

C150

Ms Sorcha Walsh,  
Senior Planner,  
Wicklow County Council,  
County Buildings,  
Wicklow Town,  
Co. Wicklow.

Wicklow County Council

18 FEB 2016

PLANNING DEPT.

Courtown Road,  
Gorey,

18th February 2016

Submission on Draft Wicklow County Council Development Plan 2016 — 2022.

Concerning c. 12.75 acres at Newcastle Middle, Newcastle, Co. Wicklow.

A Chara,

I am writing to make a submission for consideration in the draft development plan. I am part owner with others of the above lands, and I attach map of same, marked X with a purple boundary.

This land is opposite the community centre, and adjacent to the school, and within a short walking distance of the village centre. There is road frontage on the Greystones / Wicklow road. There is a cluster of private houses to the Northern boundary of our lands, and Greenwood lane investments ltd, partly developed lands directly adjacent to our land. We believe that our lands are suitably close to the village centre to provide a good quality integrated low density development which would be compatible with any general objectives for development in Newcastle.

There is an old cottage on part of our land which we feel should be zoned existing residential, it adjoins the town boundary, and is not zoned on the current Newcastle plan, see second map attached. I also note that the town boundary extends substantially beyond our land towards Rathnew, on the opposite side of the public road. I feel the town boundary should be extended in the proposed new plan on our side of the road as far as the 2 neighbouring residential properties, i.e. More or less in line with the town boundary on the opposite side of the public road.

Under the current development plan 2010 - 2016 Newcastle is designated a Level 6 "Rural Town". "Rural Towns" are strong Rural Towns with a good range of infrastructural services that are suited to accommodating a significant element of urban generated housing demand. In the current issues booklet, stage1 public consultation, on the proposed new development plan the population targets for Newcastle are set out as follows:-

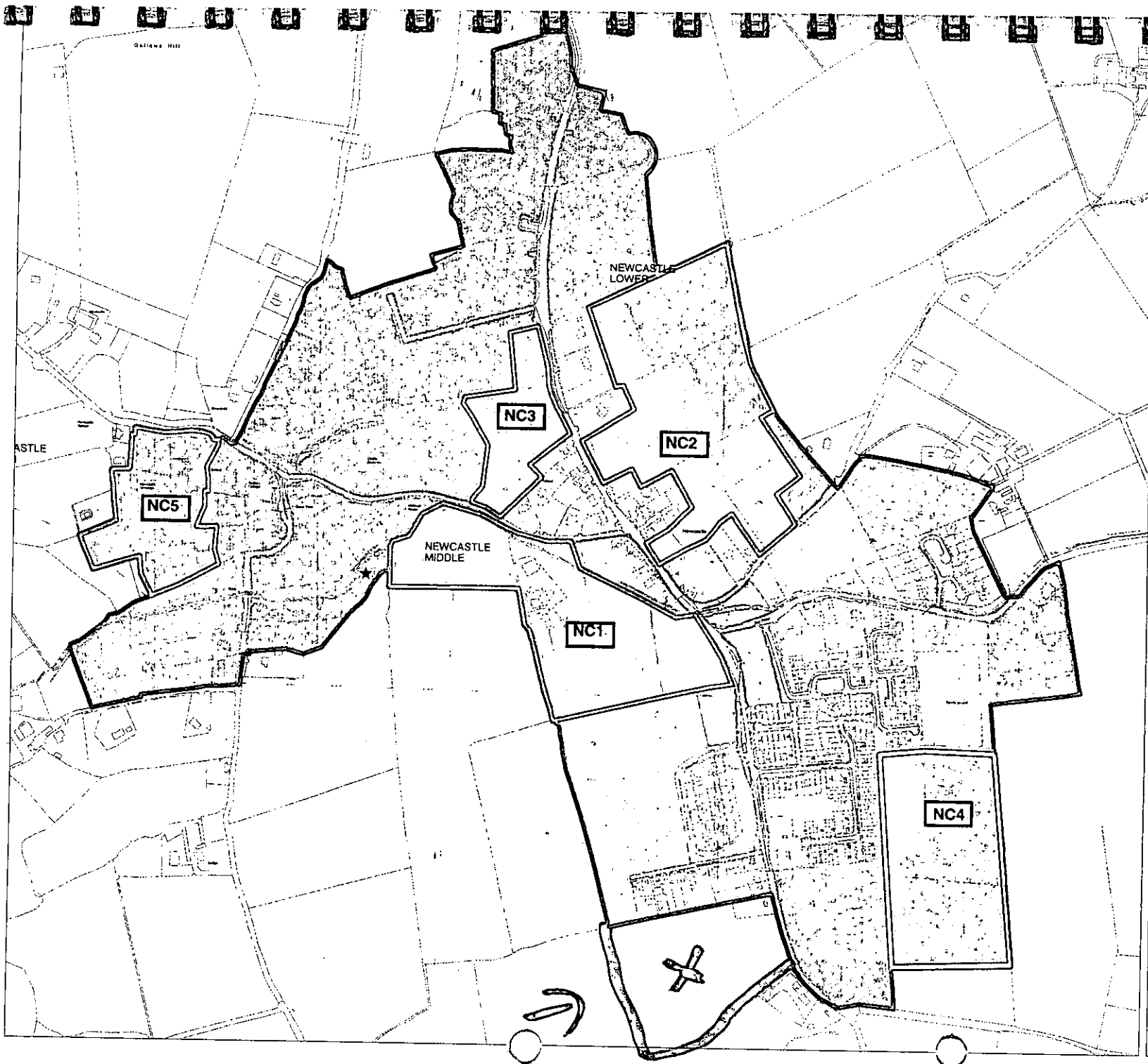
Population Growth to 1,500 by 2016 (from 817 in 2011), and further population growth to 1,750 by 2022. This is a reasonable growth target, however it is possibly conservative, and we would like to see a higher population growth target built into the new plan in order to support local business and community activities.

We would ask you to consider zoning all or part of our land for low density high quality residential development.

Yours sincerely,







*Tom Redmond*

Tom Redmond



# Newcastle Settlement Plan

**DRAFT WICKLOW COUNTY  
DEVELOPMENT PLAN 2016-2022**

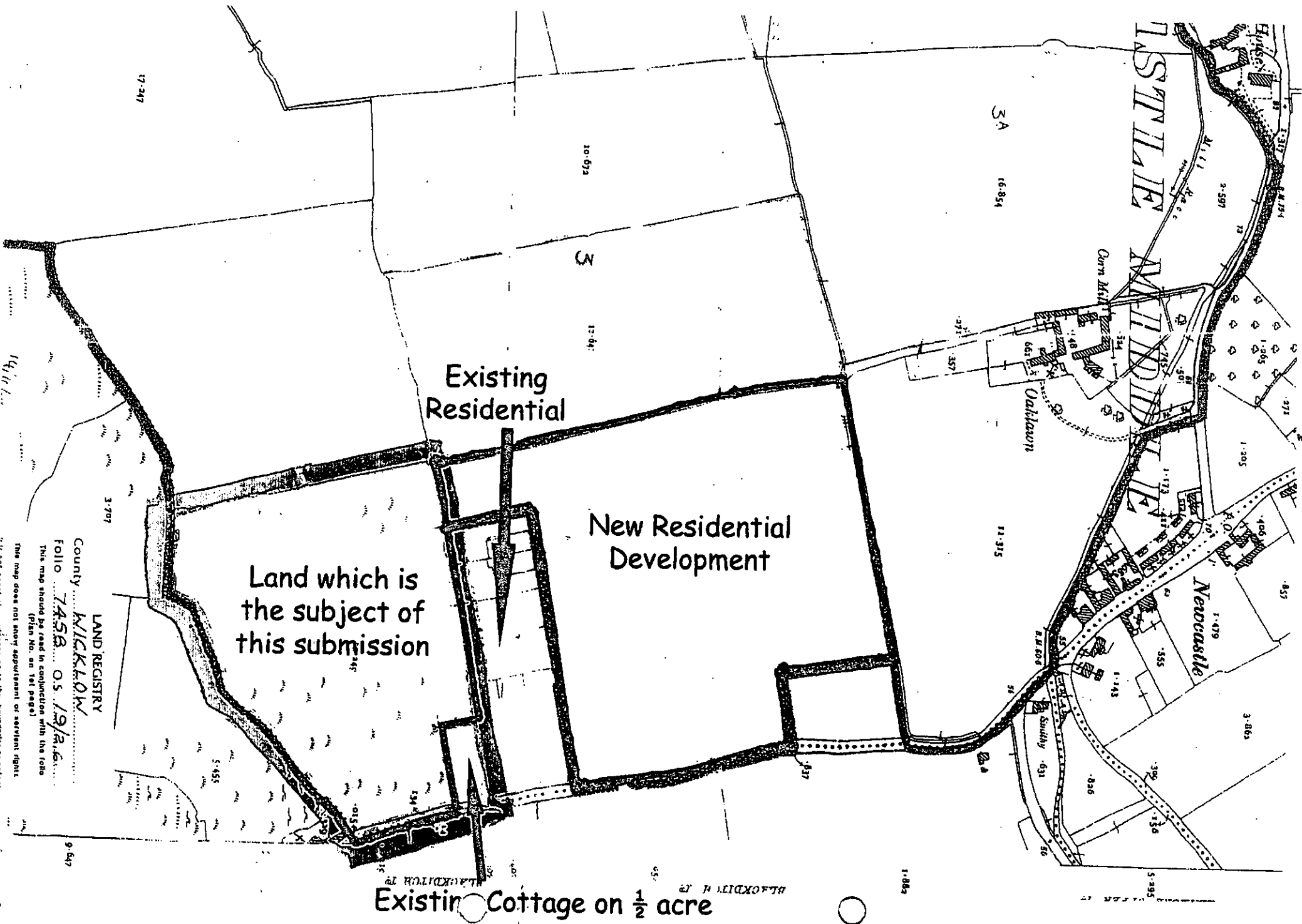
-  Settlement Boundary
-  Primary Development Area
-  Secondary Development Area
-  Tertiary Development Area
-  NC1 Plan Objective
-  Plan Objective Boundary

**Title: Land Use Zoning Objectives  
Map No.: 1**



Wicklow County Council  
Planning Department

Maps are not to scale  
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Licence Number 2015/35/CCMA/Wicklow County Council



Existing Cottage on 1/2 acre

Land which is  
the subject of  
this submission

Existing  
Residential

New Residential  
Development

LAND REGISTRY  
County **WICKLOW**  
Folio **7458 05 19/26**  
This map should be read in conjunction with the title  
(Plan No. on 1st page)  
This map does not show easement or servient right

9-647

17-247

20-672

13-041

3A

66-854

22-315

1-885

INSTANT

WINDIE

INSTANT

Newcastle

Oaklawn

Corn Mill

Sandily

3-862

1-305

1-479

3-862

2-597

1-205

1-205

1-173

1-143

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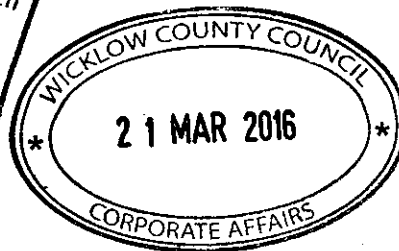
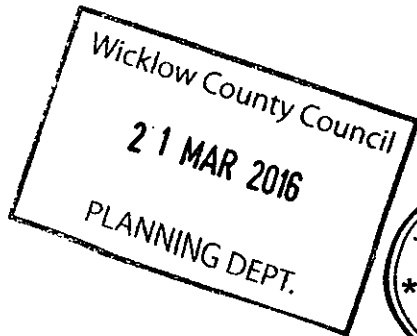
Re Newcastle Road  
Submission

Dear Corcha,

Further to submission made  
12/2/16, I attach letter of  
support from Residents Assoc.

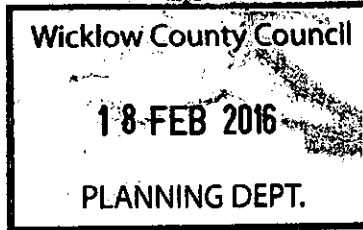
Regards

*David  
Lepinski*





Ms Sorcha Walsh,  
Senior Planner,  
Wicklow County Council,  
County Buildings,  
Wicklow Town,  
Co. Wicklow.



Courtown Road,  
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We would ask you to consider zoning all or part of our land for low density high quality residential development.

Yours sincerely,

*Tom Redmond*

Tom Redmond

**Newcastle Residents Association,**

**Newcastle,**

**Co Wicklow.**

**10/3/16**

**Planning Authority,**

**Wicklow Co Council,**

**Wicklow.**

**RE: County Development Plan 2016-2022 and request by Mr Tom Redmond and Mr Pascal Bermingham to have land rezoned at Newcastle Co Wicklow for low density housing**

Newcastle Residents Association is not objecting to the request by Mr Tom Redmond and Mr Pascal Bermingham to Wicklow County Council to have part of their lands at Newcastle zoned for very low density housing. It understands "very low density" means one house on 0.50 ha.

In not objecting to this request for a change in zoning, Newcastle Residents Association also understands the owners of the land will provide support for the future development of a public walkway along the existing right of way on the south side of the lands concerned.

**Michael Carey,**

**Chairman, Newcastle Residents Association.**

**Leonora Earls**

C 151

**From:** Matthew Weiss  
**Sent:** 17 January 2016 10:33  
**To:** Planning - Development Plan Review  
**Subject:** Observation for the Draft County Development Plan  
**Attachments:** BrambleGladeContract.pdf

Hi,

I am representing the River Vartry Protection Society which is a collection of Riparian Owners and Neighbours that are dedicated to protecting the river and the river basin. We have direct involvement in all that goes on that might endanger the future of the river. Planning is often the most sensitive of these forces that can adversely effect it. We offer the following information.

1- Attached is a new photo of the Nun's Cross Bridge that better shows off this 1710 structure with the first arch being original, standing since that time (Not visible in the photo).

2- We are very concerned that the land to the south of Bramble Glade which is Green Space according to the document attached has been changed from the LAP for Ashford 2008-2014. This is not correct according to the WCC's own document attached and was a requirement for the building of Bramble Glade and can NOT be rescinded by any future Council. All of the residents in their land deed are granted access to the river and this is the only place that they can have that access and be assured a full view of the Green Space down to the river. Changing this from Green Space would invalidate all their deeds. It can be used for Agricultural use only. Please correct this in the map.

3- The lands designated "South of Ballinahinch Park" are not suitable for building (even knowing this belongs to the WCC). This is flood plain and is an essential part of the soakage of floods that protects Mount Usher from flooding. Removing the essential flood plain is not advisable and for that reason we request that this land be designated Green Space or Flood Plain. Building in this location would require a full Flood Plain study and it would not be successful as this land is High to Medium risk and well outside the EU Guidelines for River Basin Management. This would be a poor example of forward thinking and planning for the WCC to build further units in an area subject to flooding.

4- Many of our members have been part of a community group objecting to the proposed building permission in SLO3 and would like to comment on this as this Local Area Plan will supersede the Variation on the previous LAP. It is clear from the proposal now in Further Information, that this estate will never be in character with the local surroundings. The densities of phase 1 and phase 2 amounting to 162 units will always end up as an estate unlike any in Ashford. The local community does not want this. 50 people objected to the current permission (in further information stage) and by the time it gets to An Bord Pleanala there will be at least 150 - 500 neighbours objecting. We believe An Bord Pleanala, (when it gets there), will support the community sentiment as an indication that this is "out of character". We are not looking for a comment on the actual Planning in process but offer this as an example of the numbers of units allowed for this area is well above what is sustainable planning. We ask that these are reduced so that the nature of the estate will be forced to be more like Bramble Glade or Carrig Park or Ballinhinge Terrace. It will always be the situation with these inflated numbers that the developer will go to the maximum and this will always end in An Bord Pleanala for the ultimate decision that it is "Out of Character". Changing the maximums would also allow the possibility of houses being built elsewhere instead of densities of this nature in one location.

Thank you for your consideration of these points.

RiverVartry Protection Society



Dated this

ARDAL CONTRACTORS LIMITED

-with-

WICKLOW COUNTY COUNCIL

=====  
A G R E E M E N T  
=====

CROWLEY MILLAR  
Solicitors,  
15, Lr. Mount St.,  
Dublin. 2.

LAND REGISTRY

FOLIO 8329F

COUNTY WICKLOW

THIS INDENTURE made the \_\_\_\_\_ day of \_\_\_\_\_  
One Thousand Nine Hundred & Ninety-Two BETWEEN: ARDAL  
CONTRACTORS LIMITED of 5/6, George's Quay, in the City of Dublin  
(hereinafter called "the Owners") of the One Part and the COUNTY  
COUNCIL OF THE COUNTY OF WICKLOW with Offices at County  
Buildings, Wicklow in the County of Wicklow, the Planning  
Authority for the County of Wicklow (hereinafter called "the  
Council") of the Other Part. 8

WHEREAS:

- (a) The Owners hold the lands outlined with a red line on the map hereunto annexed (hereinafter called "the said lands") in Fee Simple which said lands are part of the lands comprised in Folio 8329F of the register of Freeholders County Wicklow.
- (b) Pursuant to the provisions of the Local Government (Planning and Development) Acts 1963 to 1983 the Council on the 30th day of October, 1987 issued a Notification of Grant of Permission under Planning Register Reference 3286/87 subject to 24 conditions set out in the Schedule thereto. 8
- (c) Condition No. 1 as set out in the Schedule hereto.
- (d) The owner is agreeable to enter into these presents for the purposes of giving effect to such conditions.

NOW THIS INDENTURE WITNESSETH as follows:-

1. That in consideration of the said Permission the Owner hereby for themselves, their heirs, executors, administrator and assigns will not at anytime thereafter in respect of the said

lands without the prior written consent of the Council or its successors as such Planning Authority use the said lands which is the subject of the Permission Reference 3286/87 other than in accordance with the terms of the schedule hereto.

2. The Owner hereby consents to the registration of this Agreement has a burden on the said Folio and for this purpose the Owner hereby undertakes with the Council that immediately following the execution of this Agreement by the parties hereto he will lodge it in the Land Registry.

IN WITNESS whereof the Owners have hereunto set their hands and affixed their seal and the Council has caused its seal to be hereunto affixed the day and year first herein written.

SCHEDULE

Condition No. 1.

Before development commences, the developer (or land owner) shall enter into a legal agreement with the Planning Authority restricting the use of lands to the rear of the site i.e. between the site outlined and the river to agricultural, open space or playing field uses.

PRESENT WHEN THE COMMON SEAL  
of ARDAL CONTRACTORS LIMITED  
was affixed hereto:-

*Francis Shurley*  
15, K.R. Mount St.  
Dublin 2.  
Secretary

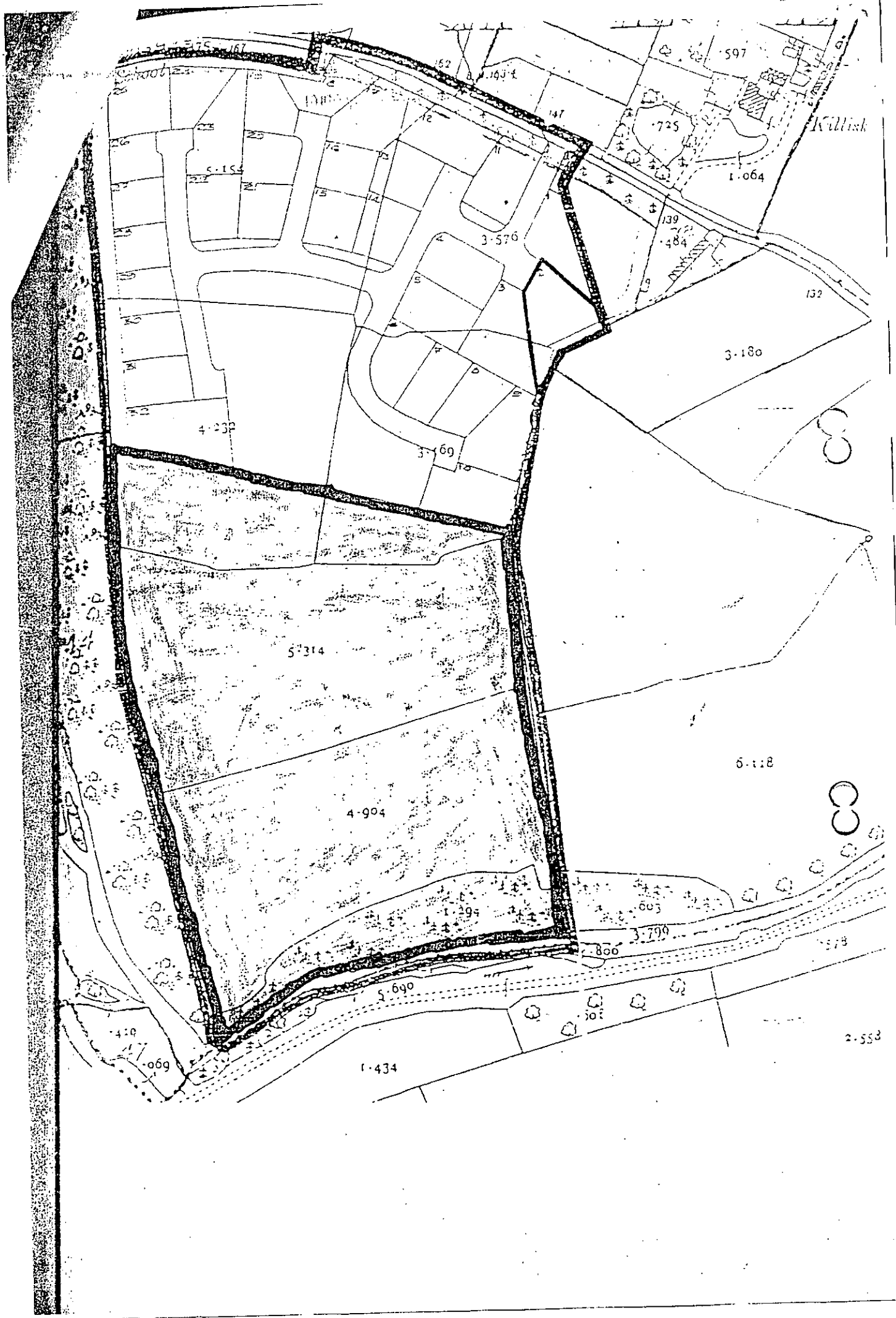
*J. Castillo*  
Francis Castillo

PRESENT WHEN THE COMMON SEAL  
of THE COUNTY COUNCIL OF THE  
COUNTY OF WICKLOW was  
affixed hereto:-

*E. J. Madh*  
County Manager

*John Don*  
Nominated Member

*Newlands*  
A/C Secretary





Leonora Earls

**From:** Matthew Weiss  
**Sent:** 29 January 2016 12:08  
**To:** Leonora Earls  
**Subject:** Addition to: Observation for the Draft County Development Plan

Hi Leonora,

After meeting with Stephen Willoughby and understanding the Wicklow County Council's position regarding the lot below Bramble Glade we would like to add to our Observation on point 2.

We understand that in the WCCs attempt to simplify Zoning that you wished to remove the Private Open Space (pOS). Whereas we understand this may simply some spaces, for the lot below Bramble Glade, this will greatly complicate things for the residents. Nama will sell this plot as full building permission and then the new owner would expect to be able to build on it and end up in court. In this case it would likely be a lawsuit against the WCC for the confusion in Zoning. A law suit resulted against the seller after the previous plan because we had pressed for the WCC to Zone it pOS in the previous Ashford LAP and this was after the sale so the deception was on the part of the seller and the WCC was not responsible as it was zoned appropriately. This will not be so if it is not marked clearly as "Private Open Space".

We have tried to think of another solution suiting your goals but can not come up with one. Making it Public Open Space would not be the correct designation so none of the current categories would suit.

We see only this solution.

1- Clarification from the WCC that Bramble Glade is managed by the WCC and that the area is clearly specified in the management document as Private Open Space and that it is not suitable for building (only agricultural) in perpetuity.

2- For the sake of the Draft Document we can suggest two solutions

A) The only solution is to mark as before "Private Open Space".

B) WCC negotiate with NAMA to transfer the land to the WCC for a token fee or small amount, or to transfer any Bramble Glade Community Association existing or to be formed in order to hold the land. The Land Registry can specify use as in the original WCC document submitted by us. This would bring us back to the original intent. It could then be forested, a path from Bramble Glade to the river for residents. As well, it could be used for Allotments for the Bramble Glade residents giving the WCC an opportunity to be Green, Progressive and Community Focused.

We can look at this as an opportunity to clear this matter once and for all in a positive manner and please contact us if you have another suggestion that might work.

Best Regards,

Matthew Weiss  
for and Behalf of the River Vartry Protection Society  
RiverRun Studio  
Nun's Cross, Ashford  
Co. Wicklow

On 18 Jan 2016, at 10:23, Leonora Earls <L.Earls@wicklowcoco.ie> wrote:  
I wish to acknowledge receipt of your email in connection with the above

Kind Regards

Leonora Earls  
Administrative Officer  
Planning and Development

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**From:** Matthew Weiss [mailto:matthew@rivervartry.com]  
**Sent:** 17 January 2016 10:33  
**To:** Planning - Development Plan Review  
**Subject:** Observation for the Draft County Development Plan

Hi,

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Thank you for your consideration of these points.

RiverVartry Protection Society  
RiverRun Studio  
Nun's Cross  
Ashford

<image001.png>

\*\*\*\*\* This message is intended only for the use of the person(s) (\\the intended recipient(s)\\) to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by Wicklow Local Authorities. Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages, as Wicklow Local Authorities do not accept any liability for contamination or damage to your systems. \*\*\*\*\* Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann na dearcaí a léirítear sa ríomhphost seo agus dearcaí Comhairle Contae Chill Mhantáin. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.

C152

**Leonora Earls**

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**From:** Aoife Byrne  
**Sent:** 19 February 2016 16:18  
**To:** Planning - Development Plan Review  
**Cc:** Tim Paul  
**Subject:** 501.00180.00141 - Wicklow County Development Plan Review - Public Consultation  
**Attachments:** 160218 501.00180.000141.02 L.Wicklow CDP submission.pdf

Dear Sir/Madam,

Please find attached a submission on behalf of Roadstone Limited regarding the draft Wicklow County Development Plan for the period 2016 – 2022.

Please acknowledge receipt of this email.

Regards,

Aoife



# SLR

**By E-mail Only**

19<sup>th</sup> February 2016

County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town

Our Ref: 501.00180.00141

Dear Sir / Madam,

**RE: WICKLOW COUNTY COUNCIL DEVELOPMENT PLAN 2016-2022  
CONSULTATION: SUBMISSION BY ROADSTONE LIMITED**

## **1.0 INTRODUCTION**

SLR Consulting Ireland acts as planning and environmental advisors to Roadstone Limited, Fortunestown, Tallaght, Dublin 24.

Roadstone Limited has a number of property assets within the Wicklow County Council administrative area at Calary Quarry, Fassaroe, Arklow, Ballyhorse and Doran's Pit in Blessington. These property assets provide aggregates, added-value products and inert material recovery to Wicklow and the surrounding region.

This submission relates to the consultation on the Draft Wicklow County Development Plan 2016-2022 (draft development plan).

## **2.0 BASIS OF THE SUBMISSION**

### **2.1 Importance of the Extractive Industries – Balanced Policies**

The importance of the extractive industries to the wider economy and the need to protect the operations of working quarries and proven aggregate resources is firmly established in national and regional planning policy.

Section 5.4.3 of the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 (including County Wicklow) states

*“Extractive industries are essential to the economy in terms of supply of aggregate materials for the construction sector, delivering transport infrastructure projects, and for the export market. There is, however, potential for conflict in the operation of these industries with wider environmental considerations. The role of the planning system is therefore to regulate, promote or control the exploitation of natural resources taking into account these other issues. Preventing and Recycling Waste – Delivering Change (March 2002) calls for the re-use or recycling of 85% Construction and Demolition (C and D) waste by 2013 and if achieved, this together with other national level sustainable development objectives, and a levelling off of construction activity, is likely to have a steadying influence on the rate of extraction of aggregates in the future.*”

SLR Consulting Ireland, 7 Dundrum Business Park, Windy Arbour, Dublin 14, Ireland  
T: +353 1 296 4667 F: +353 1 296 4676 www.slrconsulting.com

Directors: R. O'Dowd, N. O'Neill, T. Paul (Managing), N. Penhall (British), I. Roberts (British). Secretary: R. O'Dowd  
Registered in Ireland as: SLR Environmental Consulting (Ireland) Limited Registered No.253332; VAT No. 8253332)

*In planning policy terms and in order to strategically plan for future needs, there is a need to take stock of existing aggregate resources and other valuable minerals/ores and identifying potential sources which have major deposits of regional and county importance. Local authorities should engage with GSI, in so far as feasible, in mapping exercises designed to identify aggregate potential within their respective county and across a wider regional scale. Suitable protection measures for such sites should be considered to ensure their potential may be realised. Planning, heritage and environmental guidance together with legislative requirements should be used to frame policies for extractive industries. In assessing applications for extractive industries, considerations and impacts as they relate to the objectives of the Water Framework Directive (and therefore River Basin Management Plans) and other EU Directives (such as those regarding wildlife and habitats) should be central to the decision making process. Secondary impacts such as increased HGV traffic on adjoining communities and screening are key issues, and the use of levies to compensate the surrounding areas through investment in local social and other infrastructure is supported. (See also figure 3.4 of the Strategic Environmental Assessment Report regarding geological strata)."*

The extractive industry provides the necessary raw materials for the majority of building and infrastructure development in Ireland. Roads, motorways, homes, schools, hospitals, colleges, factories, water and sewerage systems are all constructed with construction aggregates and concrete products. The construction of power stations, railways, wastewater and water treatment plants and sporting stadiums is heavily dependent on the supply of crushed stone, concrete and other building materials made from aggregates.

Aggregate extraction can only take place where suitable aggregate resources exist; they are a 'tied' resource. It is considered, therefore, that planning policies should be carefully constructed to avoid adverse effects on aggregate resources and the related extractive industries that are essential for our built environment, infrastructure and future economic development.

The draft development plan addresses the extractive industries at section 5.6. Policy RUR1 relates to the permitting of employment generating development in rural areas that are tied to local resources. Policies EX1 to EX4 and the associated strategic objective refers to the extractive industries.

It is considered that greater balance should be placed in the policies on the important role of the extractive industries to the local, regional and national economy and wider society. This is consistently acknowledged in national and regional policies, but it is not referred to in the draft plan. For example, we would highlight the strategic importance of Arklow Quarry. The rhyolite stone resources at the quarry represent an aggregate resource of regional and national importance. This high quality deposit is suitable for high PSV, railway ballast and rock armour which is used for coastal defense applications. We are not aware of any other location in the south-east region with similar characteristics.

In addition, policies EX1 to EX4 do not refer to aggregate or sand and gravel extraction or associated added value production; the emphasis is on dimension stone and related and spin-off industries such as crafts and tourism. It should be noted that although dimension stone is an important and worthwhile aspect of the extractive industries, the majority of quarries rely on the production of aggregate, sand and gravel and associated added value products such as asphalt, concrete and blocks to remain viable. These products remain the principal inputs into most, if not all, building and infrastructure products.

Given that it is not generally viable to transport aggregates over long distances, each county and region, including Wicklow, should have its own sources of aggregates in order to

achieve many of the housing, development and infrastructure projects envisaged in the draft development plan. In order to ensure that existing and any future proposed extractive industry schemes are feasible under the development plan for the period 2016-2022, we recommend that the draft policies EX1 to EX4 be revised to include greater balance in relation to:

- i. The important role of the extractive industries to the national, regional and local economy and wider society;
- ii. The protection of aggregate resources within County Wicklow from sterilisation by other development or land use.
- iii. Securing long-term future supply of aggregates and value-added products including concrete products, asphalt etc.

## 2.2 Biodiversity

The draft development plan includes policies to protect both designated and non-designated sites and habitat and protected species.

Policy NH8 seeks

*"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 or wildlife corridors."*

Given that there are no clear criteria to determine the appropriateness of a development, it is recommended that this policy should incorporate the option of providing mitigation and/or compensatory measures as per policy NH6 and NH18. This policy should acknowledge that not all non-designated sites will be capable of being retained in all instances, but that mitigation and compensatory measures can provide an adequate or improved replacement habitat, if appropriate.

Furthermore, the policies relating to extractive industries should acknowledge the potential for restored quarries to increase biodiversity.

## 2.3 Noise and Emissions to Air

Policies WE11 and WE15 relate to the monitoring of noise and emissions to air:

*"WE11 To require activities likely to give rise to air emissions to implement measures to control such emissions, to install air quality monitors and to provide an annual air quality audit."*

*"WE15 To require activities likely to give rise to excessive noise to install noise mitigation measures and monitors. The provision of a noise audit may also be required as appropriate."*

Roadstone Limited regularly undertakes noise and dust monitoring at its locations using mobile monitoring equipment for the required duration and at the required intervals, in accordance the requirements set out in the national guidelines for the sector<sup>1</sup>. It is

---

<sup>1</sup> Department of Environment, Heritage and Local Government (2004), *Quarries and Ancillary Activities: Guidelines for Planning Authorities*. Dublin: The Stationery Office.  
Environmental Protection Agency (2006). *Environmental Management in the Extractive Industry (Non Scheduled Minerals)*. Dublin; EPA.,  
Irish Concrete Federation (2005). *Environmental Code*. Dublin: Irish Concrete Federation

considered that the installation of permanent continuous noise and air quality monitoring equipment at quarries or other extractive sites would be excessive and would not be in accordance with environmental management practice for the sector across the country. It is recommended, therefore, that these policies should be revised as follows:

*WE11 To require activities likely to give rise to air emissions to implement measures to control such emissions, to undertake air quality monitoring and to provide an annual monitoring audit.*

*WE15 To require activities likely to give rise to excessive noise to install noise mitigation measures, to undertake noise monitoring and to provide an annual monitoring audit.*

## **2.4 Landscape**

Policy NH19 seeks

*"To resist development that would significantly or unnecessarily alter the natural landscape and topography, including land infilling / reclamation projects or projects involving significant landscape remodelling, unless it can be demonstrated that the development would enhance the landscape and / or not give rise to adverse impacts."*

The extractive industries can result in the creation of voids and landforms that represent a significant change to the landscape. It should be noted, however, that mitigation measures can be undertaken that reduce the visual and landscape effects. In addition, although such changes may be significant, they are not necessarily adverse, permanent or long term.

Furthermore, it should be noted that infilling/restoration and landscape remodelling can be successfully employed as a mitigation measure to reduce the visual effects of both inactive and active quarries.

It is considered that the social and economic importance of the extractive industries should be acknowledged to ensure that quarry development can occur, notwithstanding the potential to alter the natural landscape and topography. In order to continue along term secure supply of aggregates and building materials, it is necessary to seek a balance between the need for quarry development & restoration, and the protection of the landscape.

It is recommended that policy NH19 should be revised as follows:

*"To ensure development would not significantly or unnecessarily alter the natural landscape and topography, unless it can be demonstrated that appropriate mitigation measures can be provided through the planning, design and construction of the development. In the case of the extractive industry these mitigation measures will include operational landscaping during extraction, if required, and restoration following cessation of extraction. "*

## **2.5 Preservation of Archaeology**

Policy BH2 states

*"Any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance as identified in Schedule 10.01 & 10.02 and Maps 10.01 & 10.02 of this*



*plan) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a competent archaeologist."*

It is submitted that the proposed text could be interpreted inflexibly and that the policy should acknowledge that in some scenarios preservation *in situ* is not possible.

The National Policy on archaeology is set out in *Frameworks and Principles for the Protection of the Archaeological Heritage* 1999. The policy states that (section 3.3):

*"Whenever the archaeological heritage is affected, or proposed to be affected, by development the approach to be followed must be preservation in-situ or preservation by record through archaeological excavation and recording."*

In section 3.4, the policy states that there should be a presumption in favour of avoiding developmental impacts on the archaeological heritage and preservation *in situ* must always be the first option to be considered and must also be presumed to be the preferred option. However, the policy elaborates that requests for authorisation or approval to undertake development which would involve the removal of archaeological sites and monuments can be granted once the relevant bodies and authorities have satisfied themselves that the proposed development:

- (i) cannot be re-located,*
- (ii) cannot be re-designed to avoid removal of the site or monument (or portions of such),*
- (iii) is really necessary.*

This approach to the protection of the archaeological heritage is further elaborated in a series of codes of practice in respect of archaeology that have been agreed with the National Roads Authority, Eirgrid, Bord Gais Eireann, Coillte, The Railway Procurement Agency, Iarnrod Eireann, Bord na Mona, ESB Networks and the Irish Concrete Federation. The Irish Concrete Federation (of which Roadstone is a member) and the Department of the Environment Heritage and Local Government agreed a code of practice in respect of archaeology in 2009<sup>2</sup>. In the code of practice (referenced in policy EX4), preservation by record is recognised as an appropriate mitigation method in certain circumstances.

The Code of Practice states that the Minister will:

*"Agree that where unexpected archaeological discoveries are made during testing, monitoring of topsoil removal or the operational phase, the most practical method of archaeological mitigation is to excavate and record except where the Minister is of the opinion that the site is of such significance that it should be preserved in situ."*

The Code of Practice states ICF members will:

*"Where it cannot be reasonably avoided, excavate and record all known monuments or archaeological sites or parts of such, that are impacted by the construction works,*

<sup>2</sup> Code of Practice between DoEHLG and Irish Concrete Federation, April 2009

*in accordance with agreed methodologies and allow sufficient time for such recording to be carried out to the satisfaction of the Minister."*

It is recommended that the text of policy BH2 should be revised as follows:

*"Any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance as identified in Schedule 10.01 & 10.02 and Maps 10.01 & 10.02 of this plan) shall be subject to an archaeological assessment. When dealing with proposals for development that would impact upon archaeological sites and/or features, there will be presumption in favour of the 'preservation in situ' of archaeological remains and settings, in accordance with Government policy. Although preservation in situ is favoured, preservation by record may be acceptable if this is not possible or feasible. Where permission for such proposals is granted, the Planning Authority will require the developer to have the site works supervised by a competent archaeologist."*

## **2.6 Record of Monuments and Places**

There are a number of national monuments listed as being located within the sites at Fassaroe and Arklow. A submission has been made to the National Monuments Section to remove these sites from the Record of Monuments and Places.

Should these sites be removed from the list Record of Monuments and Places at a future date, the county development plan should be amended accordingly.

## **2.7 Draft CDP Appendix 1**

Appendix 1 sets out the standards that will be applied to different forms of development and the expected contents of planning applications. This includes a section relating to the extractive industries.

