

CSR Ref: 24272/PG/240125

**CUNNANE STRATTON REYNOLDS**

24<sup>th</sup> January 2025

Planning Department  
Wicklow County Council  
County Buildings  
Whitegates  
Wicklow Town

Dear Sir / Madam,

**RE: PLANNING APPLICATION BY WICKLOW COUNTY COUNCIL UNDER PART 8 OF THE PLANNING AND DEVELOPMENT REGULATIONS 2001-2024 AND SECTION 179 OF THE PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED) FOR ENHANCEMENT OF AN EXISTING RECREATIONAL AMENITY AND PARK AT THE MURROUGH, WICKLOW TOWN, CO. WICKLOW**

## Introduction

This cover letter is prepared by Cunnane Stratton Reynolds (CSR) in support of a Part 8 planning application, on behalf of Wicklow County Council, for development of the Murrough Waterfront Park Enhancement, Wicklow Town, Co. Wicklow. The application is made in accordance with Part 8 of the Planning and Development Act regulations 2001-2023 and Section 179 of the Planning and Development Act 2000 (as amended). Section 179 covers local authorities own development and all local authority developments shall comply with the prescribed requirements of that Section of the Act.

## The Proposed Development

The details of the proposed development are set out in the statutory notices accompanying this planning application. The proposal comprises enhancements to the existing recreational park.

The proposed Murrough Waterfront Park Enhancements include; event space, open spaces, a pump track, 4 no. cantilevered platforms over the revetment, sensory garden, adjusted fence line to the existing dog park, camper vehicle parking and camper waste facilities, toilet and ancillary facilities, wayfinding, seating and lighting, retention of existing playground and skatepark, relocation of the Murrough Memorial Garden; tree planting, hard and soft landscaped area, associated site works and environmental improvements. The site is located in the Murrough, Wicklow Town, Co. Wicklow.

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The proposal is land based and does not encroach onto either the revetement or the sea. A number of viewing platforms are proposed which are cantilevered above the revetment impacting neither on the sea or the flood defence system. The proposals are principally surfaced based with no impact on the existing drainage regime. The proposals are an enhancement of the existing somewhat outdated amenities in this location.

### **Enclosed Information with the Application**

The following drawings and documentation is attached:

#### Drawings

- 24272-2-101 – Site Location Map
- 24272-2-102 – Existing Site Layout
- 24272-2-111 – Landscape Layout
- 24272-2-901 - Revetment Platform Details
- 24272-2-911 - Toilet Facilities & Shelters Details
- 24272-2-921 - Stage Shelter Details

#### Documents

- 24272-D01 - Design Statement
- 24.138-ROD-EGN-SW\_AE-RP-ZM-400001 - Part 8 Planning Engineering Report
- AA Screening prepared by Alan Lauder

### **The Evolution of the Proposal**

The primary objective of the project is as follows:

*“to develop a Park Masterplan and reach consensus with stakeholders to deliver a sustainable vision for The Murrough in the face of population growth and increasing levels of community participation in active leisure.”*

The overall objectives of the project commissioned by Wicklow County Council are as follows:

- *Conserve, protect and interpret the natural, cultural and historical values of The Murrough;*
- *Provide a strong, innovative and creative vision which captures and creatively interprets the essence, history and future of the site;*
- *Explore and enable opportunities for locals and visitors to have access to an inspiring and dynamic landscape that is relevant to a growing and changing population;*
- *Define key orientation points, services and facilities in the Park and develop a plan which enhances vehicular, cycling and pedestrian circulation and improves connectivity and accessibility;*
- *Provide a feasible, sustainable proposal which balances the pressures of increasing visitation and recreational demands with the need to maintain the highest quality visitor experience possible;*
- *Provide a high quality, integrated, analysis and Park Development Plan proposal for a functional, safe and legible, site responsive, sustainable and engaging outcome;*

- Explore the active and passive recreational opportunities of the Park and assess their ability to enhance the visitors experience;
- Consider Environmentally Sustainable Design and Crime/Anti-Social Activity Prevention through environmental design principles and the impacts of climate change.

