



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

Who are you:	Private Individual
Name:	Steven Matthews TD
Email Address:	steven.matthews@oireachtas.ie
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Steven Matthews TD

Green Party - Wicklow

To Wicklow Planning Services,

Thank you for the opportunity to submit my observations at this early stage of the formation of a new Local Area Plan for the Greystones-Delgany & Kilcoole area. I look forward to expanding on these suggestions following the draft plan stage, to enhance the environment, community, and economy for all the residents of the Greystones District areas of Delgany, Kilcoole, Newcastle, Newtownmountkennedy and Greystones town and environs.

My submission considers high level, issues stage observations relating to:

1. Compact Growth, housing, population
2. Regeneration and reuse of vacant buildings, urban design & landscaping, place-making and public/community places
3. Economic opportunity, employment, services & tourism
4. Heritage, protecting nature, climate action & energy
5. Transport & infrastructure
6. Plan assessment and monitoring

The Greystones Municipal District area has seen a significant increase in housing development and a subsequent population increase since the LAP 2013-2019 was adopted. This increase, in line with the previous plan has placed a genuine strain on local services including schools, transport and community and health services. Further population growth must be underpinned by a period to allow for a catch-up for investment and delivery of community, education, transport, sports & recreation and local health services to serve the existing and new residents throughout the Municipal District. The main population areas designated in County Wicklow for population growth under the regional planning strategy are Bray and Wicklow Town, the new LAP should reflect this hierarchy in its population and growth strategy.

The towns and villages that make up the population centres (Greystones Town, Delgany Village, Kilcoole Village, part of Newtownmountkennedy, Newcastle Village) should be permitted a sustainable level of compact growth which respects and embraces the unique characteristics of each settlement whilst maintaining its identity. The growth should be compact to support the local economy and community and the care should be applied to prevent sprawling and merging of areas. Whilst each settlement can complement and benefit each other socially and economically, their separate identities should be maintained. For example, there should be better interconnectivity but no further merging of development lands in Kilcoole or Delgany into Greystones.

Housing in the Greystones District, despite considerable increase in numbers, remains unaffordable for many. The LAP should seek to maximise density of development (matched by services, transport, green spaces) and mix of tenure. One of the first Cost Rental developments at scale in Ireland, was developed in a Greystones scheme. The development offers a mix of affordable, social, private, and cost rental homes in a compact layout, with amenities and close to transport and connectivity to the town centre. This should be the future model for providing homes; affordable and connected. The LAP should set this model for future housing needs for all areas. A density level and design such as the RIAI 'Low Rise Medium Density'¹ model should be adopted in design standards. Zoning maps should indicate the optimum routes for active travel connectivity and permeability through the settlement. With the objectives of the revised National Planning Framework, the new Planning Act and the targets of the National Climate Action Plan at its core, the new Greystones-Delgany & Kilcoole LAP is well timed and has the opportunity to be the standard bearer for forward planning and the urgent environmental protection which the Greystones District deserves.

¹ [Whats On | News | RIAI.ie \(The Royal Institute of the Architects of Ireland\)](https://www.riai.ie/news/whats-on/news-riai-2020/riai-releases-new-design-standards-for-low-rise-medium-density-housing)

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Each settlement in the plan requires careful balancing between provision of housing & population growth and the provision of public spaces and places, areas for recreation, and opportunities for access to the surrounding natural areas, forests, coastal routes and beaches. The LAP should clearly identify opportunity sites within each town and village for improving or providing community and public places. Places for residents to meet and enjoy their town or village, places that complement the shopping areas or main streets, places that generate civic pride and places that assist the work of our town teams and tidy towns groups. Designing population growth also requires upkeep and improvement for existing residents' amenity and enjoyment. The principle of *placemaking*, seeking to improve residents' connectivity to each other, the town and its attractiveness as a place to live, work, go to school and grow up in should be enshrined in the objectives for each settlement.

Empty or underutilised buildings should not be tolerated in our town centres and main streets. The LAP should develop a strategy to optimise Local Authority and private owners' access to supports and funding for redevelopment and re-use for homes and local business. The new Compulsory Purchase Order procedures and Dereliction and Vacancy grants should focus on areas in the district to revitalise main streets and bring life and living back to empty or derelict buildings.

Creating town centres and attractive community public places for the people that live there, creates areas where visitors and tourists wish to come. This improves the local economy by supporting and encouraging local business opportunities and adds value to homes and wellbeing to the lives of those that reside there.

The LAP should set an objective to create a rolling register of all derelict and vacant property throughout the district. The register should include details on the planning history of the site, its current zoning, details on its inclusion on the Derelict Sites Register or monies owed under the Derelicts Site Act and supports available from the local authority or Government to assist with regeneration and re-use of the site.

