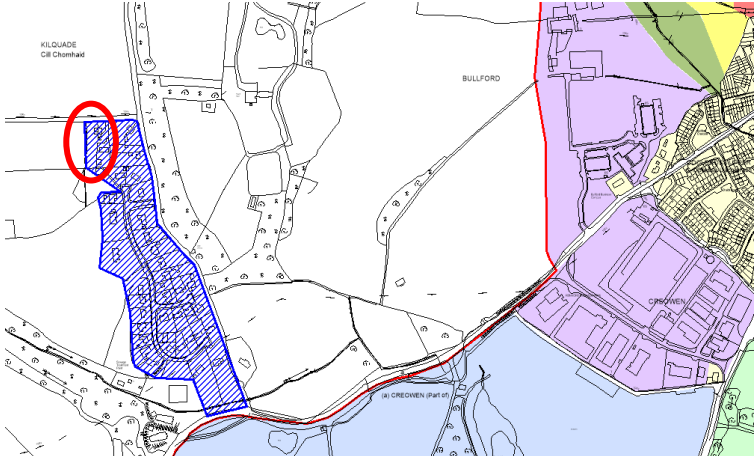
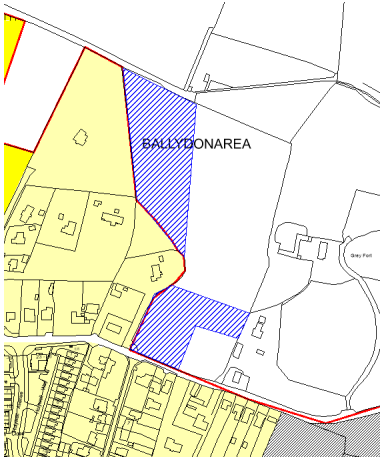
Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.

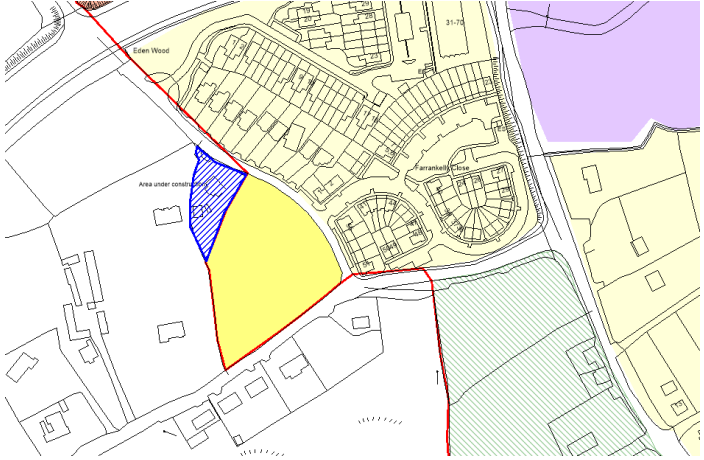
CPO 13.22

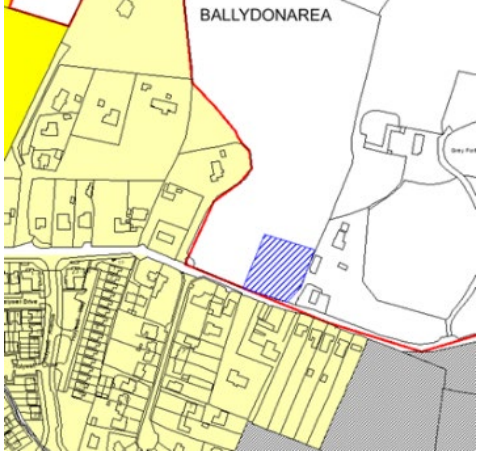
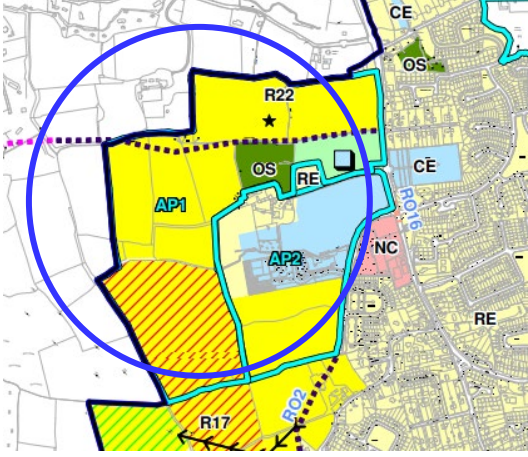
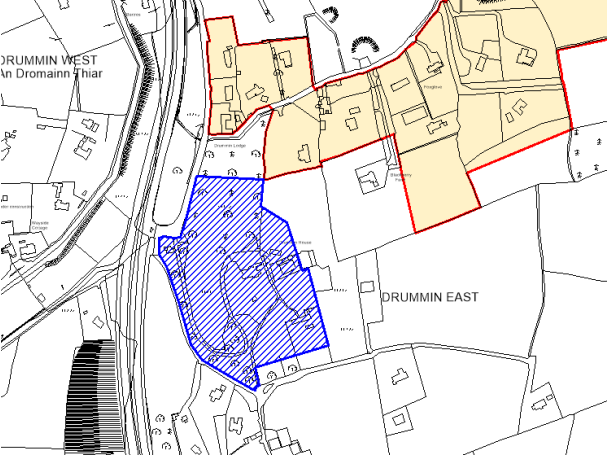
To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions

Chief Executive's Recommendations

Please see recommended amendments set out in Section 3.3.7 of this report.

Topic	Zoning	
ID	Name	Issue raised
<p>C2-75 https://consult.wicklow.ie/en/submitmission/ww-c2-75</p>	<p>Derek Johnson</p>	<p>It is requested that the area shown indicatively on the map below in blue, and particularly the site marked in red, be included in the development boundary of Kilcoole and be zoned residential use. It is put forward that:</p> <ul style="list-style-type: none"> - the site is fully serviced - the submitter hopes to build a house on the land, which comprise a rear garden of an existing house - area is already developed and would benefit from being added to the Kilcoole zoning area  <p>The map shows a development boundary for Kilcoole, outlined in blue. A specific site is highlighted with a red circle and red outline. The map includes labels for 'KILCOOLE', 'BULLFORD', and 'CREAVEN'. A road labeled 'KILQUADE CR Chomlad' is visible on the left. The site in red is located near the intersection of Kilquade and the main road.</p>
<p>C2-133 https://consult.wicklow.ie/en/submitmission/ww-c2-133</p>	<p>McConville & Shanahan families</p>	<p>Request that</p> <ol style="list-style-type: none"> (a) The boundary of the Kilcoole LAP be extended (as shown below) by 2.75 acres / 1.1ha (b) The extended area be zoned for residential use. <p>In support of this proposition it is set out that the lands are serviced, are contiguous to developed lands, are accessible and may more closely accord with the zoning principles set out in the draft CDP than currently zoned lands. It is request that it be confirm in the CDP that the boundary of Kilcoole needs to expand.</p>  <p>The map shows a proposed extension of the Kilcoole LAP boundary, outlined in blue. The area is labeled 'BALLYDONAREA'. The map shows a residential area with a road and a field. The proposed extension is a rectangular area adjacent to the existing development.</p>

<p>C2-160 https://consult.wicklow.ie/en/submit/mission/ww-c2-160 C2-172 https://consult.wicklow.ie/en/submit/mission/ww-c2-172</p>	<p>The Ross Connolly Branch- Labour Party</p>	<p>Concerned about the plans to build a high density mixed development and in the area around the Municipal Building in Greystones as these lands are not much above sea level and climate change may dictate the new buildings should not be built in low lying coastal areas. We hope the Council will take these issues into account if they develop this site.</p>
<p>C2-178 https://consult.wicklow.ie/en/submit/mission/ww-c2-178</p>	<p>Martin O'Malley</p>	<p>Request to zone land, approximately 0.15ha, located in Farrankelly / Priestsnewtown, as 'RE – Existing Residential'. It is noted in submission that site is adjoining recently completed Council housing scheme.</p> 
<p>C2-191 https://consult.wicklow.ie/en/submit/mission/ww-c2-191</p>	<p>O'Reilly Family</p>	<p>Request that lands measuring c. 0.83 acres is included in settlement boundary of Kilcoole and zoned residential. In support of this submission it is set out that the purpose of the request is to allow the family to build a single family home and workshop sufficient in size to carry out boat repair for Bray Rowing Club; that there should be more flexibility to allow self-build; the draft CDP and current LAP lack the ability of persons to build own homes; the site is just outside the development boundary and is surrounded by other zoned lands; there is no other side available to the family. It is also suggested that the train station in Kilcoole should be included in town boundary.</p>