### The Application Site

The application site lies in an area generally known as 'the Murrough'. The extent of the application site is shown in Figure 1 below.

**Figure 1: The application site**



The application site is outlined in red above. The site is bound by the coast to the east, car park to the south, existing developments (An Post and Recycling Centre), and The Murrough Road (R999) to the west and open lands or coast along the northern boundary. It should be noted that the proposed development is entirely located in the landward side of the Murrough and does not encroach into the sea or onto the adjoining revetment or retaining feature. The revetment falls outside the application site. There is no intrusion into the sea or into the existing flood defences therefore.

One can enjoy open sea views and views towards the town from the site. This area is known as an important viewing area of the annual Wicklow Regetta festival. There is an existing recreational and amenity area that includes a playground, a skate-park, a fenced dog park, a walkway, an outdoor gym and the Murrough Memorial Garden. It is considered that this area needs to be upgraded, modernised, and rejuvenated as part of the regeneration and revitalisation of the town.

## **Compliance with Planning Policy Context**

### **National Planning Framework**

The adopted National Planning Framework (NPF), including the Draft revision of July 2024, encourages the use of State and public land for the purposes of reinvigorating and reshaping urban areas by providing recreational opportunities. The Shared Goal of National Strategic Outcome of the NPF includes provision for enhanced amenities such as recreational infrastructure including activity based tourism.

Within the section on the Eastern and Midland Region in the NPF, within which the application site is located, there is a requirement to promote activity based recreation utilising canal and former rail and other routes (page 29). Section 7.4 (Coastal Environment and Planning for Climate Change) identifies opportunities for recreation and interaction with the natural environment, which are important to well-being and quality of life.

National Planning Objective 53 seeks to ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality. National Policy Objective 81 seeks to integrate green and blue infrastructure while maintaining ecosystem services and ecosystem functions and conserving and/or restoring biodiversity.

The importance of well-protected "green" and "blue spaces" such as parks, rivers, ponds and wild areas in the urban landscape is now recognised as a key part of urban landscapes that are needed for healthy communities and also offer the potential for climate adaptation co-benefits. These spaces in cities, towns and villages play an integral role as part of the fabric of settlements, either through their use for community recreation and amenity purposes, supporting biodiversity or as a natural delineation of the settlement itself, forming the interface between urban and rural areas.

### **Regional Spatial and Economic Strategy (RSES) – Eastern and Midland Region**

Key regeneration opportunities identified in the RSES include the development of Wicklow Port and Harbour, served by the port access road, to expand commercial berthing and pleasure craft capacity subject to feasibility and protection of European Sites such as the Murrough, a coastal



wetland which it is recognised is popular with walkers with views of the town and coastline.

Page 83 of the RSES identifies that Wicklow is also situated between the protected conservation sites of the Murrough cSAC/SPA and Wicklow Head SPA. While the ecological protection of these sites is a priority, the RSES states clearly that there is potential to expand the range of recreational and tourist facilities associated with its coastal location. The proposal is ideally placed to meet that regional objective. There is potential to develop Wicklow-Rathnew as a recreation and tourism hub due to its attractive coastal location and a key attractions within the town include the Murrough, coastal walks, beaches, and architectural heritage., sports facilities and as a terminus of the planned Greystones – Wicklow Coastal Route.

Growth enablers for the region are identified on page 36 and include the promotion of the region for tourism, leisure and recreational activities while ensuring that high value assets and amenities are protected and enhanced

#### Wicklow Town – Rathnew Development Plan 2013-2019 ('the Plan')

Wicklow Town-Rathnew Development Plan 2013-2019 was adopted by Wicklow County Council on 2<sup>nd</sup> September 2013 and Wicklow Town Council on the 4<sup>th</sup> September 2013. The plan came into effect on 1<sup>st</sup> October 2013. This is the statutory adopted development plan covering the application suite although it is somewhat out of date.