Placemaking and the attractiveness and liveability of a town, is ranked highly by those who invest and create jobs in small, medium and large-scale enterprises. With advancement in Working from Home and digitisation across many sectors, the availability of affordable homes to rent or buy, the connectivity to a town centre, the attractiveness of the location that employees can access, live in and enjoy is an important factor in investment decisions. The settlements in the LAP area have an abundance of attractive features and a key focus of the plan should be improving interconnectivity between the towns by either public transport or active travel links and the opportunity to provide affordable homes to rent or buy – these two factors will create the best economic boost to established new business and attract further investment.

The tourism offering and opportunity for Greystones District is well established. To draw more tourists and increase its attraction the focus should be on improving the towns and villages for those that live there. Failte Ireland recently commented at a national planning conference that, creating places where people want to live, creates places where people want to visit. In my view, this should guide the plan in relation to tourism.

For example, the proposed coastal route from Greystones to Wicklow Town passes through very sensitive habitats which are protected under EU environmental legislation. Rather than try to route the coastal path through these areas, it should avoid these locations. This provides an opportunity to connect Kilcoole to Greystones via the coast route, then take the route inland at Kilcoole railway station to connect to Kilcoole village. Reconfigure the road or create an off road route from Kilcoole to Newcastle, thus providing a safe walking and cycling route between Kilcoole and Newcastle village. Finally, bring the road route back to the coast at Newcastle and complete the coastal route into Wicklow Town

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This is an example of providing far better connectivity, safer walking and cycling, and access to local amenity for the residents first. It naturally follows, that visitors will like it too and highlights the observations that if you build nice attractions for those that live there then people will want to visit too.

Where spatial planning for connectivity & permeability, safe cycling and walking and accessibility improvements underpin development of individual settlements, this principle should expand to provide similar connectivity between those settlements. Connecting Greystones – Delgany, or Greystones, Kilcoole, Newcastle and Wicklow Town can form part of network of routes. For example, although outside the remit of this plan, it aligns with the *Mountains to the Sea* (WCC County Development Plan objective) route connecting Kilcoole to Newtownmountkennedy and on to Roundwood. The new National Cycle Network designates the east Wicklow coastal route as a core spine in the plan. The delivery of the NCN correlates with the life span of the new LAP and therefore should be incorporated in map form into the LAP.

Climate Action and the reduction of climate warming pollution must be at the core of this plan. All measures to improve transport and interconnectivity that provides better opportunities to reduce car use and take a bus, bike, scooter or walk to destinations must be included. Safe walking routes to school for children and their parents, safe routes for cyclists and walkers to the town centres, shops, jobs or public transport hubs are now urgently required. Local town busses that provide a circular, regular service around the residential areas to the town should be planned for, with provision of appropriate, safe, and secure shelters and seating. Permeability should be maximised, for example through housing estates so that the people who live there can socialise, walk and cycle to their work, school or shops, taking traffic off our streets and making them safer and quieter. All these actions lead to a reduction in climate pollution, improves our air quality, makes our roads safer and relieves some of the financial cost and stress of car dependence and congestion.

The natural beauty and range of wild natural areas through the plan area add to the quality of life and benefit of residents. These areas can suffer from overuse and erosion and require protection and management plans. There are very many locations throughout the area which do not qualify under national or EU designation but are locally important for ecology and nature. A provision for identifying these sites *locally important for ecology (LIFE sites)* should be made. This would enable the elected members and residents to suggest areas that need some attention or protection and that should be preserved as much as possible where development is proposed. Nature and development can co-exist where this relationship is considered early in the plans and the Greystones – Delgany & Kilcoole plan is an opportunity to be a leader in protecting and restoring nature.

Habitat loss and fragmentation is one of the main contributors to our biodiversity crisis, therefore the plan should clearly commit to maintaining ecological corridors throughout the plan area, providing linkage between various habitats. It should be a requirement within land zoning objectives to maintain connectivity between natural woodlands, riparian and coastal areas and other habitats present within the area during construction and use stage of a development. The culverting of streams or loss of mature hedgerows should be avoided wherever possible.

With extensive progress on renewable energy planning, maritime area planning, auctions and consenting processes, the Greystones coastal area will see the development of wind turbines at sea during the lifetime of the plan. The most recent Offshore Renewable Energy Support Scheme (ORESS1) will see three out of the four successful applicants construct turbines along the Irish east coast and the Greystones District is poised to benefit from a very substantial community fund associated with RE development. The LAP should consider how better public

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places, climate action measures or recreational facilities could be funded, or part funded through the Community Benefit Fund.