		
<p>C2-231 https://consult.wicklow.ie/en/submit/mission/ww-c2-231</p>	<p>GAP (Greystones Area Planning) Community</p>	<p>It is suggested that the residential zoning at Coolagad (AP1) be re-zoned as a SAC (special area of conservation) and lands zoned elsewhere where transport infrastructure exists such as the south side of Greystones.</p> 
<p>C2-291 https://consult.wicklow.ie/en/submit/mission/ww-c2-291</p>	<p>Brian McDonagh</p>	<p>Request that lands measuring c. 5ha at Drummin, Delgany be zoned for residential use at 1/acre.</p> 

Chief Executive's Response

Greystones – Delgany – Kilcoole has a stand-alone Local Area Plan which is not under review as part of the CDP review process. Ad hoc re-zoning within or on the periphery of LAP towns are not provided for in the County Development Plan. With respect to possible future uses and the zoning of the lands that are the subject of these submissions, should there be a desire to maintain, change or enhance same this can be dealt with in the next review of the Local Area Plan. There is no guarantee that any lands zoned in one plan will remain so zoned in any future plans.

C2/75 / C2-133/ C2-191 Kilcoole

Ad hoc stand alone residential zones are not included in the CDP; the zoning of land for new residential use is done through the local plan making process. These requests are more appropriately addressed in the next review of the Kilcoole LAP. The future boundary for the Kilcoole LAP will be determined through that process.

C2-178 / C2-231 / C2-291

Ad hoc stand alone residential zones are not included in the CDP; the zoning of land for new residential use is done through the local plan making process. This request is more appropriately addressed in the next review of the Greystones – Delgany LAP. The future boundary for the Greystones - Delgany LAP will be determined through that process.

With respect to C2-231, it should be noted that it is not within the gift of the Council to designate land as a SAC – this is an EU designation.

C2-160 / C2-172

The lands in question are not zoned for 'high density' development per se but are zoned 'town centre' which allows for a range of uses. In accordance with Government policy, the highest densities possible should be achieved in town centres, subject to all normal planning considerations. Should any development proposals come forward, issues around flood risk will be required to be addressed.

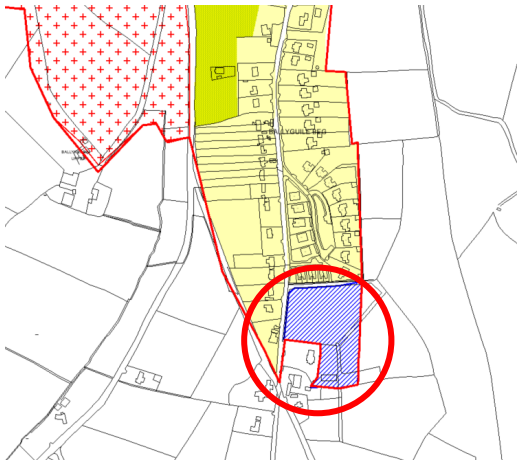
Should there be a desire to change the zoning or objectives for the development of these lands; this would be matter for the review of the LAP.

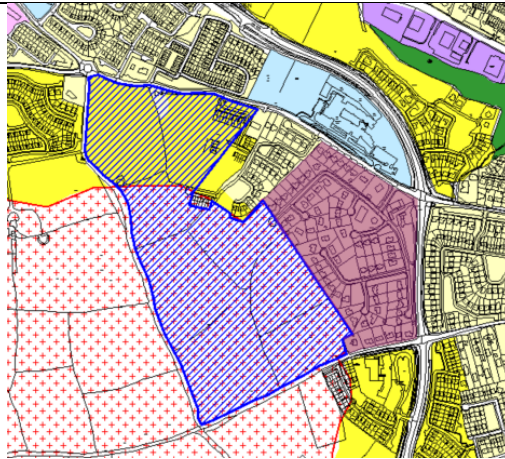
Chief Executive's Recommendations

No change

Section 3.6	LAP settlements
Section 3.6.3	Wicklow - Rathnew

Note: This part of the report only addresses submissions that raised issues that were specific to Wicklow Town – Rathnew (as defined by the Wicklow Town - Rathnew Local Area Plan) and did not fall under one of the chapter topics of the Volume 1 of the Draft Plan.

Topic ID	Zoning Name	Summary of issues raised
C2-100 https://consult.wicklow.ie/en/submit/ww-c2-100	Vincent Flynn	<p>This submission, from a landowner at Avondale Hall north of the lands that are the subject of the submission, is requesting that lands measuring c. 1.9ha, zoned <i>R4: Infill/Rural Fringe Low Density, up to 10 units per ha</i> at Ballyguile Beg, Ballyguile Road, be de-zoned to 'Agricultural'.</p> <p>It is put forward that</p> <ul style="list-style-type: none"> - the lands should never have been zoned and the town boundary now extends too far south. - the continued zoning of these lands appears to be at odds with the Office of the Planning Regulator's advice to Wicklow County Council on the proper zoning of lands in the county - the continued zoning of these lands and their retention within the town boundary would come at a time when better located lands throughout the county are being de-zoned in response to national and regional planning policies aimed at increased sustainability of residential development in the county. 
C2-243 https://consult.wicklow.ie/en/submit/ww-c2-243	Glenveagh Properties Ltd	<p>This submission requests the re-zoning of lands measuring c. 16ha (of a landholding of c. 22ha) in the current Wicklow Town – Rathnew Development Plan from 'SLB – <i>Strategic Land Bank</i>' to 'CE – <i>Community, Educational, Institutional</i>' or 'RE – <i>Existing residential</i>' to allow for the development of a nursing home or retirement village.</p> <p>It is put forward that this is an appropriate use due to the aging of the Irish population; the important service the development of a nursing home would provide; the location of the lands in the 'development boundary' of Wicklow-Rathnew; the strategic and convenient location; and because it would comprise a sustainable use of existing infrastructure.</p>



(Note: northern part of 22ha landholding is zoned R2 - new residential' in current plan)

C2-251
<https://consult.wicklow.ie/en/submit/mission/ww-c2-251>

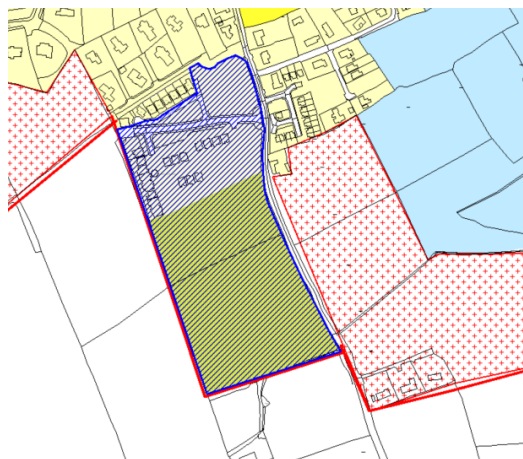
Ardale Property Group

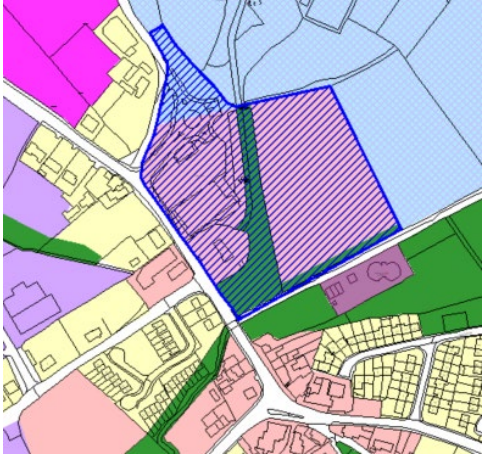
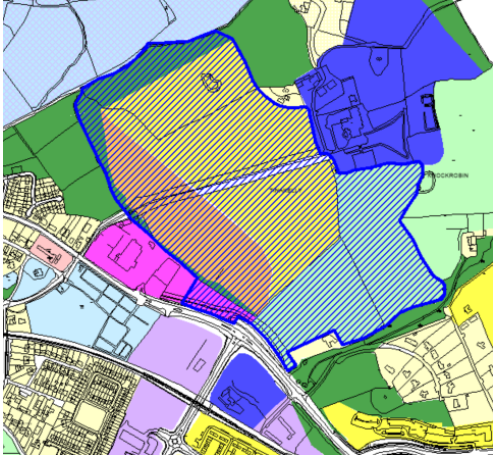
The submission relates to three parcels of land located in the Wicklow Town – Rathnew Development Plan area. It is requested that no changes are made to the zoning of these lands.