The entirety of the application site is zoned as 'POS – Passive Open Space' in the Plan. The zoning objective is as follows; *"To preserve, improve and provide for parks, recreational public and private open space, green corridors and ecological buffer zones."*

The zoning description is *"To facilitate the further development and improvement of existing parks and other passive / amenity open areas and to facilitate opportunities for the development of new parks, recreational spaces, green corridors and ecological buffers."*

The proposed development summarised above and specified in the statutory notices is entirely consistent with the zoning as open space and the accompanying zoning objective which is basically to improve this amenity area and open space for park and recreational public use.

The following land uses are principally permitted within the POS zoned lands; *"Community Facility, Open Space, Playground, Recreational Building/Facility/Sports Club, Skate Park"*

The proposed development comprises an enhanced recreation and amenity area requiring planning permission and complies with the list of amenities identified as permitted in principle in the plan.

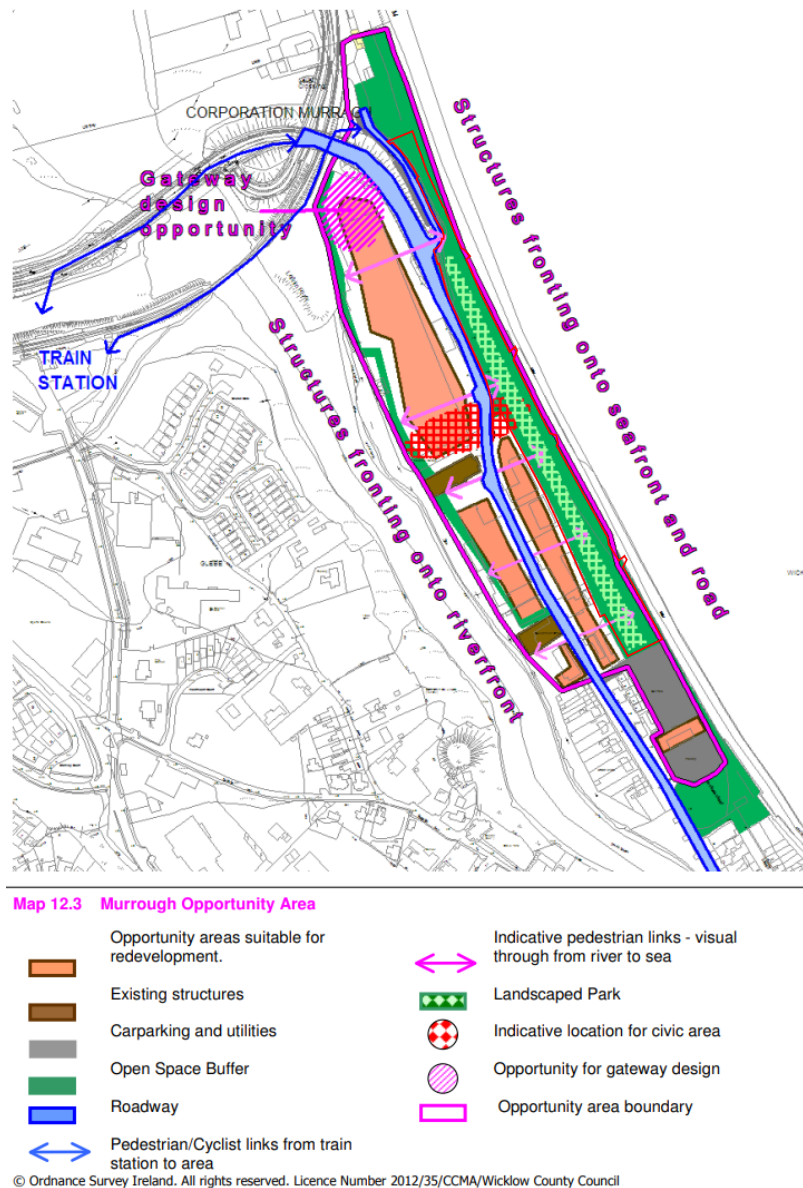
#### *The Murrough Opportunity Area*

The Murrough is identified as an Opportunity Area in the Plan and is shown in Figure 2 below. The following is of relevance and applies to the proposed development;