### **2.7.1 Information to be Supplied with Planning Applications**

The text notes that the following information should be included in planning applications related to the extractive industries:

- *"Total quantity of material to be extracted (tonnes). (State amount of saleable mineral or aggregate waste and overburden separately)";*
- *"Rate of production in tonnes per annum (mineral or aggregate and extracted waste to be separately identified)";*
- *"Tonnage of materials to be processed per annum".*

The rate of mineral extraction varies at quarry sites according to market demand. During the recent recession, demand for aggregates dropped greatly across the country and extraction and processing rates reduced accordingly. It is considered that such information is also commercially sensitive and would provide competing quarry sites with a competitive advantage. It is recommended, therefore, that details of this nature should not be required and that any details relating to rate of extraction should be limited to the anticipated timeframe for the completion of extraction.

### **2.7.2 Quarry Restoration – Provision of Financial Sureties**

In relation to the conditions attached to permissions for extractive industries, Appendix 1 states:

*"The Planning Authority will require the lodgement of cash deposits for satisfactory restoration, rehabilitation and site aftercare, including monitoring of the worked out pit area, maintenance, repair, strengthening and upgrading of the affected road network, and landscaping and screening of the site during works."*

*"Conditions attached to the operation, restoration, rehabilitation and aftercare including monitoring, maintenance, repair, strengthening and upgrading of the affected road network, and landscaping and screening of the site. In particular, the Planning Authority will require the annual submission of an 'environmental audit' setting out a summary of all of the environmental monitoring results for the year, a record of movement of heavy vehicles outside the approved opening hours, a full record of any breaches over the previous year for noise, dust, and water quality and a written record of all complaints, including actions taken on each complaint. The Planning Authority will require the lodgement of a cash deposit for the satisfactory undertaking of these activities."*

The requirement for a cash deposit (often a significant sum) imposes unnecessary restriction on the industry and can create financial difficulties for operators by tying up significant sums of cash.

As a result, quarry operators are currently and would continue to be compelled to appeal conditions relating to cash bonds to An Bord Pleanála. An Bord Pleanála (for example PL27. 234347 regarding a quarry development at Ballylusk, Ashford and SU23.SU0050 for a quarry development at Killough Hill, Co. Tipperary) adopts the following standard condition wording for quarry restoration financial sureties:

*"the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security acceptable to the planning authority to secure the provision and satisfactory restoration of the site, coupled with an agreement empowering the planning authority to apply such security or part thereof to the satisfactory restoration of any part of the site".*

It is noted that cash bonds are not required in respect of other forms of development under Appendix 1 and that the imposition of this requirement on the extractive industry alone is unwarranted and unduly onerous.

It is recommended that in order to be consistent with the standard condition wording used by An Bord Pleanála, Appendix 1 should be revised as follows:

*The planning authority will require the developer to lodge a cash deposit, a bond of an insurance company, or other security acceptable to the planning authority to secure the provision and satisfactory restoration of the site, coupled with an agreement empowering the planning authority to apply such security or part thereof to the satisfactory restoration of any part of the site".*

### 3.0 CONCLUSIONS

The extractive industry provides essential building materials for residential development, infrastructure, health care facilities, education facilities and all other forms of built development. Extraction can only take place where resources occur and it is, therefore, tied to certain locations.

Roadstone acknowledges that aggregate extraction has the potential to cause adverse effects on the environment, visual amenity and residential amenity. These effects can be mitigated during the operational and restoration phases of extraction. It is considered that the economic and social benefits of aggregate extraction / long term secure supply of aggregates / valued added products should be balanced carefully against the potential for environmental and other effects.

The county development plan should ensure that the extraction of aggregates can take place in suitable locations where resources exist without undue environmental effects. It is important to ensure that the future interpretation of CDP policies does not result in the sterilisation of aggregate resources and does not prevent the secure, long-term supply of construction aggregates and value-added products such as concrete blocks and road making materials.

Through this submission, Roadstone requests that the recommended amendments be made to the draft development plan before it is finalised and published.

Yours faithfully

**SLR Consulting Ireland**



**Tim Paul**  
Director

Cc. Mr. R. Griffin/ Mr. S. Geraghty (Roadstone Ltd.)

**Leonora Earls**

C153

**From:** Aonghus McClafferty  
**Sent:** 18 February 2016 19:48  
**To:** Planning - Development Plan Review  
**Cc:** Neil O'Mahony  
**Subject:** Submission regarding draft Wicklow County Development Plan 2016-2022  
**Attachments:** ODSDM-#4065353-v1-Letter\_to\_Wicklow\_County\_Council\_dated\_18\_February\_2016.PDF

Dear Sirs

Please see attached letter for your attention.

Aonghus McClafferty | Solicitor | Dispute Resolution & Litigation

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Our Ref: NOM\AMC\8207.78  
Date: 18 February 2016

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County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow Town

By email: [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

Our Clients: John Ronan / Academy Geographic Limited  
Re: Draft Wicklow County Development Plan 2016-2022

Dear Sirs

We refer to the draft Wicklow County Development Plan 2016-2022 (the "Development Plan") and the proposals therein in particular the proposals on page 112 to establish an amenity walk along the tree lined field boundaries connecting to the existing pedestrian route along the Dargle (the "Amenity Walk") and references to a Public Right of Way ("PROW") along Lover's Leap Lane more specifically PROW 7 (Enniskerry-Tinnehinch-Cookstown).

Our Clients are landowners in Dargle whose estate runs along and incorporates parts of the privately owned lane known locally as 'Lover's Leap Lane'. The Development Plan, particularly Figure 6.4, seems to suggest the Amenity Walk would extend across the privately owned lane. Furthermore, reference to PROW 7 and maps thereof appear to incorporate parts of land in which the legal and beneficial interest rests with our clients.

As a result, the suggested Amenity Walk would appear to transgress across our clients' estate. Without prejudice to the fact that parts of the suggested Amenity Walk would encroach on our clients lands, if such an Amenity Walk were developed alongside our clients' lands the increased footfall would greatly affect our clients' use and enjoyment of their land.

Please confirm that any suggested plan will not encroach over the aforesaid private lands (Lover's Leap Lane) and take notice that our clients formally object to any proposals for an Amenity Walk which would run alongside/transgress their estate. We submit that this proposal should be removed from the current Development Plan and excluded from any future plans.

If Wicklow County Council insists on the inclusion of the proposed Amenity Walk as it currently exists our clients will strenuously object to same on grounds of interference

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Consultants: Rory O'Donnell Patricia Heffernan Fiona Thornton David Beattie Kevin O'Connor Justin McGettigan

4058748.1B

EVERSHEDS

to their proprietary rights, privacy rights, social nuisance and safety, all of which in turn will reduce the value of our clients' property. Our Clients reserve their right to take such action as is then required, including the issuing of legal proceedings.

We await hearing from you.

Yours faithfully



**Eversheds**

Earls

C154

**From:** Erika Casey  
**Sent:** 19 February 2016 13:16  
**To:** Planning - Development Plan Review  
**Cc:** John Spain; John Tierney  
**Subject:** Draft Wicklow County Development Plan  
**Attachments:** 15261 Final Submission Lands at St. Valery's Co. Wicklow.pdf

Dear Sir/Madam

On behalf of our client Ronan Group Real Estate please find attached a submission on the draft Wicklow County Development Plan in respect of lands at St. Valery's.

I would be grateful if you could please confirm receipt of this submission.

Regards

Erika Casey  
Director  
John Spain Associates Planning and Development Consultants  
39 Fitzwilliam Place  
Dublin 2  
D02 ND61





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County Development Plan Review,  
Planning Department,  
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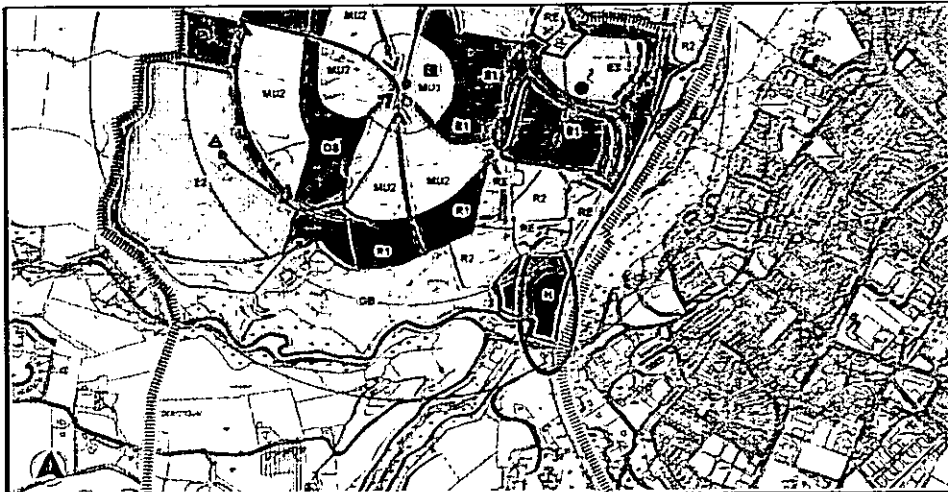
19th February, 2016

**RE: DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016 -2022**

On behalf of my client Ronan Group Real Estate, Treasury Building, Grand Canal Street, Dublin 2, I wish to make a submission on the draft County Development Plan 2016-2022.

The **submission relates to lands located at St. Valery's in the Bray Town and Environs** area of the County.

Under the current Bray and Environs LAP, the subject lands are identified as appropriate for a hotel development.



**Fig. 1: Extract from Bray Environs LAP 2009-2015**

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**Executive Director: Erika Casey** (BA (MCD) MRUP MRCPI MIP)

**Associate Directors: Paul Tierley** (BA MRUP Dip Environmental & Planning Law MIP) **Sophie Farrington** (BA MA (EDS) MRUP AIEE) **Robert Keran** (BS (ILB) MIP)

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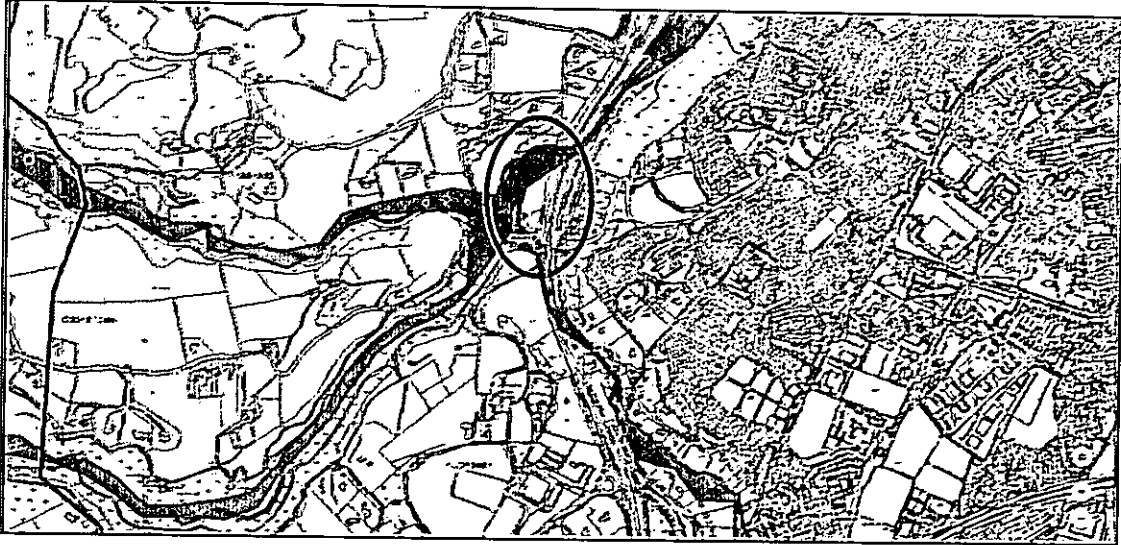
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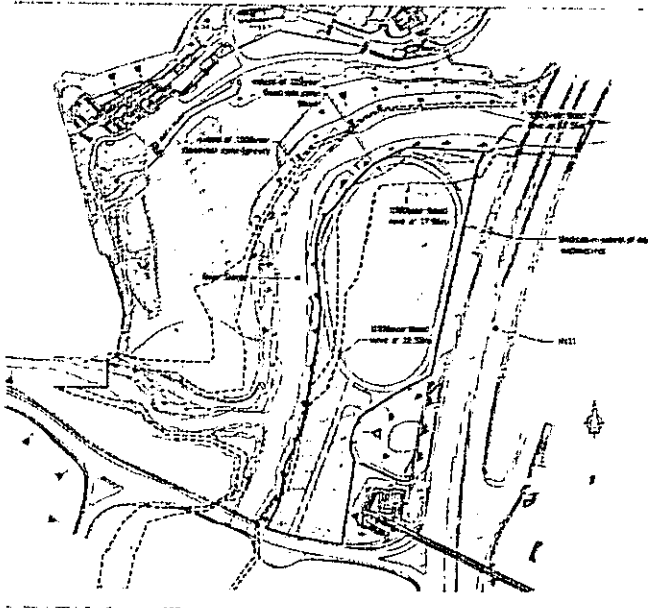
We refer to Appendix 11 of the Draft County Plan which provides a Strategic Flood Risk Assessment of the County. This includes a flood risk map of the Bray Town and Environs area and identifies part of the lands at St. Valery's as being located within a Flood Zone A. See extract from zoning map below.



It is noted that as part of a previous planning application pertaining to the site that detailed Hydrological Modelling of the site was undertaken by Kilgallen & Partners. This indicated the extent of the Flood Zone A on the subject development site.

A copy of the hydrological modelling report and associated mapping is attached.

It can be seen from this more detailed assessment that the extent of the Flood Zone A is in fact less than that currently indicated in the SFRA.



Managing Director: John P. Spain IBS NIRUP NIRUC ASOS MKDPI NIFI

Executive Director: Erika Casey IBA (AGD) NIRUP NICTPI NIFI

Associate Directors: Paul Turkey IBA NIRUP Dep. Environmental & Planning Law NIFI Stephanie Farrington IBA NIA (EDS) NIRUP NIFI Robert Keran BA ILS NIFI

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It is submitted that the draft plan should be amended to correct this discrepancy and that the extent of Flood Zone A is amended to reflect the findings of the more detailed site specific hydrological modelling.

We would be very grateful if you could take account of our submission.

Yours faithfully,

*John Spain Assoc.*

---

**John Spain Associates**

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Executive Director: Erika Casey BA (MOD) MRUP MRTPI MIP

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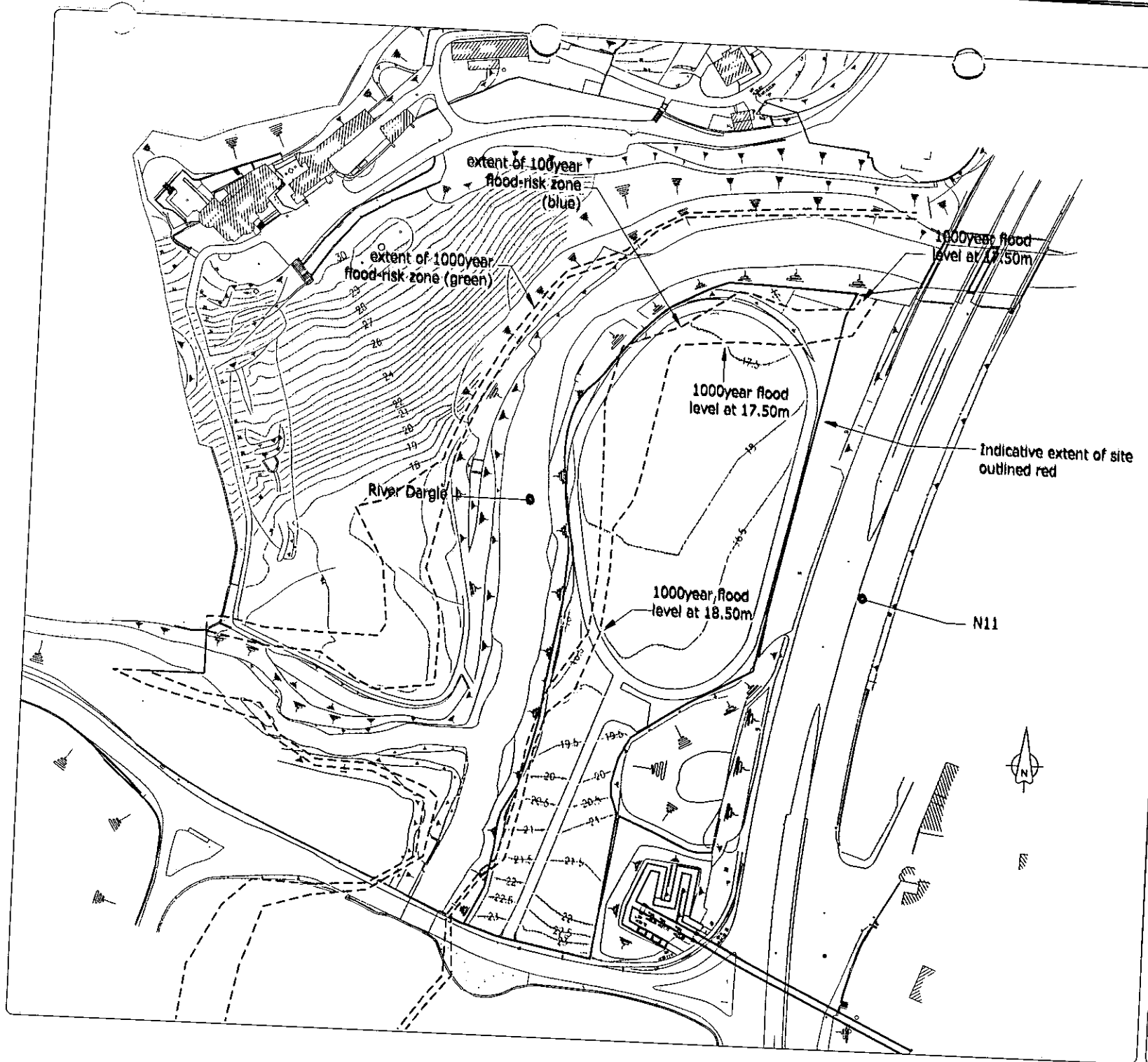
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**Appendix 1**

**Flood Risk Assessment and Extent of Flood Risk Zone**



**NOTES** A3

1. This drawing is prepared for inclusion with a Report (Ref. No. 14017-1HM) on hydrological modelling carried out for the proposed development site. This drawing must only be used in conjunction with this report and must not be used for any other purpose.
2. Flood risk zones are established using peak flood flows estimated from statistical methods described in the Flood Studies Report. Refer to Section 6 of Report 14017-1HM for recommendations in regard to minimum floor level and protection of water-vulnerable elements of future development.
3. Future proposals for development of the site must be the subject of flood risk assessment in accordance with the Flood Risk Management Guidelines.

REV	DATE	BY	DETAILS
02	22/04/14	PB	1000yr flood line revised.

STATUS  
PLANNING

CLIENT  
MOYLAN CONSULTING ENGINEERS

PROJECT  
HYDROLOGICAL MODELLING OF PROPOSED DEVELOPMENT SITE, FASSAROE, BRAY, Co. WICKLOW

TITLE  
EXTENT OF FLOOD-RISK ZONES

**KILGALLEN & PARTNERS**

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DRN:	DC	SCALE:	1:1250@A3	DRAWING NO.:	14017-01	REV.:	02
CHKD:	PB	DATE:	31/03/2014				

**Client: John Ronan Holdings**

**Project: St Valerys, Fassaroe, Kílcroney,  
Bray, Co Wicklow.**

**Report Title: Flood Risk Assessment**

**Volume No: 1 of 1**

Approval Status	Author (Name)	Date	Approved by: (Signature)	Date
Issue No. 1	Brian McCann	Apr 2014		
Issue No. 2				
Issue No. 3				



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Project No: 14-011

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Drg No 14-001 /S004	Site Survey Plan
Drg No 14-001 /S001A	Bridge Sections
Drg No 14017-01	Extent of Flood Risk Zones

Appendix B Report from floodmaps.ie

Appendix C Report on Hydrological Modelling by Kilgallen & Partners



## **1.0 INTRODUCTION**

- 1.1** This Flood Risk Assessment has been prepared by Waterman Moylan on behalf of John Ronan Holdings. It addresses the flood risk background to the development site at St. Valerys, Fassaroe, Kilcronee, Bray, Co Wicklow.
- 1.2** The Flood Risk Assessment has been prepared in accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities published by Department of Environment Heritage and Local Government (DEHLG) and Office of Public Works (OPW) in November 2009.
- 1.3** The components required to be considered in the identification and assessment of flood risk are set out in Table A1 of the Guidelines and comprise the following:
- (a) Tidal
  - (b) Fluvial
  - (c) Surface Water
  - (d) Ground Water
  - (e) Human/Mechanical Error
- 1.4** Each of the above components was investigated from the point of view of Source, Pathway and Receptor. The investigation was followed by an assessment of the likelihood of a flood occurring and the possible consequences. From the consideration of the likelihoods and the possible consequences, a risk was evaluated.
- 1.5** Finally, mitigation measures were explored where the presence of a risk existed and a residual risk presented.

## **2.0 SITE CHARACTERISTICS**

### **2.1 Location**

The subject site is located at the junction of the N11 and R117 Enniskerry Road as shown on Figure 1: OS Location Map and Drg No 14-011/S002.

### **2.2 Description**

The site is bounded to the east by the N11 Wexford Road, to the south by the R117 Enniskerry Road and to the north and west by the River Dargle. It has area of approximately 4.3 acres (1.74 ha).

The level of the site was raised by 1.0 – 1.5 metres about 2007 / 2008. It is currently vacant and undeveloped having previously been used for the exercise of horses.

### **2.3 Topographic**

A topographic survey of the development site, the adjoining St. Valery's Demesne, the River Dargle and both road frontages was carried out by Land Surveys in May 2008. The full survey is shown on Land Surveys Drg. No. D12838-F.DWG is reproduced on Waterman Moylan Drg No 14-011/S004 included in Appendix A of this report.

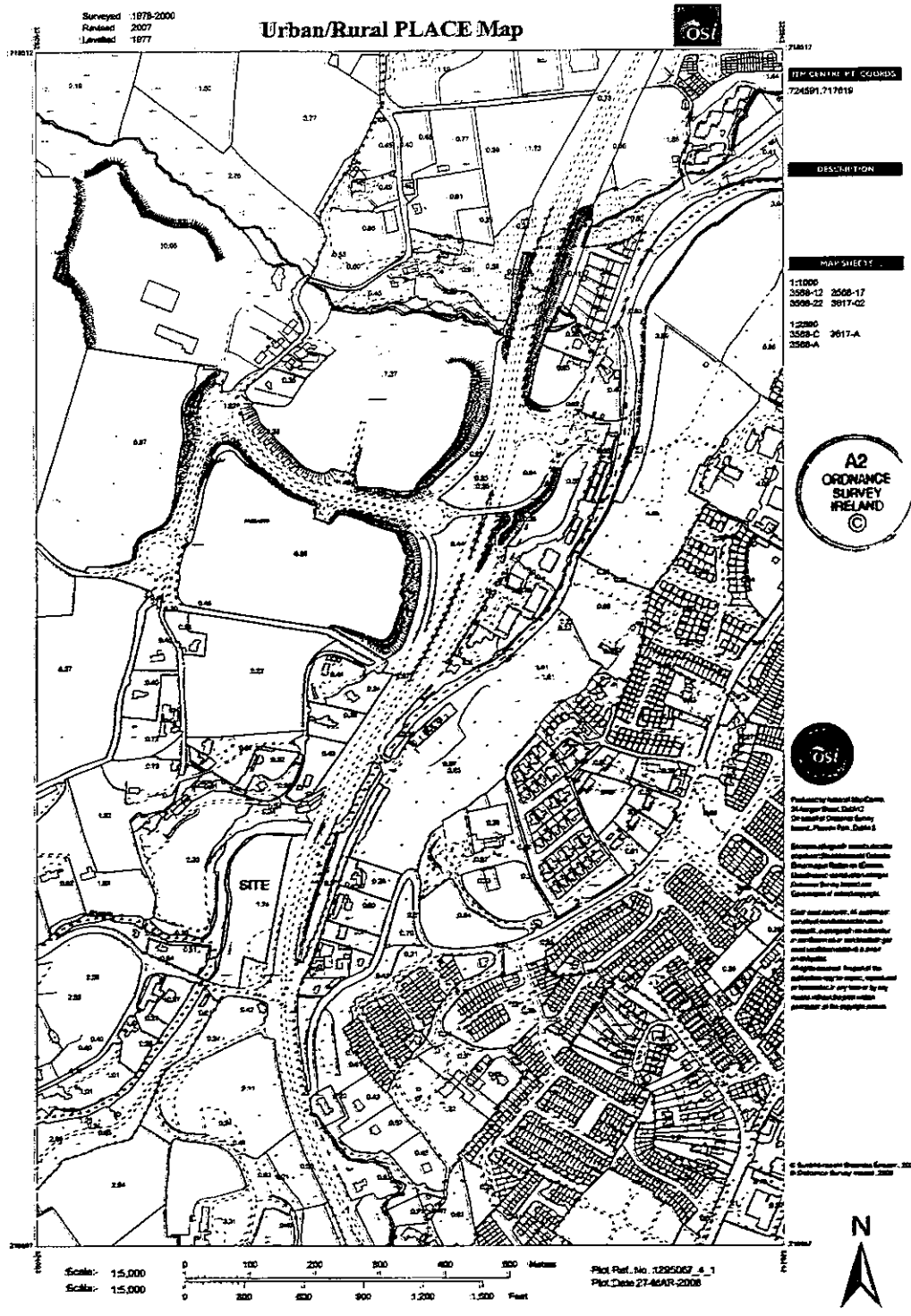


Figure 1 OS Location Map

The survey recorded that:

- (a) The ground level of the development site falls by some 7 metres from an elevation of 23.0m OD at the southern end to an elevation of 16.0m OD at the northern end.
- (b) The level of the N11 along the eastern boundary of the site falls from an elevation of 24 metres OD at the southern end to an elevation of 19 metres OD at the northern end.
- (c) The elevation of R117 Enniskerry Road along the southern boundary of the site falls from 24.0 metres OD at the N11 to 23 metres OD at the River Dargle.
- (d) The bed level of the adjoining Dargle River falls from an elevation of 14.5 metres OD at the confluence with the Cookstown River to 12.2 metres OD at the bridge under the N11.

In general, the ground level within the site is lower than the level of adjoining roads, higher than the adjoining river but significantly below St. Valerys House which is located at an elevation of 36.0 metres OD.

For the purposes of this report, additional information on the R117 Bridge and on the N11 Bridge was obtained by Waterman Moylan and is shown on Drg No 14-011/S001A included in Appendix A of this report.

In addition, supplementary topographic information on the river channel upstream of the R117 Bridge and downstream of the N11 Bridge was collected by Kilgallen and Partners and incorporated in the hydrological modelling carried out by them.

#### **2.4 Zoning**

The site is zoned for Hotel use on Map 4: Fassaroe Indicative Land Use Zoning of the Bray Environs Local Area Plan 2009 - 2015.

### **3.0 WICKLOW COUNTY DEVELOPMENT PLAN**

#### **3.1 Wicklow County Development Plan 2010 - 2016**

Section 12.6 of the Wicklow County Development Plan 2010 – 2016 advises as follows:

##### ***Flood Risk Assessment***

*Where flood risk may be an issue for any proposed development, a flood risk assessment should be carried out that is appropriate to the scale and nature of the development and the risks arising. This shall be undertaken in accordance with the DoEHLG Flood Risk Assessment Guidelines. This shall include proposals for the storage or attenuation of runoff/discharges (including foul drains) to ensure the development does not increase the flood risk in the relevant catchment.*

*Those planning new developments are advised to refer to the OPW National Flood Hazard Mapping Website, Coastal flood maps and GSI data etc prior to submitting proposals.*

##### ***Flood Management Objectives***

**FL1** *To prepare flood zone maps for all zoned lands within the County as part of future Local Area Plans.*

**FL2** *Land will not be zoned for development in an area identified as being at high or moderate flood risk (as set out in the Guidelines 4), unless where it is fully justified (through the Justification Test set out in the Guidelines) that there are wider sustainability grounds for appropriate development and unless the flood risk can be managed to an acceptable level without increasing flood risk elsewhere and where possible, reducing flood risk overall.*

**FL3** *Applications for significant new developments or developments in high or moderate flood risk areas shall follow the sequential approach as set out above.*

**FL4** *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 guidelines 'Justification Test'.*

**FL5** *To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.*

**FL6** *Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.*

**FL7** *To require all new developments to include proposals to deal with rain and surface water collected on site and where deemed necessary, to integrate attenuation and SUDS measures.*

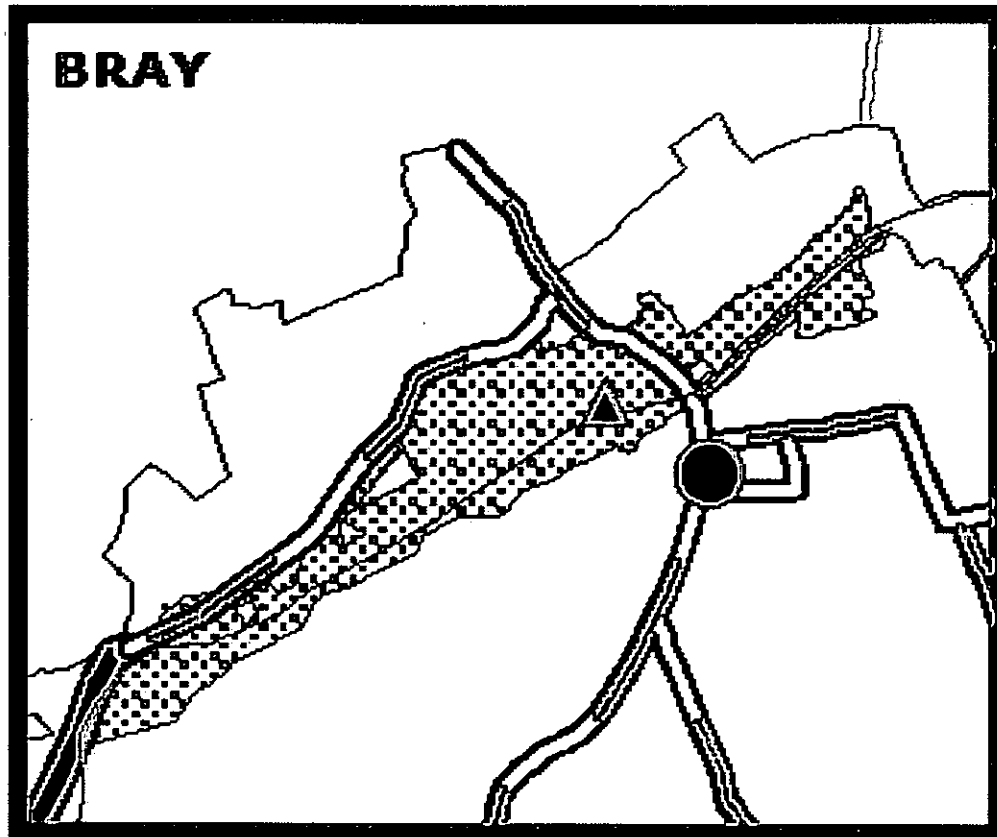
**FL8** *Flood assessments will be required with all planning applications proposed in flood risk areas to ensure that the development itself is not at risk of flooding and the development does not increase the flood risk in the relevant catchment (both up and down stream of the application site). Generally a Flood Impact Assessment will be*

*required with all significant developments and a certificate (from a competent person stating that the development will not contribute to flooding within the relevant catchment) will be required with all small developments of areas of 1 hectare or less.*

**FL9** *For developments adjacent to all watercourses of a significant conveyance capacity or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse to allow access for channel clearing/ maintenance/ vegetation. A minimum setback of up to 10-15m will be required either side depending on the width of the watercourse.*

The accompanying Map 12.01 incorporates windows showing flood maps for Arklow and Bray. The Bray map which is based on *the OPW website [www.floodmaps.ie](http://www.floodmaps.ie)* shows flooding well downstream to the N11 Bridge but not further upstream where the subject site is located.

**Map 12.01 Wicklow County Development Plan 2010 - 2016**



**3.2 Bray Environs Local Area Plan 2009 – 2015**

- 3.3** In relation to Water and Surface Water, Section 9.0 of the Bray Environs Local Area Plan 2009 – 2015 advises as follows:

*Development will not be permitted unless collection and treatment capacity can be provided.*

- *Ensure the implementation of Sustainable Urban Drainage Networks (SUDS) and compliance with the Greater Dublin Strategic Drainage Study (GSDSDS) within developments.*

- *Implement strict surface water discharge allowances from proposed development sites and encourage the use of attenuation measures to reduce surface water run off from proposed development sites to reduce the cumulative loading on the surface water network.*

- *It is the policy of the Council that a Flood Risk Assessment shall form part of the overall master plans for both Fassaroe & Kilruddery, to ensure that the development does not increase the flood risk in the relevant catchment. Any works required as a result of such assessment shall be carried out before any other development commences. For small developments less than 0.25 hectares, a certificate from an appropriately qualified specialist stating that the development will not contribute to flooding within the relevant catchment must accompany applications for planning permission. A Flood Impact Assessment shall identify potential loss of floodplain storage and how it would be offset in order to minimise impact on the river flood regime. It shall also take account of the possible effect on the natural resources of the river.*

- *All applications for development should have regard for the draft guidelines for managing flood risk as published by the Department of Environment, Heritage and Local Government ('The Planning System and Flood Risk Management') and the adopted guidelines as and when appropriate.*

- *For developments adjacent to watercourses of a significant conveyance capacity any structures must be set back from the edge of the watercourse to allow access for channel cleaning/maintenance.*

**3.4 Proposed Fassaroe Masterplan 2010**

Page 16 of the Proposed Fassaroe Masterplan dated October 2010 advises as follows:

*The area has not been assessed for flood risk. A relevant Flood Risk Assessment (FRA) is required to establish the nature and extent of flood risk zones and flood risk and to identify measures to manage any such risks.*

*Any flood risk is likely to be associated with the water courses following the southern and northern extents of the lands: the Brook, Cookstown & Dargle respectively, together with 'pluvial' or urban runoff.*

*Flood risk management will be dealt with in accordance with "The Planning System and Flood Risk Management: Guidelines for Planning Authorities", Department of Environment, Heritage and Local Government, 2009.*

#### 4.0 **TIDAL – RIVER DARGLE AND IRISH SEA**

##### 4.1 **Source**

The subject site is located in the catchment of the River Dargle which rises in the Wicklow Mountains on the northern slopes of Djouce Mountain and flows in a north-easterly direction for 20 km before discharging into the Irish Sea at Bray Harbour.

The River Dargle is tidal from Bray Harbour up to Bray Bridge with a 1-year tide level of 2.29 metres OD (Malin), a 5-year tide level of 2.40 metres OD (Malin) and a 50-year tide level of 2.70 metres OD (Malin).

The above tide levels were taken from Table 5.5.5 of the EIS for the Bray Flood Defence Scheme. Table 5.5.5 is reproduced as Table 1 below.

**Table 1 Tide Levels in River Dargle**

<b>Frequency</b>	<b>Tide Level</b>
200-year design tide	3.50 m OD
50-year tide	2.70 m OD
5-year tide	2.40 m OD
1-year tide	2.29 m OD
Mean High Water Spring (MHWS) tide	1.59 m OD

##### 4.2 **Receptor**

The receptor is the development site at St Valerys. The site is located at an elevation of 16 – 23 metres OD (Malin) as shown on Waterman Moylan Drg No 14-011/S004 included with this report.

##### 4.3 **Pathway**

The site is located just over 3 km from the Irish Sea at Bray Harbour and some 2.5 km upstream of the highest point to which ordinary tides normally flow.

Given that the site is located some 2.5 km southwest of the highest point at Bray Bridge to which ordinary tides flow and that there is a significant difference of more than 12 metres in elevation between the subject site and the 200-year design tide, there is no pathway between the source and the receptor.

##### 4.4 **Risk of Flooding**

Given that the site is located inland from the Irish Sea and that there is a significant difference in level between the subject site and high tide, the risk from tidal flooding is insignificant.

##### 4.5 **Consequence of Flooding**

The consequence of tidal flooding would be inundation of the existing undeveloped site and loss of amenity.

##### 4.6 **Mitigation Measures**

As the risk from tidal flooding is insignificant, no flood mitigation measures are required to be considered.

## **5.0 FLUVIAL – RIVER DARGLE**

### **5.1 Source**

The subject site is located in the catchment of the River Dargle which rises in the Wicklow Mountains on the northern slopes of Djouce Mountain and flows in a north-easterly direction for 20 km before discharging into the Irish Sea at Bray Harbour.

The River Dargle is tidal between Bray Harbour and Bray Bridge with a 200-year design high tide level of 3.50 metres OD (Malin).

### **5.2 Receptor**

The receptor is the development site at St Valerys. The site is located at an elevation of 16 – 23 metres OD (Malin) as shown on Waterman Moylan Drg No 14-011/S004 included with this report.

### **5.3 Pathway**

The subject site is located on the right bank of the Dargle River immediately upstream of the N11 Bridge as shown on Waterman Moylan Drg No 14-011/S002 included with this report.

### **5.4 Risk of Flooding**

#### **5.4.1 Historical**

Four major floods have occurred in Little Bray during the last century. These were on 25th August 1905, 3rd September 1931, 16th/17th November 1965 and 25th/26th August 1986. Two other less significant floods occurred in Bray in 1947 and 1958.

Based on these events, flooding in Bray Town occurs with an approximate frequency of once every 25 to 30 years.

However, flooding in Bray only extends some 2.5 km from Bray Harbour to a point just upstream of the area in Bray Commons known as 'The Slang'.

There is no record of flooding extending as far as the subject site which is a further 0.6 km upstream of The Slang.

(Ref: Preliminary Report on River Dargle Flood Protection Scheme, John B Barry & Partners, December 1986 and Environmental Impact Statement for Bray Flood Defense Scheme, Bray Town Council, July 2007)

#### **5.4.2 Ordnance Survey**

The historic 1:2500 mapping available for the subject site is available for viewing on the Ordnance Survey Ireland website. The area was surveyed before the construction of the N11 Bray By-Pass. The mapping recorded the subject site and surrounding area as parkland. The site was not identified as liable to flooding.



#### 5.4.3 OPW Flood Mapping

The report generated by floodmaps.ie identifies all flooding within 2.5 km of the site. The map to the report shows the subject site is not located in a flood zone. However, the accompanying results show a number of flooding events in the surrounding area.

OPW have not published any record of flooding on the subject site.

#### 5.4.4 Eastern Catchment Flood Risk Assessment and Management (CFRAM)

The Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study under the direction of the Office of Public Works commenced in June 2011 and will run until the end of 2016.

The main aims of the Eastern CFRAM Study are to:

- assess flood risk, through the identification of flood hazard areas and the associated impacts of flooding;
- identify viable structural and non-structural measures and options for managing the flood risks for localised high-risk areas and within the catchment as a whole;
- prepare a strategic Flood Risk Management Plan (FRMP) and associated Strategic Environmental Assessment (SEA) that sets out the measures and policies that should be pursued to achieve the most cost effective and sustainable management of flood risk;
- ensure that full and thorough public and stakeholder consultation and engagement is achieved.