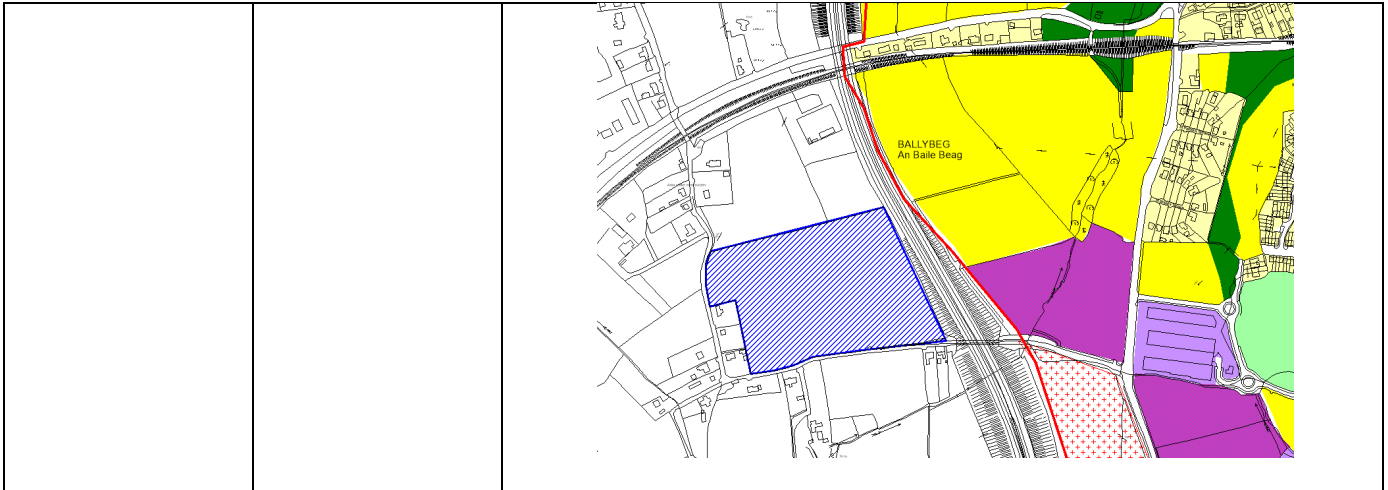
It is put forward that

- all three parcels are compliant with the zoning principals outlined in the draft plan to promote compact growth, delivery population and housing targets, promote higher densities and follow the sequential approach;
- all three sites have utilities and water infrastructure
- all three sites are accessible to Wicklow town Centre and transport infrastructure

Mariners Point



		<p>Rathnew</p>  <p>Tinakilly</p> 
<p>C2-99 https://consult.wicklow.ie/en/submission/ww-c2-99</p>	<p>Eileen & Roy Byrne</p>	<p>It is requested that land shown indicatively on the map below, measuring c. 8ha be zoned for commercial use, connected via an underpass to land zoned E2 'Enterprise & Employment - Warehousing'; for use specifically as a wind farm with battery storage and / or alternative energy related project only.</p> <p>It is put forward that:</p> <ul style="list-style-type: none"> - lands are close to centre of Rathnew and are accessible via an underpass to Milltown Lane; - land were zoned previously in 2004



Chief Executive's Response

Wicklow Town – Rathnew has a stand-alone Local Area plan which is not under review as part of the CDP review process. Ad hoc re-zoning within or on the periphery of LAP towns are not provided for in the County Development Plan. With respect to possible future uses and the zoning of the lands that are the subject of these submissions, should there be a desire to maintain, change or enhance same this can be dealt with in the next review of the Wicklow Town - Rathnew Local Area Plan. There is no guarantee that any lands zoned in one plan will remain so zoned in any future plans.

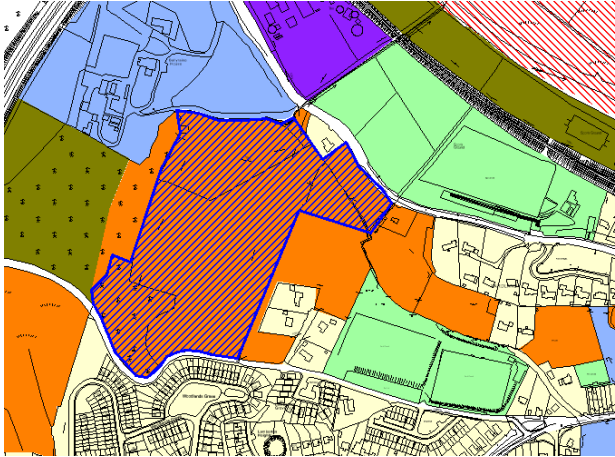
With regard to nursing home use proposed in submission C2-243, the current and Draft Plans provide that nursing homes may be considered outside of the zoned area of a settlement where certain conditions are fulfilled (CPO 7.24); such a project is possible therefore to progress without specific zoning.

With regard to C2-99, commercial / employment zoning is not required for the development of a wind farm / alternative energy project to be considered, having regard to the Wicklow Wind Energy Strategy or objectives relating to alternative energy development set out in Chapter 16. Therefore no change is recommended.

Chief Executive's Recommendations

No change

Section 3.6	LAP settlements
Section 3.6.4	Arklow

Topic		Residential Zoning
ID	Name	Issue raised
C2-251 https://consult.wicklow.ie/en/submit/ww-c2-251	Ardale Property Group	<p>It is requested that no changes are made to the zoning of the lands shown indicatively on the map below at Heatherside, Vale Road (c. 10.2ha).</p> 

Chief Executive’s Response

Arklow has a stand-alone Local Area Plan, which sets out the zoning provision for the town and its environs, as defined by the LAP boundary. The current LAP is in place until at least 2024. Matters related to zoning / changes in zoning will be considered upon the next review of the LAP and cannot be made via this CDP review process. It should be noted that no guarantees can be made that any land zoned in any plan will retain said zoning in future plans.

Chief Executive’s Recommendations

No change

Section 3.6	LAP settlements
Section 3.6.5	Blessington

Note: This part of the report only addresses submissions that raised issues that were specific to the Blessington town (as defined by the Blessington Local Area Plan) and did not fall under one of the chapter topics of the Volume 1 of the Draft Plan.

Topic	Overall Strategy	
ID	Name	Issue raised
C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125	Blessington District Forum	<p><i>(This a detailed submission with the majority of the issues raised being addressed in the relevant section of this report. Only the Blessington specific issues are detailed here)</i></p> <ul style="list-style-type: none"> - Blessington as a designated large town currently has its own standalone 'Local Area Plans', which will be reviewed after the adoption of County Development Plan 2021 – 2027. The existing plan contained a lot of excellent suggestions on town development but unfortunately little if any have been delivered upon, and in some cases the opposite has occurred to what was deemed the best plan for our town. - Into the future Blessington should be better planned, to ensure all developments are done in a sustainable manner. Housing should only be built with enhanced community facilities, and in parallel business and employment opportunities need to be delivered to ensure residents are afforded the opportunity to work locally in their community rather than heavy traffic commutes into Dublin. - It is imperative to ensure that population growth in Blessington is managed and that the sense of community is not diminished by over population. - Blessington has huge opportunities into the future to be a destination town as opposed to a town people pass through. The County Development Plan and future LAP must proactively ensure Blessington becomes a destination town. Envidable location, on the edge of the Blessington Lakes, beside the Wicklow Mountains, within short distances of Dublin and Kildare and a rich local heritage that should be explored. All these characteristics should be maximized to build the Blessington brand. <p>With respect to tourism & recreation, the following is suggested:</p> <ul style="list-style-type: none"> - Completion of Blessington E-Greenway around Lakes, and provision of support facilities - Develop and enhance the public realm in Blessington by improving street furniture, improving the parking conditions, the concealment of overhead cabling to underground and deliver a public park. - Expansion of tourist accommodation facilities in the area - Development of Culture and Heritage Activities - Development of Viking TV series links within West Wicklow, potentially film sites and driving routes, similar to what has been done in NI with Game of Thrones. - Develop a walkway from Blessington into and through Glen Ding Woods, existing right of ways should be protected.