*"The Murrough also has major potential to become an important recreational and amenity space within the town centre. Further recreational facilities such as a playground, improved pathways and new riverside uses, in association with general landscaping and other*

environmental improvements can be achieved here. Tourism facilities such as a hotel and a tourism information centre would greatly enhance the amenity potential of the area. The Murrough area has the potential to become a vibrant mixed-use area, capable of providing the employment and residential demands necessary for the town to become self-sufficient settlement.”

**Figure 2: Extract of the Murrough Opportunity Area Map from the Plan**



The proposed development the subject of this Part 8 application seeks to enhance without significant impact the existing recreational facilities in the Murrough. The subject development meets ‘head on’ the following key objectives for this area where it is stated “*Further recreational facilities such as a playground, improved pathways and new riverside uses, in association with general landscaping and other environmental improvements can be achieved here*”. In doing so the proposal assists in the realisation of the area’s amenity and tourism potential without significant impact on the environment and specifically on the qualifying interests of the Murrough SPA.

The following development objective is of relevance;

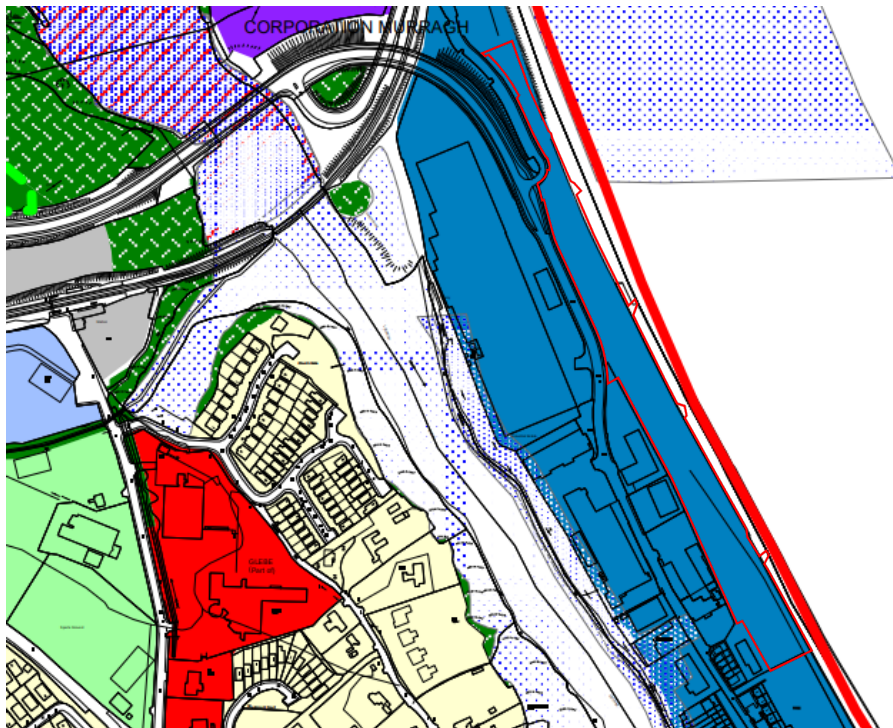
**MB7** - *To facilitate the development of a landscaped linear public park along the coastal edge of the Murrough connecting to the Murrough Wetlands / Broadlough, complete with playground, designated walkways, toilet and washroom facilities, boardwalk areas, seating, fishing stands, signage and lighting.*

All of the above amenities envisaged in Objective MB7 for the revitalisation, sustainable use and development of this area are proposed in this application. The proposed development is consistent with the Opportunity Area defined in the Plan and presented in Figure 2 above.