The study focuses on Areas for Further Assessment (generally settlements). Modelling of the rivers within, and upstream and downstream, of AFAs is being undertaken in order to generate flood risk maps. Flood risk management options are then developed once the flood risk is understood.

There are no Areas for Further Assessment associated with the River Dargle and so no modelling of Dargle River is being undertaken as part of the study.

Bray was initially designated as an AFA but has since been dropped from the study due to the ongoing construction of River Dargle Flood Defence Scheme.

(Ref: The National Preliminary Flood Risk Assessment (PFRA), Designation of Areas for Further Assessment, OPW, March 2012).

#### 5.4.5 River Dargle (Bray) Flood Defence Scheme

Construction of the River Dargle Flood Defense Scheme including deepening and widening of the river channel downstream of the subject site, commenced in May 2012. Work was suspended in 2013 due to events beyond the control of Bray Town Council and the contractor, SIAC Construction Ltd. The Scheme was some 35% complete at the time of suspension. It is hoped by Bray Town Council that a new contractor will recommence work in 2014.

The details of the Scheme are set out in the Environmental Impact Statement (EIS) published by Bray Town Council in July 2007.

The Scheme extends over a river reach of 3.5 km upstream from the Harbour Bridge. It is directed towards significantly reducing the very real flood risk in Bray through a comprehensive defence scheme.

The study area for the Scheme extended from the R117 Enniskerry Road Bridge at the south-west corner of the subject site (Chainage 0) through the N11 Bridge (Chainage 400) to the Harbour Bridge (Chainage 3,550).

The Scheme was designed to accommodate the 100 year flood, having regard to major floods in August 1905, September 1931, November 1965 (peak flow of 200 m<sup>3</sup>/sec at Harbour Bridge) and August 1986 (Hurricane Charlie – peak flow of 285 m<sup>3</sup>/sec at Harbour Bridge).

Rainfall intensities and durations for the August 1986 storm event are predicted by Met Eireann to have a return period of between 50 and 100 years in the low lying areas of Bray and in excess of 100 years in the upland catchment of the River Dargle.

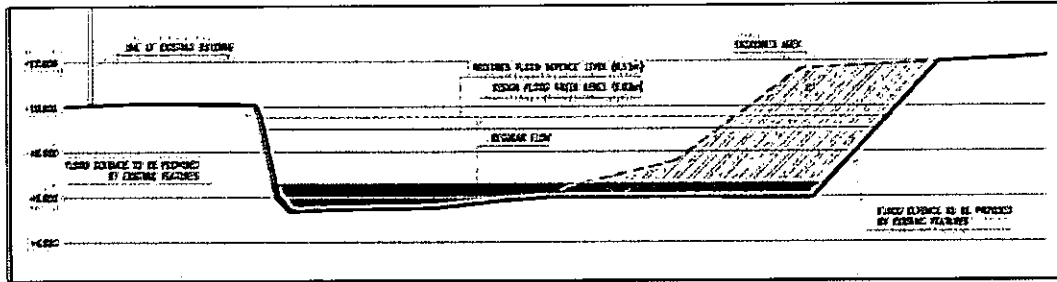
It will be seen from the EIS, undertaken by McGill Planning Ltd. in association with O'Connor Sutton Cronin, Consulting Engineers on behalf of Bray Town Council that the Flood Studies Report catchment characteristic methodology was shown to significantly underestimate the accepted 100 year design flow.

To compare the calculated design flows, the entire River Dargle catchment runoff was calculated using the FSR catchment characteristics method. This calculation resulted in a flow of 141m<sup>3</sup>/s for the 100 year return period.

The estimated 1986 storm event flood flow was twice this value and 5 times the calculated Qbar. In order to make a conservative estimation of the 100 year flood plain at the site location, a factor of 5 times Qbar has been utilised as opposed to the usual factor of 2.6.

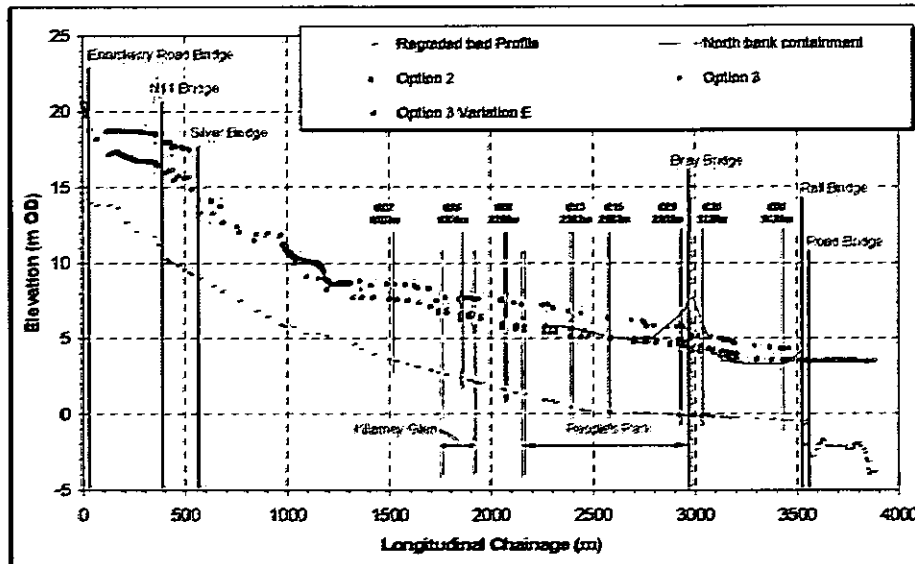
Immediately downstream of the N11 Bridge, the scheme provides for deepening by up to 1 metre and widening by up to 15 metres of the river channel as shown on EIS Fig. 2.13 to cater for the flood flow of 285m<sup>3</sup>/s per second at the upstream end of the scheme. For flood defence, a freeboard of 0.5 m was also included.

**Figure 2.13 Rehills La Vallee widening (Section A: Drawing B237-144)**



Design Flood Profiles for the preferred Option 3 are presented in EIS Fig. 3.27. This shows a predicted top water level of 16.12 m OD at the N11 Bridge increasing to 19.55 m OD at the Enniskerry Road Bridge.

**Figure 3.27 Design Flood Profile – Option 3 and Option 3 Variation E**



**5.4.6 Hydrological Modelling**

Hydrological modelling for the subject site was undertaken by Kilgallen & Partners in April 2014. Their Report is included as Appendix C to this report.

The output from the hydrological modelling concluded that

- (a) The peak flood flow in the River Dargle adjacent to the subject site is predicted to vary from 213 cubic metres per second for the 1 in 100 year event to 282 cubic metres per second for the 1 in 1000 year event.
- (b) A minor area of the site is predicted to be inundated by the 1 in 100 year flood and a slightly larger area by the 1 in 1,000 year flood as shown on Kilgallen & Partners Drg No 14017-001.

#### **5.4.7 Flood Levels in River Dargle at St. Valerys**

The results of the hydrological modelling predicted that the 1 in 1000 year flood level in the area of the site would vary from 19.5 mOD at the upstream end of the site (R117 bridge) through 18.5 mOD at the middle of the site to 17.5 mOD at the downstream end (N11 bridge).

#### **5.4.8 Summary**

Given that there is a pathway between the source and the receptor, the risk from fluvial flooding is significant over a minor part of the site adjacent to the River Dargle.

However, most of the area subject to possible inundation is located in the setback of 10 – 15 metres required under Flood Management Objective FL9 of the Wicklow County Development Plan 2010- 2016.

#### **5.5 Consequence of Flooding**

The consequence of fluvial flooding would be inundation of the existing undeveloped site and loss of amenity.

#### **5.6 Mitigation Measures**

The mitigation measures associated with the subject site are the findings of the Bray Flood Study and the works being carried out by Bray Town Council as part of the Bray Flood Defence Scheme.

## **6.0 SURFACE WATER**

### **6.1 Source:**

The subject site is located on the right bank of the River Dargle between the R117 Enniskerry Road Bridge and the N11Bray By-Pass Bridge.

Surface water runoff from the site and surrounding area drains to the River Dargle.

### **6.2 Receptor**

The receptor is the development site at St Valerys. The site is located at an elevation of 16 – 23 metres OD (Malin) as shown on Waterman Moylan Drg No 14-011/S004 included with this report.

### **6.3 Pathway**

There is no existing surface water drainage system on the subject site.

The existing site is undeveloped. As a result, the existing surface water drainage is of an agricultural nature discharging overland into the adjoining River Dargle.

Piped storm water drainage is not provided by the local authority in the vicinity of site. Current drainage policy in County Wicklow dictates that it is necessary to apply the Sustainable Urban Drainage Design (SUDS) procedures to all new developments. SUDS have known benefits in terms of improving water quality, quality and consider the effects of less frequent storms.

Accordingly, when the site is developed, there is expected to be an attenuated network of surface drains discharging to the river. The outfalls to the river are likely to be fitted with non-return valves to prevent any return flow from the river channel to the subject site.

Surface water from roads and car parks are expected to be collected to separate drains and treated by a combined Class 1 silt and petrol interceptor before discharge to the River Dargle.

### **6.4 Risk of Flooding**

At present, the risk of flooding due to surface water is confined to local ponding.

Following development, the risk of flooding from surface water is low.

### **6.5 Consequence of Flooding**

The consequence of surface water flooding would be inundation of the existing undeveloped site and loss of amenity.

### **6.6 Mitigation Measures**

A risk to the subject site could arise if flow from the surface water drainage system is unable to discharge to the River Dargle.

The mitigation measures associated with this risk are the elevation of the subject site and the fitting of non-return valves to the outfalls from the surface water drainage system.

Further mitigation measures are provided by the works being carried out by Bray Town Council as part of the River Dargle Flood Defence Scheme.

## **7.0 GROUNDWATER**

### **7.1 Source**

On-site groundwater could be a potential source of flooding.

### **7.2 Receptor**

The receptor is the development site at St Valerys. The site is located at an elevation of 16 – 23 metres OD (Malin) as shown on Waterman Moylan Drg No 14-011/S004 included with this report.

### **7.3 Pathway**

During periods with extreme prolonged rainfall, groundwater might come to the surface and cause local ponding on the subject site.

Investigations undertaken on behalf of Bray Town Council for the River Dargle (Bray) Flood Defence Scheme indicated that

- (a) topsoil where encountered was up to 0.9 metres thick.
- (b) made ground up to 3.0 m thick was encountered in the vicinity of the river.
- (c) the river bed is predominantly composed of mixed gravels, sands and silts.

A full geotechnical investigation of the subsoil is expected to be undertaken as part of the future development.

### **7.4 Risk of Flooding**

Given the location of the subject site on the bank of the River Dargle, the likelihood of flooding of the subject site from groundwater is remote compared to the risk from fluvial flooding.

### **7.5 Consequence of Flooding**

The consequence of groundwater flooding would be inundation of the existing undeveloped site and loss of amenity.

### **7.6 Mitigation Measures**

A risk to the subject site could arise if water on the surface of the subject site is unable to discharge to the River Dargle.

The mitigation measures associated with this risk are the elevation of the subject site above the flood level in the adjoining river channel.

Further mitigation measures are provided by the works being carried out by Bray Town Council as part of the River Dargle Flood Defence Scheme.

## **8.0 HUMAN / MECHANICAL ERRORS**

### **8.1 Source**

Blockage of any future drainage system or failure of any future pumping system could be a source of flooding.

### **8.2 Receptor**

The receptor is the development site at St Valerys. The site is located at an elevation of 16 – 23 metres OD (Malin) as shown on Waterman Moylan Drg No 14-011/S004 included with this report.

### **8.3 Pathway**

The subject site is located adjacent to the River Dargle. Following development, it will be served by foul and surface water drainage systems.

#### **Surface Water**

When the site is developed, there is expected to be an attenuated network of surface drains discharging to the river. The outfalls to the river are likely to be fitted with non-return valves to prevent any return flow from the river channel to the subject site.

There are unlikely to be any pumps or other mechanical equipment in the future surface water drainage system within the subject site.

#### **Wastewater**

Wastewater generated on site after development is expected to be collected via a piped underground system to a pumping station at the north-west section of the site. From the pumping station, the wastewater will be discharged through a rising main under pressure to an existing public sewers.

### **8.4 Risk of Flooding**

The likelihood of flooding of the subject lands from human /mechanical errors is remote compared to the risk from fluvial or surface water.

### **8.5 Consequence of Flooding**

The consequence of flooding would be inundation of the existing undeveloped site and loss of amenity.

### **8.6 Mitigation Measures**

With a prescribed maintenance system and emergency alarms and duty / stand-by pumps arrangement in place, the likelihood of a future flood occurring on the subject site due to a failure of the wastewater pumping systems is remote.

## **9.0 JUSTIFICATION TEST**

### **9.1 Development Plan Zoning**

The site is zoned for Hotel use on Map 4: Fassaroe Indicative Land Use Zoning of the Bray Environs Local Area Plan 2009 - 2015.

The site is currently vacant and undeveloped having previously been used for the training of horses.

Further information on zoning is provided in a separate report by John Spain & Associates, Planning Consultants.

### **9.2 No Increase In Flood Risk Downstream**

The site has never been developed nor has it ever been designated as a floodplain. It is not included in the flood maps accompanying the County Development Plan nor is it included in the Areas for Further Assessment under the Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study currently being carried out by the Office of Public Works.

The site is not a floodplain, there is little if any on-site flood storage and accordingly there is no increase in flood risk downstream other than a possible but slight risk from future development on the site.

Any such slight risk will be mitigated by measures which will be included during the planning and design stages.

### **9.3 Measures To Minimise Flood Risk As Far As Possible**

Measures to minimise the flood risk including setback of structures and hard landscaping, design site levels and freeboard, finishes, SUDS, surface water attenuation and provision for overland flood routing will be included in any future planning application for the site.

### **9.4 Residual Risks To The Development Site**

There could a residual risk to the development area in the event that extreme conditions exceeding the design storm with a 1 in 1000 year flood event occurs.

The consequences of this will be minimised by ensuring that a flood resilient structure(s) and finishes, are incorporated into the detailed design of any future buildings on the site.

The residual risk to the development area will be mitigated by the proper design of the on-site levels and finishes.

### **9.5 Wider Planning Objectives**

The wider planning objectives are addressed in a separate report by John Spain & Associates, Planning Consultants.



**9.6 Conclusion**

A Flood Risk Assessment has been carried out in accordance with the Department of the Environment, Heritage and Local Government / OPW Guidelines for Planning Authorities "*Planning System and Flood Risk Management*" (November 2009) and the residual risks of flooding on this site have been addressed.

The Justification Test in accordance with the DEHLG/OPW Guidelines has been applied to the site and the result of the test confirms that future development on this site is appropriate.

**10.0. SUMMARY**

- 10.1** No evidence was found during the preparation of this report that the subject lands have ever been inundated by floodwaters.
- 10.2** Nor is there any evidence that the subject site was ever classified as a floodplain or liable to flooding on any of the following:
- (a) Ordnance Surveys Maps.
  - (b) River Dargle Flood Defence Scheme.
  - (c) Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study.
  - (d) OPW flood maps.
- 10.3** The subject lands have been analysed for risks from flooding from the Irish Sea, the River Dargle, the future surface water drainage network, the future wastewater drainage network, groundwater and failure of the mechanical system(s), if any, associated with a future wastewater drainage system.
- 10.4** The risks associated with these sources on the undeveloped site are summarised in Table 2 below.

**Table 2 Risks of Flooding – Existing Undeveloped Site**

Source	Pathway	Receptor	Likelihood	Consequence	Risk	Mitigation Measures	Residual Risk
Tidal	River Dargle	Site	Remote	Inundation of land and loss of amenity.	Low	None	Low
Fluvial	River Dargle	Site	Significant over a minor part of the site	Inundation of land and loss of amenity	High	River Dargle Flood Defence Scheme	Moderate
Surface Water	Existing ground levels	Site	Low	Inundation of land and loss of amenity	Low	River Dargle Flood Defence Scheme	Low
Ground Water	Existing ground	Site	Remote	Inundation of land and loss of amenity	Low	None	Low
Human / Mechanical Error	None	Site	None	Inundation of land and loss of amenity	None	None	None

- 10.5** The corresponding risks associated with these sources on the future developed site are summarised in Table 3 below.

**Table 3 Risks of Flooding – Future Developed Site**

Source	Pathway	Receptor	Likelihood	Consequence	Risk	Mitigation Measures	Residual Risk
Tidal	River Dargle	People, Property	Remote	Damage to property and loss of amenity.	Low	None	Low
Fluvial	River Dargle	People, Property	Low	Damage to property and loss of amenity.	Low	Future development levels	Low
Surface Water	Future drainage network	People, Property	Low	Damage to property and loss of amenity.	Low	Non-Return fittings on river outfall(s)	Low
Ground Water	Existing ground	People, Property	Remote	Damage to property and loss of amenity.	Low	Good development design	Low
Human / Mechanical Error	Existing drainage network	People, Property	Possible	Damage to property and loss of amenity.	Low	Good maintenance procedures	Human/ Mechanical Error

- 10.6** Arising from the hydraulic modelling undertaken by Kilgallen & Partners, a minor part of the site alongside the River Dargle could be slightly inundated during a 1 in 100 or a 1 in 1000 year flood event.

However, most of the area subject to possible inundation is located in the setback of 10 – 15 metres required under Flood Management Objective FL9 of the Wicklow county Development Plan 2010- 2016.

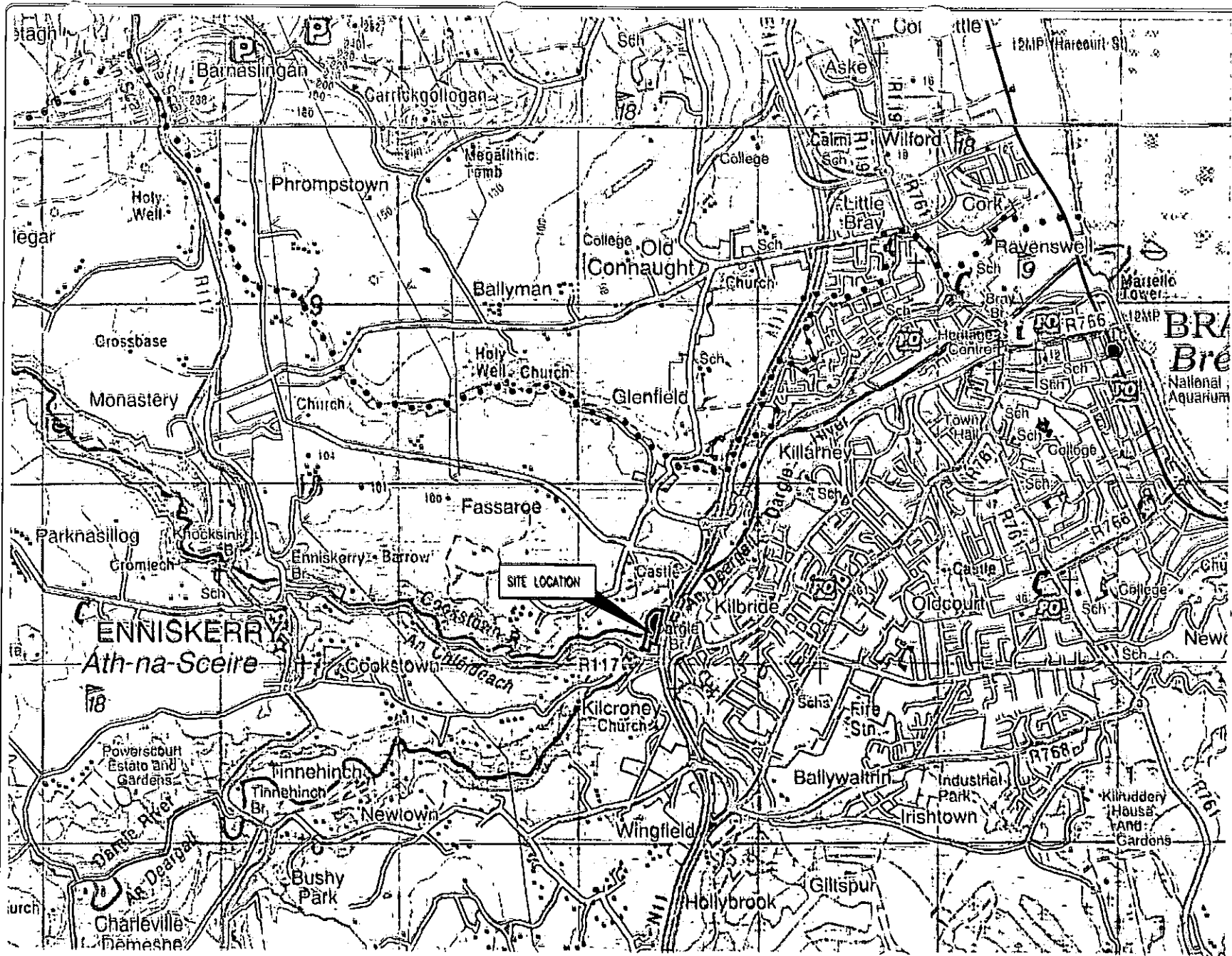
- 10.7** The design criteria for development of the site will include:

- A setback of structures by 10 – 15 metres from the river bank.
- Design floor level not lower than 19.5 metres OD incorporating a minimum freeboard of 0.5 metres.
- 
- Soffitt of structures not lower than 19.0 metres OD.
- SUDS including surface water attenuation and provision for overland flood routing.

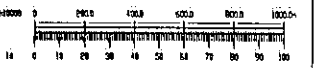
- 10.8** A Flood Risk Assessment has been carried out in accordance with the Department of the Environment, Heritage and Local Government / OPW Guidelines for Planning Authorities "*Planning System and Flood Risk Management*" (November 2009) and the residual risk of flooding on this site have been addressed.

- 10.9** The Justification Test in accordance with the DEHLG/OPW Guidelines has been applied to the site as described in the previous section of this report. The result of the test confirms that future development on this site is appropriate.

**APPENDIX A**  
**DRAWINGS AND FIGURES**



- NOTES:
1. DO NOT SCALE. USE FIGURED DIMENSIONS.
  2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT ARCHITECTURAL AND ENGINEERING DRAWINGS.



REV.	DATE	AMENDMENT	DRN	APPR

CAD REF: W:\Projects\1111-211\LocMap\LocMap.dwg

STATUS: **FOR INFORMATION NOT FOR CONSTRUCTION**

**Waterman Moylan**  
Engineering Consultants

WATERMAN MOYLAN ENGINEERING CONSULTANTS  
120 GLENVIEW ROAD, DUBLIN 15  
TEL: 01 454 9999 FAX: 01 454 9911  
Email: info@watermanmoylan.ie

CLIENT: JOHN ROWAN HOLDINGS

ARCHITECT:

PROJECT: ST. VALERY'S PASSAGE  
BRAY, CO. WICKLOW

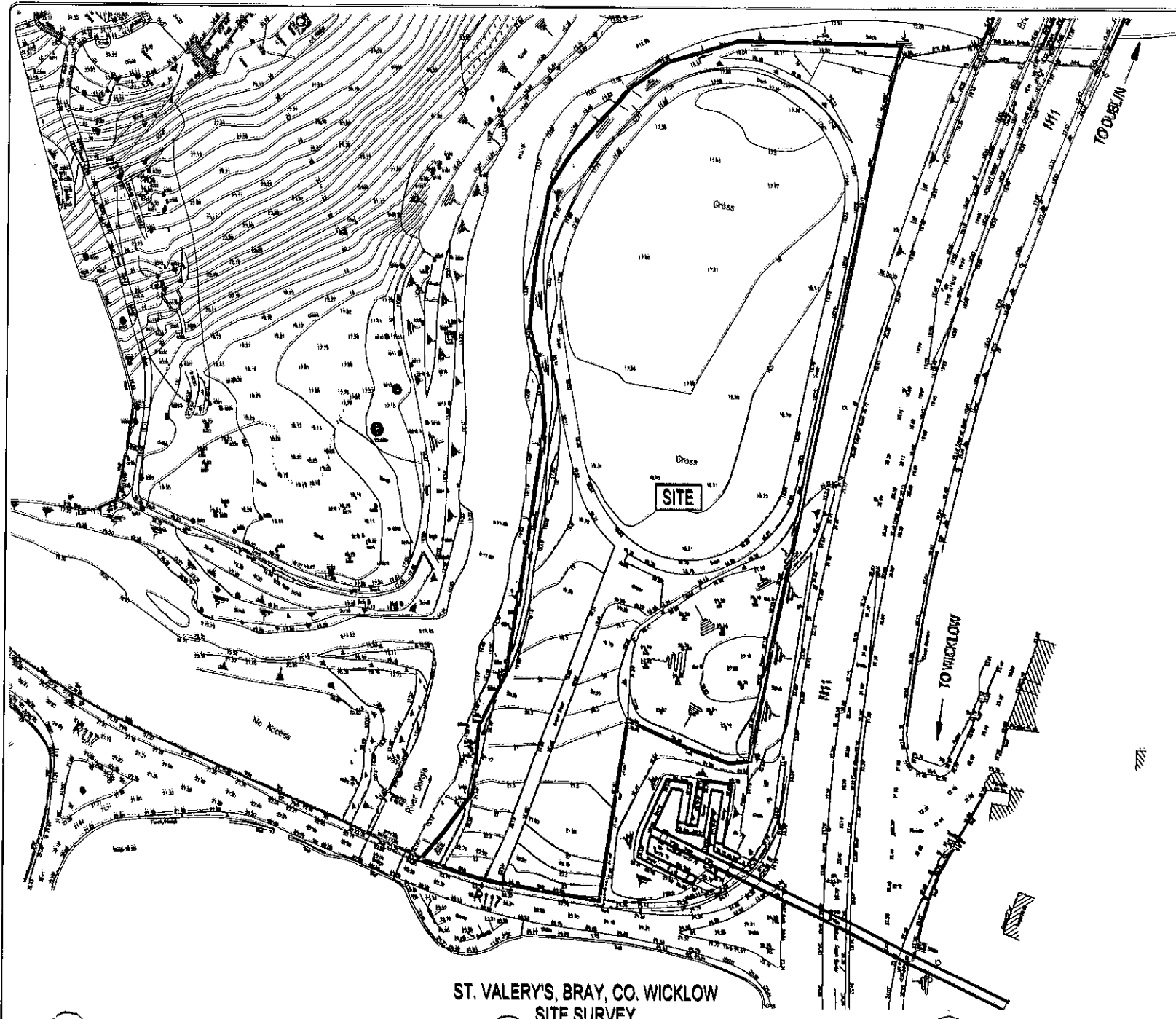
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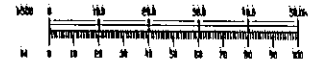
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ST. VALERY'S, BRAY, CO. WICKLOW  
LOCATION MAP

1:10000 @A1



- NOTES:
1. DO NOT SCALE. USE FIGURED DIMENSIONS ONLY.
  2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT ARCHITECTURAL AND ENGINEERING DRAWINGS.



REV.	DATE	AMENDMENT	DRN.	APPO.
1	14/02/14	ISSUE FOR INFORMATION		

CAD REF: 14021401

STATUS: **FOR INFORMATION NOT FOR CONSTRUCTION**

**Waterman Moylan**  
 Engineering Consultants  
WATERMAN MOYLAN ENGINEERING CONSULTANTS  
 14 BALLYMOUNT ROAD, DUBLIN 4  
 TEL: 01 460 8000 FAX: 01 460 8010  
 Email: info@watermanmoylan.ie

CLIENT: **JOHN KEVIN HOLDINGS**

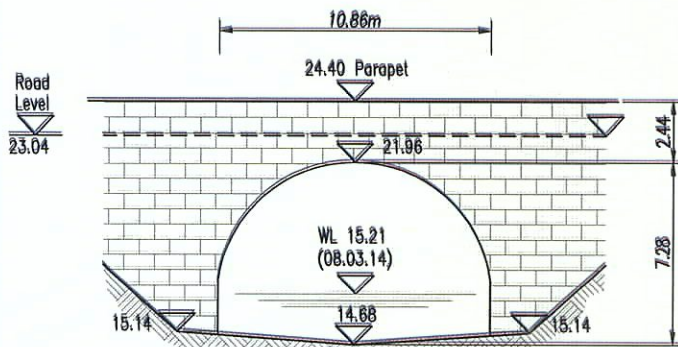
PROJECT: **ST. VALERY'S  
 RESERVE,  
 CO. WICKLOW**

TITLE: **SITE SURVEY**

DRAWN	DESIGNED	APPROVED	DATE
SMC	SMC		FEB 2014
SCALE: 1:500 (A1)	JOB NO: 14-011	REVISION:	

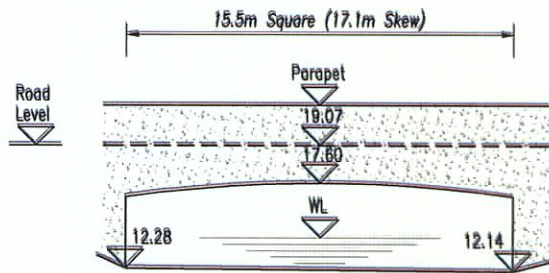
**ST. VALERY'S, BRAY, CO. WICKLOW  
 SITE SURVEY  
 1:500 @ A1**





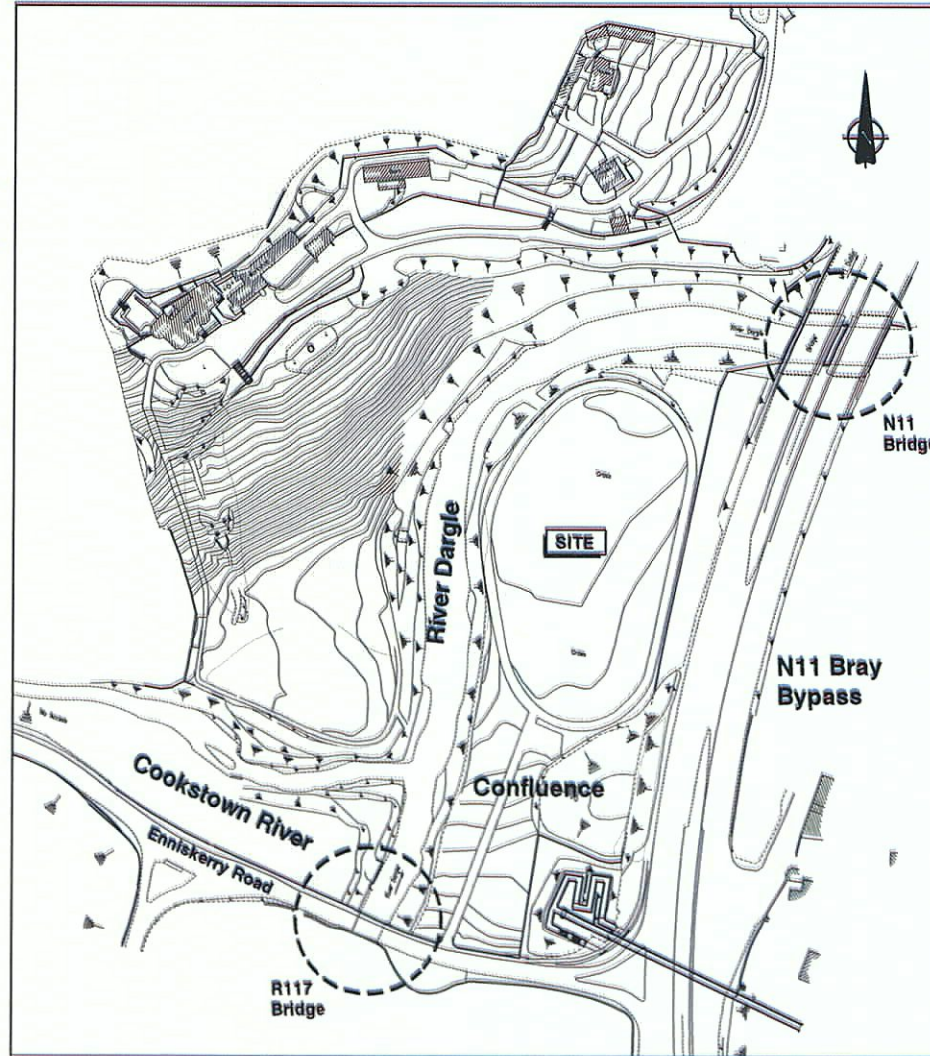
**R117 BRIDGE SECTION**

SCALE 1:200 @ A3



**N11 BRIDGE SECTION**

SCALE 1:200 @ A3



**PLAN VIEW**

SCALE 1:2000 @ A3

**NOTE:**

Upper and lower water levels to be confirmed

**NOTES:**

1. DO NOT SCALE. USE FIGURED DIMENSIONS ONLY.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT ARCHITECTURAL AND ENGINEERING DRAWINGS.



**R117**



**N11**

A	BRIDGE SURVEY ADDED	GB	BMC
REV.	DATE	AMENDMENT	DRN
CAD REF: W:\Projects\14-011-011\011-011-011.dwg (Waterman Moylan)			

STATUS: **FOR INFORMATION NOT FOR CONSTRUCTION**

**Waterman Moylan**  
Engineering Consultants

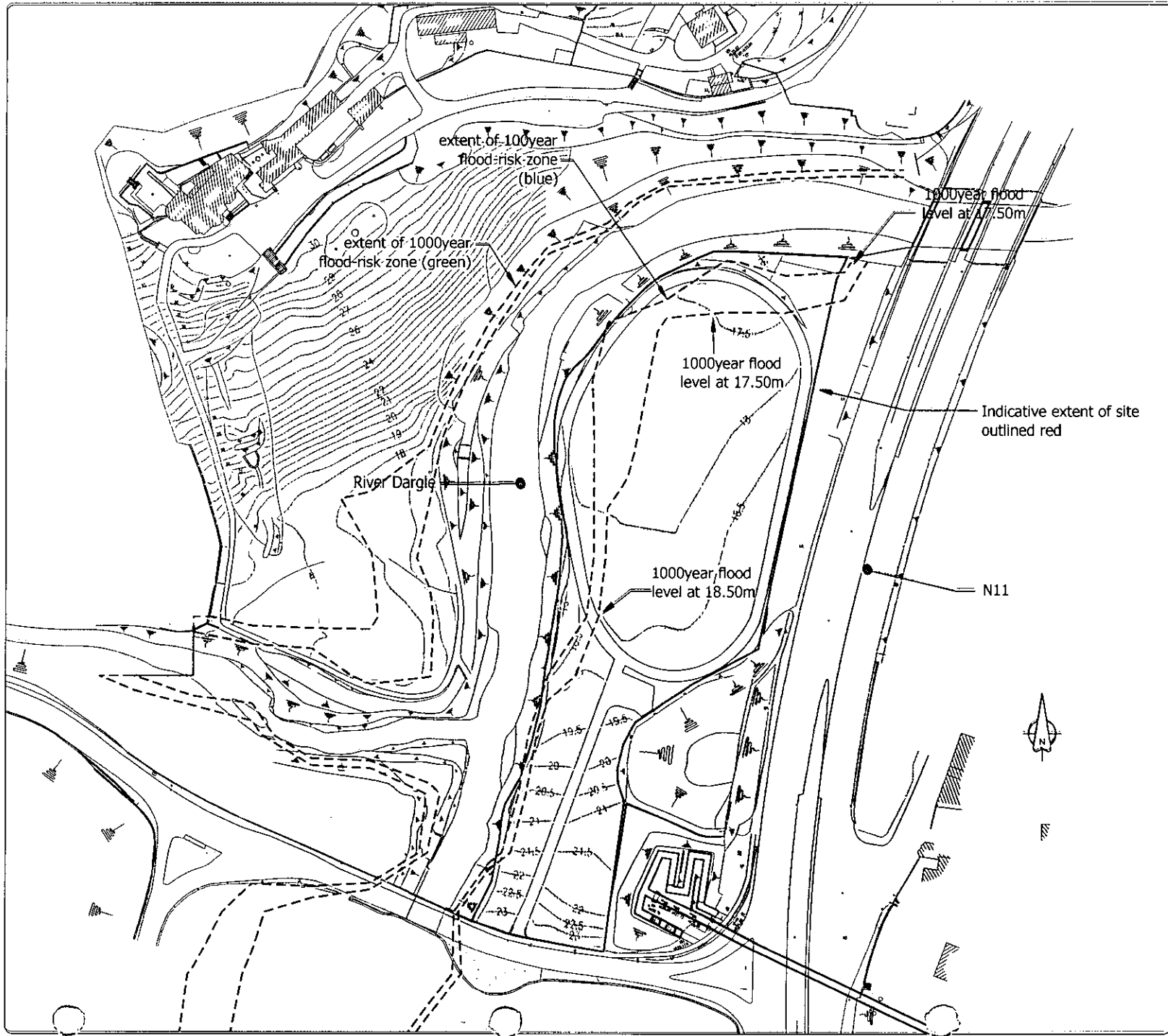
MARINE HOUSE, CLAWWILLIAM PLACE, DUBLIN 2  
Tel: 01 854 8900 Fax: 01 851 3618  
Email: info@watermanmoylan.ie www.watermanmoylan.ie

CLIENT: **JOHN ROWAN HOLDINGS**

PROJECT: **ST VALERY'S, FASSAGE, BRU CO Wicklow**

TITLE: **RIVER DARGLE BRIDGE SECTIONS**

DRAWN G. Byrne	DESIGNED BMC	APPROVED	DATE FEB. 2014
SCALE AS SHOWN (A3)	JOB NO. 14-011	DRG. NO. 5001	REVISION A



**NOTES** A3

1. This drawing is prepared for inclusion with a Report (Ref. No. 14017-HM) on hydrological modelling carried out for the proposed development site. This drawing must only be used in conjunction with this report and must not be used for any other purpose.
2. Flood risk zones are established using peak flood flows estimated from statistical methods described in the Flood Studies Report. Refer to Section 6 of Report 14017-HM for recommendations in regard to minimum floor level and protection of water-vulnerable elements of future development.
3. Future proposals for development of the site must be the subject of flood risk assessment in accordance with the Flood Risk Management Guidelines.

REV	DATE	BY	DETAILS
02	22/04/14	PB	1000y: Flood line revised.