Chief Executive's Response

All of the concerns expressed are noted, and the provisions of the Draft Plan strives to address all of these issues; in particular:

- The Draft Plan sets out a new Overall Strategy which provides for a revised overall development strategy for the County and for Blessington, based on the core pillars of climate action, placemaking and economic opportunity. In addition, the new Core Strategy has revised the growth strategy for Blessington, particularly with respect to population and housing, to ensure it is effectively linked and supported by adequate service infrastructure and employment (Chapters 2, 3 and 4)
- The Draft Plan has at its core enhanced sustainability, across a wide range of actions, including for example more compact growth, enhanced recognition of the need to address climate and biodiversity concerns, enhance water management and protection measures, enhance sustainable transport objectives, higher quality standards for new buildings / housing etc
- The Draft Plan set out a wide range of new objectives in Chapter 5 designed to support the regeneration and enhancement of town centres, and with respect to Blessington particularly, the following are identified as regeneration priorities
 - *Regeneration of the town centre to include reclaiming the Market Square as an amenity space and focal point for the town, providing public realm improvements, addressing dereliction, providing remote working / enterprise hub, repurposing the former HSE building to create a visitor centre for the Blessington e-Greenway and significantly improving permeability and sustainable mobility. The regeneration proposals will strive to include measures to increase economic opportunities within the town to reduce the need for commuting.*
 - *The delivery of the inner relief road is a key element in realising the revitalisation of the town as it will remove the excessive traffic volumes travelling through the town centre.*
- The Draft Plan explicitly supports and facilitates the enhancement of Blessington's role as a visitor / tourism hub in West Wicklow, as set out in the various tourism strategies which have a larger role in this area than the CDP (the CDP is not the 'tourism plan' for the County); the Draft Plan for example sets out a range of new and enhanced objectives with regard to tourism:

Strategic Objectives

- *To facilitate the expansion of existing and the development of new tourism and recreation related development, in line with the principles for sustainable tourism set out to follow;*
- *To facilitate Fáilte Ireland and Wicklow County Tourism initiatives for the development of tourism in the County;*
- *To direct tourism development primarily into settlements and facilitate the development of these settlements as tourism hubs;*
- *To facilitate the development of Bray, Wicklow-Rathnew, Arklow, Greystones, **Blessington**, Baltinglass and Tinahely/Carnew as year round tourism destination towns;*
- *To integrate the County's transport and tourism strategies to promote increasingly sustainable travel patterns among visitors to the County;*
- *To ensure the effective management and enhancement of the appearance of the key settlements within the County;*
- *To protect Wicklow's principal strengths and capitalise on the distinct tourism and recreational attractions that are on offer – scenic beauty, woodlands and waterways, coastal areas and beaches, and built and natural heritage;*
- *To facilitate the development of alternative tourism products within the County such as eco tourism, craft /artisan centres, having regard to the ability of an applicant to demonstrate compliance with the principles of sustainable tourism;*

- To preserve the character and distinctiveness of scenic landscaped as described in the Landscape Categories of the County set out in Chapter 17;
- To ensure a focus on high quality tourism and recreation facilities that are of benefit to visitors and the community alike;
- To protect the environmental quality of the County.

CPO 11.29 In conjunction with Fáilte Ireland, to support the development of Bray, Wicklow-Rathnew, Arklow, Greystones - *Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Newtownmountkennedy, Rathdrum and Tinahely/Shillelagh/Carnew (South West Wicklow) as tourism hubs.*

CPO 11.30 To support and promote the development of rural towns and villages, particularly those distant from the largest centres(as detailed in Objective 11.27) **such as in west and south west Wicklow**, as local tourism hubs particularly with respect to the provision of accommodation and service bases for outdoor recreation activities.

CPO 11.35 Support and facilitate the delivery of the **Blessington** Greenway and the South Wicklow Greenway Arklow to Shillelagh including facilities ancillary to these routes (such as sign posting, car parks) and the development of linkages between these trails and other local routes.

CPO 11.36 To support and promote the development of tourism infrastructure, services and accommodation so located so as to service and support users of the **Blessington** Greenway and future extensions thereto, in particular (but not limited to) those located in the following settlements – Blessington, Ballyknockan, Lackan and Valleymount – with particular support for developments that include the renovation of existing building stock, especially historic / vernacular buildings’.

CPO 11.45 To support the development of the following outdoor recreation hubs/clusters – Glendalough, Rathdrum, **Blessington/Baltinglass, Tinahely/Shillelagh and East Coast Maritime.**

(Note: The changes marked in red above are recommended on foot of other submissions to the Draft Plan)

In addition, the provisions of the Draft Plan fully support the development of new / enhanced accommodation, heritage / cultural attractions, film trails and other visitor facilities / activities. The Council is committed to the further development of the greenway.

Glending links

The provisions of the current Blessington LAP support the improvement of access to Glending; indicative pedestrian and cycling route are shown in the plan, and objective for their delivery are set out in Objective E5, AA1 among others. At this time a challenge is however presented by the reservation of road corridor for possible future N81 by-pass of Blessington being located between the town and Glending Hill. The progress of this scheme and its impact will continue to be monitored.

In addition, the provisions of the Draft Plan support the development of new or enhanced walkways, in particular via the following objectives:

CPO 11.34 To support the development of a strategic national network of *walking, cycling, horse riding and water-based* trails.

CPO 11.37 To protect and enhance existing and support the development of new, walking, cycling *and horse riding* routes / trails, including facilities ancillary to trails (such as sign posting and car parks) and the development of linkages between trails in Wicklow and adjoining counties. In particular, to encourage and facilitate:

- *hill walking* trails in West Wicklow;

CPO 18.5

*To identify and facilitate the provision of linkages along and between green / river corridors within the county and adjoining counties to create inter connected routes and develop riverside parks and create linkages between them to form 'necklace' effect routes including development of walkways, cycleways, *bridleways* and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.11

To support the development of greenways, blueways and other access routes along natural corridors while ensuring that there is no adverse impact on the flora and fauna, biodiversity or water quality of natural assets.

*In particular, to support the development of existing and examine the feasibility of new walking, ~~and~~ cycling, *horse riding and water based routes and* trails along the following routes:*

- *from Bray Head, via the Sugarloaf Mountains, joining up with The Wicklow Way;*
- *the extension of the 'Blessington Greenway' walk around the Phoulaphuca reservoir;*
- *the expansion of a lakeshore walk around the Vartry reservoir;*
- *the extension of the old Shillelagh branch recreational trail - railway walk from Arklow to Shillelagh;*
- *the development of a route along the disused Great Southern and Western Railway line (Naas to Tullow branch) through Dunlavin and Baltinglass.*
- *the development of a coastal route from Bray to Arklow as well as links between this potential route and the coast road;*
- *the Wicklow Way and St. Kevin's Way (as permissive waymarked routes).*
- *the Wicklow to Glendalough "pilgrim walk" incorporating ancient wells.*
- *'Mountains to the Sea' amenity route incorporating Glendalough, Laragh, Annamoe, Roundwood, Newtownmountkennedy and Kilcoole-Newcastle.*

(Note: The changes marked **in red** above are recommended on foot of other submissions to the Draft Plan)

Should there be a desire to change or enhance the provisions of the Blessington LAP, for example to translate these County objectives to a more local level, or to identify new walking routes this can be considered in the next review of the LAP, which will commenced upon adoption of the new CDP.