The Greystones District requires better public transport infrastructure and services; the DART South project will increase rail frequency to six trains per hour between Bray & Greystones whilst the DART extension to Wicklow Town has potential to deliver up to 18 trains per day each way. Bus Connects proposes to introduce a new circulating town bus service for Greystones Town (Route L3) and two further improvements to provide routes L1 & L2 to serve Greystones, Kilcoole, Newcastle, Killadreenan, Newtownmountkennedy, Kilpedder and Delgany. The delivery of these services will take place during the lifetime of this LAP, therefore the population strategy and land use strategy should focus on locations aligned with the planned service improvements. Concentrating growth in these locations will support service investment and align transport and planning strategies to reduce car dependency and reduce transport emissions.

The potential for growth in Kilcoole and Newcastle should be considered on the basis of timely delivery of the DART extension to Wicklow Town. Kilcoole is currently served by 6 trains per day each way but will benefit from a trebling of services under the DART extension. Due to the characteristics of electric trains, the potential exists to create a stop that serves Newcastle (and potentially Charlesland South area) without greatly increasing the current rail journey time between Greystones and Wicklow. The procurement of electric trains (Battery Electric Multiple Unit BEMU) is underway, and they will enter service during the lifetime of this LAP. The installation of the train charging system in Wicklow Railway Station and new signalling equipment is under design. The delivery of a frequent electric service to Wicklow Town will provide a reliable, affordable, and attractive alternative to car dependency and can potentially relieve congestion on the N11 from Wicklow north.

Wicklow County Council was successful in its 'Pathfinder' proposal to the Department of Transport. This ambitious proposal includes the area of Greystones and Kilcoole, to provide a safe and integrated network of pedestrian and cycle connectivity between, and to the town centres. The success of the pathfinder designation should provide inspiration to further expand the network to include connectivity to and between the village centres of Delgany/ Greystones, Newcastle/Kilcoole and Kilcoole/Newtownmountkennedy. The LAP should set the highest ambition in objectives to make the Greystones District the most attractive, safest and interconnected area providing safe routes to school, safe walking routes to towns and shops and an expansive cycling network.

The **N11 Main Scheme**, is supported by many public representatives and residents who wish to see a third car lane on the N11. This scheme proposes to close many local access routes and exits to/from the N11. The scheme is aimed at consolidating the strategic nature of the N11, ie a main road connecting Dublin to Roslare. However, the scheme has never proposed to improve local connectivity between the town and villages along the route where local access may be extinguished. The LAP should consider the opportunity to improve local connectivity (cycling/e-cycling, walking, public transport) between Newcastle, Kilcoole, Charlesland, Greystones town towards Bray as a sustainable travel counterbalance to the closing of exits and access proposed under the N11 Main Scheme.

The **N11 Bus Priority Scheme** is currently undergoing public consultation assessment. The scheme can potentially improve journey times for busses serving the N11 access routes to Kilcoole, Newcastle and Newtownmountkennedy. The LAP should consider, in the event that the Bus Priority Scheme proceeds, how to optimise safe active travel links to the N11 bus stops and assess provision of adequate bus shelters, secure bike facilities.

Recreational and social opportunities are as important to the creation of sustainable towns and villages as housing, employment, transport, education and health services. With the growth of Kilcoole, Greystones and Delgany there is a commensurate need for sports, social and leisure

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facilities to serve the homes and residents of the area. Many sports clubs are struggling to provide adequate space and playing pitches

The former Charlesland Golf Club land, although privately owned, provides an opportunity to plan for parkland, shared playing pitches and active open space development. This area could adequately serve the current and future needs of the local GAA clubs, soccer clubs and running clubs in the district. The land should not be considered for further housing development. Any active open space development should require a safe active travel link connecting to the current network.

Plan Monitoring and Reporting

The objective to optimise land use in the common good and aligned with population growth and the core strategy for Wicklow is complex and challenging. The information contained in Local and County Plans can sometimes be difficult to decipher especially on population and housing targets. It would be beneficial for residents if there was a an on going review and reporting on the execution of objectives contained in the plan. For example, performance indications document every 2 years that outlined the amount of zoned land that has been activated in terms of consenting and commencement of development or a tally on housing completions. A report should be brief, non technical and presented in an easily understood format. This would be equally beneficial to elected members and would assist in the statutory review process after 4 years for the new plan.

It would also be beneficial to carry out an assessment on population growth, the demand this is likely to place on schools, for primary and secondary places, and the actual capacity available for schools in the Greystones District

Thank you for the opportunity to contribute to the issues stage of the proposed Greystones/Delgany – Kilcoole Local Area Plan. I hope my observations will be considered and addressed in the draft LAP.

Regards

Steven Matthews TD