**STATUS**  
PLANNING

**CLIENT**  
MOYLAN CONSULTING ENGINEERS

**PROJECT**  
HYDROLOGICAL MODELLING OF PROPOSED DEVELOPMENT SITE, FASSAROE, BRAY, Co. WICKLOW

**TITLE**  
EXTENT OF FLOOD-RISK ZONES



**KILGALLEN & PARTNERS**

KYLEKIPROE, WELL ROAD, PORTLAOISE, CO. LAOIS

Tel: +353 57 86 62880, Fax: +353 57 86 62881  
E-mail: info@kilgallen.ie, Web: www.kilgallen.ie

DRN:	DQ	SCALE:	1:1250@A3	DRAWING NO.:	14017-01	REV:	02
CHKD:	PB	DATE:	31/03/2014				



**APPENDIX B**  
**REPORT FROM FLOODMAPS.IE**

**Summary Local Area Report**

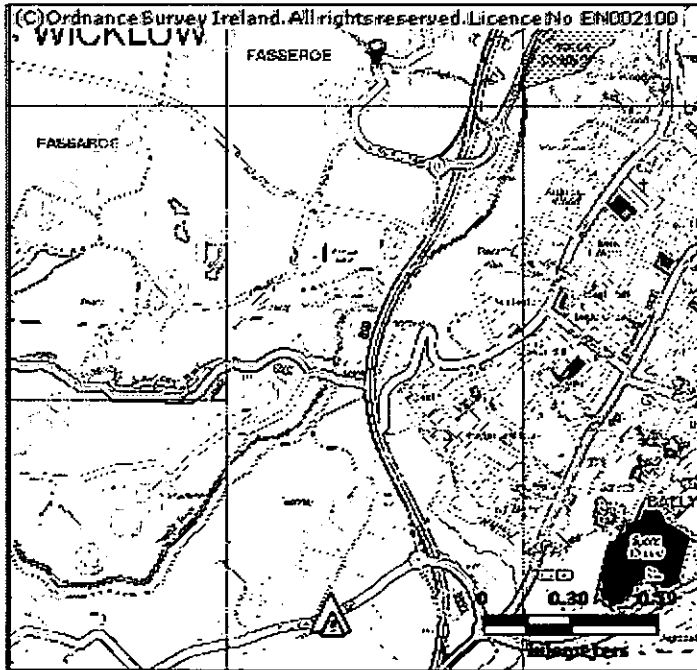
This Flood Report summarises all flood events within 2.5 kilometres of the map centre.

The map centre is in:

County: Wicklow

NGR: O 244 172

This Flood Report has been downloaded from the Web site [www.floodmaps.ie](http://www.floodmaps.ie). The users should take account of the restrictions and limitations relating to the content and use of this Web site that are explained in the Disclaimer box when entering the site. It is a condition of use of the Web site that you accept the User Declaration and the Disclaimer.



Map Scale 1:24,491

Map Legend	
	Flood Points
	Multiple / Recurring Flood Points
	Areas Flooded
	Hydrometric Stations
	Rivers
	Lakes
	River Catchment Areas
	Land Commission *
	Drainage Districts *
	Benefiting Lands *

\* Important: These maps do not indicate flood hazard or flood extent. Their purpose and scope is explained in the Glossary.

**6 Results**

- |  |   |   |
|--|---|---|
|  | 1. Dargle Bray August 1986<br>County: Wicklow<br><br>Additional Information: Reports (9) Press Archive (38) More Mapped Information | Start Date: 25/Aug/1986<br>Flood Quality Code:1 |
|  | 2. Dargle Bray Nov 1965<br>County: Wicklow<br><br>Additional Information: Reports (4) Press Archive (3) More Mapped Information     | Start Date: 17/Nov/1965<br>Flood Quality Code:3 |
|  | 3. Dargle Bray 1905<br>County: Wicklow<br><br>Additional Information: Reports (4) Press Archive (54) More Mapped Information        | Start Date: 24/Aug/1905<br>Flood Quality Code:3 |
|  | 4. Kilcorney Lane Recurring<br>County: Wicklow<br><br>Additional Information: Reports (1) More Mapped Information                   | Start Date:<br>Flood Quality Code:4             |
|  | 5. Old Connaught Ave Recurring<br>County: Dublin  | Start Date:<br>Flood Quality Code:4             |

Additional Information: Reports (2) More Mapped Information

---



6. Forge Road Enniskerry Undated

Start Date:

County: Wicklow

Flood Quality Code:4

Additional Information: Reports (1) More Mapped Information



**APPENDIX C**  
**REPORT BY KILGALLEN & PARTNERS**



**KILGALLEN & PARTNERS**  
CONSULTING ENGINEERS

**Hydrological Modelling of a proposed development  
site at Fassaroe, Bray, Co. Wicklow**

**Waterman Moylan Consulting  
Engineers  
WilsonHouse  
Fenlan Street  
Dublin 2**

**Kilgallen & Partners  
Consulting Engineers  
Well Road, Kylekiproe  
Portlaoise, Co. Laois**

**Report No. 14017-HM  
Issue 02**

**April 2014**

## DOCUMENT AMENDMENT HISTORY

<b>Client:</b>	<b>Waterman Moylan Consulting Engineers, WilsonHouse, Fenlan Street, Dublin 2</b>
<b>Title</b>	<b>Hydrological Modelling of a proposed development site at Fassaroe, Bray, Co. Wicklow</b>

<i>Date</i>	<i>Description</i>	<i>Origin</i>	<i>Checked</i>	<i>Approved</i>	<i>Issue</i>
10 .04.14	Initial Issue	PB	DQ	PB	01
22.04.14	Drg. In Appendix B revised	PB	DQ	PB	02

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2.0 LOCATION AND BACKGROUND..... 1

3.0 SOURCE DATA ..... 1

3.1 DESK STUDY ..... 1

4.0 ESTIMATION OF FLOOD FLOWS ..... 3

5.0 HYDROLOGICAL MODELS ..... 6

6.0 ASSESSMENT OF SITE WITH RESPECT TO FLOODING..... 6

APPENDIX A DETAILS OF CALCULATION OF PEAK FLOOD FLOW

APPENDIX B DRG. NO. 14017-01 – FLOOD RISK ZONES A AND B

## **1.0 INTRODUCTION**

Kilgallen & Partners Consulting Engineers were commissioned by Moylan Consulting Engineers to carry out hydrological modelling of a proposed development site at Fassaroe, Bray, Co. Wicklow.

The site is located in the catchment of the River Dargle and adjoins the N11 National Primary Road.

This report presents the findings of this hydrological modelling.

## **2.0 LOCATION AND BACKGROUND**

The site is bounded to the south by the R117 Regional Road, to the east by the N11 National Primary Road and to the west and north by the Dargle River.

Figure 1 provides a map showing the site location.

## **3.0 SOURCE DATA**

The data upon which the hydrological modelling is based has been obtained from a combination of desk studies and field measurement. This data is used in the estimation of the flood flows for the flood events under consideration and in the subsequent hydrological modelling from which the flood-risk plain maps are derived.

### **3.1 DESK STUDY**

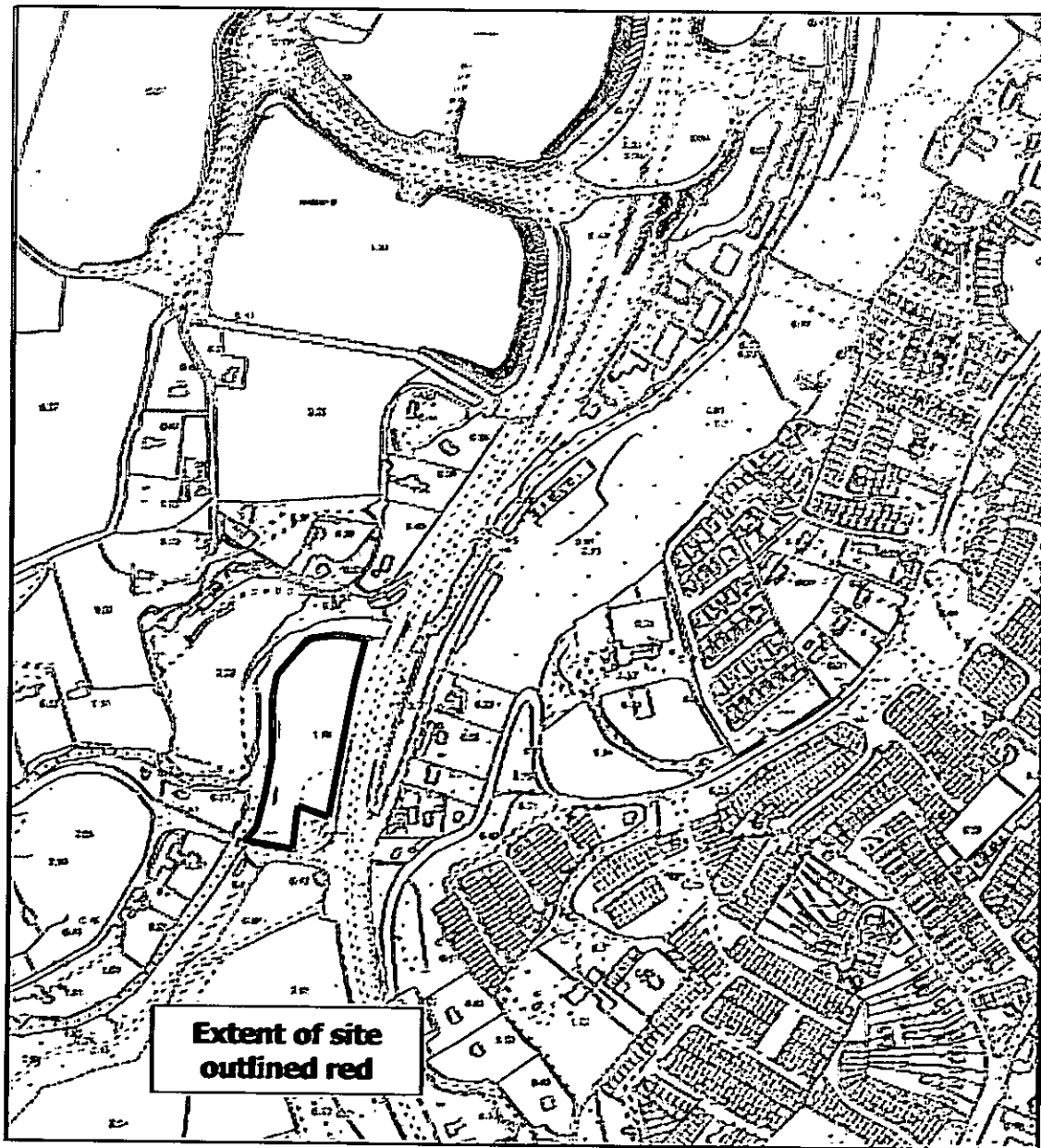
The desk study was prepared using records made available by Environmental Protection Agency (EPA) and the Office of Public Works (OPW). These records were supplemented by the examination of Ordnance Survey of Ireland (OSI) maps for the area.

OPW and EPA records indicate that neither body operates a hydrometric station on the Dargle River.

Data from the OPW (as shown on the DoEHLG website myplan.ie) indicates fluvial flooding associated with the Dargle encroaching upon the subject site.

It is estimated that the 'Hurricane Charlie (1986)' flow measured 285m<sup>3</sup>/s and that this corresponded to the total 100-year flow in the River Dargle catchment (*Bray Flood Defence Scheme – EIS Section 5.5*).





**Figure 1**  
**Site Location Map**

### 3.2 FIELD MEASUREMENT

Kilgallen and Partners was provided with a detailed topographical survey to be used in carrying out the hydrological modelling. In addition, a detailed inspection of the study area was carried out and significant features such as bridge dimensions were measured.

The topographical survey and field measurement was used to create a detailed ground model of the study area which included channel dimensions, bridge dimensions and other features. This ground model was then used in the creation of a hydrological model for the Dargle in the study area (see Section 5).

## 4.0 ESTIMATION OF FLOOD FLOWS

### 4.1 FLOOD RETURN PERIODS

"The Planning System and Flood Risk Management – Guidelines for Local Authorities " published by the Office of Public Works identifies the following risk categories for development in flood-risk zones:

- Flood Zone A: High Probability of Flooding (River: 100-year; Tidal: 200-year)  
*Most types of development would be considered inappropriate in Flood Zone A.*
- Flood Zone B: Moderate Probability of Flooding (River: 100-year to 1,1000 year; Tidal: 200-year to 1,000 year)  
*Highly vulnerable development, such as social infrastructure and residential developments would generally be considered inappropriate in Zone B unless the requirements of the Justification Test can be met. However, less vulnerable development, such as retail, commercial and industrial uses might be considered appropriate in this zone. In general however, less vulnerable development should only be considered in this Zone B if adequate lands or sites are not available in Zone C and that the flood risk to the development can be managed.*
- Flood Zone C: Low Probability of Flooding (outside of the River and Tidal 1,000 year floodplains)  
*Flood Risk Zone C is appropriate for all types of development.*

In accordance with these risk categories, the hydrological modelling considered the proposed development in terms of the 100year flood event (Flood Risk Zone A) and the 1000year flood event (Flood Risk Zone B).

#### 4.2 PEAK FLOWS FOR 100YEAR AND 1,000YEAR FLOODS

In the absence of recorded data for historical peak flows, the peak flood flow was calculated based on statistical methods in accordance with the Flood Studies Report (FSR) and incorporating recommended allowances for factorial error.

The catchment of the Dargle from its source to the N11 crossing was identified from OS mapping and from site inspection and is shown in Fig. 2. In plan area, the catchment shown in Fig. 2 is approximately 73% of the overall Dargle catchment.

The catchment of the Dargle is steep and features a dense pattern of smaller tributaries which feed into the main river. In addition, substantial areas of the catchment are of low permeability, leading to high run-off rates. As a result, the Dargle is a 'flashy' river, delivering peak floods of short duration but high volume relative to the size of its catchment.

Based on the catchment and using application of statistical methods as described in the FSR, the following peak flow figures were established:

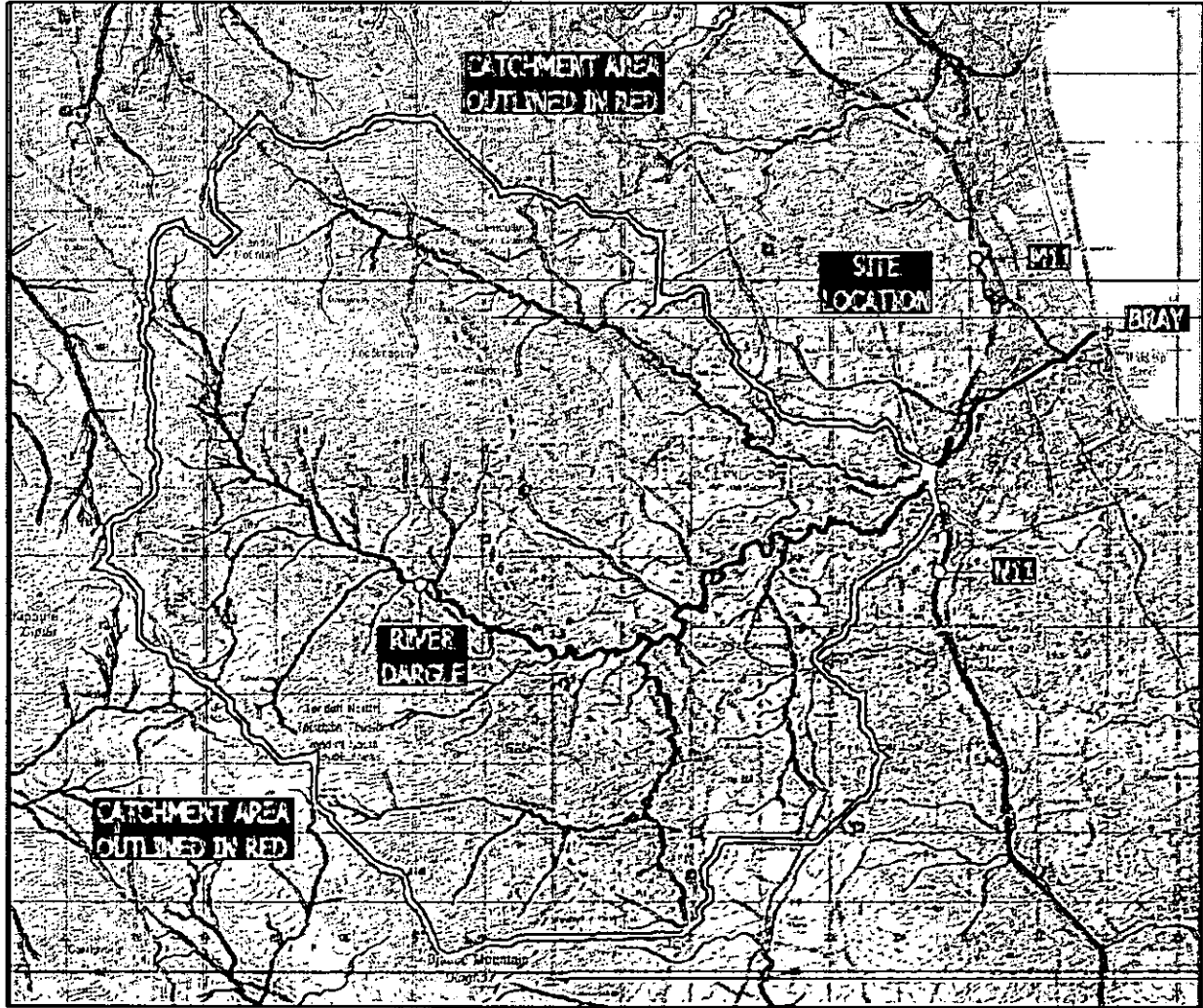
$$1 \text{ in } 100 \text{ year flood flow:} \quad = \quad Q_{100} \quad = \quad 213 \text{ m}^3/\text{s}$$

$$1 \text{ in } 1,000 \text{ year flood flow:} \quad = \quad Q_{1,000} \quad = \quad 282 \text{ m}^3/\text{s}.$$

Details of the calculations used in arriving at these flows are included in [Appendix A](#).

It is estimated that the 'Hurricane Charlie (1986)' flow measured 285m<sup>3</sup>/s and that this corresponded to the total 100-year flow in the River Dargle catchment (Bray Flood Defence Scheme – EIS Section 5.5).

The predicted value of 213m<sup>3</sup>/s for  $Q_{100}$  is approximately 74.5% of 285m<sup>3</sup>/s. Given that the catchment shown in Figure 2 is approximately 73% of the overall River Dargle catchment, there appears to be good correlation between the predicted value for  $Q_{100}$  and the total 100-year flow in the River Dargle catchment for the 'Hurricane Charlie' flood event.



**Figure 2**  
**Catchment Map**

## **5.0 HYDROLOGICAL MODELS**

In order to assess the impact of these peak flood flows on the subject site, a hydrological model which simulates the flow patterns during design flood events in the vicinity of the site was developed using the RiverCAD software modelling package. RiverCAD software amalgamates the industry standard software packages HEC-RAS (US Army Corps of Engineers) and AutoCAD (Autodesk). The data input into the program consisted of the following:

- Cross-sectional data for the river channel, including bridge dimensions, and surrounding lands as derived from the ground model described in Section 3;
- Appropriate values for Manning's "n" as determined from visual inspection of the site;
- Peak flood flows for the 100-year and 1,000-year flood events as described in Section 4.2.

The application of this model allowed the flood risk zones associated with both the 100year and 1000year flood events to be established. Drg. No. 14017-01 included in Appendix B shows these flood risk zones.

It was found that the site is affected only marginally affected by the 100year flood risk zone. The site is affected to a greater degree by the 1000year flood event.

## **6.0 ASSESSMENT OF SITE WITH RESPECT TO FLOODING**

### **6.1 Flood-risk zones**

Having determined peak flood flows for the 100year and 1000year flood events using a statistical method in accordance with the Flood Studies Report, a hydrological model which simulates the flow patterns during design flood events in the vicinity of the site was developed using the RiverCAD software modelling package.

Using this model, it was found that the site is only marginally affected by the 100year flood risk zone. The site is affected to a greater degree by the 1000year flood event. The extent to which the site is affected by these flood-risk zones is shown on Drg. No. 14014-01 included in Appendix B.

### **6.2 Minimum levels for water-vulnerable areas of development**

The flood risk zones described in section 5.0 were established using peak flood flows estimated from statistical methods and incorporating recommended allowances for factorial error.

Given the flashy nature of the Dargle catchment, the allowance for factorial error recommended by FSR, while appropriate for assessment of flood plain impact, is not considered sufficient a factor of safety against flooding of buildings and other vulnerable areas of development.

Accordingly, whereas The Flood Risk Management Guidelines recommend that the minimum floor levels for new development should be set above the 1 in 100 river flood level (including an allowance for climate change and freeboard), it is the recommendation of this report that water-vulnerable areas of the development are set above the 1 in 1000year flood level as follows:

Peak flood level for 1 in 1000year flood = 18.50m  
*(taken at point shown on Drg. No. 14017-FRA-01)*

Provide 500mm freeboard = 0.5m

-----  
Min. level for water-vulnerable development = 19.0m

Where building is proposed below this level (e.g. basements / underground car-parking / Plant Rooms, etc.), care must be taken to ensure that thresholds and any other pathways by which flood water could enter the buildings are set above this minimum level.

The site narrows considerably at its upstream end. During the 100year and 1000year flood events, the Dargle overtops its banks resulting in overland flow towards the downstream end of the site. Development of the site must be designed to ensure that water-vulnerable areas are not put at risk from this overland flow.

### 6.3 Assessment of development proposals

This assessment has been carried out in the absence of any specific proposals for development of the site. Future proposals for development of the site must be the subject of flood risk assessment in accordance with the Flood Risk Management Guidelines.

**APPENDIX A**

**DETAILS OF CALCULATION OF PEAK FLOOD FLOW**

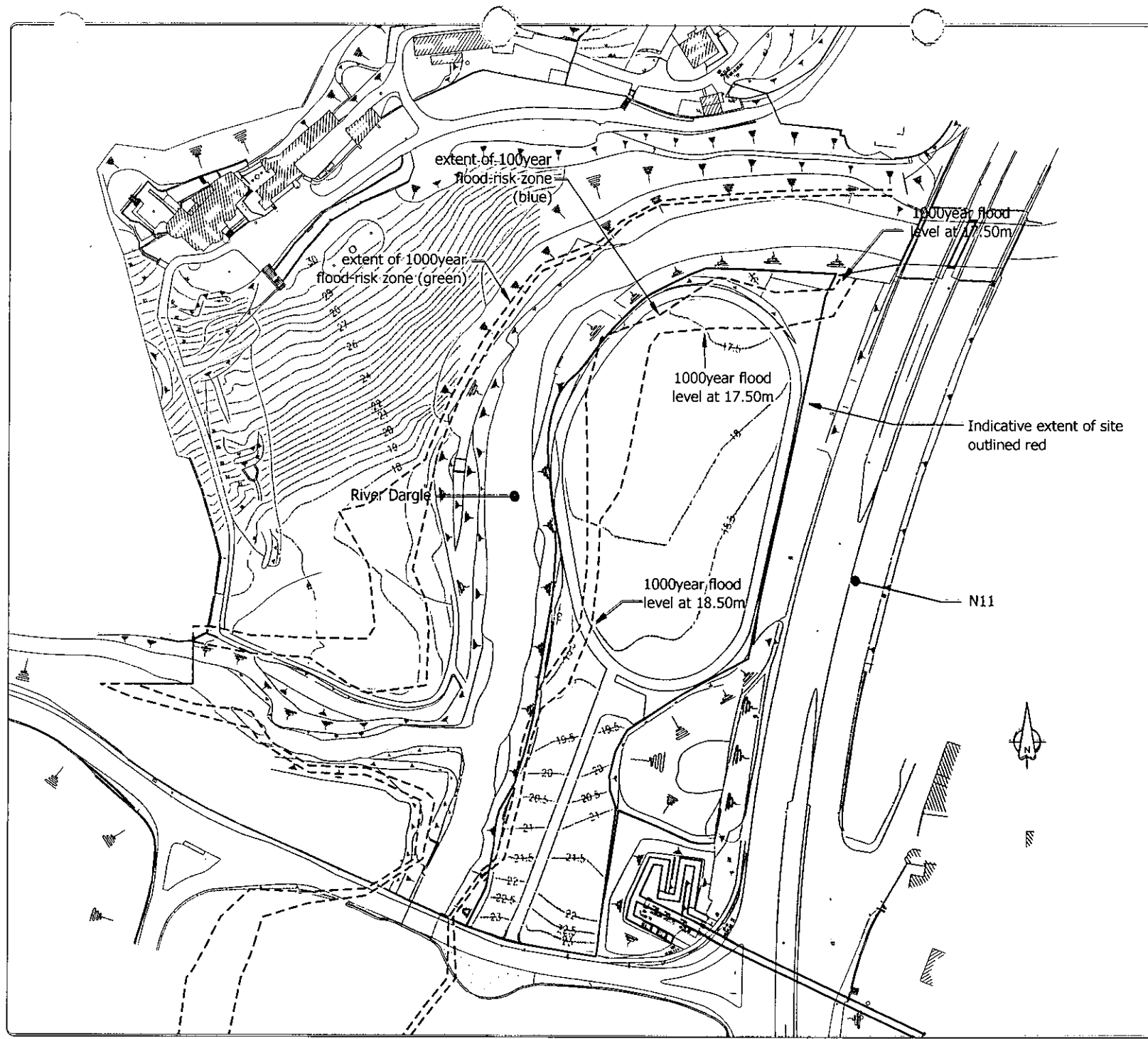
<b>Estimation of Q<sub>100</sub> For Dargle River (FSR Statistical)</b>			
<b>Characteristic</b>	<b>Value</b>	<b>Unit</b>	<b>Source</b>
C (Ireland)	0.0172		FSR
Area	93.0	km <sup>2</sup>	OS map
No. of Junctions	104		
STMFRQ	2.96		Cunnane/Lynn
SAAR	1340	mm	
G1 %	0	%	Fig I 4.18 FSR
G2 %	17	%	Fig I 4.18 FSR
G3 %	0	%	Fig I 4.18 FSR
G4 %	0	%	Fig I 4.18 FSR
G5 %	83	%	Fig I 4.18 FSR
Soil index (G)	0.47	%	
M5-2day	86	mm	Fig II 3.2 (I) FSR
r	23	%	Fig II 3.5 (I) FSR
M5-24hr / M5-2day	80.7	%	Table 6.21 Guide to FSR
M5-24hr / M5-2day	0.81		
M5-24h	69	mm	Step 3: Guide to FSR
M5-1day	63	mm	Step 3: Guide to FSR
ARF	94.4	%	Fig 6.58 Guide to FSR
ARF	0.944		
M5-1day x ARF	59.0	mm	Step 3: Guide to FSR
SMD	7.0	mm	Fig. I 4.19 FSR
RSMD	52.0	mm	Step 3: Guide to FSR
Stream length upstream	19.1	km	Measured on Map
Level at 10% upstream	72	m	Measured on Map
Level at 85% upstream	360	m	Measured on Map
S1085	20.10	m/km	Step 1: Guide to FSR
Lake	0.00	(fraction)	
Q	60.46	m <sup>3</sup> /s	



<b>Estimation of <math>Q_{100}</math> For Dargle River (FSR Statistical) (continued)</b>			
<b>Characteristic</b>	<b>Value</b>	<b>Unit</b>	<b>Source</b>
Factorial Error Factor	1.47		FSR Factorial Error
$Q_{BAR}$	88.87	m <sup>3</sup> /sec	
$Q_{100} / Q_{BAR}$ (Ireland)	1.96		FSR
$Q_{1,000} / Q_{BAR}$ (Ireland)	2.6		FSR
Climate Change Factor	1.2		GSDSDS
$Q_{100 RURAL}$	209.02	m <sup>3</sup> /sec	
$Q_{1,000 RURAL}$	277.28	m <sup>3</sup> /sec	
URBAN	1.0	%	
URBT	1.01		
URBT <sup>1.8</sup>	1.02		OPW
Tp	4.15	Hours	
<b><math>Q_{100}</math></b>	<b>213</b>	<b>m<sup>3</sup>/sec</b>	
<b><math>Q_{1,000}</math></b>	<b>282</b>	<b>m<sup>3</sup>/sec</b>	

**APPENDIX B**

**DRG. No. 14017-01 – FLOOD RISK ZONES A AND B**



**NOTES** A3

1. This drawing is prepared for inclusion with a Report (Ref. No. 14017-HM) on hydrological modelling carried out for the proposed development site. This drawing must only be used in conjunction with this report and must not be used for any other purpose.
2. Flood risk zones are established using peak flood flows estimated from statistical methods described in the Flood Studies Report. Refer to Section 6 of Report 14017-HM for recommendations in regard to minimum floor level and protection of water-vulnerable elements of future development.
3. Future proposals for development of the site must be the subject of flood risk assessment in accordance with the Flood Risk Management Guidelines.

D2	22/04/14	PB	1000yr flood line revised.
REV	DATE	BY	DETAILS

STATUS  
**PLANNING**

CLIENT  
**MOYLAN CONSULTING ENGINEERS**

PROJECT  
HYROLOGICAL MODELLING OF PROPOSED DEVELOPMENT SITE, FASSAROE, BRAY, Co. WICKLOW

TITLE  
**EXTENT OF FLOOD-RISK ZONES**



**KILGALLEN & PARTNERS**

KYLEKIPROE, WELL ROAD, PORTLAGISE, CO. LAGIS

Tel: +353 87 86 82860, Fax: +353 87 86 82861  
E-mail: info@kilgallen.ie, Web: www.kilgallen.ie

DWN:	DQ	SCALE:	1:1250@A3	DRAWING NO.:	14017-01	REV.:	02
CHKD:	PB	DATE:	31/03/2014				

C155

Monica Byrne

**From:** Monica Byrne  
**Sent:** 19 February 2016 12:36  
**To:** Planning - Development Plan Review  
**Subject:** Submission to Co. Development Plan 2016 -2022  
**Attachments:** RDCC submission to CDP 190216.pdf

A Chara

Please see attached submission from Roundwood & District Community Council Kid regards  
Monica Byrne

Roundwood & District Community Council  
Roundwood  
Bray  
Co Wicklow  
Email:  
Web:



## ROUNDWOOD & DISTRICT COMMUNITY COUNCIL

The Forge

Roundwood

Co. Wicklow

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow

A Chara

### Re: DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016 – 2022

The Roundwood and District Community Council represent the community of Roundwood and its hinterland, approximately 1,500 people. Based on the feedback from recent meetings within the community we submit the following for consideration.

The format of this plan is not user friendly. The format of the previous draft plan and the presentation of the maps was much more succinct, user friendly and greatly aided the consultation process. All sections relevant to Roundwood and other towns and village were contained within one chapter 'Town & District Plans'. The current format is unwieldy. The maps are too general and the legends for the various development uses are not displayed on the maps.

#### Observations with regard to Roundwood Specific Development Objectives

- (1) **Improve and provide roads, footpaths and cycleways where required and at the following locations.**

Along the L-5059 between the town centre and St. Lawrence O'Toole National School.

*Agreed*

Along the R-765 from junction with R755 towards "Waters Bridge"

*Completed*

Along the R755 from Health Clinic to GAA Club.

*Completed*

**Also:**

**Along L5077 from junction with R764 to the old schoolhouse.**

*The road is poorly surfaced and needs to be resurfaced and made safe for both motorists and pedestrians*

**Also:**

**Junction at R764 /R755**

*Very unsafe as currently set up and operated*

*Use of junction for Main Street turning should be discouraged by visually acceptable signage*

Also:

**Provide footpath along the R755**  
Along the R755 from Roundwood Caravan Park to the Vartry Ground which links to the Vartry Reservoir Walks

Also:

**Provide footpath along the R764**  
Extend footpath from Kavanagh's Vartry House to Roundwood Park gates

(2) To facilitate the provision of pedestrian and cycling linkages within and between existing and new housing/mixed use development throughout the settlement.  
*Good, including (1) listed above.*

(3) To provide for a footbridge at Mullinaveigue Bridge on the R755 to connect the Vartry Reservoir Loop walks for pedestrians.  
*Good, and to provide for public safety*

(4) Due to the inherent risk of leakage from waste water pumping chambers or treatment plants, these installations and any other development that would have a significant risk to the Vartry Reservoir will not be permitted within 200 m if the reservoir shore.  
*Good, see also comment under "Priorities" below*

(5) All development proposals shall appropriately address the protection of waterways connected to the Vartry Reservoir, which is designated a proposed Natural Heritage Area (pNHA) and is hydrologically linked to protected European sites downstream.  
*Good*

(6) To maintain views eastwards from the main street of the Vartry Reservoir, development proposals for the lands between the main street and the Reservoir shall be designed to maintain views following evaluation and agreement of the principal vistas.  
**Excellent**  
*Request that the Roundwood & District Community Council be a non-statutory Notice Party to relevant applications affecting the view*  
*"Evaluation & agreement" should include "No significant degradation of view" in both cases and should be indicated on the maps associated with Draft Plan as previously.*

(7) To protect established trees within the area.  
*Agreed*

(8) To provide for additional car parking and set down area on the lands across the road from the school identified as (RD1) on map No.1  
*Good*

(9) To provide for a town centre extension and a "Village Green" on lands identified as (RD2) on Map No.1 in accordance with the following criteria.  
*Good*

- A minimum of 500 sqm of commercial floor space shall be provided, particularly in the form of new street / village green facing ground floor retail /retail services / professional services use.  
**Amend**

500 sqm of commercial floor space may be provided, particularly in the form of new street/village green facing ground floor retail/retail service/professional services use.

- 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%v of the lands within the objective boundary shall be developed prior to the provision of the "Village Green".

**Amend**

A village green 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%v of the lands within the objective boundary shall be developed prior to the provision of the "Village Green".

- Vehicular / pedestrian / cycle access / links from the main street to the primary development lands to the south (RD5) and provision of pedestrian / cycle links to the secondary development lands to the north (RD3) and towards the Reservoir.

Good

- (10) On the lands identified as (RD5) on Map 1, to ensure that any development proposals allow for future connectivity to the lands to the north and south (RD2 and RD4).

Good

- (11) To provide for secondary development uses on the lands identified as RD3 on Map no.1 and the following shall also be provided:

- Pedestrian and cycle access / link to the (RD2) primary Development Area to the south.

Good

**Also**

Secondary Development Uses to be defined and indicated by legend on the maps associated with the Plan

- 0.2ha of children's play area at an appropriate location close to the Primary Area.

Good

Preferred location to be identified by consultation. Please note that there is currently a proposal in train for a playground off the R755 in conjunction Roundwood Athletic Club and Wicklow Co Council on the south side of Roundwood village as per map below.

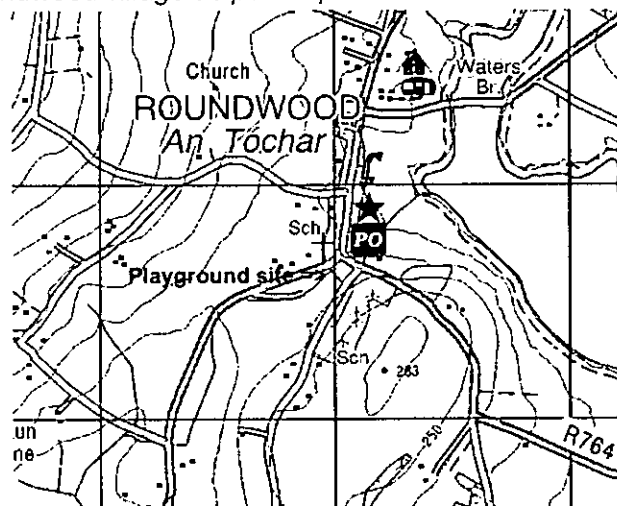


Photo 1 Proposed site of playground

- Reserve the existing tree line corner (0.7ha) along the R755 road from development.  
Good  
*Application relative to this area should be included in Notice Party Notifications*  
*Secondary Development Uses*

(12) To provide for secondary development uses on the secondary lands identified as (RD4) on Map No.1 and the following shall also be provided:

***Secondary Development Uses to be defined and indicated by legend on Plan***

- 1.37ha of active open space on the tertiary development lands, these lands shall be levelled, drained and rendered suitable for active open space use. No more than 50% of the secondary development lands shall be developed prior to the provision of the active open space.  
***Tertiary Development Uses to be defined and indicated by legend on the maps associated with the Plan***
- Development proposals shall allow for future connectivity to the lands to the north (RD5).  
Good

In addition to the above specific observations please note the following which we believe are priorities and should be included in the Roundwood Settlement Plan

(1) ***Traffic Infrastructure***

***Parking and traffic control is a No.1 safety and infrastructural issue and should be top priority.***

(2) ***Services Infrastructure***

***Water treatment plant capacity to be upgraded in advance of any further connections in excess of treatment capacity. Current treatment capacity and estimated capacity requirements and upgrades to 2022 to be confirmed in consultation with Uisce/Irish Water***

(3) ***Tourism / Leisure Infrastructure***

***The Roundwood Settlement area to be officially identified as far as possible as an important "Gateway" to the uplands for seasonal tourists and year round walkers.***

Thank you for the opportunity to meet with your officers at the recent consultation meeting. We would welcome an opportunity to discuss any of the issues raised above.

Yours sincerely

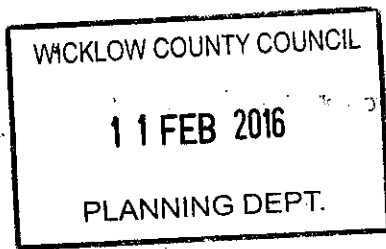


Monica Byrne

Secretary

18<sup>th</sup> of February 2016





C156

*Thereseah*  
*Newcastle Lower*  
*Co. Wicklow* A63 CC67

2<sup>nd</sup> February 2016  
County Development Plan Review,  
Planning Dept.,  
Wicklow County Council,  
Station Road,  
Wicklow

A Chara,

I have examined the Draft Development Plan and think its appropriate for me to make comment on how it may impinge on me and the possibility that it may be appropriate to consider including my property which is currently designated as Residential Tertiary Development in the Secondary Development Phase.

I note with interest that the proposed location for a new Primary School has been moved somewhat since the previous plan. I can't but agree that your current suggested location does seem very appropriate for that use and would facilitate easy access for most children in the area.

However we have been living in Newcastle for 38 years and have enjoyed a very peaceful isolated existence in the middle of the fields. It seems likely that in our 70's the arrival of a school beside us may be something that we could find difficult to accommodate and may choose to move elsewhere.

Should this be our inclination at the time it may be appropriate to look at its inclusion with the adjoining property.

My property is a very unusual narrow strip of land extending right on to Leamore Lane since I also own the house below where I am living. It has no real development potential in its own right but should it be incorporated into the adjoining school development, being on high ground, it could facilitate a coastal view and possibly provide a rear entrance into the land designated N2.

Perhaps you might take a look at my location and consider should an option be there to evaluate its incorporation in the development of the adjoining land.