Chief Executive's Recommendations

No change

Community / Social Infrastructure		
ID	Name	Summary of issues raised
<p>C2-145 https://consult.wicklow.ie/en/submission/ww-c2-145</p> <p>C2-189 https://consult.wicklow.ie/en/submission/ww-c2-189</p> <p>C2-228 https://consult.wicklow.ie/en/submission/ww-c2-228</p>	<p>Lakeshore Striders Running Club</p> <p>Ken Lynch</p> <p>Emer McIntyre Reape</p>	<p>This submission requests a multipurpose community centre be provided for the Blessington area to include, running track, swimming pool and other appropriate community facilities.</p>
<p>C2-125 https://consult.wicklow.ie/en/submission/ww-c2-125</p>	<p>Blessington District Forum</p>	<p>The Forum is in favour of housing being developed in the Blessington area and across the county as a whole, but must ensure that all housing developments are carried out in a sustainable manner and only built in parallel with community facilities.</p>
<p>C2-187 https://consult.wicklow.ie/en/submission/ww-c2-187</p>	<p>Blessington AFC</p>	<ul style="list-style-type: none"> - Currently Blessington suffers from a lack of local accessible Active Play space and Community facilities within the town environs. - Blessington AFC is located an 8km round trip from the centre of town to leased playing fields at an elevation of 55m; this includes having to negotiate the N81 an extremely dangerous road. This makes the trip unfeasible without mechanised transport for youth players. The lack of accessible playing fields within the town boundaries is severally hampering club's ability to help the community and grow. - Furthermore, during the autumn / winter months clubs like Blessington AFC have no facilities to continue training players; there are no shared all-weather pitches within the town (the GAA club have the only all-weather pitch) and more importantly no large Community Hall space that could be used for indoor training - Submit that any future County or town development plan include for adequate active play spaces, located within / adjacent to the town. It should be a condition of planning that these active play spaces must be fully developed and handed to local sports clubs before any further residential / commercial development takes place. Blessington has in the past, and presently, seen a wealth of housing developments granted planning permission without proper facilities being put in place for the families these houses / apartments will bring.
<p>Chief Executive's Response</p>		
<p>Community Infrastructure</p> <p>The Draft Development Plan includes objectives to support the development of community facilities, including sport facilities, throughout the County. The community facilities hierarchy model, as shown in Chapter 7, Table 7.1, provides a list of the social and community facilities that are considered necessary in settlements, according to</p>		

their population range. It is the role of the development plan to support and facilitate the delivery of such social / community infrastructure; however, the actual delivery of such infrastructure is the responsibility of a wide range of agencies (including the Local Authority) as well as private developers as part of a development proposal.

Table 7.1 Community Facilities Hierarchy Model

COMMUNITY FACILITIES HIERARCHY MODEL	
LEVEL 1 – SETTLEMENTS WITH POPULATION RANGE 15,000 – 30,000	
Multi-purpose Community Resource Centre Regional and Local Indoor Sports and Recreation Facilities Swimming Pool/Leisure Centre Youth Centre Athletics Track and Field Facilities Arts and Cultural Centre Local Multi-Purpose Community Space/Meeting rooms	Outdoor Water Sports Facilities (where applicable) Neighbourhood Parks and Local Parks Outdoor (full size) Multi-Use Games Areas – Synthetic/ Hardcourt Playground(s) Playing Pitches Alternative/Minority Sports Facilities Open Space/Urban Woodlands/Nature Areas Library
Acceptable rural catchment commuting time by car: 30 min	
LEVEL 2 – SETTLEMENTS WITH POPULATION RANGE 7,000 – 15,000	
Multi-purpose Community Resource Centre Sport & Recreation Centre Swimming Pool/Leisure Centre Youth Resource Centre Local Multi-Purpose Community Space/Meeting Rooms Outdoor Water Sports Facilities (where applicable) Neighbourhood and Local Parks	Outdoor Multi-Use Games Areas – Synthetic/ Hardcourt Playground(s) Playing Pitches Alternative/Minority Sports Facilities Open Space/Urban Woodlands/Nature Areas Library Arts and Cultural Centre
Acceptable rural catchment time by car: 15 mins	
LEVEL 3 – SETTLEMENTS WITH POPULATION RANGE 2,000 – 7,000	
Community/Parish Hall Multi-purpose Community Space/Meeting Rooms Local /Town Park (s) and Open Spaces/Nature Areas Outdoor Multi-Use Games Area – Synthetic/ Hardcourt	Playgrounds Playing Pitches Library
Acceptable rural catchment commuting time by car: 10-15 mins	
LEVEL 4 – SETTLEMENTS WITH POPULATION RANGE < 2,000	
Community/Parish Hall Open Spaces/Play Areas	Outdoor Multi-Use Games Area – Synthetic/ Hardcourt Playing Pitches
Acceptable rural catchment commuting time by car: 5-10 mins	

This is not to say that an area cannot benefit from greater provision of community facilities and support for this is also provided for in the draft plan under the following objective:

CPO 7.3 *To support and facilitate the delivery and improvement of community facilities in accordance with the 'Hierarchy Model of Community Facilities' prepared under the Development Levy Scheme (under Section 48 of the Planning and Development Acts) (as set out on Table 7.1 of this chapter). While the above 'Hierarchy Model of Community Facilities' provides an extensive list of community infrastructure, the Council recognises that needs may differ from area to area over time and therefore it is recognised that additional community infrastructure needs may arise and such facilities will be facilitated where considered appropriate.*

With regard to the delivery of new community facilities in tandem with new housing development, the Draft Plan set out the following objectives:

CPO 7.5 *Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.*

Where specified by the Planning Authority, new significant residential or mixed use development proposals (of which residential development forms a component)¹, will be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

CPO 7.6 To require as part of any social infrastructure audit process that the cumulative effects of similar large scale developments be appropriately factored as part of the audit when determining the capacity of the assessed infrastructure that will be affected by the increase in population. This is to ensure that the compounding effects of any such large scale increase to a local population will be adequately serviced with community infrastructure.

CPO 7.7 To require that as part of social infrastructure audit the applicant submit supporting documentation from any social / community infrastructure providers, educational institutions, community organisations and other social service providers, verifying the assessment set out in the audit.

Sport facilities

Specifically with regard to sporting facilities, the Draft Plan provisions fully support the delivery of new / enhanced facilities, as set out the following objectives:

CPO 7.31 Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan.

CPO 7.32 To facilitate opportunities for play and support the implementation of the Wicklow County Council Play Policy and its objectives, including the collection of development levies.

CPO 7.39 To provide for the development of facilities that will contribute to the improvement of the health and well-being of the inhabitants of County Wicklow and facilitate participation in sport and recreation.

CPO 7.40 Facilities for sports shall normally be located on designated active open space, close to towns or villages where they are easily accessed by sustainable mobility options. All efforts shall be made to locate new sports facilities close to existing community facilities, schools or areas of dense residential development. The Council may consider providing sites for these purposes or may be prepared to make financial or other assistance available, subject to reasonable access being made available to the public and to reasonable safeguards for the continued use of the land as open space.

CPO 7.42 The development of new sports or active open space zones shall be accompanied by appropriate infrastructure including:

- Fully accessible changing rooms and drinking water fountains;
- Car parking with EV charge points;
- Pedestrian / cycling access and facilities; linkages to public transport.

CPO 7.43 To facilitate and support the development of a community swimming pool facility within the western region of the County, so located to achieve maximum accessibility to the residents of West Wicklow.

¹ Being defined as developments in excess of 50 units of housing in any settlements in Levels 1-4 in the hierarchy, 25 units in Levels 5-10, and **all developments** in excess of 500m distance to a public transport service, as well as other format / sizes / locations are may be deemed necessary by the Local Authority.

CPO 7.44 *To facilitate and support the development of multipurpose covered outdoor areas for all year round outdoor activities such as yoga, Pilates, tai chi etc.*

CPO 7.50 *To support the development of regional-scale Open Space and Recreational facilities particularly those close to large or growing population centres within the Region.*

It is recommended that **CPO 7.43** be enhanced, as set out to follow.