#### Draft Wicklow Town – Rathnew Local Area Plan 2025 (Draft LAP)

Whilst the somewhat outdated Wicklow Town – Rathnew Development Plan 2013-2019 remains the statutory development plan covering the application site, the County Council is currently preparing the Wicklow Town - Rathnew Local Area Plan 2025. The draft LAP was on display from 9<sup>th</sup> October to 20<sup>th</sup> November 2024 inclusive, where submissions were invited from the public and interested parties.

**Figure 3: Extract of the draft Plan and the application site is zoned as ‘WZ – Waterfront’**



The application site is zoned as ‘WZ – Waterfront’, as per the Draft LAP. The WZ land use zoning has the following objective: *“To provide for the development and improvement of the waterfront zone, to facilitate the continuation and development of existing employment / maritime / port, residential, public utilities, and community / recreational uses and to promote and provide for new residential, tourism and other mixed-use development.”* This is, in many ways, similar to the zoning in the adopted Plan 2013—2019, but the emerging zoning is wider in its extent of development specified as acceptable in principle in the emerging LAP. However, the proposed

development falls clearly within the range of permitted uses, activities and development as essentially an enhancement of existing. The extent of WZ zoning is shown in Figure 3 above.

The permitted uses for the waterfront (WZ) zoned lands, identified within the Draft LAP include; *“aquaculture / fishing, residential, childcare, civic / cultural uses, community facilities, education, employment / office uses, general and light industry, harbour uses, health related service / uses, hotels, maritime uses, recreational and leisure uses, retail, restaurants, parking, public house, tourism uses, utility installations and ancillary development in accordance with the CDP and LAP.”*

The proposed development provides mainly recreational amenities and enhancement of existing open space and falls clearly within the permitted uses and activities under the WZ zoning.

Prospects and views from the railway line are protected as per ‘Map 2B - Natural Heritage’. The proposed enhancement and the lack of substantial structures or buildings would ensure that those protected views are not affected.

#### *Protected / Designated Sites*

There are no protected structures on site. The site does not fall within any protected area or designated sites, such as any Architectural Conservation Area (ACA), Special Protection Area (SPA), Special Conservation Area (SAC) and Natural Heritage Area (NHA) or proposed Natural Heritage Area (pNHA). However, the site lies adjacent to, but not within, the Murrough SPA (004186) and is located close to the Murrough Wetlands SAC (002249) and Wicklow Town Site pNHA (001929).

Figure 4 above shows the extent of the application site in the context of adjacent Designated Sites. The application is accompanied by a Stage 1 Appropriate Assessment Screening Report undertaken by Alan Lauder Ecologist.