Yours sincerely,

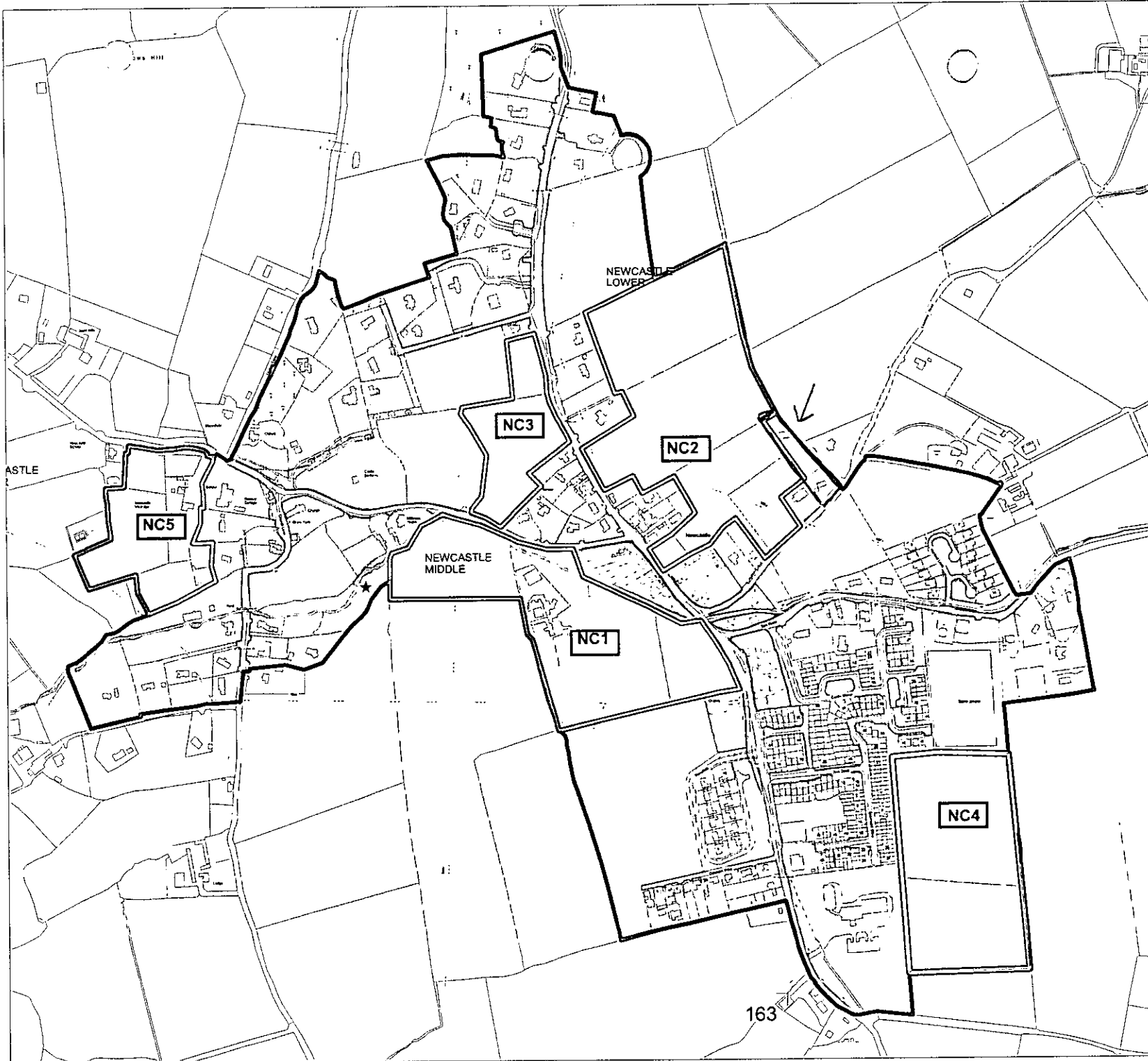
A handwritten signature in dark ink, appearing to read "Fred &amp; Ann Rountree".

**Fred & Ann Rountree**

# Newcastle Settlement Plan

## DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

-  Settlement Boundary
-  Primary Development Area
-  Secondary Development Area
-  Tertiary Development Area
-  Plan Objective
-  Plan Objective Boundary



Title: Land Use Zoning Objectives  
Map No.: 1



Wicklow County Council  
Planning Department

Maps are not to scale

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**From:** marion rueter  
**Sent:** 19 February 2016 16:18  
**To:** Planning - Development Plan Review  
**Subject:** Submission to Co. Development Plan

Marion Rueter.  
Clogga  
Arklow  
Co. Wicklow.

Dear Sir

I propose to alter NH42 to the following:

To facilitate a study to determine the best feasible walking and cycling route between Bray and Arklow in consultation and agreement with landowners.

Logic:

The purpose of this objective is to provide a recreational, car free route for residents and tourists, linking the coastal towns. The justification is for tourism and financial benefit. There is no non-subjective reason to limit the route options to the seashore.

A complex range of issues will need to be addressed before the route is decided.

1. Environmental impact
2. Ownership and Liability
3. Practical management
4. Compliance with all other NH objectives.

The Coastal area in Wicklow is already the most intently used section of the county. It includes all the major towns, the railway and three national parallel roadways along with a network of secondary roads and pathways. It has the most vulnerable habitats and the most important areas of biodiversity. The urbanisation of the area is ongoing.

As a tourism incentive this walkway/cycleway would be considered a success if it carried thousands of people over a year.

It is not unreasonable to ask that such a large development be planned properly from the start.

Yours sincerely

Marion Rueter.

C158

Leonora Earls

**From:** stephen  
**Sent:** 18 February 2016 17:05  
**To:** Planning - Development Plan Review  
**Cc:** Sorcha Walsh; Deirdre Whitfield; Stephen Willoughby; Christine Flood  
**Subject:** Second Submission for Draft Wicklow Development Plan 2016 - 2022: Sexton Garden Centre Lands at Glen of The Downs (Re-designation as Corridor Zone)  
**Attachments:** Submission for Re-designation of Sexton's Garden Centre Lands from Little Sugar Loaf Area of Outstanding Natural Beauty to a Corridor Zone.pdf

Dear Sorcha,

Please find attached the second submission that requests the Council to consider including in the draft Wicklow County Development Plan the removal of the Property from the Little Sugar Loaf Area of Outstanding Natural Beauty and the re-designated of the Property as a Corridor Zone.

As Stephen helpfully mentioned at the public consultation in Enniskerry we have included the photographs to show the commercial activity on the Property to support our submission and we can supply photographs of all the new roads and the culverts should they be required.

Please do not hesitate to contact me should you have any queries on

Please can you confirm you have received the email and that you can open the attachment.

Kind regards,

Stephen Sexton

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
County Wicklow

Paul Sexton  
St. Anne's  
Bray Road  
Shankill  
Co. Dublin

18<sup>th</sup> February 2016

By Email Only to [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

**Second Submission to Draft Wicklow County Development Plan 2016 - 2022**

**Submission for Re-designation of Sexton's Garden Centre Lands from Little Sugar Loaf Area of Outstanding Natural Beauty to a Corridor Zone.**

The Sextons Garden Centre Lands at the Glen of the Downs ('the Property') are situated on the edge of, but still within, the Little Sugar Loaf Area of Outstanding Natural Beauty.

We request the Council consider that the Property be removed from the Little Sugar Loaf Area of Outstanding Natural Beauty and that the Property be re-designated as a Corridor Zone in the Wicklow County Development Plan 2016 - 2022.

The Property has been in commercial use for over half a century with numerous permanent structures, displays, sheds and other items existing on the Property over the decades. The land to the rear is entirely reconstituted from when a pitch and putt golf course operated from the Property. The entire Property has therefore been altered and changed from its original condition and in some areas on more than one occasion.

Furthermore the immediate area surrounding the Property were altered dramatically in visual terms by the National Roads Authority on the completion of the N11 Kilmacanogue/Glen of the Downs Dual carriageway, the Foxborough Lane Realignment road and Junction 9 of the N11 separated interchange/overpass which now overlooks the Property. A new inclined road and embankment was also built by the National Roads Authority for commercial and customer traffic to and from the Property within the Property itself.

The Property, as a result is now surrounded on all four sides by medium to national scale roads as well as containing a substantial road and embankment within the Property itself. The accompanying N11 concrete separation and road signs have also significantly altered the visual appearance of the Property and the area around the Property

The constructions of the following culverts have also substantially altered the Property:

1. A very large culvert at the northern end of the site to accommodate the N11.
2. A substantial culvert at the southern end of the site to accommodate the overpass.
3. A further culvert at the southern eastern of the site to accommodate the "Foxborough Lane Realignment" road.

The Property is now essentially an island commercial brownfield site with commercial uses and reformed land completely distinct from the high amenity local countryside surroundings and the Property is clearly not the 'pristine' open fields, forests or mountains that are typical of the other land designated within the Little Sugar Loaf Area of Outstanding Natural Beauty

As such, our submission is that the draft Wicklow Development Plan 2016 - 2022 should remove the Property from the Little Sugar Loaf Area of Outstanding Natural Beauty and that the Property should be re-designated as a Corridor Zone within the draft Wicklow Development Plan 2016 - 2022.

We were grateful for the assistance of the Wicklow County Planning and Economic Officers at the Public Consultation who suggested that photographs be included with the submission to demonstrate the changes particularly in the last couple of decades that demonstrate how inappropriate the Little Sugar Loaf Area of Outstanding Natural Beauty designation is now and that the Property be re-designated a Corridor Zone.

Regards

*Paul Sexton*

Paul Sexton







































## Leonora Earls

---

**From:** stephen  
**Sent:** 18 February 2016 15:47  
**To:** Planning - Development Plan Review  
**Cc:** Sorcha Walsh; Deirdre Whitfield; Stephen Willoughby; Christine Flood  
**Subject:** First Submission for Draft Wicklow Development Plan 2016 - 2022: Sexton Lands at Glen of the Downs (Revised Zoning)  
**Attachments:** First Submission for the Draft Wicklow County Development Plan 2016 - 2022 (Sexton Lands at Glen of the Downs).pdf; Wicklow Garden Village Market Images.pdf; Wicklow Garden Village Potential Layout.pdf

Dear Sorcha,

My father and I are very grateful to Christine, Stephen and yourself for the very helpful and informative assistance at the public consultation in Enniskerry. The attached revised zoning submission takes account of our discussions in particular in relation to being less specific with the wording of the revised zoning we are requesting be considered by the Council for inclusion in the Draft Wicklow County Development Plan.

We are doing two submissions that we are asking the Council to consider for inclusion the Draft Development Plan, the attached submission is in relation to the revised wording of the zoning of the Property. We are doing a second submission, which you will receive shortly, to request that the Property be excluded from the Sugar Loaf Area of Outstanding Natural Beauty and be placed in a Corridor Zone. We are making two submissions as we feel the revised zoning wording and the re-designation are two separate issues and we should explain our request for each submission to be considered by the Council for inclusion in the Draft Wicklow County Development Plan in separate submission documents.

We understand and accept Christine's comments that even if the revised zoning and the re-designation of the land into a Corridor Zone were to be supported by the Council that this does not guarantee that any further planning application would be successful.

I trust the attached is all self explanatory and please do raise any queries you, or your colleagues, have with me by email or on the phone and my phone number is :

I would be grateful if you could confirm you have received this email and that you can open all the attachments.

Kind regards,

Stephen Sexton



County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
County Wicklow

Paul Sexton  
St. Anne's  
Bray Road  
Shankill  
Co. Dublin

18<sup>th</sup> February 2016

By Email Only to [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

**Submission for Draft Wicklow County Development Plan 2016 - 2022**

**Current Zoning for the Glen of the Downs Garden Centre Lands**

The current zoning for the Sexton's Garden Centre Lands Glen of the Downs ("Property") in the Wicklow County Development Plan 2016 – 2022 is very specific;

*Tourism and Recreation Themes and Products (T30)*

*To support the development of craft/artisan centres at established tourist facilities. In particular the Council will support the development of an Arts, Crafts and Interpretive Centre at Sexton's Garden Centre, Glen of the Downs.*

We would like the Council's support to revise the zoning submission in the Draft Wicklow County Development Plan so that the zoning for the Property should be more general for a number of reasons.

An integral part of the current zoning for the Property in respect of the Interpretive Centre for the Glen of the Downs Nature Reserve was to explore if a physical link or track could be created from the proposed Interpretive Centre on the Property along quiet local roads to the Glen of the Downs Nature Reserve so that tourists could park their cars on the Property, use the facilities and follow a delineated path to walk from the Interpretive Centre on the Property to the Glen of the Downs Nature Reserve.

The feedback from local residents in relation to a physical delineated path, track or link being created from the proposed Interpretive Centre on the Property via quiet local roads to the Glen of the Downs Nature Reserve was not favourable. The local residents who live in houses located on roads between the Property and the Glen of the Downs Nature Reserve, completely understandably, do not wish to have tourists interrupting the quiet enjoyment of their residential homes and we wish to respect our neighbour's views. We therefore will not be taking the idea of an Interpretive Centre forward as having no delineated link, path or track from the Interpretive Centre to the Glen O Downs Nature Reserve undermines the credibility and viability of having an Interpretive Centre dedicated to the Glen O Downs Nature Reserve on the Property.

The Property has been used for retailing since planning consent was granted in 1969 for a "display and garden centre" (Register Reference 2496/69). We are requesting that the ongoing retail use, and employment in support of that retail use, continue to be supported in the draft Wicklow Development Plan as it is an established and long term retail employment location.

In addition we are seeking the Council's support to add 'tourism' to the zoning as we see the future retail development being tourist led arts, craft, food and other local produce retail employment.

The high number of enquiries we get from local artisan food and craft producers seeking space at the Property also confirms that, should the revision to the current zoning for the Property in the draft Wicklow County Development Plan 2016 – 2022 be supported by the Council, the end users are there to underwrite the economic and community success of the project.

The specifics of any future proposals would be assessed and considered in the usual way by the Wicklow County Planning Department as part of a comprehensive planning application for the Property should the revised zoning proposal be supported by the Council.

### **Revised Zoning for the Glen of the Downs Garden Centre Lands 2016 - 2022**

In light of the above, and the very helpful feedback from the Council's Planning Officers received at the first public consultation, we are seeking the Council's support in the draft Wicklow County Development Plan 2016 – 2022 for a revised zoning as follows;

*"Sexton's Garden Centre Lands should be supported as area to continue to be developed as a key retail and tourism attraction in a sustainable manner"*

The above revised zoning for the Property would;

- not be too specific;
- support the substantial numbers of existing retail jobs;
- create the possible opportunity, subject to a comprehensive and detailed planning application, of a major tourist attraction showcasing the best Wicklow arts, craft, food and other local producers; and
- establish sustainability as a key consideration for this highly sensitive location.

### **Proposal and Vision**

We set out below the reasoning and concepts behind why we are seeking the Council's support for the Property to be an *"area to continue to be developed as a key retail and tourism attraction in a sustainable manner"* in the Wicklow Development Plan 2016 – 2022.

We want to enhance the long and successful history of retail at the Property by creating a major new Wicklow tourist destination to show case Wicklow's strong food and craft industry. We propose to expand an established retail location, with the necessary infrastructure already in place, to access a ready-made passing market on our door step that has huge potential to create new jobs locally and in Wicklow while helping to support existing employment at the Property and at SMEs across Wicklow.

A fantastic opportunity exists to combine some of Wicklow's strongest and unique sectors; food, craft and tourism, in an idyllic setting with easy access to substantial numbers of passing visitors and tourists and to the urban conurbations of North Wicklow and Dublin.

### **The County Wicklow Economic Think Tank Action Plan**

The Summary of the County Wicklow Economic Think Tank Action Plan sets out the need for the development of a Wicklow Brand that highlights where Wicklow excels and what differentiates it from other counties and maximises the value of Wicklow's status as 'The Garden County'. We have selected the following sections of the Objectives set out in the County Wicklow Economic Think Tank Action Plan that are relevant to this submission;

#### County Wicklow Economic Think Tank Action Plan: Objective 1.1 Ensure the infrastructural requirements of business are in place

The Property has had long established and diverse retailing in place since the 1969 so all the services that new business require are already in situ, long established and used by multiple active retail businesses that already operate from the Property.

The future expansion potential of the Property was enabled by the construction of the link road directly from Junction 9 of the N11 into the Property. The link road into the Property when built by the National Roads Authority was future proofed by the National Roads Authority to have the capacity to accommodate increased demand to be created by further retail employment activities at the Property.

The customer traffic coming to this proposal for a Wicklow Food and Crafts Village would be predominately from the Dublin direction in the mornings, in the opposite direction to the commuter traffic going to work, and predominately returning north in the late afternoon, in the opposite direction to the commuter traffic going home.

We would seek the advice of the Wicklow Tourist Board and others about an on-site tourist information office branded with 'Welcome to The Garden of Ireland'. The tourist information office would provide information on other great locations and places of interest available to tourists to visit in Wicklow. We would request leaflets and other information from other tourist destinations in Wicklow for tourist and other visitors to become informed about all of Wicklow's amenities, tourist destinations, historic attractions, activities, sightseeing and hill walking.

We would encourage 'open days' where charities and other organisations can hold events, competitions, and sponsorships and where well known Wicklow and National Chefs can come and demonstrate how great and easy Wicklow produce is to cook.

We would decorate the internal access areas and common parts with images of wild Wicklow, photos of farmland, mountains and coastline and profile local growers to foster the Wicklow Brand.

We would work with Wicklow County Council the NRA, Bord Bia and others to alter the existing road signage we have in both directions of the N11 to notify tourists on the north bound and south bound dual carriageways of the location of the Wicklow Food and Crafts Village at Junction 9 of the N11 and ensure that signage on site is consistent with the signage on the N11 and with other tourist facilities in Wicklow.

We would insist that all the local food and craft retailers also have a high quality consistent signage so that all the signage on the N11 and within the Property is clear and easy to use.

County Wicklow Economic Think Tank Action Plan: Objective 2.1

Develop a Retail Marketing plan for County Wicklow with objectives to: Get people into Wicklow to shop; Keep people shopping in Wicklow; Build consumer confidence

The Property is directly accessible by 50,000 vehicles passing weekly, a huge potential customer base for artisan food and craft retailers. A significant proportion of that passing traffic goes from Dublin through Wicklow to Wexford and other counties and vice versa and does not stop and spend any money or time with local food and craft businesses in Wicklow. This opportunity allows that lost trade to be captured and revenues to be generated for Wicklow's food and craft businesses and producers selling quality products and produce made in Wicklow. The proposal is to create a 'day out' for visitors and tourists alike with the focus on easy access from the N11 to well-presented high quality local foods and crafts in a beautiful setting with views of the Sugarloaf and areas for picnics and walking.

We have had numerous requests from Wicklow based craft and food producers to rent part of the existing buildings or temporary buildings. However rather than a piecemeal approach the proposal would see a comprehensive and coordinated plan in place to allow large numbers of artisan food and craft producers to come together as a business community and create a substantial tourist attraction for Wicklow.

An enjoyable well branded retail environment where consistently high quality local products and produce is sold will give consumers the confidence to return for repeat trips and word of mouth will help the general success of the Wicklow SMEs. We would also have an advertising campaign to announce the opening of the facility with ongoing marketing in conjunction with the local food and craft producers.

County Wicklow Economic Think Tank Action Plan: Objective 3.1

Promote Niche Tourism Opportunities to Specific Groups in the Tourism Population  
In some case these niches will offer untapped or underdeveloped economic opportunities. Examples include: Food

There are numerous excellent farmers' markets, concessions and other outlets for the sale of local produce in Wicklow that in the main are periodic and attract the local populations to acquire locally produced food and products. What we are proposing is not to compete with these facilities, rather to create a permanent facility with access to the untapped and underdeveloped opportunity of people from other counties and tourists from other countries passing on the N11 having access to Wicklow produce and products creating a new niche of tourism for Wicklow.

We have the space to set aside attractive areas for 'Pop Ups' for local start-up businesses not yet ready for a permanent retail area but requiring a low cost environment to start and grow a business. It would give new ventures the ability to test their produce and products in a strong Wicklow branded environment and obtain advice and assistance from the more established SMEs in Wicklow food and crafts. We would ask Wicklow County Council for assistance with a rates incentive scheme to match the low cost ethos of the proposal and to encourage existing SMEs to thrive and expand and new SMEs in the food and crafts sector to emerge in Wicklow.

County Wicklow Economic Think Tank Action Plan: Objective 5.1  
Establish an SME Food Sector Forum

The SMEs that characterise the artisan food and craft businesses in Wicklow face a serious challenge with a permanent location to sell their produce in high profile locations. Town centres tend to be characterised by competition from super markets, high rents, and the cost of parking discouraging customers who want to browse at their leisure. We proposed a low cost environment with high quality bespoke food and craft retail units and free car parking. The ability of the SME food sector to sell the locally produce food and drink will create a ready-made forum for the exchange of ideas, exploration of potential synergies and collaborations especially between the more established SMEs assisting the less established start-ups with advice promoting a community atmosphere. A good example of a collaborative idea would be a collective website for Wicklow Food and Crafts Village that would promote all the SMEs in the Wicklow Food and Crafts Village individually and as a collective.

County Wicklow Economic Think Tank Action Plan: Objective 5.2  
Develop a Wicklow Food Brand

We would propose and encourage all the SMEs to have a strong and collective Wicklow branding with emphasis on provenance, traceability, co-operative processing, protection of the environment and sustainability. All of these attributes will help the overall branding of Wicklow as 'The Garden of Ireland'.

**The Craft Council of Ireland Regional Outlets Program**

A central focal point in Wicklow with easy customer access is required for local arts and craft trades to display and manufacture their products and the Property would be an ideal location.

The Craft Council of Ireland has identified the need for such a facility under the Centres of Excellence Programme and confirmed to us that the Property is ideally suited and located.

The Craft Council of Ireland:

1. Agrees with the need for such a communal focal point in Wicklow;
2. Agrees that garden, food, craft and tourism uses are linked; and
3. Identifies the pivotal concept that these uses complement each other whilst remaining sensitive and suitable to their surroundings.

We have a list of in excess of 30 local arts and craft operators who have made enquiries seeking to retail their goods and produce at the Property.

### **Branding and Scale**

We have been working on a number of potential names such as Wicklow Food and Crafts Village and Wicklow Garden Village. We would consult widely in assessing what the best brand identity for the proposal that is also consistent with the 'Wicklow' brand referred to in the Wicklow Local Economic and Community Plan 2016 – 2000.

The County Wicklow Economic Think Tank Action Plan states that there is an established cluster of artisan/SME food processing companies estimated to be in excess of 35 companies with potential for growth in Wicklow. We also have a similar number of craft companies that have confirmed support in the past. We understand that not all the SMEs will need space as many will sell exclusively on line. We have therefore included a potential layout to demonstrate that we will be able to incorporate between 30 and 40 food and craft SMEs.

### **Supporting Existing and Future Employment**

The County Wicklow Economic Think Tank Action Plan states that the Artisan/SMEs in the food cluster employ 220 people and in addition to helping to support and maintain those 220 people the proposal would assist and support the existing 25 full and part time jobs created by the existing businesses on the Property with an additional 100 additional jobs that would be created by a well organised, Wicklow branded food and crafts retail location. The crafts and other non-food local producers that this will also support would increase the number of jobs directly or indirectly supported to 500.

### **Summary**

An unrivalled opportunity exists to create a permanent major tourist attraction for the promotion of Wicklow food and crafts. The potential customer base is unlimited give the volume of passing traffic and the proximity to major urban centres via the N11 and M50. The existing infrastructure is in place at Junction 9 of the N11 and within the Property. The opportunity would see the preservation of existing jobs, the creation of an additional 100 part and full time jobs locally and generally maintain and foster employment in the food, craft and tourism SMEs across Wicklow.

We are seeking the Council's support in the Wicklow County Development Plan 2016 – 2022 for a zoning to support the current retail employment at the Property and to encourage the general future retail and tourism uses at the Property for the benefit of local artisan food and craft producers as follows;

*"Sexton's Garden Centre Lands should be supported as area to continue to be developed as a key retail and tourism attraction in a sustainable manner"*

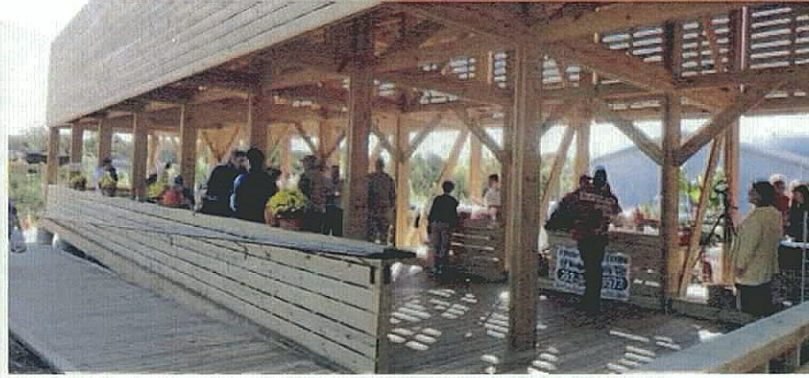
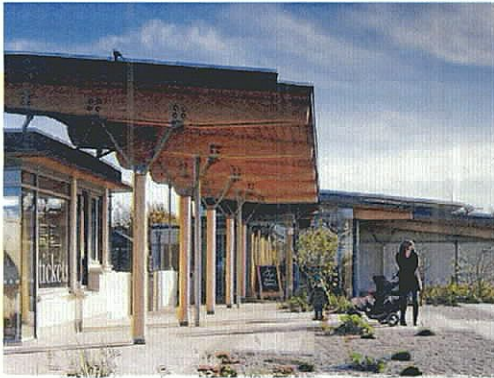
Yours sincerely

Paul Sexton  
Paul Sexton



# Wicklow Village Market

January 28<sup>th</sup>, 2016



Typologies; Finishes



Wicklow Village Market

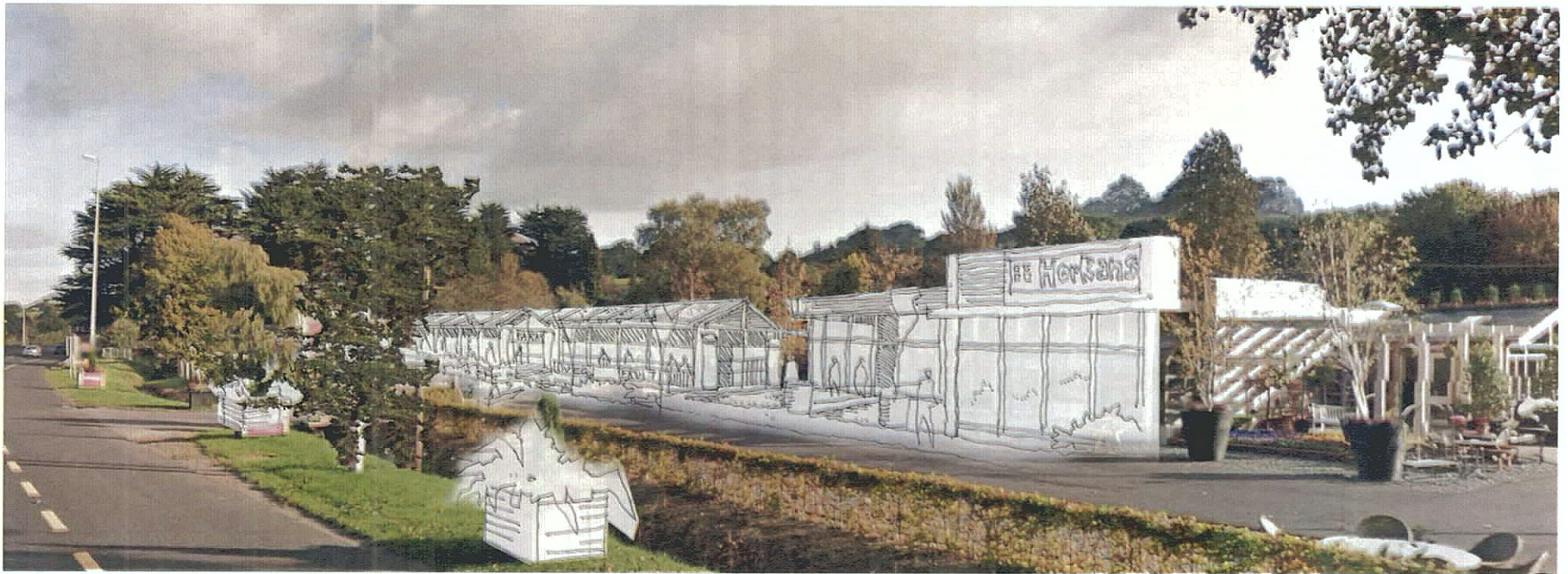
Sketch Perspective

**Ferreirarchitecture**



# Wicklow Village Market

January 28<sup>th</sup>, 2016

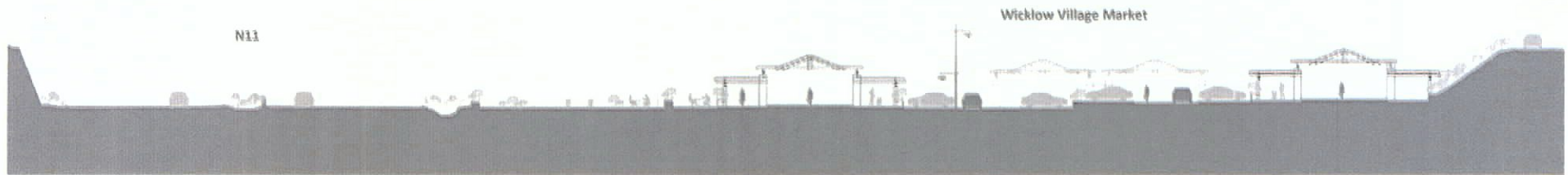
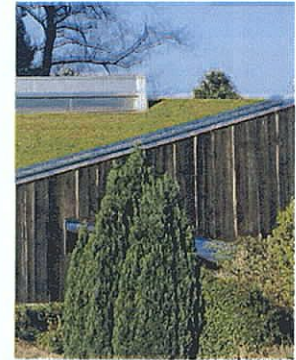
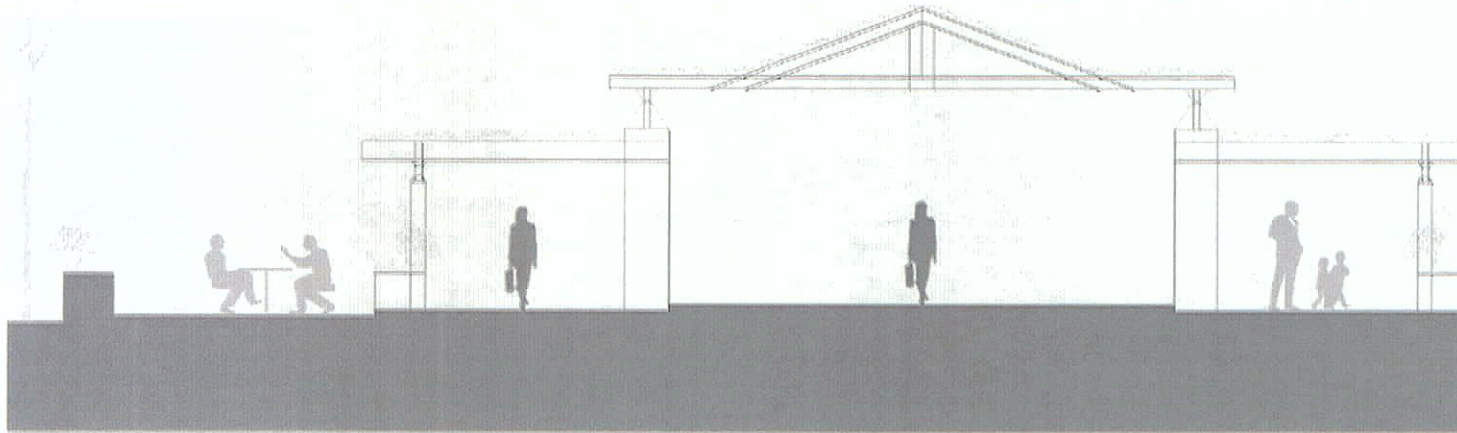


**Ferreirarchitecture**



# Wicklow Village Market

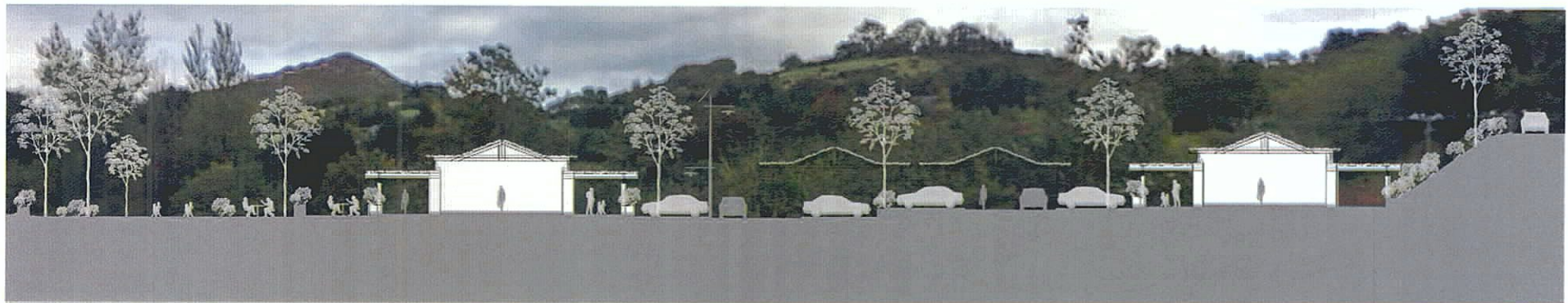
January 28<sup>th</sup>, 2016



**Ferreirarchitecture**

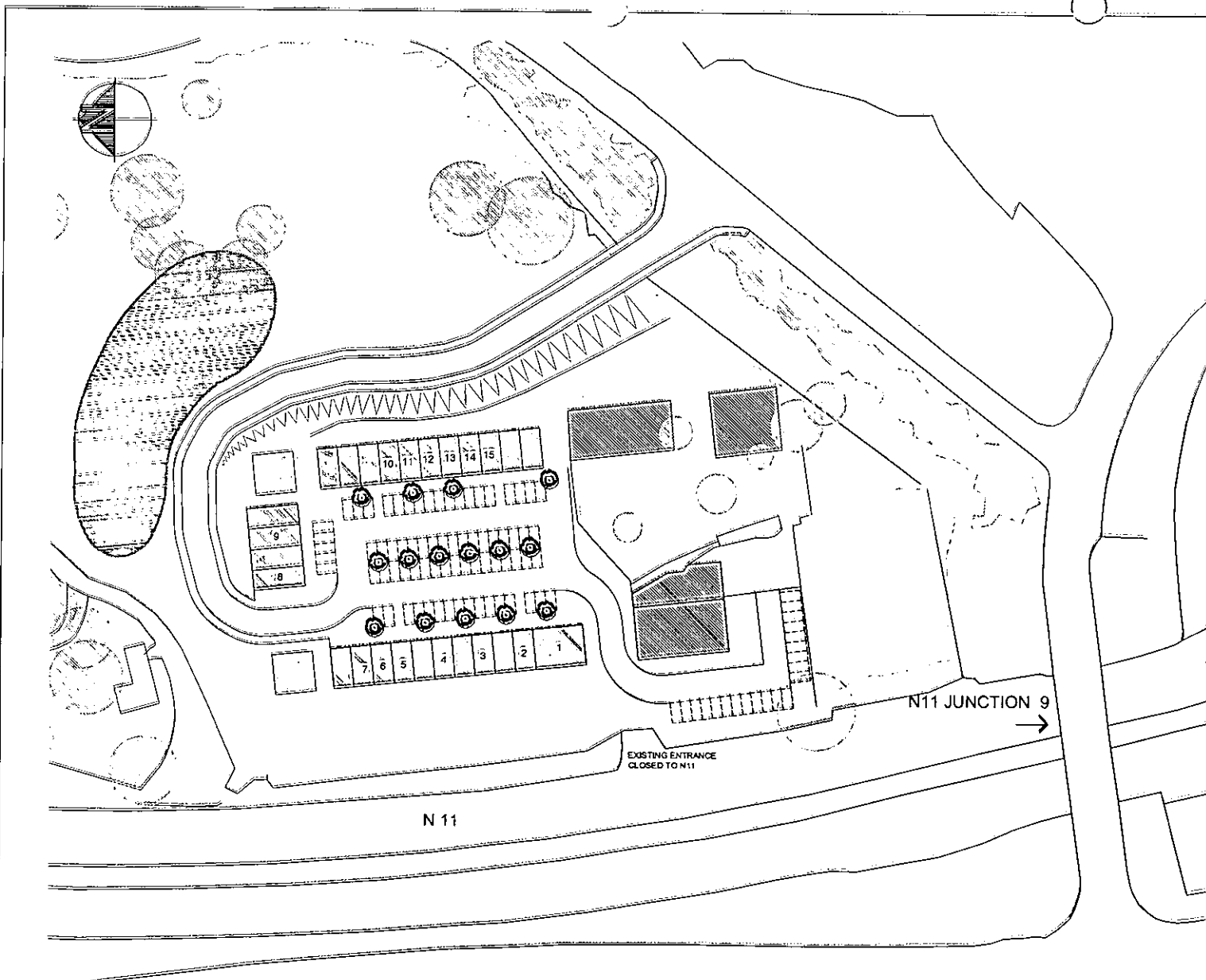
# Wicklow Village Market

January 28<sup>th</sup>, 2016



**Ferreirarchitecture**





SCHEDULE OF ACCOMMODATION



EXISTING HORKANS GARDEN AND LIFESTYLE CENTRE



POSSIBLE TENANTS IN UNITS

- 1 WICKLOW TOURIST OFFICE
- 2 WICKLOW VILLAGE ARTISAN BAKERY
- 3 WICKLOW VILLAGE ORGANIC VEGETABLES
- 4 WICKLOW VILLAGE ORGANIC BUTCHER
- 5 WICKLOW VILLAGE SEA FOOD
- 6 WICKLOW HONEY
- 7 WICKLOW WOOL
- 8 WICKLOW HERBS
- 9 WICKLOW FLOWERS
- 10 WICKLOW CIDER
- 11 WICKLOW CHUTNEYS
- 12 WICKLOW CHEESE AND DIARY
- 13 WICKLOW DELICATESSEN
- 14 WICKLOW JUICES
- 15 WICKLOW CIDER



SERVICE AREAS WCs



CHILDRENS PLAY PARK AND PICNIC AREAS

**PROPOSED SITE LAYOUT SCALE 1:500@A3**  
**Wicklow Village Market , Glen of Downs**

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**Ferrera Architecture**

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Sorcha Walsh

**From:** stephen  
**Sent:** 31 January 2016 22:32  
**To:** Christine Flood  
**Cc:** Sorcha Walsh; Stephen Willoughby  
**Subject:** Proposal for Inclusion of Sexton Lands at Glen of the Downs in the Wicklow Local Economic and Community Plan (2016 - 2022)  
**Attachments:** Glen O Downs Garden Centre Lands Proposal for Inclusion in LECP.pdf; Wicklow Garden Village Market Images.pdf; Wicklow Garden Village Potential Layout.pdf; Map of Sextons Garden Centre Lands at Glen of the Downs.pdf

Dear Christine,

Thank you for the email attaching the draft LECP (2016 - 2022) and the County Wicklow Economic Think Tank Action Plan and both were very helpful.

We were also very grateful to yourself, Sorcha and Stephen for the kind assistance and explanations provided to my father and I at the public consultation in Enniskerry.