In terms of the actual development of new sports grounds, the role of the Plan, as a land use framework, is to ensure that the development objectives for the area support and facilitate such a project, and in particular that adequate lands are zoned for active open space use, which would earmark / reserve them for that use and ensure no other use is permitted thereon. In the case of Blessington, c. 17ha of undeveloped land is zoned in the LAP for AOS use.

Thereafter to deliver the project, various agencies and actors, including the Local Authority, the clubs, local stakeholders and landowners etc must work together to obtain funding to secure / purchase lands and have them developed. The CE is committed, through both the Community, Cultural and Social Development Directorate, and the Municipal District Council, to assisting clubs in this regard.

Education

With regard education, the Department of Education is the provider of education services. The Department has considerable data available to it with respect to school demands – in particular when and where they will arise, both from the Census and other national data sources. In the preparation of development plans, the Department will provide information to the Council as to emerging needs for new school, places / new schools and it is the role of the Development Plan to ensure that the policies and objectives, such as the zoning of land, support the Department in delivering the required facilities. The Council has no further role in the delivery of new / expanded schools other than the granting of permission for same when application are made.

Should there be a desire to change or enhance the provisions of the Blessington LAP, for example to zone land or identify possible sites for the development of new sports facilities, for new schools etc, this can be considered in the next review of the LAP, which will commenced upon adoption of the new CDP.

Chief Executive's Recommendations

Amend the Plan as follows:

Volume 1, Chapter 7

CPO 7.43 To **prioritise**, facilitate and support the development of a community swimming pool facility **and a sports complex** within the western region of the County, so located to achieve maximum accessibility to the residents of West Wicklow.

Section 3.7 Submissions relating to Strategic Environmental Assessment & Appropriate Assessment

Note: This part of the report relates only to submissions regarding the content and process of the SEA and AA; general environmental issues are addressed in Section 3.1-3.6 of this report.

Section 3.7.1 Submissions from SEA authorities

Name: Environmental Protection Agency	Sub ID: C2-19	
Issue Raised	SEA/AA Response	SEA/AA Update to Documents
<p>We acknowledge your notice, dated 2nd June 2021, in relation to the Draft Wicklow County Development Plan 2021 -2027 (the 'Plan') and SEA Environmental Report.</p> <p>The EPA is one of the statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the Plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.</p> <p>As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via the attached guidance document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources'.</p> <p>This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. We suggest that you take this guidance document into account</p>	<p>Noted.</p> <p>The EPA's 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been and will be taken into account in undertaking the SEA and preparing the Plan.</p> <p>The Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.</p>	<p>None.</p>

<p>and incorporate the relevant recommendations, in finalising and implementing the Plan.</p> <p>Wicklow County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.</p>		
<p>Specific Comments on the Environmental Report Assessment of Alternatives</p> <p>You should describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative. You should assess the alternatives against the 'Strategic Environmental Objectives' identified in the SEA ER.</p>	<p>Alternatives are described in SEA Environmental Report Section 6 "Description of Alternatives".</p> <p>Alternatives are assessed, including against Strategic Environmental Objectives, as appropriate, in SEA Environmental Report Section 7 "Evaluation of Alternatives". Section 7 identifies the selected alternative.</p>	<p>To add the following subsection to SEA Environmental Report Section 7 "Evaluation of Alternatives":</p> <p>"Section 7.4 Selected Alternatives</p> <p>Selected alternatives for the Plan from each of the four tiers of alternatives that emerged from the planning/SEA process are indicated above.</p> <p>These alternatives have been adopted by the Members having regard to both:</p> <p>1. The environmental effects which were identified by the SEA and are detailed above; and</p> <p>2. Planning - including social and economic - effects that also were considered by the Members."</p>
<p>Assessment of Environmental Effects</p> <p>You should assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.</p>	<p>The full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects, are assessed and documented in SEA Environmental Report Section 8 "Evaluation of Plan Provisions".</p>	<p>None.</p>

<p>Mitigation Measures Where you have identified the potential for likely significant effects, you should provide appropriate mitigation measures to avoid or minimise these. You should ensure that the Plan includes clear commitments to implement the mitigation measures.</p>	<p>Appropriate mitigation measures are identified in SEA Environmental Report Section 9 "Mitigation Measures" and have been fully integrated in the Draft Plan.</p>	<p>None.</p>
<p>Monitoring The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, Wicklow County Council should ensure that suitable and effective remedial action is taken. Guidance on SEA-related monitoring is available on the EPA website</p>	<p>Noted. The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement. The cited guidance has been and will be taken into account in undertaking the SEA and preparing the Plan.</p>	<p>None.</p>
<p>State of the Environment Report - Ireland's Environment 2020 In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our State of the Environment Report Ireland's Environment – An Integrated Assessment 2020 (EPA, 2020) should be considered, as relevant and appropriate. This should also be taken into account, in preparing the Plan and SEA.</p>	<p>Noted. This report has been and will be taken into account in undertaking the SEA and preparing the Plan.</p>	<p>None.</p>
<p>Future Amendments to the Plan You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.</p>	<p>Proposed material alterations will be screened using a method similar to that used for the Plan.</p>	<p>None.</p>

<p>SEA Statement "Information on the Decision"</p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises :</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p> <p>Guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php</p>	<p>An SEA Statement containing the required information will be prepared at the end of the process. The cited guidance will be taken into account in preparing the SEA Statement.</p>	<p>None.</p>
<p>Environmental Authorities</p> <p>Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (formerly Minister for Culture, Heritage and the Gaeltacht (functions transferred from Minister for Environment, Heritage and Local Government/ Minister for Housing, Planning and Local Government to Minister for Culture, Heritage and the Gaeltacht by S.I. 192 of 2011); • Minister for Environment, Climate and Communications; and • Minister for Agriculture, Food and the Marine. • any adjoining planning authority whose area is contiguous 	<p>Noted. Relevant environmental authorities are being consulted with as part of the SEA/Plan preparation process.</p>	<p>None.</p>

to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.		
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Name: Department of Housing, Local Government and Heritage	Sub ID: C2-54	
Issue Raised	SEA/AA Response	SEA/AA Update to Documents
<p>Archaeology</p> <p>Archaeological heritage is discussed in Chapter 8 of the draft Development Plan. The Department previously commented at the Development Plan review/SEA scoping stage of the preparation of the development plan in a detailed submission dated 10/01/2020 (our ref. FP2019/096). The draft Development Plan has clearly taken into consideration the observations and recommendations outlined in our previous submission and detailed objectives relating to the protection of the archaeological heritage have been included in the draft Development Plan.</p> <p>All references to the “Department of Culture, Heritage & the Gaeltacht” in Chapter 8 should be amended to read “Department of Housing, Local Government & Heritage”.</p>	<p>Noted.</p> <p>References to “Department of Culture, Heritage & the Gaeltacht” in Chapter 8 of the Plan will be amended to read “Department of Housing, Local Government & Heritage” as appropriate.</p>	<p>None</p>
<p>Nature Conservation</p> <p>The Department of Housing, Local Government and Heritage (DHLGH) would like to commend Wicklow County Council for its commitment to the protection and enhancement of the county’s natural heritage which is woven throughout this plan. This is not simply contained in the Introduction or the chapter on natural heritage and biodiversity but is reflected in many other sections of the draft plan and declared up front in SCO6. It is good to see the recognition of the place of Appropriate Assessment in the planning process decisions which will be made based on this plan (1.4.2).</p>	<p>Noted.</p>	<p>None</p>
<p>The County’s commitment to wider biodiversity (in addition to designated sites) is also welcomed. This is seen in CPOs dealing with:</p> <ul style="list-style-type: none"> • SUDs • Connectivity of green spaces and wildlife habitats • The implementation of the county Heritage and Biodiversity Action Plans • The protection of natural resources from degradation 	<p>Noted.</p>	<p>None</p>

