



Draft Wicklow Town – Rathnew LAP Submission - Report

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Wicklow Planning Alliance



18th November 2024

Submission to the Local Area Plan for Wicklow Town and Rathnew

Land Use Maps and policies

In general terms the Wicklow Planning Alliance (WPA) would support the general direction of the zoning and phasing in the draft Local Area Plan and are not aware of any particular idiosyncrasies. It is appropriate to consolidate growth in the Primary Growth Centre and a population of 18-20,000 should be sufficient to create a largely internal low carbon economy servicing each other with local employment opportunities.

The rationale for the zoning for employment uses is less clear and certainly doesn't conform to recently published Office of the Planning Regulator's Practice Notes which recommend much more data led analysis of need and clearly identified sectoral demand to justify the chosen size and location. See

<https://publications.opr.ie/storage/publications/gC5yxMzYiDv3xbb0dbpv74WAtaqLZ6jeEmVU0BO7.pdf>

It is highly unlikely that zoning in itself will draw in high paying jobs as such businesses generally prefer much larger population bases and the focus of the Claremont Hub for the film industry is unlikely to provide stable, full time decent jobs that will provide mortgages adequate for the current high prices of housing. A dose of realism rather than wishful thinking would not go amiss so that decision making will be better informed. Fortunately, the Food Hub at Claremont at least is more in keeping with the Wicklow Planning Alliance previous proposals for Claremont to be the support centre for Climate Adaptation and a low carbon sustainable economy.

The Wicklow Planning Alliance
The Corner House, Newtownmountkennedy, Co. Wicklow. A63XP26
wicklowplanningalliance@gmail.com

Monitoring and Indicators

It is hoped that the Office of the Planning Regulator's recommendations in their Practice Notes will be taken on board and time and resources devoted to the collection of much more data. This is not only critical to the analysis of employment needs but to many other aspects of monitoring the success of the planning policies espoused in the draft document. Whilst the framework to support business and employment is important, it is also critical that this is underpinned by the need to ensure that it will not increase carbon emissions or biodiversity loss.

We would suggest that the monitoring proposed in the SEA is completely inadequate and much better indicators are required. Examples of such indicators can be found in many earlier submissions from the Wicklow Planning Alliance or more recently in Doughnut Economics "A Data Portrait of Place. see:
<https://doughnuteconomics.org/tools/doughnut-unrolled-data-portrait-of-place>

Traffic, Parking and Transport

Much of the text in the draft is overly optimistic and not reflected in experience. We refer in particular to the description of traffic and transport. The need for more housing is no longer the main topic of conversation in the town, Now it is traffic! The justification for much of the high density housing is access to the railway station however the likelihood of a usable service is far off in the future despite valiant attempts by many. A Park and Ride bus service from Rathnew is of course essential but hardly likely to make much of a dent in commuter traffic and the Local Link bus is notoriously unreliable making it unusable for workers to use and to abandon their cars. The map identifying all areas of Wicklow Town within 15 minutes of public transport is excellent but not much help if the service is inadequate. There is an urgent need for a local town bus. Bus Eireann currently operates town bus services in six towns across Ireland, including Athlone and Navan. The Athlone town service, which became Ireland's first fully electric bus service in January 2023, is facilitating 10,000 passenger journeys per week. The population of Athlone town, at 22,869 is slightly smaller than Carlow, however, both towns have growing urban centres and not much larger than Wicklow Town. Furthermore, whilst it is a bit late as most of the planned new housing estates are already built or permitted, new roads should provide pull In stops so that buses do not impede other traffic flows.

This would make a significant impact on the carbon emissions from the transport needs of all the new housing, which currently all need to drive to access the retail area of the town. A reduction in traffic would also improve the shopping experience. Meanwhile an objective to

slow down traffic through the town would be helpful. Current proposals to reduce speed limits are not adequate. It should be reduced to 20kph through the main street . Whilst it may not be possible to remove traffic from the main street it should be made clear that pedestrians have priority. We are aware that the control of speed limits is outside the control of a Local area Plan however it could be included as an objective to seek such limits. We maintain that a speed limit of 30kph should be put on ALL approach roads to the town for at least 1-2kilometres. Walking into town is possible for many but most unpleasant beside speeding traffic.

It is also unrealistic to maintain that there is adequate parking in the town when there is currently no alternative to the car for most and often all the car parks are full. There is an opportunity to build a 2-3 story car park on council land beside the AIB Bank though it would be very important to design something in keeping with the historic town centre opposite an Area of Architectural Conservation. A carpark on the eastern end of town, perhaps behind the Gaol, is also important, especially if it is anticipated that the old court house will eventually be redeveloped and that end of town revived. It could be included as an objective.

Active Open Space

The lack of provision for sporting activities close to the heart of the town is a serious omission in the Plan. The land is now mostly covered in housing with few amenities that don't require getting into the car. It is a relief to see that the tennis courts remain as they are well placed and contribute to the character of the town. It is our understanding that there are 5 sports clubs all needing better sites.

If you want to squeeze residents, especially families with children, into high density living then you absolutely must deliver quality public open and active open space. It is worth noting that often in the evenings or after school Greystones Park & Ride is packed with cars delivering children and teenagers to the several different sports clubs that happen to be located nearby. It is our understanding that in Wicklow there are 5 sports clubs all needing better sites and our local plan should aspire to similar facilities to those in Greystones . A larger site needs to be identified for shared facilities rather than spreading them around smaller sites with higher building and maintenance costs.

Light Pollution

Of critical importance if new sports facilities are built is the issue of light pollution. The controls outlined briefly in the County Development Plan are not adequate to impact on the problem in the town. We already have examples of thoughtless lighting such as around the Black Castle. Such up-lighting as seen on the headland is contrary to good practice and leaving them on all night is very wasteful too. It would be appropriate to protect the character of the town by including specific guidelines for lighting new developments including along the shoreline which is zoned for significant new development. To quote an earlier submission from Dark Skies Ireland: "The awareness of the disruptive nature of the blue content of lighting, the increased perception of glare from such sources, and the rapidly-improving efficiency of lower correlated colour temperature (CCT) has led to an increasing adoption of warmer-coloured lighting with a drive towards "warm white" lighting with a CCT of 3000K or less, and this was also a stated outcome of the EU Green Procurement Policy review . In the UK such lighting is becoming more standard, particularly for residential areas, and even lower CCT lighting is likely to be adopted. Warm white lighting is similar to the temperature of halogen light as used in shops to provide better colour discrimination and has safety benefits in low-visibility conditions and where older people (who suffer from eye conditions such as cataracts) are concerned. This light is also perceived as more "friendly" and is therefore worthy of consideration in terms of making the outdoor environment more welcoming, particularly with the growth in outdoor dining and the push to boost service industries and attracting people back into town centres post-Covid. The national Road Management Office (RMO) provides for measures of local autonomy in terms of moving to lower CCT lighting. As an example, Mayo has adopted 2700K LED lighting on a number of routes, including on the N59 via Newport town to improve the environment as well as to reduce light pollution. In consultation with the NPWS, adoption of warmer lighting – including, potentially, amber lighting in more sensitive areas – as well as "trimming and dimming" of lighting levels should be considered for more environmentally-sensitive areas." This should all be adopted for the new roads and urban development that is anticipated in the new Local Area Plan.

Craig Bishop
Chairman of the WPA