We attach our proposal in support of the inclusion of the Sexton Lands at Glen of the Downs in the draft LECP and I trust we have provided sufficient information?

Sorcha kindly explained to my father and I, at the public consultation, that for zoning request purposes it might be more advisable if more general uses be stated in the Development Plan proposal (which will follow), rather than a specific use, as circumstances may change over time. We thought it a good idea to adopt a similar approach in our attached request for inclusion of the Sexton Lands in the LECP. We have set out a detailed specific proposal but we have requested that the Sexton Lands be generally recorded in the LECP 'as an area to continue to be developed as a key retail and tourism attraction in a sustainable manner' and we would welcome any further guidance on the appropriate wording that should be used in the LECP.

Please do not hesitate to contact me should you have any queries about the attached documents.

I would be really grateful if you could confirm you have received this email and that you can open the attachments?

Kind regards,

Stephen Sexton

----- Original Message -----

**From:** "Christine Flood" <cflood@wicklowcoco.ie>

**To:** "stephen"  
**Cc:**

**Sent:** Tue, 12 Jan 2016 15:01:15 +0000  
**Subject:** FW: Local Economic and Community Plan

Dear Stephen,

I would like to thank you and your father Paul, for attending our consultation event in Enniskerry, for the Wicklow County Development Plan and the Local Economic and Community Plan. I attach a copy of our LECP and also the County Wicklow Economic Think Tank Action Plan

If you require further information or should you have any queries please do not hesitate to contact me.

Kind Regards

*Christine Flood,*

Senior Executive Officer,

County Wicklow Economic Think Tank,

Wicklow County Council,

County Buildings,

Wicklow

[cflood@wicklowcoco.ie](mailto:cflood@wicklowcoco.ie)

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d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhri an dlí is infheidhme inti. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann na dearcaí a léirítear sa ríomhphost seo agus dearcaí Comhairle Contae Chill Mhantáin. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dlíteanas ar bith i leith éilliú ná dámáiste do do chuid córas.

Christine Flood  
Senior Executive officer  
County Wicklow Economic Think Tank  
County Buildings  
Wicklow

Paul Sexton  
St. Anne's  
Bray Road  
Shankill  
Co. Dublin

30 January 2016

By Email Only cflood@wicklowcoco.ie

**Submission for Wicklow Local Economic and Community Plan 2016 - 2022**

**Proposal and Vision**

We set out below and attached the reasoning and concept behind why the Glen of the Downs Garden Centre Lands ("Property") should be recorded as an "area to continue to be developed as a key retail and tourism attraction in a sustainable manner" in the Wicklow Local Economic and Community Plan 2016 – 2000.

We want to enhance the long and successful history of retail at the Property by creating a major new Wicklow tourist destination to show case Wicklow's strong food and craft industry. We propose to expand an established retail location, with the necessary infrastructure already in place, to access a ready-made passing market on our door step that has huge potential to create new jobs locally and in Wicklow while helping to support existing employment at the Property and at SMEs across Wicklow.

A fantastic opportunity exists to combine some of Wicklow's strongest and unique sectors; food, craft and tourism, in an idyllic setting with easy access to substantial numbers of passing visitors and tourists and to the urban conurbations of North Wicklow and Dublin.

**The County Wicklow Economic Think Tank Action Plan**

The Summary of the County Wicklow Economic Think Tank Action Plan sets out the need for the development of a Wicklow Brand that highlights where Wicklow excels and what differentiates it from other counties and maximises the value of Wicklow's status as 'The Garden County'. We have selected the following sections of the Objectives set out in the County Wicklow Economic Think Tank Action Plan that are relevant to this submission;

**County Wicklow Economic Think Tank Action Plan: Objective 1.1**  
**Ensure the infrastructural requirements of business are in place**

The Property has had long established and diverse retailing in place since the 1950s so all the services that new business require are already in situ, long established and used by multiple active businesses that operate from the Property.

The future expansion potential of the Property was enabled by the construction of the link road directly from Junction 9 of the N11 into the Property. The link road into the Property when built by the National Roads Authority was future proofed by the

National Roads Authority to have the capacity to accommodate increased demand from further commercial activities in the Property.

The customer traffic coming to this proposal for a Wicklow Food and Crafts Village would be predominately from the Dublin direction in the mornings, in the opposite direction to the commuter traffic going to work, and predominately returning north in the late afternoon, in the opposite direction to the commuter traffic going home.

We would seek the advice of the Wicklow Tourist Board and others about an on-site tourist information office branded with 'Welcome to The Garden of Ireland'. The tourist information office would provide information on other great locations and places of interest available to tourists to visit in Wicklow. We would request leaflets and other information from other tourist destinations in Wicklow for tourist and other visitors to become informed about all of Wicklow's amenities, tourist destinations, historic attractions, activities, sightseeing and hill walking.

We would encourage 'open days' where charities and other organisations can hold events, competitions, and sponsorships and where well known Wicklow and National Chefs can come and demonstrate how great and easy Wicklow produce is to cook.

We would decorate the internal access areas and common parts with images of wild Wicklow, photos of farmland, mountains and coastline and profile local growers to foster the Wicklow Brand.

We would work with Wicklow County Council the NRA, Bord Bia and others to alter the existing road signage we have in both directions of the N11 to notify tourists on the north bound and south bound dual carriageways of the location of the Wicklow Food and Crafts Village at Junction 9 of the N11 and ensure that signage on site is consistent with the signage on the N11 and with other tourist facilities in Wicklow.

We would insist that all the local food and craft retailers also have a high quality consistent signage so that all the signage on the N11 and within the Property is clear and easy to use.

#### County Wicklow Economic Think Tank Action Plan: Objective 2.1

Develop a Retail Marketing plan for County Wicklow with objectives to: Get people into Wicklow to shop; Keep people shopping in Wicklow; Build consumer confidence

The Property is directly accessible by 50,000 vehicles passing weekly, a huge potential customer base for artisan food and craft retailers. A significant proportion of that passing traffic goes from Dublin through Wicklow to Wexford and other counties and vice versa and does not stop and spend any money or time with local food and craft businesses in Wicklow. This opportunity allows that lost trade to be captured and revenues to be generated for Wicklow's food and craft businesses and producers selling quality products and produce made in Wicklow. The proposal is to create a 'day out' for visitors and tourists alike with the focus on easy access from the N11 to well-presented high quality local foods and crafts in a beautiful setting with views of the Sugarloaf and areas for picnics and walking.

We have had numerous requests from Wicklow based craft and food producers to rent part of the existing buildings or temporary buildings. However rather than a piecemeal approach the proposal would see a comprehensive and coordinated plan in place to allow large numbers of artisan food and craft producers to come together as a business community and create a substantial tourist attraction for Wicklow.

An enjoyable well branded retail environment where consistently high quality local products and produce is sold will give consumers the confidence to return for repeat trips and word of mouth will help the general success of the Wicklow SMEs. We would also have an advertising campaign to announce the opening of the facility with ongoing marketing in conjunction with the local food and craft producers.

County Wicklow Economic Think Tank Action Plan: Objective 3.1  
Promote Niche Tourism Opportunities to Specific Groups in the Tourism Population  
In some case these niches will offer untapped or underdeveloped economic opportunities. Examples include: Food

There are numerous excellent farmers' markets, concessions and other outlets for the sale of local produce in Wicklow that in the main are periodic and attract the local populations to acquire locally produced food and products. What we are proposing is not to compete with these facilities, rather to create a permanent facility with access to the untapped and underdeveloped opportunity of people from other counties and tourists passing on the N11 having access to Wicklow produce and products creating a new niche of tourism for Wicklow.

We have the space to set aside attractive areas for 'Pop Ups' for local start-up businesses not yet ready for a permanent retail area but requiring a low cost environment to start and grow a business. It would give new ventures the ability to test their produce and products in a strong Wicklow branded environment and obtain advice and assistance from the more established SMEs in Wicklow food and crafts. We would ask Wicklow County Council for assistance with a rates incentive scheme to match the low cost ethos of the proposal and to encourage existing SMEs to thrive and expand and new SMEs in the food and crafts sector to emerge in Wicklow.

County Wicklow Economic Think Tank Action Plan: Objective 5.1  
Establish an SME Food Sector Forum

The SMEs that characterise the artisan food and craft businesses in Wicklow face a serious challenge with a permanent location to sell their produce in high profile locations. Town centres tend to be characterised by competition from super markets, high rents, and the cost of parking discouraging customers who want to browse at their leisure. We proposed a low cost environment with high quality bespoke food and craft retail units and free car parking. The ability of the SME food sector to sell the locally produce food and drink will create a ready-made forum for the exchange of ideas, exploration of potential synergies and collaborations especially between the more established SMEs assisting the less established start-ups with advice promoting a community atmosphere. A good example of a collaborative idea would be a collective website for Wicklow Food and Crafts Village that would promote all the SMEs in the Wicklow Food and Crafts Village individually and as a collective.



County Wicklow Economic Think Tank Action Plan: Objective 5.2  
Develop a Wicklow Food Brand

We would propose and encourage all the SMEs to have a strong and collective Wicklow branding with emphasis on provenance, traceability, co-operative processing, protection of the environment and sustainability. All of these attributes will help the overall branding of Wicklow as 'The Garden of Ireland'.

**The Craft Council of Ireland Regional Outlets Program**

A central focal point in Wicklow with easy customer access is required for local arts and craft trades to display and manufacture their products and the Property would be an ideal location.

The Craft Council of Ireland has identified the need for such a facility under the Centres of Excellence Programme and confirmed to us that the Property is ideally suited and located.

The Craft Council of Ireland:

1. Agrees with the need for such a communal focal point in Wicklow;
2. Agrees that garden, food craft and tourism uses are linked; and
3. Identifies the pivotal concept that these uses complement each other whilst remaining sensitive and suitable to their surroundings.

**Branding and Scale**

We have been working on a number of potential names such as Wicklow Food and Crafts Village and Wicklow Garden Village. We would consult widely in assessing what the best brand identity for the proposal that is also consistent with the 'Wicklow' brand referred to in the Wicklow Local Economic and Community Plan 2016 – 2000.

The County Wicklow Economic Think Tank Action Plan states that there is an established cluster of artisan/SME food processing companies estimated to be in excess of 35 companies with potential for growth in Wicklow. We also have a similar number of craft companies that have confirmed support in the past. We understand that not all the SMEs will need space as many will sell exclusively on line. We have therefore included a potential layout to demonstrate that we will be able to incorporate between 30 and 40 food and craft SMEs.

**Supporting Existing and Future Employment**

The County Wicklow Economic Think Tank Action Plan states that the Artisan/SMEs in the food cluster employ 220 people and in addition to helping to support and maintain those 220 people the proposal would assist and support the existing 25 full and part time jobs created by the existing businesses on the Property with an additional 100 additional jobs that would be created by a well organised, Wicklow branded food and crafts retail location. The crafts and other non-food local producers that this will also support would increase the number of jobs directly or indirectly supported to 500.

### Summary

An unrivalled opportunity exists to create a permanent major tourist attraction for the promotion of Wicklow food and crafts. The potential customer base is unlimited given the volume of passing traffic and the proximity to major urban centres via the N11 and M50. The existing infrastructure is in place at Junction 9 of the N11 and within the Property. The opportunity would see the preservation of existing jobs, the creation of an additional 100 part and full time jobs locally and generally maintain and foster employment in the food, craft and tourism SMEs across Wicklow.

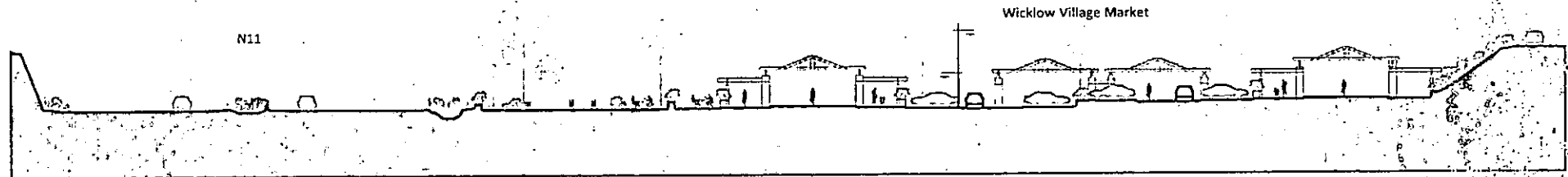
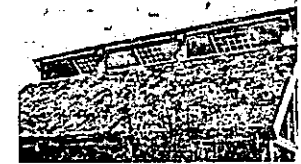
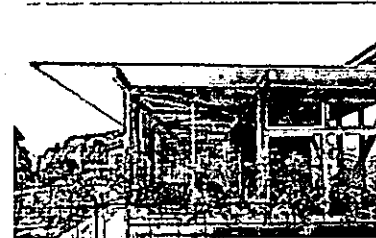
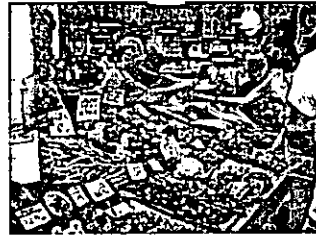
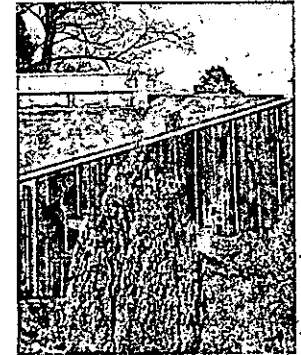
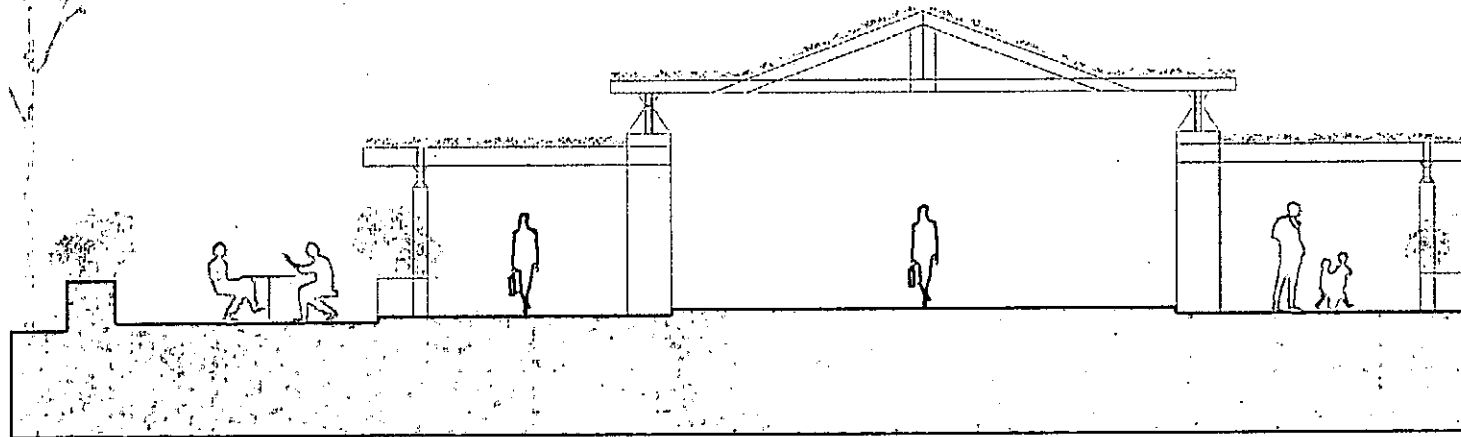
Yours sincerely



Paul Sexton

# Wicklow Village Market

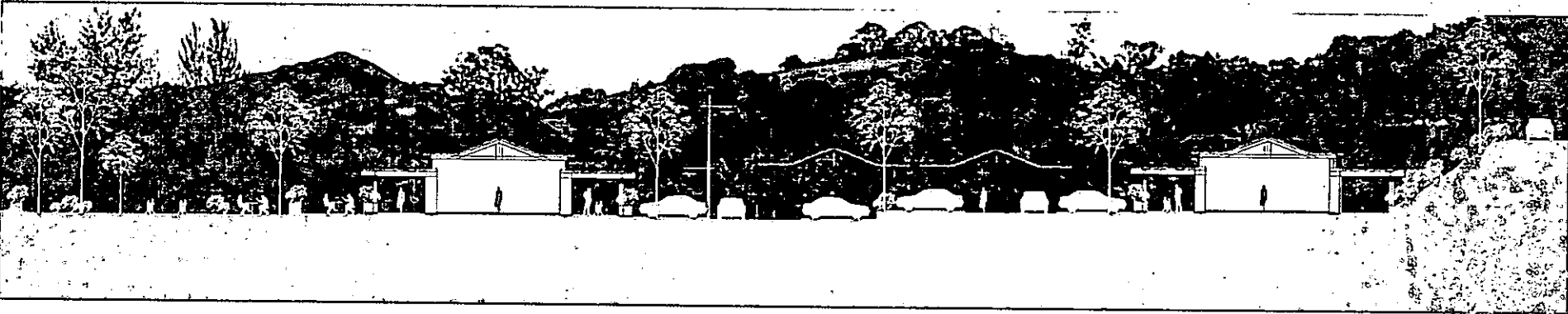
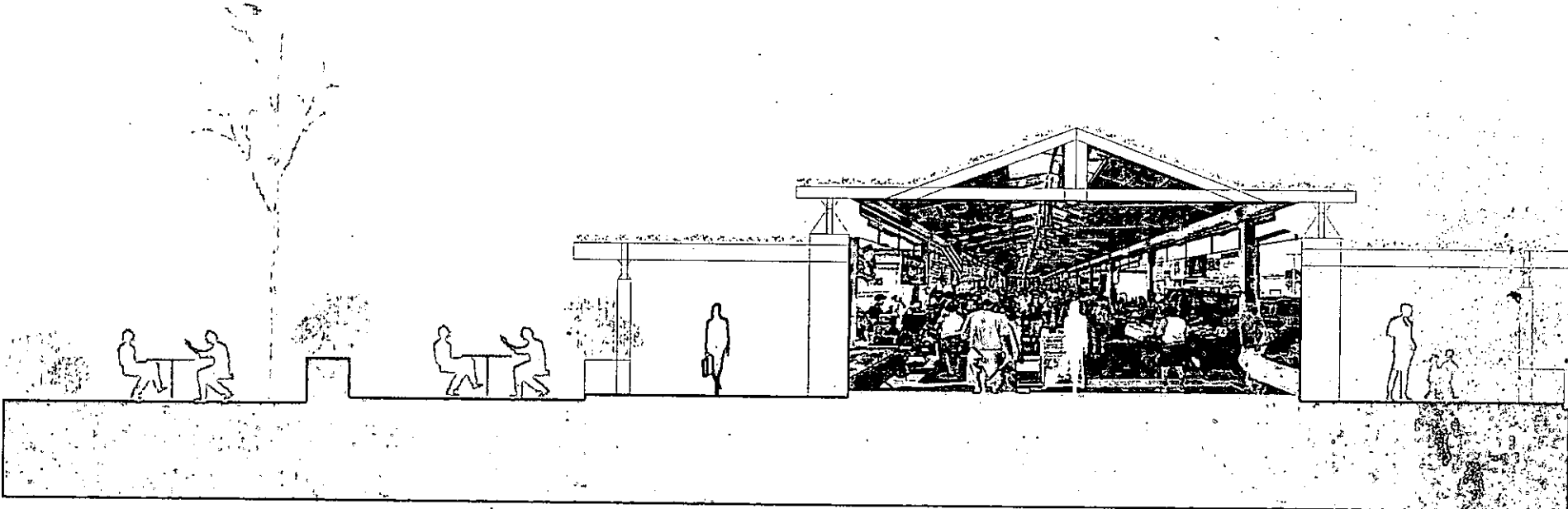
January 28<sup>th</sup>, 2016



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# Wicklow Village Market

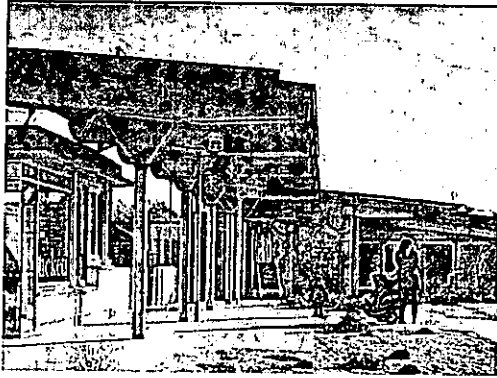
January 28<sup>th</sup>, 2016



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# Wicklow Village Market

January 28<sup>th</sup>, 2016



Typologies; Finishes



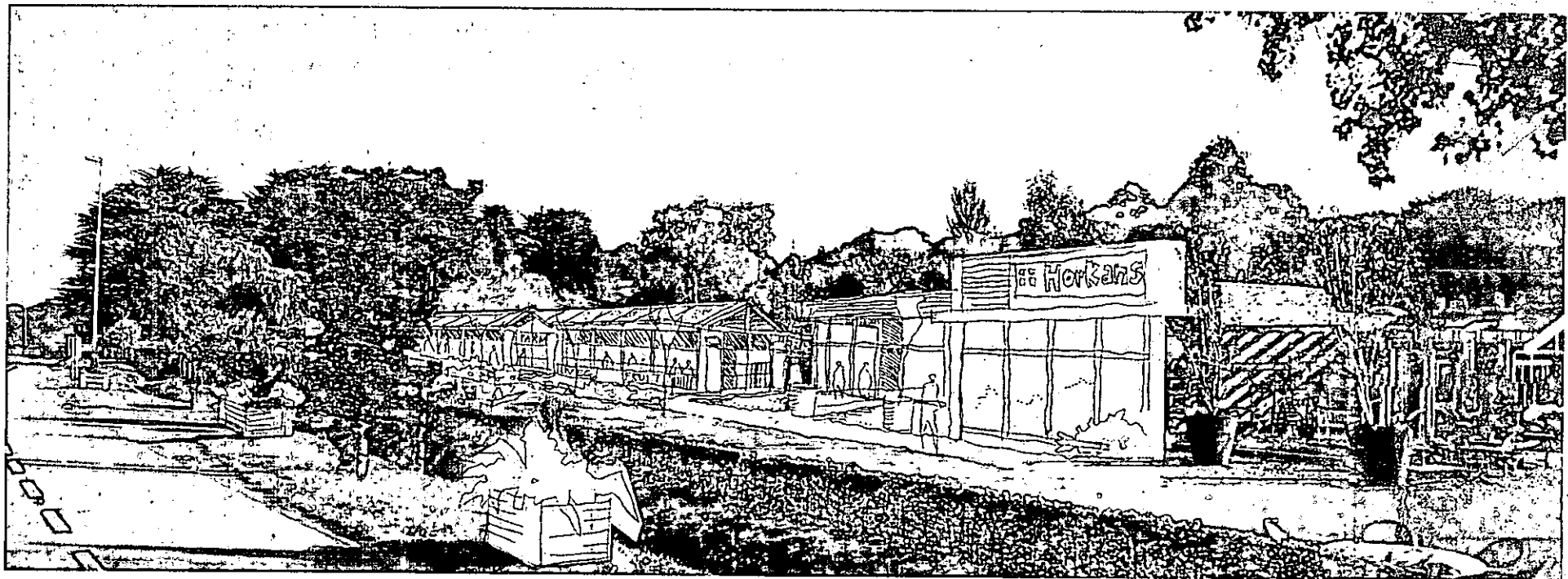
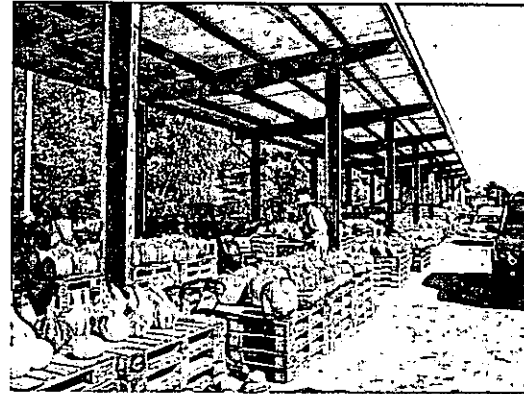
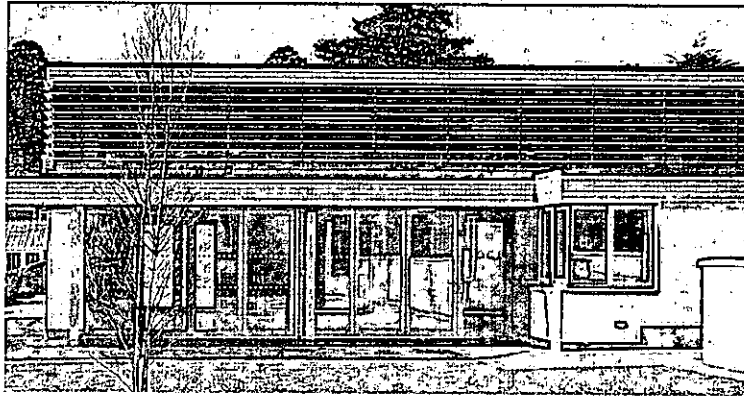
Wicklow Village Market

Sketch Perspective

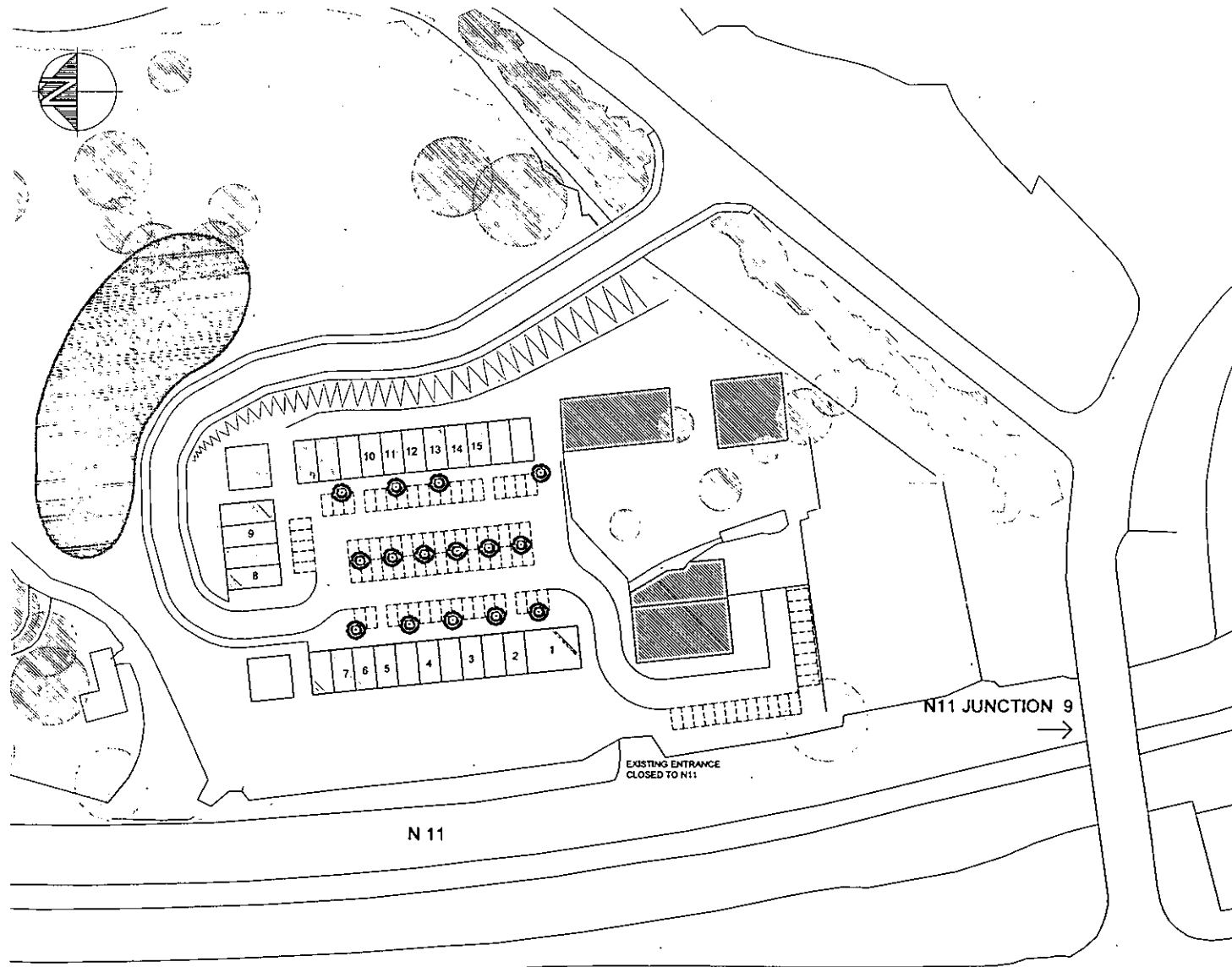
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# Wicklow Village Market

January 28<sup>th</sup>, 2016.



Ferreirarchitecture



SCHEDULE OF ACCOMMODATION



EXISTING HORKANS GARDEN AND LIFESTYLE CENTRE

POSSIBLE TENANTS IN UNITS



- 1 WICKLOW TOURIST OFFICE
- 2 WICKLOW VILLAGE ARTISAN BAKERY
- 3 WICKLOW VILLAGE ORGANIC VEGETABLES
- 4 WICKLOW VILLAGE ORGANIC BUTCHER
- 5 WICKLOW VILLAGE SEA FOOD
- 6 WICKLOW HONEY
- 7 WICKLOW WOOL
- 8 WICKLOW HERBS
- 9 WICKLOW FLOWERS
- 10 WICKLOW CIDER
- 11 WICKLOW CHUTNEYS
- 12 WICKLOW CHEESE AND-DIARY
- 13 WICKLOW DELICATESSEN
- 14 WICKLOW JUICES
- 15 WICKLOW CIDER



SERVICE AREAS WCs



CHILDRENS PLAY PARK AND PICNIC AREAS

PROPOSED SITE LAYOUT SCALE 1:500@A3

# Wicklow Village Market , Glen of Downs

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# Wicklow Village Market

January 28<sup>th</sup>, 2016



Typologies; Finishes



Wicklow Village Market

Sketch Perspective

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# Wicklow Village Market

January 28<sup>th</sup>, 2016

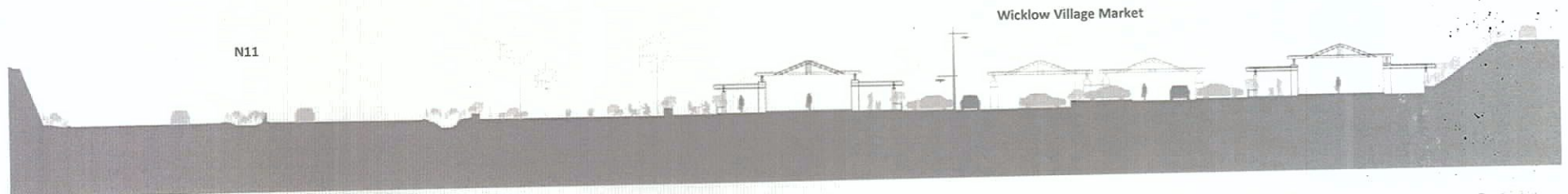
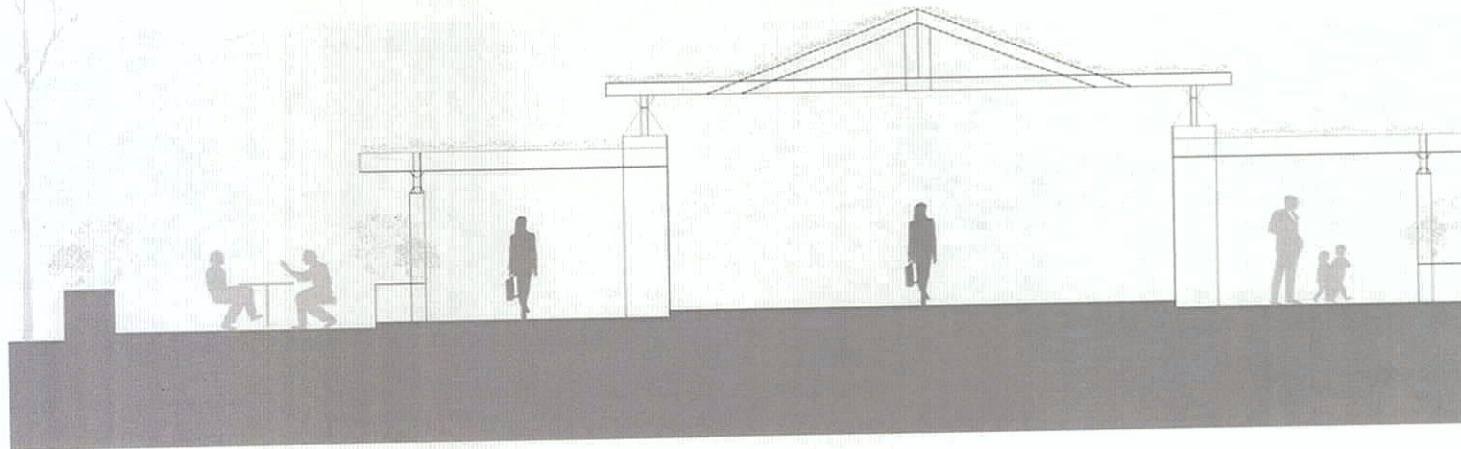


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# Wicklow Village Market

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# Wicklow Village Market

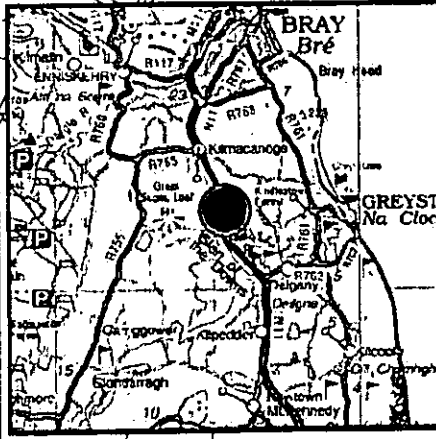
January 28<sup>th</sup>, 2016



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# Sextons Garden Centre, Glen of the Downs



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Wicklow CDP 2010 - 2016

**Sorcha Walsh**

**From:** Leonora Earls  
**Sent:** 06 January 2016 09:15  
**To:** Stephen Willoughby; Sorcha Walsh; Aisling Mac Namara; Bernadette Harvey  
**Subject:** Fwd: Development Plan 2016 - 2022  
**Attachments:** WCC - County Development Plan Submission - Page 1.jpg; WCC - County Development Plan Submission - Page 2.jpg; WCC - County Development Plan Submission - Page 3.jpg; WCC - County Development Plan Submission - Page 4.jpg; Map 9.08 - Glen of the Downs Zoning - Arts, Craft & Interpretative Centre.pdf

Sent from my HTC

----- Forwarded message -----

**From:** "Senan Sexton"  
**To:** "Leonora Earls" <LEarls@wicklowcoco.ie>  
**Cc:** "Stephen Sexton"  
**Subject:** Development Plan 2016 - 2022  
**Date:** Wed, Jan 6, 2016 09:05

Dear Leonora

I thank you very much for confirming the meeting at 3.30 on Thursday 7 January at Powerscourt Arms; Enniskerry Village.

I confirm that my father and brother, copied in, will be attending.

We understand that only matters relevant to the Draft Development Plan can be discussed.

In line with my attached Draft Development Plan submission; we would like to discuss the following:

1. Our site remains within an Area of Outstanding Beauty and should now be Corridor Zone - Appendix 5 Landscape Assessment.
2. Our site should be listed as a potential area to be developed as a key tourist attraction in a sustainable manner – Chapter 7 Tourism & Recreation.
3. The description of the current zoning of our site should be altered - Chapter 7 Tourism & Recreation.
4. Our site should be linked to the Glen of the Downs Nature Reserve – Chapter 10 Heritage.

I would also add that although the zoning of the site is included at T30 of Chapter 7 Tourism & Recreation and a reference is made to Map 7.11, no such map is present.

Thank you

Senan

On 5 January 2016 at 10:42, Leonora Earls <LEarls@wicklowcoco.ie> wrote:

Dear Senan,

I wish to acknowledge your request for a meeting in relation to the Draft County Development Plan. Members of the Forward Planning team will be available at 3.30pm on Thursday 7<sup>th</sup> January to meet with you.

For clarification, I would advise that the only matters that can be discussed at this meeting relate to the policies as proposed in the Draft Plan which is on public display. In this regard, I would refer you to Chapter 6 of the Draft Plan, which is on our website. [www.wicklow.ie](http://www.wicklow.ie)

The Forward Planning Team will not be in a position to discuss specific matters relating to the site such as pre-planning, enforcement etc as these are outside the public consultation process for a County Development Plan.

If you have specific matters of this nature, there are other avenues to deal with such queries outside of the County Development Plan process.

I hope this clarifies matters for you and look forward to seeing you on 7<sup>th</sup>

Kind Regards

Leonora Earls

Administrative Officer

Planning and Development

---

**From:** senan  
**Of** Senan Sexton  
**Sent:** 04 January 2016 18:18  
**To:** Stephen Willoughby  
**Cc:** Planning - Development Plan Review; Stephen Sexton  
**Subject:** Re: Development Plan 2016 - 2022

Dear Stephen

I thank you for confirming the meeting times and dates.

My father owns the 7 acre commercial site at the Glen of the Downs / Kilmurray on the east side of the N11 at Junction 9.

We would like to discuss this site with your Planning Team colleagues as part of their considerations in relation to the Draft Wicklow Development Plan 2016 - 2022 and the Wicklow Local Economic & Community Plan 2016 - 2022.

Councillor Chris Fox has informed us that private meetings start at 2pm.

I would be obliged to make an appointment to meet the planners at 2pm on Thursday 7 January 2016 at Powerscourt Arms, Enniskerry.

My brother Stephen, copied in, and my father Paul will be in attendance.

I would be obliged if you could confirm the meeting and who we will be meeting.

Thank you

Senan Sexton

Glen of the Downs Garden Centre & Outdoor Display Area

On 4 January 2016 at 17:21, Stephen Willoughby <[SWilloughby@wicklowcoco.ie](mailto:SWilloughby@wicklowcoco.ie)> wrote:

Hi Senan,

Please find attached the schedule for public meetings, dates/times as requested.

Kind Regards

Stephen

---

**From:** Senan Sexton  
**Sent:** 04 January 2016 17:15  
**To:** Planning - Development Plan Review  
**Subject:** Development Plan 2016 - 2022

Behalf

Dear Sir / Madam

I believe the Council is holding public meetings where interested parties can meet the Development Plan planners.



and date. I would be obliged if you could confirm if this is correct and advise of the locations and dates/times.

Thank you

Senan Sexton BCL FCA  
Travel Joy Hostels  
111 Grosvenor Road  
London SW1V 3LG

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Administrative Officer  
Wicklow County Council  
Station Road  
Wicklow Town  
Co. Wicklow

Senan Sexton  
St. Anne's  
Bray Road  
Shankill  
Co. Dublin

28 October 2014

Re: County Development Plan 2016 – 2022 - Submission under Stage 1 – Pre Draft Public Consultation.