<p>through tourism</p> <ul style="list-style-type: none"> • The control of invasive alien species • The support of the development of site specific conservation objective and • The commitment to maintaining the conservation value of Natural Heritage Areas (NHAs) amongst many other objectives. 		
<p>The AA/NIS for the CDP</p> <p>A screening for Appropriate Assessment was carried out for the plan which led to a determination that the plan needed a Stage 2 Appropriate Assessment. It is the Department's opinion that the screening out of a number of Special Protection Area (SPA) sites because they did not have a hydrological connection with Wicklow was incorrect. Birds are highly mobile species and many fly long distances foraging and therefore should have been considered. In Table 3.1 Screening of European sites, the Light-bellied Brent Geese <i>Branta bernicla hrota</i> have been omitted from a number of SPAs including The Murrough SPA 004186, South Dublin SPA 004024 and North Bull Island SPA 004006. There is evidence that these birds use multiple sites for feeding and so there is a connection between the sites. Other Special Conservation Interest (SCI) species, e.g. gulls, can travel long distances for feeding purposes – the lesser black backed gull <i>Larus fuscus</i> forages up to 181km from its roost site (Thaxter et al. 2012¹) to give just one example. The Department therefore recommends that the AA Screening and NIS are revised to ensure that the connections between the SPAs are examined carefully and that the impacts on these mobile SCI species are assessed.</p>	<p>There are several SPAs within the county boundary that have been considered and appropriate mitigation measures have been presented in this regard.</p> <p>The closest external SPA is over 6 km away, although the ranging patterns of the associated species may result in the utilisation of ex-situ resources within County Wicklow. It is not likely that effects from the land uses proposed by the Plan would have a significant effect on these external SPAs. This is due to the availability of resources at the wider landscape scale. The AA NIR will be updated to demonstrate this logic.</p>	<p>To update the AA NIR by adding the following sentence to Table 3.1 for each of the SPAs that are not within County Wicklow:</p> <p>“Furthermore, at this scale – given the availability of resources within the wider landscape – it is not anticipated that significant effects to ex-situ foraging areas are likely.”</p>
<p>European Sites</p> <p>CPO 17.5 states that projects which will have adverse effects on the integrity of a European site will not be permitted on the basis of the</p>	<p>Comments noted; the concern about potential conflict between development, tourism and financial interests and the protection of European sites is noted but no resolution to same</p>	<p>None</p>

¹ Thaxter CB, Lascelles B, Sugar K, Cook ASCP, Roos S, Bolton M, Langston RHW, Burton NHK. (2012) Seabird foraging ranges as a preliminary tool for identifying candidate Marine Protected Areas. *Biological Conservation* 156 (2012) 53-61

<p>plan. The Department would like to remind Wicklow County Council that this is actually the law and that there is no legal basis for allowing such projects to progress anyhow except under IROPI/Stage 4 Appropriate Assessment.</p> <p>CPO 17.6 is also the law of the land and all projects likely to have a significant effect on a European site must be screened for AA.</p> <p>The Department is concerned about what will happen in the decision-making process when development, tourism and financial interests in projects clash with the protection of European sites and indeed broader biodiversity values expressed elsewhere in the plan.</p>	<p>can be provided as part of this process, and this is presumably a conflict that is present across the nation and the wider EU. CPO 17.5 and 17.6 have been integrated into the Plan in order to communicate these issues to prospective developers and in order allow the AA to demonstrate that the Plan will not affect the integrity of any European site².</p> <p>All developments seeking permission under the Plan are required to comply with its provisions, including those relating to the protection/management of European sites and biodiversity. This will help to ensure appropriate protection/management of these environmental components.</p>	
<p>Coastal pathway</p> <p>Despite the various commitments given to the protection of European sites within the plan there are a number of contradictory objectives which could lead to damage of these sites. One such is CPO 18.6 on promoting and developing coastal paths, strategic walkways and cycleways. Map no. 18.07 shows this route through several extremely sensitive European sites. The engineering specifications for greenways and cycleways are completely unsuitable for inclusion in European sites, not least because of the amount of habitat loss but also because of the additional recreational pressure and disturbance this will bring.</p> <p>This coastal pathway appears in several other objectives including CPO 11.31 and CPO 11.37. This suggests that the environmental issues with this route are not actually being taken seriously by Wicklow County Council despite the objectives on conserving natural heritage.</p>	<p>Objective CPO 18.6 is extremely general and non-specific about the location of possible coastal pathways; in addition Map 18.07 does not show the location of a future coastal path / route but rather it simply denotes the 'coastline'. In order to ensure that no conflicts arise with the protection of European Sites from such a project (if such a project is ever further developed), the Draft Development Plan includes the following objectives:</p> <p><i>CPO 18.17 Where projects for significant green infrastructure identified in this chapter are not already provided for by existing plans / programmes or are not already permitted, then the feasibility of progressing these projects shall be examined, taking into account planning need, environmental sensitivities as identified in the SEA Environmental Report and the objectives of the plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new green infrastructure in two stages:</i></p>	None

² Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection.

CPO 18.18 *Where relevant, the Council and those receiving permission for development under the plan, shall seek to manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant environmental effects, including loss of habitat and disturbance. Management measures may include ensuring that new projects and activities are a suitable distance from ecological sensitivities; visitor/habitat management plans will be required for proposed projects as relevant and appropriate. Potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.*

(Note: Similar provisions are set out in Chapter 11 Tourism)

As well as the following objectives in Chapter 17:

CPO 17.4 *To contribute, as appropriate, towards the protection of designated ecological sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).*

To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation,

Policies, Plans and Guidelines, including but not limited to the following and any updated/superseding documents:

- ☐ EU Directives, including the Habitats Directive (92/43/EEC, as amended) , the Birds Directive (2009/147/EC) , the Environmental Liability Directive (2004/35/EC) , the Environmental Impact Assessment Directive (2011/92/EU, as amended), the Water Framework Directive (2000/60/EC), EU Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC); EU 'Guidance on integrating ecosystems and their services into decision-making' (European Commission 2019)*
- ☐ National legislation, including the Wildlife Acts 1976 and 2010 (as amended) , European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008 (as amended) and the Flora Protection order 2015.*
- ☐ National policy guidelines (including any clarifying circulars or superseding versions of same), including 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018), 'Guidance for Consent Authorities regarding Sub-Threshold Development' (2003), 'Tree Preservation Guidelines', 'Landscape and Landscape Assessment' (draft 2000), 'Appropriate Assessment Guidance' (2010);*
- ☐ Catchment and water resource management plans, including the National River Basin Management Plan*

	<p>2018-2021 (including any superseding versions of same),</p> <ul style="list-style-type: none"> ☐ Biodiversity plans and guidelines, including National Biodiversity Action Plan 2017-2021 (including any superseding versions of same) and the County Wicklow Biodiversity Action Plan; ☐ Ireland's Environment – An Integrated Assessment 2020 (EPA), including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges. <p>CPO 17.5 Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan .</p> <p>CPO 17.6 Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.</p> <p>The suggestion that WCC is not taking is environmental obligations seriously is therefore rejected.</p>	
<p>Tourism One of the major threats to the natural heritage of the county is the expansion of tourism. NPWS welcomes the emphasis being put on</p>	<p>The information regarding the size of the National Park (20,000ha) in Chapter 11 was sourced directly from the National Parks website. This can be amended as a non-material</p>	<p>Updated to take account of any changes to Plan objectives</p>