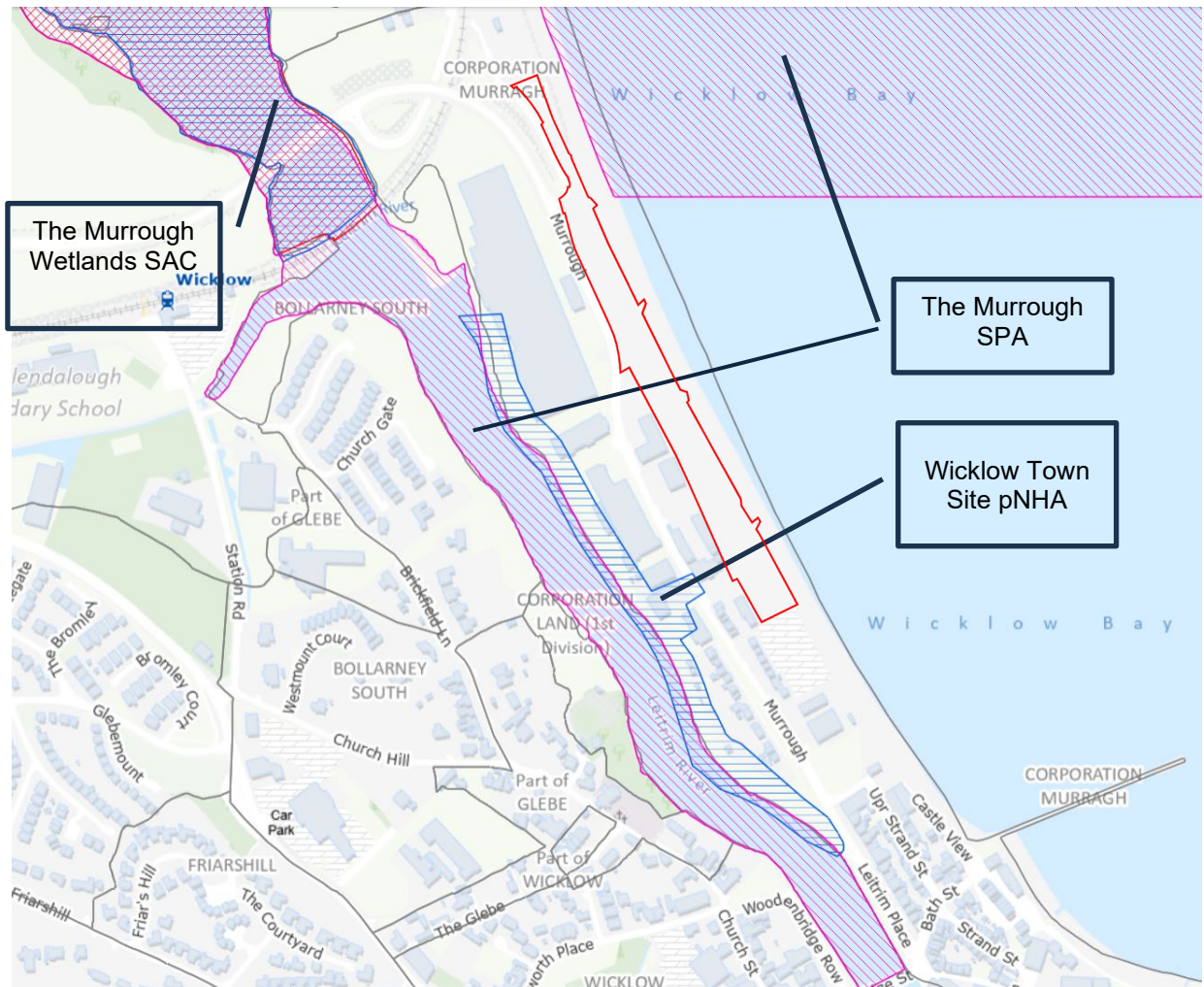
Since the northern part of the site abuts the Murrough SPA, the following ‘qualifying interests’ have been considered during the assessment of the proposed development by Alan Lauder:

- *Red-throated Diver (Gavia stellata) [A001]*
- *Greylag Goose (Anser anser) [A043]*
- *Light-bellied Brent Goose (Branta bernicla hrota) [A046]*
- *Wigeon (Anas penelope) [A050]*
- *Teal (Anas crecca) [A052]*
- *Black-headed Gull (Chroicocephalus ridibundus) [A179]*
- *Herring Gull (Larus argentatus) [A184]*
- *Little Tern (Sterna albifrons) [A195]*
- *Wetland and Waterbirds [A999]*

The proposed development is an enhancement and upgrade of the existing recreational and amenity area without physical intrusion into either the sea or the revetment and the proposed development, as mentioned above, is not a significant change to what is existing. The proposed development would not directly or indirectly impact on these designated sites given its limited enhancement and complementary use to what is existing. The proposed viewing points are suspended over the revetment.



**Figure 4: Extract of NPWS Designations Viewer**



### *Wicklow Town Waterfront Zone Strategy*

Chapter 5 of the draft LAP identifies three key regeneration areas within the LAP area and Wicklow Town Waterfront is one such key regeneration area with significant potential for regeneration. The strategy for the regeneration and revitalisation of this area is set out in the Chapter 5 of the draft LAP. The extent of the boundary and the three distinct areas within it are identified in Figure 5 below. The application site falls within ‘Area 2 – Recreational and Amenity Area’ of the Wicklow Town Waterfront Zone Strategy, as identified in the strategy map, shown below.