Dear Sir / Madam

I refer to the above; this submission concerns itself with two matters.

1 **Review of Little Sugar Loaf Area of Outstanding Natural Beauty to exclude the Glen of the Downs Garden Centre site**

The Glen of the Downs garden centre lands are situated just within the Little Sugar Loaf Area of Outstanding Natural Beauty.

We propose that the boundaries of the Little Sugar Loaf Area of Outstanding Natural Beauty be slightly rolled back so as to place our lands within a Corridor Zone.

We contend that both the site and the area surrounding the site have very significantly altered since the completion of the N11 Kilmacanogue/Glen of the Downs Dual carriageway, the Foxborough Lane Realignment road and the N11 grade separated interchange/overpass which now overlooks the site.

The Glen of the Downs garden centre lands are surrounded on all four sides by medium to national scale roads. Furthermore, these road works, the N11 concrete separation and the road signs have significantly altered the appearance of the Glen of the Downs garden centre lands.

Finally, the construction of the following culverts have substantially altered the site:

1. A very large culvert at the northern end of the site to accommodate the N11.
2. A substantial culvert at the southern end of the site to accommodate the overpass.
3. A further culvert at the southern eastern of the site to accommodate the "Foxborough Lane Realignment" road.

The Glen of the Downs garden centre lands are now essentially an "island" site distinct from the local countryside surroundings.

As such, the Little Sugar Loaf Area of Outstanding Natural Beauty needs to be reviewed to exclude the Glen of the Downs garden centre lands and the lands revert to a Corridor Zone.

**FILE COPY**  
28/10/14  
Wicklow County Council  
regarding letter  
**POSTED**

2 **Note the Glen of the Downs Garden Centre lands as a potential area to be developed as a key tourism attraction in a sustainable manner**

I outline the reasoning and concept behind why the Glen of the Downs garden centre lands should be noted as a "potential area to be developed as a key tourism attraction in a sustainable manner" as outlined within the Tourism section of the Consultation document.

INTERPRETATIVE CENTRE

The Glen of the Downs garden centre lands are currently zoned Arts, Tourism & Interpretative Centre.

The Glen of the Downs garden centre lands need to be linked to the adjacent Glen of the Downs Nature Reserve Special Area of Conservation (SAC) which is operated and owned by The National Park and Wildlife Service (NPWS).

However, it is the responsibility of the Education & Visitor Service Unit of the Office of Public Works (OPW) to create visitor facilities on NPWS lands and as such create this pedestrian link. Please see attached correspondence from the OPW.

Wicklow County Council and the OPW must work together to build a new pedestrian entrance to the Nature Reserve at the northern end of the Nature Reserve beside the N11 using the adjacent small public road there. This small public road gives access to a small number of homesteads and it is perfect for the proposed use. Users of the Nature Reserve could then park in the Glen of the Downs garden centre lands and walk into the Nature Reserve.

We have consulted with The NPWS who were very enthusiastic about the project but were only able to give verbal confirmation that they back the proposal.

It would be a great opportunity to celebrate the Reserve and Ireland's Ancient Woodlands through an Interpretative Centre which could also double as an Information and Tourism Gateway Centre for Wicklow.

The Interpretative Centre will be based on a "Woodlands of Ireland / Environmental Awareness" theme with demonstrations of how to recycle and reduce carbon usage.

We can provide gardening education and distribute free seeds and trays to schools.

School children and special needs groups can be educated on the value of recycling and environmental awareness.

Please see correspondence from National Learning Network, Sunbeam House Services, and the Health Service Executive. These bodies recognise the important part recreational and nature activities play in therapeutic rehabilitation.

Positioning interpretative centres with their parking requirements adjacent to, rather than within, sites of national interest is preferable so as not to affect the protected site.

It would also facilitate the closing of the existing dangerous car park and car park entrance at the Nature Reserve.

Such a Centre could be built and long leased at a peppercorn rent to State bodies or NGO's associated with nature conservation and/or tourism. We are very happy to facilitate and fund the provision of this facility on our lands.

Therefore, this Interpretative Centre will enable the amenities and history of the internationally famous Glen of the Downs Nature Reserve Special Area of Conservation (SAC) to be enjoyed and celebrated.

#### TOURISM ELEMENT

Wicklow desperately needs a centralised focal point to dispense ticketing and information services for all of Wicklow's amenities to include historic attractions, activities, sightseeing and hill walking.

The Glen of the Downs garden centre lands are an ideal location for same; existing tourism offices at Bray and Wicklow Town are difficult to access due to traffic congestion.

The Glen is ideally located on the N11 at the gateway to all of Wicklow's tourist attractions and could not be more perfect in its setting, ease of access and location.

The site can act as a tourist orientation point for onward sight-seeing and hill-walking into the NPWS sites in Knocksink and Enniskerry and other heritage sites such as Glendalough, Glenmalur, Powerscourt and all of Wicklow's amenities including the nearby Sugarloaf.

I refer to attached correspondence from Failte Ireland, Wicklow Tourism and Wicklow County Enterprise Board.

#### ARTS & CRAFT CENTRE UNDER THE CRAFT COUNCIL OF IRELAND - REGIONAL OUTLETS PROGRAMME

A central focal point is required for indigenous arts and craft trades to display and manufacture their wares and the Glen of the Downs garden centre lands would be an ideal location.

Please see attached correspondence from The Craft Council of Ireland identifying the need for such a facility, how it falls under the Centres of Excellence Programme and that the Glen of the Downs garden centre lands are ideally suited and located for same.

The Craft Council of Ireland:

1. Agrees with the need for such a communal focal point.
2. Agrees that garden, craft and tourism uses are linked.
3. Identifies the pivotal concept that these uses complement each other whilst remaining sensitive and suitable to their surroundings.

4. Identifies the appeal of the project to the growing market of Cultural & Eco-Tourism. (This is especially popular with the Scandinavians and Dutch).

We propose an ancillary retail area selling ecologically friendly and recycled products and a food offering.

#### BENEFITS

- Uniqueness, setting, innovation, educational focus and high eco standards.
- Opportunity for Wicklow to promote itself nationally and internationally.
- Educational, heritage and tourism benefits.
- A commercially viable approach that is at the same time pro community, heritage, environment, employment and tourism.
- Sensitive, low impact approach based on synergetic uses.
- Innovative, educational, environmentally and family friendly concept.
- Creation of sustainable local trade and employment.
- Provision of local community amenities.
- Competitive platform to achieve the aims of each respective body involved.
- The site is extremely well signposted both northbound and southbound.

We have had discussions with the Department of Arts Sports & Tourism who also wish the project the best.

The garden centre lands are within close proximity of Bray, Greystones and are within one mile of Kilmacanogue.

We have reached an agreement with the Glenview hotel to connect to their sewage system if the plans proceed.

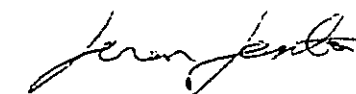
#### 3 Summary

Wicklow County Council should include the above proposals within the Development Plan and work with the OPW to provide the required new pedestrian entrance to the Nature Reserve this providing the necessary framework to bring this highly innovative and beneficial project to planning and fruition. Please see below logo.

If you have any queries, please contact the undersigned at 2827359 or 0044-75-00807800 or 0044-207-8349689.

Yours sincerely

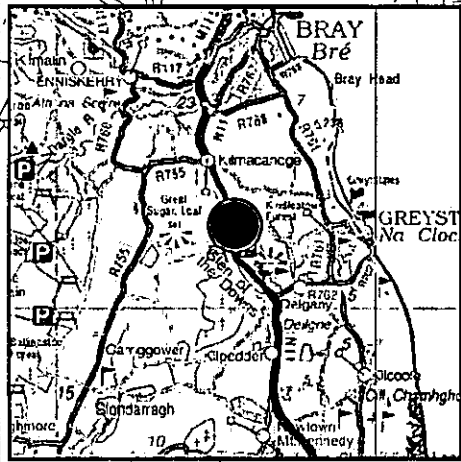
Paul Sexton



Senan Sexton BCL ACA

# Sextons Garden Centre, GUP of the Downs

Map No. 9:08



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Wicklow CDP 2010 - 2016

**Leonora Earls**

**C159**

**From:** Triona Sheeran  
**Sent:** 18 January 2016 15:10  
**To:** Planning - Development Plan Review  
**Subject:** Town Development Plan

Good afternoon,

I would like to submit these ideas for Greystones Town Development plan.

1. That noise control be introduced to all new builds or adaptations to builds to include industrial noise guidelines , night time noise , noise decibel standards not exceeding 40 decibels on an ongoing basis. No night time activities neighbouring residential housing
2. That planning objections for individual houses must state if they are related to other objectors to the same planning permission application. This is to ensure fairness
3. That no fry zone or fast food chains be built or adapted or extended within residential areas or school zones / playgrounds
4. That no residential should be significantly devalued as a result of commercial or large retail units built or renovating (on the basis of protect the residents

Kind regards  
Triona Sheeran  
Twin oaks , church lane , Greystones



C160

Leonorá Carle

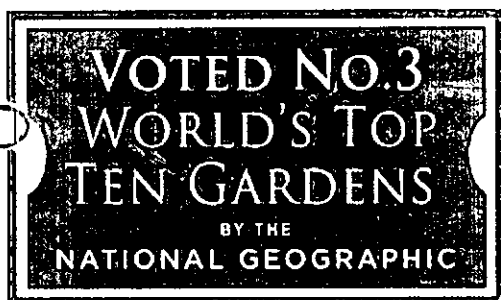
**From:** Sarah Slazenger  
**Sent:** 19 February 2016 11:36  
**To:** Planning - Development Plan Review  
**Subject:** Submission regarding Draft County Development Plan 2016-2022  
**Attachments:** Powerscourt submission County Dev Plan 2016-2022.pdf

Dear Sir or Madam,

Please find attached a submission in relation to the Draft County Development Plan 2016-2022.

Regards

Sarah Slazenger



POWERSCOURT  
ESTATE

**Sarah Slazenger**  
*Managing Director*  
Call me on :

Visit us on : [www.powerscourt.ie](http://www.powerscourt.ie)  
Powerscourt Estate, Enniskerry, Co. Wick



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**POWERSCOURT**  
ESTATE

County Development Plan Review  
Planning Department  
Wicklow County Council  
County Buildings  
Station Road  
Wicklow Town

19<sup>th</sup> February 2016

Dear Sir or Madam,

**Re Draft County Development Plan 2016-2022 – Enniskerry Town Plan**

I wish to make a submission on behalf of Powerscourt Estates Ltd in relation to lands within Powerscourt Demesne proposed to be zoned for residential development in the above plan.

I confirm that Powerscourt Estates Ltd, owner of the lands, is satisfied that the proposed zoning is an appropriate use of that land, given that it is located adjacent to existing housing at Kilgarron and opposite Parc na Sillogue.

I note the particular conditions in relation to residential development on the Demesne and concur with the stipulations outlined. The proposed zoned area is screened from the rest of the Demesne by a hill and oak plantation.

The proposed zoned area is easily serviced by the public water supply and sewer which run along the public road next to the lands.

In view of the demand for housing in the area, if the lands were zoned as proposed in the draft plan, Powerscourt would move immediately to apply for planning permission so that the houses could be built as soon as possible.

Yours sincerely

Sarah Slazenger  
Managing Director

Powerscourt Estates Ltd.

Registered Office: Powerscourt Estate, Enniskerry, Co. Wicklow. Telephone: 01 204 6000. Fax: 01 204 6900.

[www.powerscourt.com](http://www.powerscourt.com)

Directors: J Slazenger, P Slazenger, W Watson, J Griffin, S Slazenger, T Clarke, B Smyth, P Dearden (British)

Registered in Ireland No: 19135

C161

Leonora Earls

From: Wicklow County Council  
Sent: 21 January 2016 16:00  
To: Planning - Development Plan Review  
Subject: Form submission from: Pre-Draft Submission - Wicklow County Development Plan 2016-2022

Submitted on Thursday, January 21, 2016 - 15:59 Submitted by anonymous user:  
[178.167.254.216] Submitted values are:

Name: Patrick Sliney  
Organisation, Group, Company, etc :  
Address: Cedar Cottage Churchlands, Tinahely.  
Email:

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Submission - If you wish to make comments on a topic, please fill in the box below: There is a need for some form of transport link so people can travel to Dublin. At present it is only once a week; Alternatively you can attach your submission (10MB limit on attached files):

Attachment No.2 (10MB limit on attached files):

Attachment No.3 (10MB limit on attached files):

--Town / Settlement Plans--

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-: Tinahely

Submission - If you wish to make comments on a Town / Settlement Plan please type into the box below:

Alternatively you can attach your submission (10MB limit on attached files):

Attachment No.2 TP's (10MB limit on attached files):

Attachment No.3 TP's (10MB limit on attached files):

**Leonora Earls**

~~SECRET~~  
**C162**

**From:** Albert Smith  
**Sent:** 20 January 2016 18:38  
**To:** Planning - Development Plan Review  
**Subject:** access

Achara.

I have read the County Development Plan, particularly with reference to the Enniskerry area, where I live.

There is much to recommend many of the proposals in the plan and I really only wish to make one point, but it seems to me to be particularly important.

There is stress in the plan for Enniskerry on the village's being the "gateway to the Wicklow mountains" and to the importance of tourism and leisure activities in the economy of the area.

Central to both of these notions is access to the countryside. There are very few identified walks around and from the village and the whole plan only identifies one public right-of-way deemed worthy of protection.

Back in the late 1980s and early 1990s a programme to identify and describe walking routes in North Wicklow listed 110 walkways and bridle paths in North Wicklow. None of these has ever been listed.

Under the 2010 Planning Act, listing of routes is now required and I note that the Plan makes a very tentative start by listing a small number. But really, compared to similar-size councils in England and Wales, the number of routes available to both locals and visitors is nothing short of pathetic. That is not even considering Scotland where, as in Scandinavia, you can go virtually anywhere.

Yes, I know this whole issue is controversial and fraught with nay-sayers who refuse to recognise the rights of anybody other than landowners. I know, too, that the legal position is far from clear (with a public access case in the Glencree Valley awaiting an appeal hearing). But that really is not a good enough excuse to almost completely fail to protect walking and cycling routes in an area that you then go on to describe as the gateway to the Wicklow mountains depending on tourism and leisure activities. If in the whole Enniskerry area the council only identifies one route in a plan that is to last until 2022 then it is clear that you have decided to ignore the need to protect the dozens of other routes in need of protection. That, I respectfully submit, is a ridiculous omission and amounts to a failure to protect the public good.

Albert Smith  
Kilmolin,  
Enniskerry

**Leonora Earls**

**C163**

**From:** Advanced Water Coolers  
**Sent:** 19 February 2016 08:46  
**To:** Planning - Development Plan Review  
**Subject:** County Development Plan Review Submission

**Niall Smyth**  
Milaois,  
Kilcroney Lane,  
Bray,  
Co. Wicklow  
Tel :  
E Mail:

18<sup>th</sup> February 2016

**RE: DRAFT Wicklow County Development Plan 2016 - 2022 submission regarding Objective HD21**

Dear Sir / Madam,

With regard to the proposals under Objective H21 in the proposed County Development Plan 2016-2022, I would like to state that I support the changes to rural housing in the countryside and that is very important to maintaining a vibrant rural community.

I also am in favour of the wording attached to points 1 and 12.

Thanking you.

Best regards

**Niall Smyth**

C164

Leonora Earls

---

From: Richard More-O'Ferrall  
Sent: 19 February 2016 13:22  
To: Planning - Development Plan Review  
Subject: Submission to County Development Plan Review  
Attachments: CDP16-22 Submission.pdf

Dear Sir,

I attach hereto submission by South Wicklow Wind Action Group to the above review and shall be obliged if you will kindly acknowledge receipt of same

*Richard More-O'Ferrall*

---

**Richard More-O'Ferrall, Secretary,**  
**South Wicklow Wind Action Group**  
c/o Jigsaw Cottage, Moyne,  
Tinahely, Co. Wicklow Ireland  
Email:-

Ph:-

## South Wicklow Wind Action Group

Promoting sustainable development through Democracy, Human Rights and the Rule of Law

c/o Jigsaw Cottage, Moyny, Timahely, Co. Wicklow, Ireland

Telephone:-

E-mail:-

The Secretary,  
County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town.

19<sup>th</sup> February 2016

### Wicklow County Development Plan 2016 - 2022

Dear Secretary,

**South Wicklow Wind Action Group (SWWAG)** requests that in reviewing the **Wind Energy Strategy** for the County Development Plan 2016-2022, the Council takes full account of the following submission and builds appropriate safeguards into the Plan to ensure due and adequate regard is had to the issue raised.

#### **Obligation to protect Health and Well-being of Citizens**

On page 198 of the Chief Executive's report on the pre-consultation draft the following statement appears:-

*"..... concerns in relation to possible health impacts in respect of wind energy infrastructure are not matters which fall within the remit of the Wind Energy Development Guidelines as they are deemed to be more appropriately dealt with by health professionals."*

SWWAG has come upon a significant number of hard-evidence-based instances of the adverse impact which Industrial Wind Turbines have caused to the health and well-being of residents of the rural areas adjacent to them. Furthermore, there is a raft of high quality, peer-reviewed research into the damaging effects of Low Frequency Noise (LFN) and Infrasound on the quality of peoples' lives. These reports and instances, links to many of which are listed in **Appendix 1**, are occurring in many countries right across the world. We request that the Council reads and carefully considers them. Here are just a few excerpts:-

**From Finland** [http://tvky.info/tiedostot/infra\\_aani.pdf](http://tvky.info/tiedostot/infra_aani.pdf)

**Mauri Johansson, MD (Specialist in Community & Occupational Health. Master in Humanities and Health studies, MHH) - Prevention & Health Promotion (Denmark)**

*"...Their rotating blades generate low frequency noise and infrasound, i.e. frequent and continuous air pressure pulses that can travel for very long distances.*

*Low frequency noise refers to frequencies between 20-200 Hz that are audible to the human ear, and infrasound refers to frequencies between 0.1-20 Hz that can't be picked up by the human ear. Wind power companies, as well as some researchers, have claimed that infrasound can't cause adverse health effects as it is inaudible. Similarly, we could maintain that radiation isn't harmful as it is beyond sensory perception.*

*However, in the summer of 2015 the German Max Planck Institute released a study conducted using a new kind of measurement technology. Contrary to the well-established view, the study showed that the alarm mechanisms of the human brain are sensitive to very low infrasound that is below the hearing threshold".*

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**SOUTH WICKLOW WIND ACTION GROUP**

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**From Canada:- Bulletin of Science, Technology & Society 30.09.2011 /Gordon Whitehead, retired audiologist**

Natural Resources Canada, which oversees funding for wind farm projects, found no problems with low frequency noise or infrasound. However, Whitehead also conducted tests and **found similar results** but came up with a **different conclusion**: *"They are viewing it from the standpoint of an engineer; I'm viewing it from the standpoint of an audiologist who works with ears . . . The report should read that (the sound) is well below the auditory threshold for perception. In other words, it's quiet enough that people would not be able to hear it. But that doesn't mean that people would not be able to perceive it. . . low-frequency noise can affect the balance system of the ear, leading to a range of symptoms including nausea, dizziness and vision problems. It's not perceptible to the ear but it is perceptible. It's perceptible to people with very sensitive balance mechanisms and that's generally people who get very easily seasick".*

**From USA <http://www.nornow.org/2015/12/04/wind-turbine-neighbors-report-adverse-effects/>**

*"...Now she [Peg Papanek] was packing for a trip to Asheville, N.C., where she spends the winter. But that night she slept fitfully and woke up with a strange moving pressure in her head. Again the next night she was unable to sleep, and the following day developed pains in her ears and chest. "I felt like all the cells in my body were vibrating," says Papanek. As she considered possible causes, she remembered the wind turbines. She drove up Schoolhouse Road toward the Flagg Hill site and saw the turbines spinning. "I didn't know they'd been started," says Papanek. "At that point, all the pressure was in my forehead," she says. As she continued up Beckley Bog Road with the turbines a few hundred yards to her right, she felt the pressure on the right side of her head and grew nauseated. At some point during the day, Papanek's symptoms stopped. She was able to sleep that night and woke up feeling fine. Later, she learned that the turbines had been temporarily turned off. She left Norfolk shortly afterwards, and the symptoms haven't recurred".*

**From Ireland (email to DECLG on 11<sup>th</sup> November 2013) The Deputy Chief Medical Officer in the Department of Health, Dr Colette Bonner, is on record as follows:-**

*"... there is a consistent cluster of symptoms related to wind turbine syndrome which occurs in a number of people in the vicinity of industrial wind turbines. There are specific risk factors for this syndrome and people with these risk factors experience symptoms. These people must be treated appropriately and sensitively as these symptoms can be very debilitating."*

Furthermore, in their response to a query from Deputy Helen McEntee on 30th Oct 2014, the same Department wrote as follows;

*"A range of symptoms have been described by people living close to wind turbines mainly related to environmental noise exposure. These symptoms include headaches, irritability, difficulty concentrating, fatigue, dizziness, anxiety and sleep disturbance and are often described in relation to annoyance. Anyone who experiences such symptoms should seek medical advice from their family doctor who may be able to prescribe suitable medication."*

It is abundantly clear from the above that every decision on the location of industrial wind turbines brings with it significant risks to the health of those who live in the vicinity. The existing Wind Energy Guidelines - 2006- which recommend a minimum setback distance of 500 metres from homes were formulated at a time when turbines seldom exceeded sixty metres in height and had a significantly lower power output than those being constructed today at heights of 150 to 180 metres tall, well in excess of twice the previous norm.

In January 2016 the following letter appeared in the On-line edition of Lockport Union-Sun & Journal under the heading:- **Health Studies should be prerequisite of Wind farm Development.** The letter, written by DAN EGERT, Town Supervisor of Somerset, a small town in Niagara county, New York state, includes the following statement:- *"[It] ...is my strong belief that a baseline health study should be required for any*

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## **SOUTH WICKLOW WIND ACTION GROUP**

*Promoting Sustainable development through Democracy, Human Rights and the Rule of Law*

*industrial wind turbine project which is proposed to be constructed so near to people. As town supervisor, it is a fundamental duty of mine to be proactive, not reactive, in protecting the health and safety of Somerset residents. If health impacts are reported by individuals after a project is in place, the burden shouldn't be on a resident to prove that the project is the cause but rather, it should be the other way around. A developer should be required to conduct a health study and prove to the community in advance that there are no health impacts". The complete letter is at Appendix 2.*

The fact that revision of the Guidelines has been long delayed is no reason for Wicklow County Council not to adopt a similar pro-active, precautionary approach to that enunciated by Mr. Egert in order to ensure that the health and well being of communities is not jeopardised. By so doing the Council will demonstrate that it takes seriously its obligation to exercise a **Duty of Care** when formulating its policies and regulations. Accordingly, SWWAG requests that in updating the Wind Energy Strategy full account is taken of risks posed by industrial wind turbines to community health and that appropriate provision is made, including a requirement that applicants for permission to erect turbines be required to conduct a health study and prove to the community as part of the pre-application process that no adverse impacts on human will arise in the event of permission being granted.

Yours faithfully,

*Richard More-O'Ferrall*

*Richard More-O'Ferrall, Secretary*

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**SOUTH WICKLOW WIND ACTION GROUP**

*Promoting Sustainable development through Democracy, Human Rights and the Rule of Law*

## APPENDIX 1

Reports on peer-reviewed research into the damaging effects of Low Frequency Noise (LFN) and Infrasound may be found at these links

<http://www.pacifichydro.com.au/english/our-communities/communities/cape-bridgewater-acoustic-study-report/>

<http://www.nornow.org/2015/12/04/wind-turbine-neighbors-report-adverse-effects/>

<http://docs.wind-watch.org/Infrasound-wind-turbines-4-August-2015.pdf>

<http://windfarmtorture.blogspot.in/>

<http://windfarmtorture.blogspot.in/p/why-this-blog.html>

<http://www.thegazette.com/subject/opinion/guest-columnists/industrial-wind-is-destroying-iowas-eagle-habitats-20151227>

<https://www.wind-watch.org/documents/wind-turbine-noise-international-congress-on-acoustics/>

<https://www.wind-watch.org/news/2016/01/24/ignoring-harm-of-noise/>

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**SOUTH WICKLOW WIND ACTION GROUP**

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APPENDIX 2

**Letter from Dan Egert, Town Supervisor, Somerset, New York State**

**Credit:** Lockport Union-Sun & Journal | January 5, 2016 | [www.lockportjournal.com](http://www.lockportjournal.com)

Last month it was reported that the Niagara County Board of Health voted to ask Albany for a full environmental review of the proposed giant Lighthouse Wind Project, which is projecting 70 massive industrial wind turbines that tower more than 620 feet into the sky, immediately along the beautiful and tranquil shoreline of Lake Ontario in the towns of Somerset and Yates. The developer is Apex Clean Energy from Charlottesville, Va.

Also reported in this article is my strong belief that a baseline health study should be required for any industrial wind turbine project which is proposed to be constructed so near to people. As town supervisor, it is a fundamental duty of mine to be proactive, not reactive, in protecting the health and safety of Somerset residents. If health impacts are reported by individuals after a project is in place, the burden shouldn't be on a resident to prove that the project is the cause but rather, it should be the other way around. A developer should be required to conduct a health study and prove to the community in advance that there are no health impacts.

The regularity of community complaints near wind projects has spawned an identifiable interdisciplinary research concern internationally. Such was presented at this meeting, and in response to my call for a baseline study prior to the project, Apex representatives and Canadian scientist Dr. Christopher Olsson stated, "The company doesn't have to do such a study and if people are concerned, they should see their local physician."

It should also be noted that the immediate response from Apex representatives to the question from the NCBOH was that it was a "funding" issue. The response was and remains wholly unacceptable.

Interestingly, before he was hired by Apex Clean Energy to say the opposite, Dr. Olsson held a much different position regarding health effects posed by wind turbines and seemed to agree with me. In a 2011 peer-reviewed paper published in the Environmental Health Journal, Dr. Olsson stated, "Conducting further research into the effects of wind turbines (and environmental change) on human health, emotional and physical, as well as the effect of public consultation with community groups in reducing preconstruction anxiety, is warranted. Such an undertaking should be initiated prior to public announcement of a project, and could involve baseline community health and attitude surveys ..."

His new position, of course, was/is intended to persuade the Niagara County Board of Health. I'm not convinced and remain committed to requiring a baseline health study to be conducted in a community prior to the installation of wind turbines.

Dan Egert

Supervisor, Town of Somerset

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**SOUTH WICKLOW WIND ACTION GROUP**

*Promoting Sustainable development through Democracy, Human Rights and the Rule of Law*

C165

Leonora Earls

From: Florence Staunton  
Sent: 19 February 2016 14:27  
To: Planning - Development Plan Review  
Subject: County Development Plan Review - Donard village

Re: Draft Wicklow County Development Plan 2016-2022 - Volume 2 - Level 6 Settlement Plans/Donard

I have lived in Newtown, Donard, County Wicklow for 38 years. I have read the above section of the draft County development plan and request that the following be taken into consideration:

- 1.

**Stephen Willoughby**

---

**From:** Stephen Willoughby  
**Sent:** 09 March 2016 16:59  
**To:** 'Florence Staunton'  
**Subject:** RE: County Development Plan Review - Donard village

Hi Florence,

Please see email submission below re. Donard Village received on the 19th of February.

I think there may have been a problem with an attachment or the content of the email. If you could reply to me with the contents of your submission in the next day or two I will be able to include with the other issues raised for Donard Village.

The Chief Executives report on submissions is currently being prepared.

Thanks

Stephen

-----Original Message-----

**From:** Florence Staunton  
**Sent:** 19 February 2016 14:27  
**To:** Planning - Development Plan Review  
**Subject:** County Development Plan Review - Donard village

Re: Draft Wicklow County Development Plan 2016-2022 - Volume 2 - Level 6 Settlement Plans/Donard

I have lived in Newtown, Donard, County Wicklow for 38 years. I have read the above section of the draft County development plan and request that the following be taken into consideration:

1.

C166

**Ashford Property Services**

The Square Ashford. Co, Wicklow.  
Mobile  
Email:

Wicklow County Council

18 FEB 2016

PLANNING DEPT.

**Wicklow County Council**  
County Buildings,  
Whitegates, Wicklow Town

**Review of the County Development Plan 2016-2022**  
**Submission prepared on behalf of Patrick & Eugene Stephen's.**  
**In respect of Lands at Ballinalea, Ashford, Co. Wicklow.**

Dear Sir.

Please find the following enclosed

- 1) Copt of submission.
- 2) Land transfer agreement.

Should you require any further information, please do not hesitate to contact the undersigned.

*Pat O'Connor* 17/02/2016.

Ashford Property Services t/a  
Pat O'Connor & Associates.  
Planning, Architectural and  
Property Consultants

Pat O'Connor. Dip Arch.  
Rory O'Connor. BSc (Hons) Con. Man. MIEI.  
Ross Boyce. Architectural Technician



**Land Transfer Agreement**  
**between**  
**Patrick Stephens and Eugene Stephens**

See Attached map for clarification:

Land marked (A) On attached map and outlined in red containing  
2.26ha / 6.6 acres.

The residential zoning on lands marked (A) to transfer to land marked (B)  
and outlined in blue.

Dated 16/02/2016.

Signed: *Eugene Stephens*

Eugene Stephens

Signed: *Patrick Stephens*

Patrick Stephens

Witness: *[Signature]*

**Peace Commissioner**  
**Roinn dli agus cirt**  
**Padraig O Conchobhaire**  
**Ath Na Fuinseoige, Co. Cill Mhantain**  
**Appointment of Padraig O Conchobhaire**  
**to be a peace commissioner in the**  
**County of Co Cill Mhantain and within the**  
**counties immediately adjoining that county**  
**C3789.150106.2.000.5/86.WEM\G10-0110.**

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## Ashford Property Services

The Square Ashford. Co, Wicklow.

Mobile

Email:

Wicklow County Council

County Buildings,

Whitegates, Wicklow Town

## Review of the County Development Plan 2016-2022


Submission prepared on behalf of Patrick & Eugene Stephen's.

In respect of Lands at Ballinalea, Ashford, Co. Wicklow.

This submission is for the realignment of the lands contained within AA1 of the Ashford Town Plan, our proposals as follows.

- 1) Area marked (A) and outlined in red and containing 2.26 ha, this area to be designated as open space for the housing project.
- 2) Area marked (B) and outlined in blue and containing 2.26 ha, this area to be designated as development land for affordable housing.
- 3) Area marked (c) and outlined in yellow this area is designated as development land for housing. containing 5.03 ha
- 4) Area marked (D) and outlined in green and containing 1.80 ha, this area to be designated as active open space for future expansion of the local soccer club.

Should you require any further information, please do not hesitate to contact the undersigned.

 *Pat O'Connor.* 17/02/2016.

Ashford Property Services t/a

Pat O'Connor & Associates.

Planning, Architectural and

Property Consultants

Pat O'Connor. Dip Arch.

Rory O'Connor. BSc (Hons) Con. Man. MIEI.

Ross Boyce. Architectural Technician

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**Ashford Property Services**

The Square Ashford. Co, Wicklow.

Mobile

Email:

**Wicklow County Council**

County Buildings,

Whitegates, Wicklow Town

**Review of the County Development Plan 2016-2022**

Submission prepared on behalf of Patrick & Eugene Stephen's.

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Should you require any further information, please do not hesitate to contact the undersigned.

*Pat O'Connor* 17/02/2016.

Ashford Property Services t/a

Pat O'Connor & Associates.

Planning, Architectural and

Property Consultants

Pat O'Connor. Dip Arch.
















Rory O'Connor. BSc (Hons) Con. Man. MIEI.

Ross Boyce. Architectural Technician

# ASHFORD TOWN PLAN

## MAP 1: LAND USE ZONING OBJECTIVES

### LEGEND

-  Existing Residential
-  R20 Proposed Residential
-  R15 Proposed Residential
-  Town Centre Activities (TC)
-  Employment (E)
-  Film Industry
-  Community & Education (CE)
-  Active Open Space
-  Open Space & Amenity (OS)
-  Private Open Space (pOS)
-  Specific Local Objective
-  Action Area Plan Boundary
-  Public Utility
-  Strategic Land Reserve
-  Plan Boundary

Director of Services: **Desmond O' Brien**

Scale: **1: 100**      Date: **10/10/14**

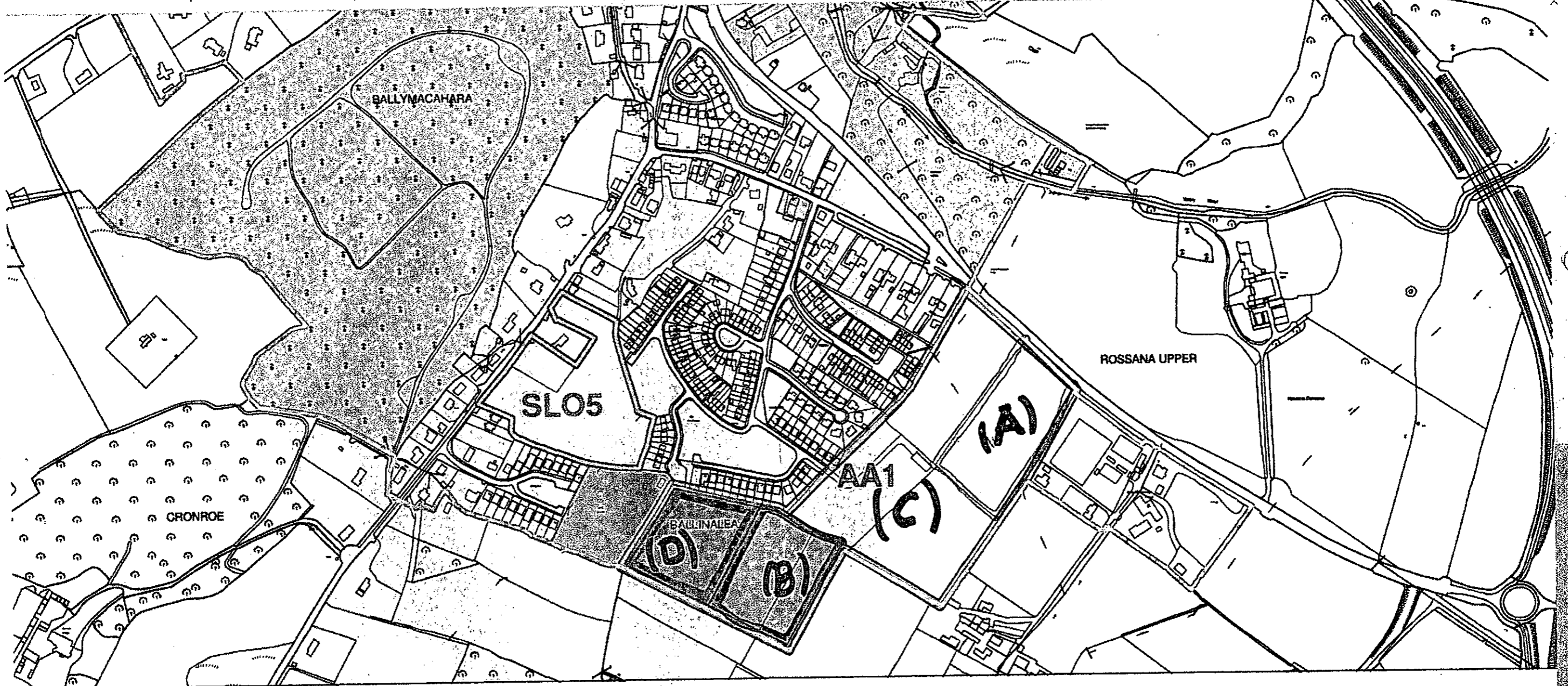
Drawn By: **SW**      Checked By: **SW**

Ordnance Survey Ireland. All rights reserved.  
Licence Number 2014/35/CMA/WicklowCountyCouncil



**WICKLOW COUNTY COUNCIL**  
Wicklow County Council Planning Department  
County Buildings, Station Road, Wicklow  
Tel: (0404) 20100 Email: [planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)





C167

**Leonora Earls**

**From:** Ray O'Malley  
**Sent:** 16 February 2016 16:58  
**To:** Planning - Development Plan Review  
**Subject:** Submission No. 2 to Draft County Development Plan for Brian Stokes  
**Attachments:** Stokes SLO1 Draft Plan Sub 16.02.16.pdf

Dear Sir or Madam,

Please find attached a second submission in respect of the DRAFT Wicklow County Development 2016-2022 on behalf of **Mr. Brian Stokes, Inchanappa House, Ashford, Co. Wicklow.**

Please acknowledge receipt of this second submission.

Regards,

○ **Raymond O'Malley, Director**  
Kieran O'Malley & Co. Ltd.  
Town Planning Consultants  
St. Heliers  
Stillorgan Park  
Blackrock  
Co. Dublin  
A94 A2K8

**Web.** [www.kom.ie](http://www.kom.ie)

○

16<sup>th</sup> February 2016

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow Town

**Lands at Inchanappa House, Ashford, Co. Wicklow**  
**RE: Draft Wicklow County Development Plan 2016-2022**

Dear Sir or Madam,

This is a submission in respect of the DRAFT Wicklow County Development Plan 2016-2022 on behalf of **Brian Stokes, Inchanappa House, Ashford, Co. Wicklow**. We have reviewed the DRAFT Development Plan and in particular the Ashford Town Plan in Volume 2. The Council is requested to propose the following as material amendments to SLO1 Inchanappa House within the Ashford Town Plan:

1. **Re-instate the 50 metres setback to the motorway,**
2. **Increase density from R20 to R25 on part of the lands,**
3. **The 'community park', and**
4. **Spelling of Inchanappa.**

**50 Metres Motorway Setback**

As part of the approval of the existing Ashford Town Plan (variation 5.1 to the Wicklow County Development Plan 2010-2016), the following service infrastructure objective was included in section 6.4 of the Ashford Town Plan at the behest of the Council Members:

**SI4 For the purpose of this plan, the minimum set back of all new development (other than employment development) from the M11 shall be 50m. Where housing development is proposed within 100m of the M11; the developer shall be responsible for designing, providing and maintaining suitable noise and light pollution mitigation measures. The design of noise and light pollution mitigation measures shall comply with NRA best practice guidance.**

Setbacks to various types of road are now proposed in Appendix 1 of the draft plan but there is no mention of SI4 or a reduction to 50 metres at Ashford. The case to support a reduced setback at Ashford has been made on several previous occasions to the local authority and the Council Members. We enclose for your attention our submission dated 15<sup>th</sup> December 2009 in relation to the Draft Wicklow County Development Plan 2010-2016, which sets out in detail our client's position with regard to this issue. The 100 metres



setback appears excessive, it would effectively sterilise a large area of serviced land within close proximity of the town centre to no useful planning purpose and it is contrary to the provisions of the current statutory development plan.