<p>centring the provision of facilities close to existing settlements. In Chapter 11 the size of the Wicklow Mountains National Park should be corrected to read 22,000ha.</p> <p>CPO 11.47 states that the Council and those receiving permission for tourist developments "shall seek to manage" increases in visitor numbers or changes in visitor behaviour which would cause significant environmental damage. This is not strong enough. Such changes must be managed. This objective should be strengthened.</p> <p>Consideration should also be given to CPO 11.37 regarding increasing the number of cyclists at the Sally Gap. Neither the Old Military Road nor the R759 are safe for motorists, cyclists nor pedestrians at present due to the narrowness and undulating nature of the roads. Currently there are many stretches where two cars have difficulty passing and where it is impossible to safely overtake groups of cyclists. Much recent media publicity was given to injuries received by cyclists on these routes which act as important business and commuting routes across the mountains and which are not treated or ploughed in winter. The feasibility of such an objective should be examined from a road-user safety point of view.</p>	<p>change at a later time once the actual size has been clarified.</p> <p>Objective CPO 11.47 can be strengthened as requested (see Part 2 of this report)</p> <p>With respect to Objective CPO 11.37, while the concerns expressed are noted, no road safety concerns with this objective have been identified by the Roads & Transportation professionals in the Council, and indeed fundamentally the objective is about improving cycling and walking routes in the interest of both visitor experience and aspects such as safety. No change is therefore recommended.</p>	
<p>Wind, solar and other forms of energy</p> <p>The Department recognises that the Council are waiting for the updated national guidelines on wind energy before completing this chapter and look forward to the opportunity to comment on this as an amendment to the plan when it is written. Off-shore wind energy must be subjected to the strictest of environmental scrutiny, and the Department will be commenting on such proposals within its statutory responsibilities.</p> <p>CPO 16.4 supports the creation of solar farms. While many of these farms will be placed on farmland it should be recognised that there will be implications for wider biodiversity through the creation of such farms so the siting of developments will be important.</p>	<p>Noted. The natural heritage and biodiversity objectives of the plan will be applied where permission is sought for solar farms.</p> <p>Noted. To update the SEA Environmental Report to take account of this suggestion.</p>	<p>Under Section 8 of the SEA Environmental Report, to add the following text:</p> <p><i>"CPO 16.4 supports the creation of solar farms. While many of these farms will be placed on farmland, it should be recognised that there will be implications for wider biodiversity through the creation of such farms so the siting of developments will be important. Provisions that have been</i></p>

		<i>integrated into the Plan (see Section 9 "Mitigation Measures") will ensure the appropriate protection of biodiversity and flora and fauna".</i>
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Section 3.7.2

Submissions from other bodies / persons

Name: Geological Survey of Ireland	Sub ID: C2-109	
Issue Raised	SEA/AA Response	SEA/AA Update to Documents
<p>Groundwater</p> <p>i. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.</p> <p>ii. In the SEA environmental report, we are pleased to see use of our Groundwater data sets in Sections 3.6 'Water', 4.9.5 'Ground Water' and 4.9.6 'Aquifer Vulnerability and Productivity' and as maps in Figure 4.12 'Groundwater Vulnerability' and Figure 4.13 'Groundwater Productivity'. We welcome the listing of Public Water Supply and Group Scheme Preliminary Source Protection Areas in Section 4.8.3 'Source Protection Areas' and in map form in Figure 4.8. Please ensure that use of our data or maps is attributed correctly to 'Geological Survey Ireland'.</p> <p>ii. We note reference to the Wicklow Groundwater Protection Scheme undertaken jointly between Geological Survey Ireland and Wicklow County Council. The local authority should include the Groundwater Protection Scheme information within the CDP/SEA via a combination of the land mapping outlined above and the groundwater protection responses for potentially polluting activities available on our website.</p>	<p>i. Noted. Provisions have been integrated into the Plan that address groundwater issues.</p> <p>ii. Noted The SEA Environmental Report maps Inner and Outer Source Protection Areas and Group Scheme Preliminary Source Protection Areas.</p> <p>iii. The County Development Plan provides information on the Groundwater Protection Scheme as well as providing various measures relating to the protection of groundwater, including those which integrate the Scheme:</p> <ul style="list-style-type: none"> ▪ CPO13.4 To ensure that any development or activity with the potential to impact on ground water has regard to the GSI Groundwater Protection Scheme (as shown on Map 17.06) ▪ CPO 13.9 To protect existing and potential water resources of the County, in accordance with the EU Water Framework Directive, the River Basin Management Plans, the Groundwater Protection Scheme and source protection plans for public water supplies ▪ CPO 13.16 Permission will be considered for private wastewater treatment plants for single rural houses where: ▪ the specific ground conditions have been shown to be suitable for the construction of a 	<p>To attribute relevant maps in SEA Environmental Report to 'Geological Survey Ireland'.</p>

	<p>treatment plant and any associated percolation area;</p> <ul style="list-style-type: none"> ▪ the system will not give rise to unacceptable adverse impacts on ground waters / aquifers and the type of treatment proposed has been drawn up in accordance with the appropriate groundwater protection response set out in the Wicklow Groundwater Protection Scheme (2003); ▪ the proposed method of treatment and disposal complies with Wicklow County Council’s Policy for Wastewater Treatment & Disposal Systems for Single Houses (PE ≤ 10) and the Environmental Protection Agency “Waste Water Treatment Manuals”; and ▪ in all cases the protection of ground and surface water quality shall remain the overriding priority and proposals must definitively demonstrate that the proposed development will not have an adverse impact on water quality standards and requirements set out in EU and national legislation and guidance documents. 	
<p>Geological Mapping Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found here, in your future assessments. We welcome use of these datasets for policy objective CPO 17.27, in Chapter 17 ‘Natural Heritage and Biodiversity’ of the CDP.</p>	<p>Noted.</p>	<p>None</p>
<p>Geohazards In the SEA report, we are pleased to see use of our online mapping data sets for Landslide Events and Landslide Susceptibility in Section 4.8.4 ‘Landslides’ and as a map in Figure 4.9 ‘Landslide Susceptibility and Previous Landslide Events’. Please ensure that use of our data or maps is attributed correctly to</p>	<p>Noted.</p>	<p>To attribute relevant maps in SEA Environmental Report to ‘Geological Survey Ireland’.</p>

<p>'Geological Survey Ireland'.</p>		
<p>Natural Resources (Minerals/Aggregates)</p> <p>i. In Section 4.11.8 'Minerals and Aggregates' of the draft SEA report, we are pleased to see mention of our Aggregate Potential Mapping, Bedrock Mapping, Quaternary and Physiographic, and National Aquifer and Recharge datasets that would be of benefit to planning and individual projects. We welcome the inclusion of the Mineral Localities map in Figure 4.18.</p> <p>ii. Aggregates are an essential natural resource for the construction industry and with the Government of Ireland "Building Ireland 2040" plan, understanding of aggregate source and supply will be important. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer. We would welcome the consideration of aggregate potential sterilisation included as part of the draft SEA / CDP.</p>	<p>i. Noted.</p> <p>ii. Aggregate Potential Mapping, available from GSI, is reference in Section 4.11.8 of the SEA Environmental Report.</p> <p>CPO 17.27 from the Draft Plan provides that: <i>"Geological and soil mapping where available shall be considered in planning decisions relating to settlement, excavation, flooding, food production value and carbon sequestration, to identify prime agricultural lands (for food production), degraded/contaminated lands (which may have implications for water quality, health, fauna), lands with unstable soils / geology or at risk of landslides, and those which are essential for habitat protection, or have geological significance."</i></p>	<p>In the SEA Environmental Report, to include the following as a potential adverse effect: "Aggregate potential sterilisation".</p> <p>The Draft plan to include a map of 'aggregates potential'</p>
<p>Geophysical data</p> <p>The Geochemistry and Geophysical datasets would be of benefit in Chapter 4 'Environmental Baseline', Section 4.8 'Soil' of the SEA environmental report. These datasets would be a useful addition to the list of Geological Survey Ireland datasets that would be useful in "planning and assessing individual projects with regard to the environmental topic(s) of soil and/or material assets".</p>	<p>Noted.</p>	<p>In the SEA Environmental Report, to include the GSI's Geochemistry and Geophysical datasets that may be useful in "planning and assessing individual projects with regard to the environmental topic(s) of soil and/or material assets".</p>

Name: An Taisce	Sub ID: C2-244	
Issue Raised	SEA/AA Response	SEA/AA Documents Update to
<p>The Council should ensure that monitoring of significant environmental effects is carried out and that any unforeseen adverse impacts that arise are remediated.</p>	<p>Agreed. The SEA Environmental Report contains a Monitoring Programme at Section 10.</p> <p>As identified under subsection 20.5 "Environmental Monitoring" of the Draft Plan "Article 10 of the SEA Directive requires monitoring of the significant environmental effects of the implementation of the County Development Plan in order to identify, at an early stage, unforeseen adverse effects and to enable appropriate remedial action to be undertaken. While the ongoing implementation of the objectives of the plan and the monitoring processes detailed above incorporates some monitoring of environment related objectives, the full and comprehensive monitoring and evaluation assessment, required to be undertaken under Article 10 of the SEA Directive, is set out in the Strategic Environmental Assessment that accompanies the County Development Plan.</p>	<p>None</p>