The following are the key strategic aims of the Waterfront Zone Strategy;

*“to facilitate regeneration and growth of the port, harbour, quays and Murrough; in order to fulfil the potential of the port as a competitive international cargo port that is a thriving economic hub and a centre of excellence for the off-shore renewable energy sector; to facilitate the regeneration of the Port and Murrough mixed use areas, to create new compact high density urban quarters with a distinctive identity and character within the settlement; to facilitate healthy placemaking by significantly enhancing the recreational, cultural, leisure*

and amenity potential of the harbour, beach and Murrough park area; that will significantly enhance people's quality of life through the creation of a healthy and attractive place to live, work, visit and invest in. (our underlining is for emphasis)

The proposed development realises a healthy placemaking opportunity, significantly enhancing the recreational, cultural, leisure and amenity potential of the town.

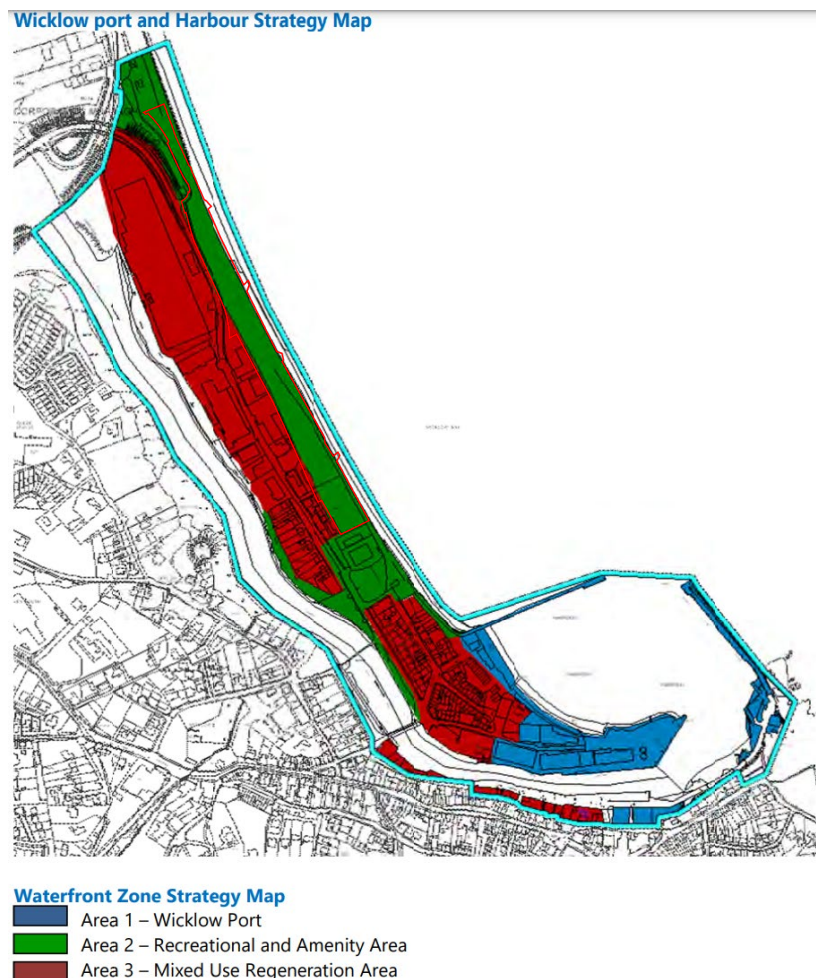
*"...It is important that the town centre and the waterfront have strong connections, physical and visual, to mutually exploit each other's assets without compromising their potential or their historical or environmental amenity...."*

The proposed further connects the existing park to the town via the waterfront promenade.

*"...To protect the natural heritage of this area ensuring that the conservation objectives of European sites are not adversely impacted upon, either directly, indirectly or cumulatively through any proposal."*

Appropriate Assessment screening of the proposed development has been undertaken for this planning application. The Screening Report concludes that the proposed development does not impact on any Designated Site.

**Figure 5: Wicklow Town Waterfront Strategy boundary map (extract of the draft LAP)**



The 'Area 2 - Murrough Recreational and Amenity Area', which includes the application site is described as:

*"A narrow band of vegetation runs uninterrupted along the river bank, with the river walk, on the western edge, while to the east, a grassed area, that has hard and soft landscaping in parts, to the northern part approximately 4 - 5m wide separates the buildings and activities from the seashore. The landscaped area includes a playground, a skate-park, a dog park, a walkway and an outdoor gym. This area is an important viewing area of the annual Wicklow Regatta festival. Additional landscaping and parks are proposed for this area. This area has major potential to become an important recreational and amenity space within the town centre. In addition to the existing recreational facilities, additional facilities such as a pump park and an Aires park, along with landscaping and other environmental improvements can be achieved here."*

The objectives identified in this Area 2 (above) are met by the subject development. The specific requirements for Area 2 such as the pump park, an Aires Park, landscape and environmental improvements are all proposed in this instance.

Regarding appropriate and acceptable uses within Area 2 (including the application site), the Draft LAP identifies the following objectives:

*"Within Area 2 (Recreation & Amenity Area) the following uses are the 'only uses' that will be permitted in principle:*

- Formal and informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, 'Mixed Use Games Areas' and outdoor gyms;*
- Tourist / visitor infrastructure including car parking, Aires sites, information signage / booths, toilets;*
- Buildings / infrastructure associated with safety, rescue, utilities, etc;*
- Seasonal markets / fairs / events."*

The proposed development is compliant with the following policies of the emerging LAP:

*WTR55 - To facilitate the development of a landscaped linear public park along the coastal edge of the Murrough recreational and amenity area, complete with formal and informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, 'Mixed Use Games Areas' and outdoor gyms, tourist / visitor infrastructure including car parking, Aires sites, information signage / booths, toilets, buildings / infrastructure associated with safety, rescue, utilities etc, Seasonal markets / fairs / events.*

*WTR61 - To facilitate the improvement of pedestrian/cyclist/transport movement and access to the Waterfront zone, by facilitating the provision of appropriate directional and information signage that increases access to and the legibility of the routes between attractions and facilities in the Waterfront zone. In the Waterfront area, no development will be considered that would reduce or remove existing public amenity access to the coast, river banks or port/harbour quays. Any development proposals will be required to show how existing access is to be maintained, improved or new access is to be provided.*

A range of uses and activities for the Murrough Park enhancement are provided in accordance with Policy WTR55. The uses and activities proposed are permitted in principle within the WZ zoning. Wayfinding and enhanced access forms part of the proposal to enhance public amenity access to the coast, which would be highly desirable, meets Policy WTR61 of the draft LAP.

The proposed development is consistent with the policies and objectives set out in the draft LAP.

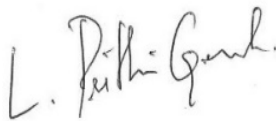
## **Conclusion**

The proposed development is acceptable in principle. The application site is zoned 'POS – Passive Open Space' in the adopted Plan, and 'WZ – Waterfront Zone' in the draft LAP. The desire for the sensitive and low impact development of the Murrough Waterfront Park, as an important town recreational and amenity space, is clearly showcased in this instance consistent with the current Plan and the draft LAP.

The proposed enhancement of an existing amenity and recreational area is limited predominantly to surface works, does not encroach onto or into either the revetment or the sea, and is a clear enhancement of what is there on site currently. The proposed development reflects and meets the policies and objectives of the adopted Plan and the strategy set out for the waterfront in the draft LAP. The proposed development would not negatively impact on any Designated Sites as set out in the Stage One Appropriate Assessment Report undertaken by Alan Lauder.

The proposed development is in accordance with the proper planning and sustainable development of the area.

Yours sincerely,



**Assistant Planner**

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