When approving SL4, it was accepted by the Council Members that in the case of Ashford: -

- No traffic hazard would arise from development closer to the M11 than 100 metres,
- It is unlikely that further M11 widening will be required, and
- Any impacts on residential amenity (such as noise, light glare, etc.) would have to be mitigated by the developer.

In addition, the residential zoning within SLO1 is setback 50 metres and not 100 metres from the M11, so there is no increase or change in residential zoning being sought at this location. As the setback only affects development at Inchanappa/SLO1 in the Ashford Town Plan, it is recommended that a slightly modified version of SL4 as follows is added as a material amendment to the development criteria for SLO1 on page 29 of Volume 2:

- ***The minimum set back of all new development (other than employment development) within SLO1 from the M11 shall be 50m. Where housing development is proposed within 100m of the M11, the developer shall be responsible for designing, providing and maintaining suitable noise and light pollution mitigation measures. The design of noise and light pollution mitigation measures shall comply with NRA best practice guidance.***

#### ***Increase density from R20 to R25***

Our client requests an increase in density on part of the Inchanappa lands from R20 to R25. The land subject to this proposal is outlined and hatched in red on the attached plan. It measures 5.6 hectares and it is that land abutting the proposed community park/public open space at Inchanappa. This land was previously zoned R28, so the modest increase to R25 is still short of what the planning authority previously planned for this area. The increase in density would potentially result in a modest increase in yield, which should be supported given the lands proximity to the amenities of Ashford town centre, the new community park and the expanse of public open space that will be provided between this land and the adjoining public road.

#### ***The 'community park'***

As the Council will be aware, our client through a lease agreement with a local community group has facilitated the delivery of a one acre community park that includes an adult gym area, a junior play area, basketball area, zip line, etc. within SLO1. It therefore follows that the provision of a playground, teenage zone and adult gym (minimum 0.4 ha in area) at an easily accessible and safe location within SLO1 has already been met and thus it should be omitted from the development criteria in SLO1.

In addition to that facility, SLO1 requires the lands zoned 'AOS' in this SLO shall be developed as a 'community park' but that only 50% of the proposed residential element may be developed prior to the open space lands being laid out in manner to be agreed with Wicklow County Council and devoted to the public. Our client has no objection to the provision of a public park; it will form a key element of the

residential community planned for Inchanappa. However, the Council is invited to reconsider the obligation to limit the construction of only 50% of the residential development in advance of the community park. Our client suggests the community park is provided on a pro rata type basis in conjunction with the residential development.

In considering applying a pro rata basis for the delivery of the community park, the Council is invited to have regard to our client's proven record. Brian Stokes has worked over many years with the officials and Elected Members of Wicklow County Council. He consistently delivered on undertakings given in relation to his lands at Inchanappa House and he has supported the community in many important ways including the following

- Grant long term lease to community group for Community Park which is nearly complete.
- Financial support for Ashford Development Group to complete the Community Centre.
- Financial support for Ashford Rovers FC to complete the Astro pitch at Ballinalea.
- Providing land for the main Ashford Roundabout free of charge to Council.

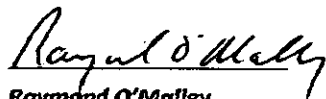
We attach a letter dated 22<sup>nd</sup> May 2014 from Ashford Community Park, which speaks for itself.

***Spelling of Inchanappa***

Finally, while it is only a minor item, the Council is requested to correct the spelling of Inchanappa in the draft plan, which in every instance is spelt with an "i" i.e. Inchinappa instead of Inchanappa.

Please acknowledge receipt of this submission and direct all future correspondence to this office.

Yours,



**Raymond O'Malley**  
Kieran O'Malley & Co. Ltd.

ROM: rom

Enclosures      1.      Copy of submission dated 15<sup>th</sup> December 2009  
                         2.      Outline of lands for R25 zoning  
                         3.      Letter dated 22<sup>nd</sup> May 2014 from Ashford Community Park

15<sup>th</sup> December 2009

Planning Department  
Wicklow County Council  
Aras an Chontae  
Wicklow  
Co. Wicklow

**COPY**

**Wicklow County Draft Development Plan  
Action Area 1 Lands at Inchanappa, Ashford.  
(Brian Stokes)  
REPRESENTATION**

Dear Sir or Madam

This is a representation by Brian Stokes, Inchanappa House, Ashford, in respect of one provision of the Draft County Plan. This is paragraph 11.7.6 'Set backs from Public Roads'. He requests the Council to qualify its 100 metre national road building line set back by either excluding its application within the boundary of the Ashford LAP or alternatively by relaxing it to 50 metres within the LAP. Each of the three factors of Paragraph 11.7.6 relied on to justify building lines i.e. traffic safety, residential amenity and long term space needs for roads, particularly in rural areas, is addressed.

**1. Traffic safety**

There are circa 95 kilometres of motorway, national and secondary roads, in Co. Wicklow to which the 100 metre set back relates. While it may be that a 100 metre building line is of traffic safety significance along parts of the motorway/national network, we see no obvious M11 traffic safety advantage of a 100 metre set back at Action Area 1, not least because for the most part the M11 is in cut (up to 10 metres deep in places).

The Council is reminded that the claimed reasons for the 100 metre building line at paragraph 6.1.6 of the 2004-2010 County Development Plan do not include traffic safety.

**2. Residential amenity**

It is widely accepted that noise is the dominant road impact on residential amenity. Because the M11 is in deep cut, traffic noise is already attenuated over much of the length of the M11 adjoining Action Area 1. At locations of shallow, or little or no cut, it will be feasible to construct earth embankments from surplus excavated material (thereby avoiding unsustainable off-site haulage to dispose of it) so it follows proposed dwellings at Inchanappa do not need, for acoustic reasons, to

comply with a 100 metre set back that may well be appropriate in flat terrain and/or in open rural landscapes.

Our client's acoustic consultant advises that there is only a 2 dBA difference between the noise received 100 metres and 50 metres from a noise source. This table shows the predicted impact of changes in traffic noise levels.

Change in Sound Level (dB LA10)	Subjective Reaction	Impact
< 3	Imperceptible	Neutral
3 - 5	Perceptible	Minor
6 - 10	Up to a doubling of loudness	Moderate
11 - 15	Over a doubling of loudness	Major
> 15	--	Severe

**Likely Impact Associated With Change in Traffic Noise Level**

The top line confirms that sound differences of less than 3 dBA are "imperceptible" to the human ear with neutral impact. Accordingly there appears to be no noise related grounds to insist on 100 metres; 50 metres is adequate.

Another residential amenity factor is visual amenity which is not referred to in the draft plan but is adverted to at paragraph 6.1.6 of the 2004-2010 County Plan. As an inspection of our client's lands at Inchanappa confirms, Brian Stokes has grown a five metre deep plantation of mixed coniferous and deciduous trees alongside his eastern boundary along this section of the M11. While the sound attenuation effect of trees and woodlands is minimal, this maturing motorway-side planting very effectively isolates potential M11 noise/headlight glare impact from Ashford's residentially zoned lands, an insulation reinforced by the M11's vertical alignment being mostly in cut topography. In short, the Council is asked to accept that the aggregate effect of the cut topography, of future potential earth mounding and maturing trees/woodlands screening, ensure that the M11 has no adverse impact on residential amenity of proposed residential development on the Action Area 1 lands at Inchanappa, Ashford.

**3. Long term space needs for roads, especially in rural areas.**

With the advantage of the former N11 through Ashford being intact and with the new M11 east of the settlement, the Council is invited to accept that the traffic needs of the national network at Ashford are satisfied for the foreseeable future; indeed probably indefinitely. In contrast this is not so for much of the county's national network, lengthy parts of which require improvement online and offline, the alignment options for which are obviously improved materially by imposing 100 metre building lines. Insisting on 100 metre set backs both sides automatically produces a 200 metre wide undeveloped alignment options corridor. That is not required at Ashford. With grade separated M11 intersections north and south of Ashford, there is no future M11 intersection related reason to sterilize residentially zoned lands 100 metres deep.

#### 4. Sustainable development implications within LAP

While paragraph 11.7.6 allows reduced set backs to match extant lower values, that adjustment is of no relief at Action Area 1. However, what does obtain at Action Area 1 is the second last factor at page 145 of the Plan i.e. "The desire to maximise development density at locations in or close to urban areas". Brian Stokes invites the Council to have special regard to this factor which is central to his representation. Indeed, it is the primary factor that distinguishes urban area related building lines from rural ones. Our client does not contest the general application of 100 metre set backs in rural Co. Wicklow which accounts for perhaps 95% of the county's national system. Ashford's LAP proposes to consolidate the settlement's urban function. It is designed to optimise the development yield from scarce valuable serviced and serviceable zoned land and for the time being unzoned land within the LAP boundary. The M11 has a 1.5 km long boundary with the Ashford LAP. 750 metres of the M11 abuts Action Area Plan AA1. The planning authority is invited to agree that to squander potential AA1 development yield by the application of a 100m set back, when for the reasons adduced herein it is not needed to attain its intended amenity goals, is contrary to the proper planning and sustainable principles of the 2000-2007 Acts.

The 100 metres set back has the effect of precluding any building between the curtilage of Inchanappa House, a protected structure, and the M11. This has the unexpected and undesirable result of effectively producing two 'detached' housing estates, one north the other south of the protected structure, which includes its walled Victorian garden curtilage. While there is room for a vehicular and pedestrian link and open space continuity between the two, the overall desired integrated development concept is lost.

Because the 100 metre set back is unnecessarily deep and some 750 metres of AA1 is affected, this building line sterilizes a large area for building. Its relatively large size invites using it in large part to satisfy the scheme's residential public open space demand, which produces a long, narrowish, linear shape, all of it within earshot of the M11.

The knock-on effect of this on potential layouts is that most of the open space will be provided at the site periphery and further from the housing than is desirable. This has the effect of over concentrating house construction elsewhere on the site which would be bereft of the visual relief of more centrally positioned open space.

It also forces some housing into areas of pronounced sloped topography; with the prescribed densities it is not possible to appropriately respect the sloped topography which the planning authority would ordinarily want.

Inevitably the perimeter sterilized zone will invite threading the main north/south local distributor road alongside and more or less parallel to the M11 when all other planning considerations invite threading this carefully through the housing enclaves on an alignment more central and sympathetic to the site's topography, its mature trees and its woodlands.

**COPY**

The scheme architects, O'Mahony Pike, who have designed more housing in Ireland than any other office over the past 20 years, support Brian Stokes' representation. They calculate that a 100 metre building line sterilizes 14.4 acres (5.82 hectares) of land compared with 5 acres (2 hectares) for a 50 metre set back. This reduces the housing yield by 115 dwellings, shrinking the Council's prospective Section 48 financial contribution accordingly. O'Mahony Pike drawing 002, copy attached, is a sketch layout designed to illustrate the planning and development advantages at Action Area 1 by using a 50m rather than a 100m M11 set back.

**5. Amendment**

For the reasons adduced herein, the planning authority is invited to modify its national road system related road set back from 100 metres to 50 metres in the case of the 0.75 km of the 95 km national network that abuts Action Area 1 of the Ashford LAP. The proposed amendment might be to add the words:

**"These set backs do not apply within Ashford's LAP" or**

**"The 100 metre set back shall be reduced to 50 metres within the boundary of Ashford's LAP".**

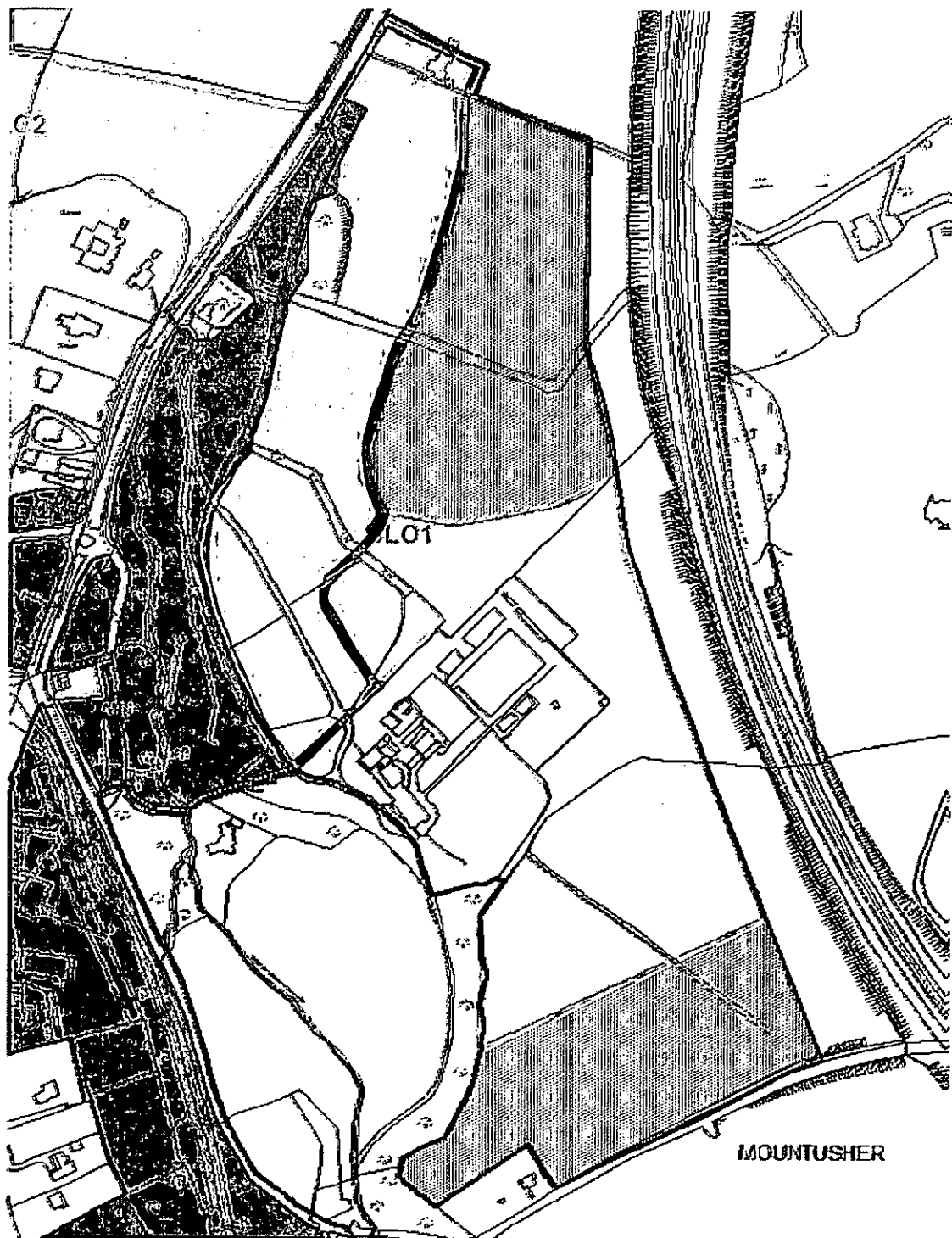
Yours faithfully,

  
Kieran O'Malley  
Kieran O'Malley & Co. Ltd.

**COPY**

Enclosure:

- (i) O'Mahony Pike Drg. 002.



**Proposed R25 Zoning at SLO1**

**KIARAN O'MALLEY & CO. LTD.**

*Town Planning Consultants*

St. Heliers, Stillorgan Park, Blackrock, Co. Dublin



ashford community park



Ashford Community Park Ltd

Christine Carroll Solicitors

Ashford Business Centre,

Mount Usher Court

Ashford

Co. Wicklow

22<sup>nd</sup> May 2014

PLAY YOUR PART

**Re: Inchinappa Lands, Ashford Co. Wicklow**

To whom it may concern,

We, Ashford Community Park Ltd, have worked closely with Brian & Emmet Stokes over the past 2 years to deliver a truly outstanding Community Park & Playground on a 1-acre site at Inchinappa, Ashford.

We have counted on Brian Stokes' support throughout the process, which has been unwavering, and have entered into a 30-year lease for the lands. This has allowed us develop a wonderful amenity which would otherwise not have been available to the residents of Ashford until the Inchinappa Lands were developed in full.

We greatly appreciate the support that the Stokes family have shown throughout this process, and look forward to many years enjoyment of this wonderful amenity.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Maurice Ramsay". The signature is written in dark ink on a white background.

Maurice Ramsay

Ashford Community Park Ltd

Ashford Community Park,  
Ashford, Co. Wicklow.



Ashford Community Park



[ashfordcommunitypark@gmail.com](mailto:ashfordcommunitypark@gmail.com)

Company Reg. No. 622641

16<sup>th</sup> February 2016

County Development Plan Review  
Planning Department  
Wicklow County Council  
Statlon Road  
Wicklow Town

**Opportunity Site 2 (OP2) at Ashford, Co. Wicklow**  
**RE: Draft Wicklow County Development Plan 2016-2022**

Dear Sir or Madam,

This is a submission in respect of the DRAFT Wicklow County Development Plan 2016-2022 on behalf of **Brian Stokes, Inchanappa House, Ashford, Co. Wicklow**. We have reviewed the DRAFT Development Plan and in particular the Ashford Town Plan in Volume 2. The Council is requested to propose the following as material amendments to opportunity site 2 (OP2) within the Ashford Town Plan:

1. **Increase the town centre zoning by 0.3 hectares, and**
2. **Omit the requirement for a 300 sq.m. Multi-games area.**

Opportunity Site 2 (or OP2) is a small area of town centre zoned land north of the former Garda Station at Ashford. Our client requests a small area of additional town centre zoning on the lands adjoining to the east and south of the former Garda Station at Ashford. The attached map of figure 1.4 SLO1 from the draft plan shows the additional land for town centre zoning outlined in red. The additional town centre zoning would be c. 0.3 hectares, which would increase the area of opportunity site 2 to 0.62 hectares. This re-zoning proposal also affects the boundary of SLO1, which would be amended to exclude the land subject of this re-zoning request.

This land is centrally located in Ashford but it is underutilised relative to its town centre location. A town centre zoning as part of an extended opportunity site 2 would enable further consolidation of the town centre at a pivotal central location which in turn would contribute to the town's future vitality and vibrancy as required by the Ashford Town Plan. The County Manager previously recommended this site for development in his manager's report of April 2008 as part of the preparation of the Ashford Local Area Plan 2008. At that time, it was proposed as part of Area Action 5 – see attached map with the County Manager's proposed AA5 outlined red.

Despite the indicative flood areas shown on Map 3: Indicative Flood Zones, the land subject of this re-zoning request has no history of flooding. Our client has resided at Inchanappa House for over 27 years and has

never witnessed any flooding in this area. A site inspection will confirm that this area of land is dry and doesn't exhibit any signs associated with flooding or wetlands. The Vartry River is many metres below ground level and consistent with the Council's approach to the town centre zoned land already within OP2, our client agrees that only 'Less Vulnerable' or 'Water Compatible' development as defined in the 'Planning System and Flood Risk Management: Guidelines for Planning Authorities' may be developed on the proposed extended OP2 site.

The Council is also requested to omit the obligation for a 300 sq.m. 'Multi-Use Games Area' from opportunity site 2. 'Ashford Park', which is immediately north of OP2, has now opened. This park has been delivered by a 30 year lease from our client, Brian Stokes, to a local community group. It's just over one acre in area with an adult gym area, a junior play area, basketball area, zip line, etc. As a multi use games area of a much greater scale has already been provided, the Council is invited to accept that this proposal within OP2 can now be considered unnecessary. As a result, the Council is requested to omit it from OP2.

Please acknowledge receipt of this submission and direct all future correspondence to this office.

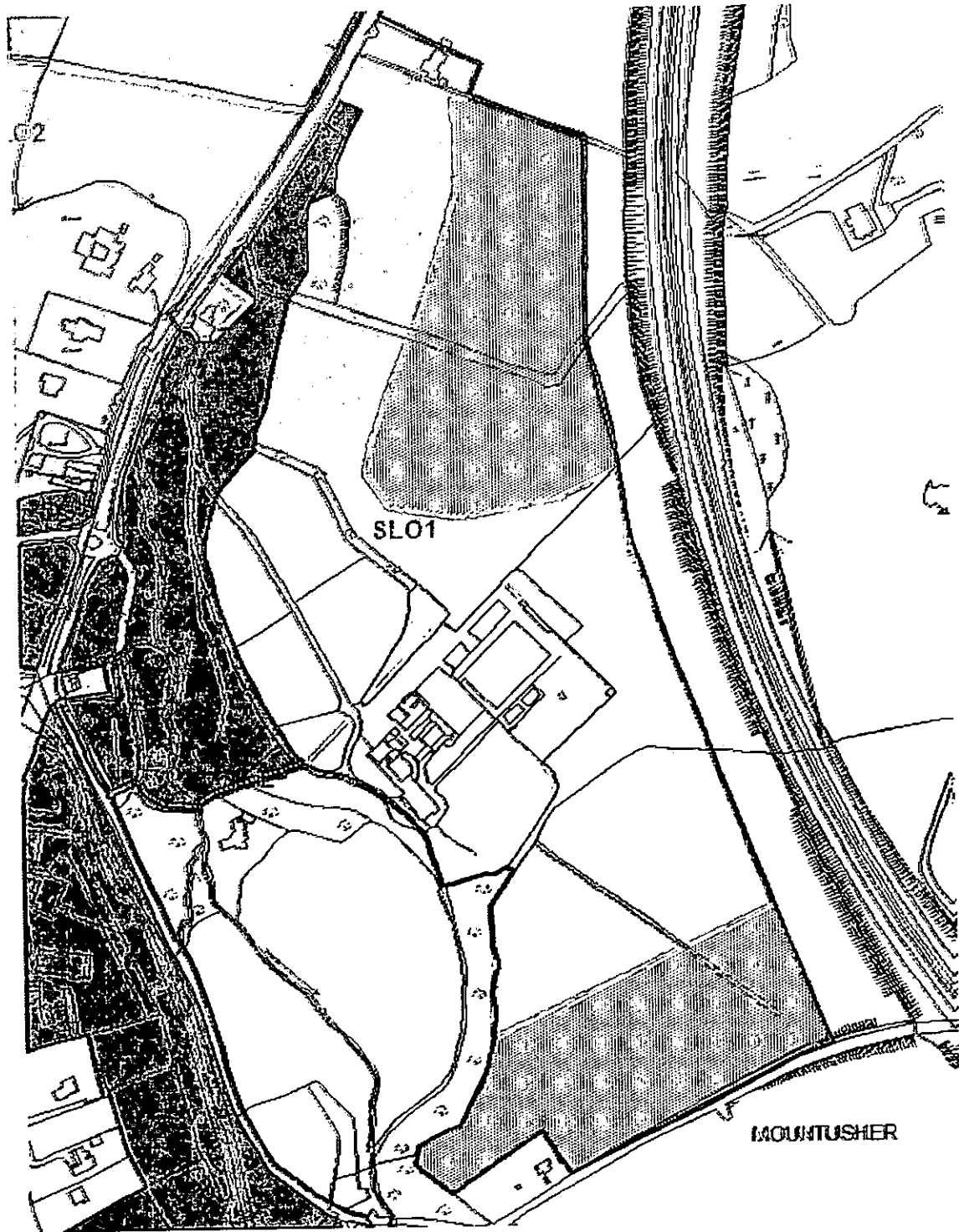
Yours,

  
Raymond O'Malley

Kieran O'Malley & Co. Ltd.

ROM: rom

- Enclosures
1. Figure 1.4 SLO1 in B&W
  2. Map of AAS from April 2008

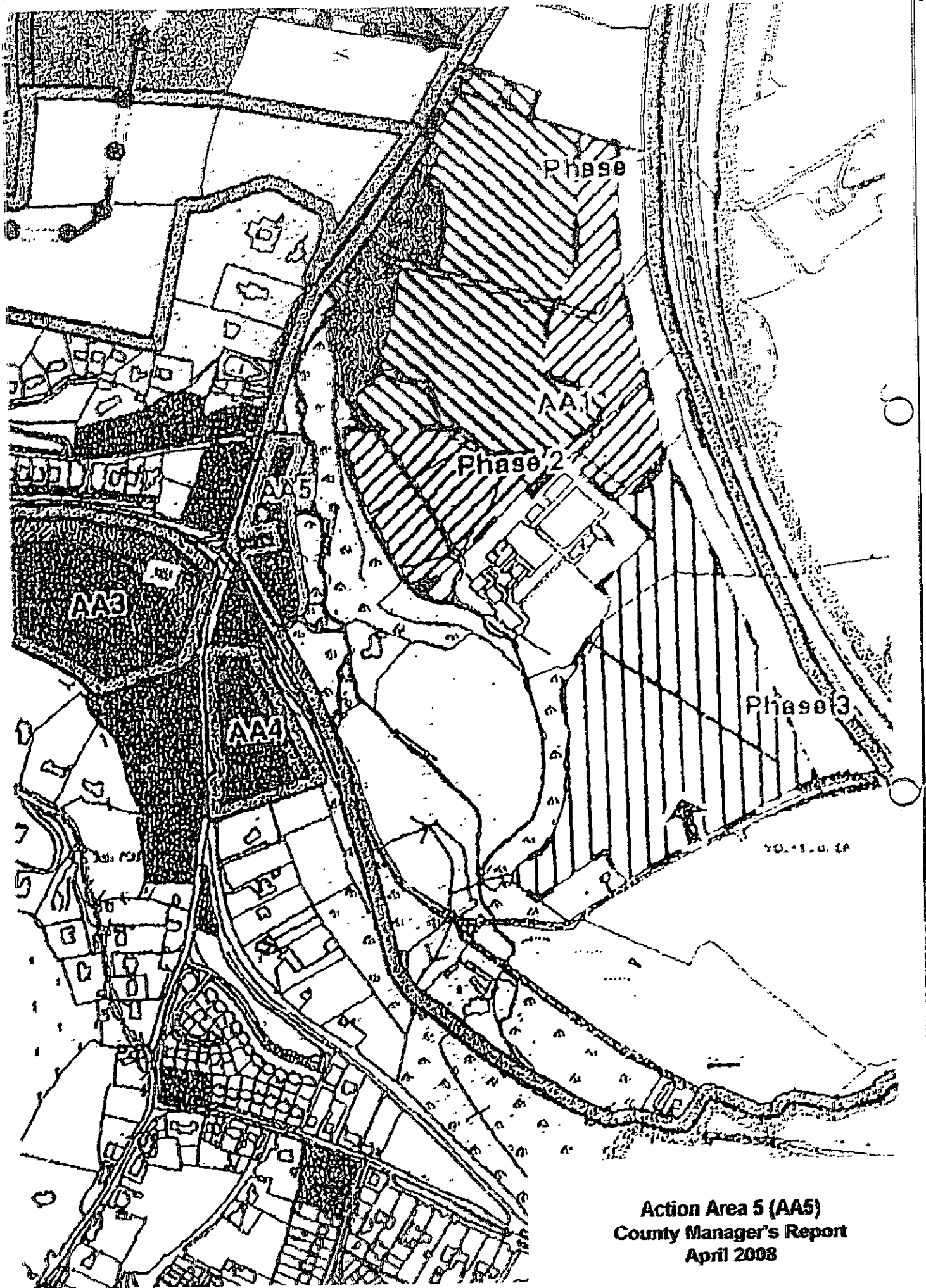


**Proposed Extension to OP2**

**KIARAN O'MALLEY & CO. LTD.**

*Town Planning Consultants*

St. Heliers, Stillorgan Park, Blackrock, Co. Dublin



**Action Area 5 (AA5)**  
**County Manager's Report**  
**April 2008**

C168

Leonora Earls

**From:** Bernadette Stokes  
**Sent:** 19 February 2016 16:59  
**To:** Planning - Planning and Development Secretariat  
**Subject:** Submission  
**Attachments:** Wicklow County Council dog park submission.docx

Dear Sorcha,

My name is Bernadette Stokes and I am emailing you with a submission for the Wicklow County Development Plan 2016.

Please find attached the submission.

Many thanks,

Yours sincerely,

Bernadette Stokes

"The West Wing"

33, Kindlestown Park,

Greystones,

Co. Wicklow

19<sup>th</sup> February 2016

The following is a submission for Wicklow County on behalf of Bernadette Stokes and the Campaign for Greystones Dog Park.

As a large beautiful and green county, unfortunately Wicklow is without a dog park anywhere in the county. Dog parks are badly needed in order to exercise dogs correctly and without causing interference to the public. People who bring their dogs to dog parks are responsible citizens and in my experience pick up after their animals. However, Wicklow residents have no option but to travel to another county in order to correctly exercise their dogs.

We would like to make the point that it is not very difficult to put a dog park together. Firstly, it is waste ground of approximately 2 acres converted to grass, fenced, double gated and a separate double gate for lawnmower access, some seating benches and a water tap if possible. Fencing of about 2 acres would cost approximately €8,000.00 which can be easily raised by responsible dog park users.

Having observed the 5 different dog parks that the Dun Laoighaire Rathdown Council have in place, we would like to make the point that a small area fenced off for small dogs within the dog park would be an improvement on their dog parks.

We hope that as our County Council you will give this matter serious and urgent consideration and that it be prioritised as there are no dog parks in Wicklow whatsoever!

Enclosed with our submission is a active small dog park plan which may be of assistance to you.

Yours sincerely,

---

Bernadette Stokes



C169

**Leonora Earls**

---

**From:** Julia Strickland ;  
**Sent:** 14 February 2016 16:32  
**To:** Planning - Development Plan Review  
**Subject:** submission county development plan 2016-2022  
**Attachments:** submission from Strickland.docx

Please find attached my submission on the Wicklow County Council County Development Plan 2016 - 2022.

Please confirm you have received it to the correct place and it is in a format that you can manage.

Kind regards,

Julia and Carl Strickland

Winterberry  
Kilmolin,  
Enniskerry  
County Wicklow  
7-2-2016

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow Town

Submission to Wicklow County Council regards 'County Development Plan 2016 – 2022'.  
From Julia and Carl Strickland.

Dear Sir/Madam,

I wish to submit the following issues with respect to the Enniskerry development in the Parknasilloge AA1 area.

1. Traffic/ Road Safety.

- a. The steep incline and decline on Kilgarron Hill is a risk to traffic safety especially during winter conditions. The additional reduction to one lane due to parked cars means the extra traffic from 156 new properties and businesses all having no alternative route will cause congestion and pose a hazard to pedestrians and cyclists. The village hasn't the infrastructure to be a town.
- b. If, after development, the only walking opportunity in the Parnasilloge/Kilmolin area is along a busy road (because the fields will be gone and there will be more traffic), the residents will have to resort to driving further afield, increasing the traffic even further.

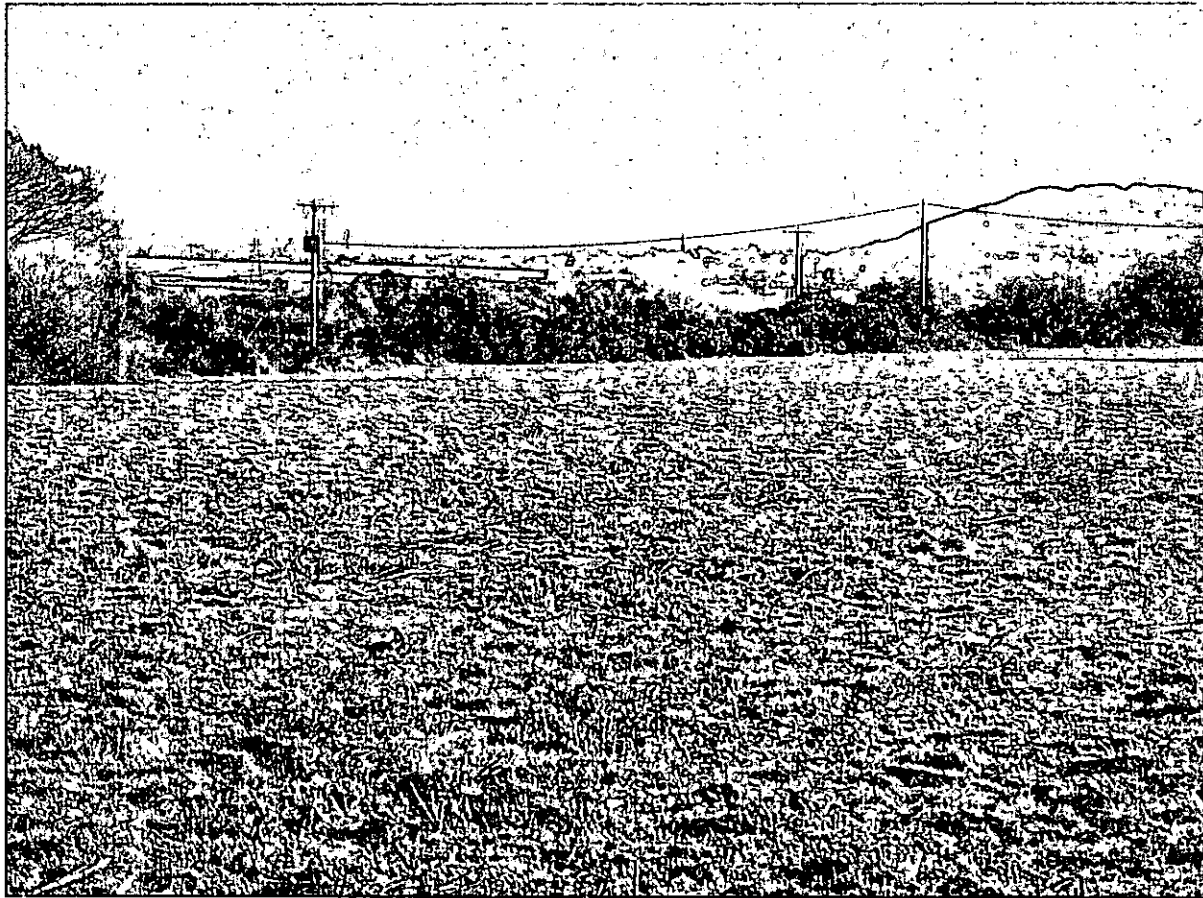
2. Protection of residential amenity.

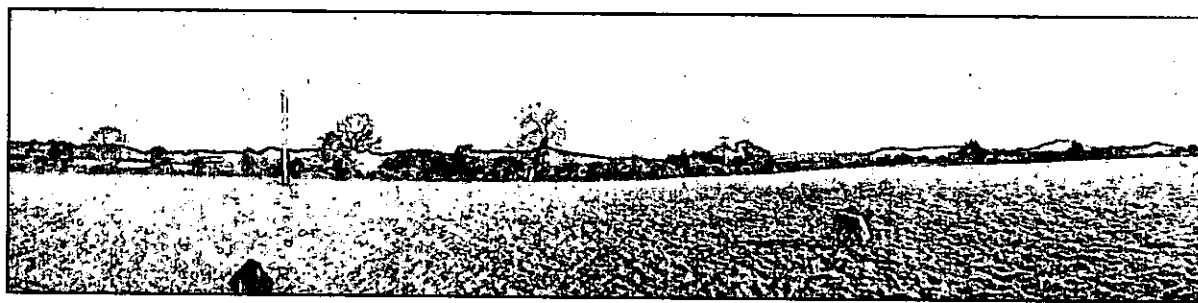
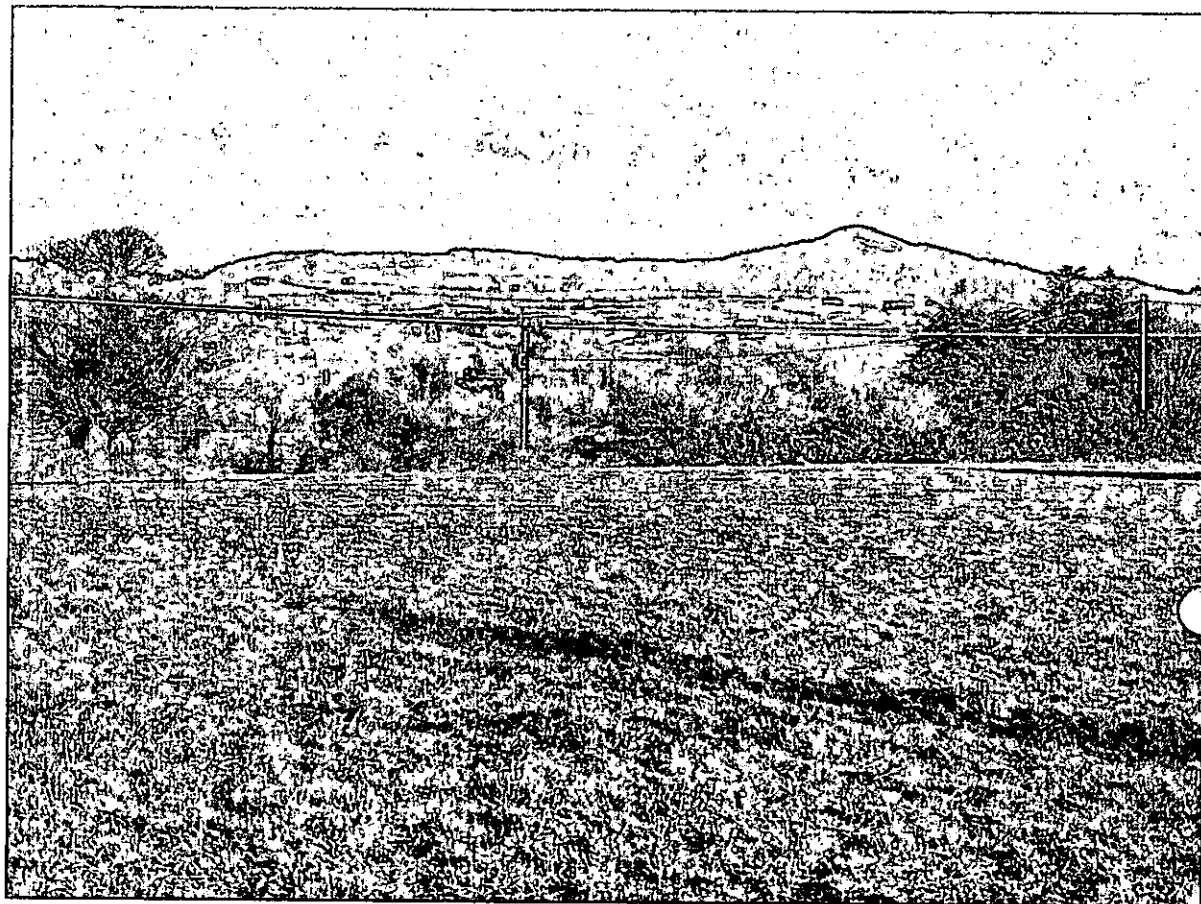
- a. The only green amenity area in the plans is to retain the **existing** GAA field (where dogs are not allowed). There are no new communal village green areas included on the current plan, only concrete and playground areas for the use of children. This seems unbalanced. We are going directly from living in the country to quite dense suburbia.
- b. Restriction of height. An Bord Plenala made a ruling on a planning application adjoining this land (ref PL 27.237190, Wicklow County Council ref 10/2230) as follows: "Having regard to the location of the site between the road and an area of outstanding natural beauty and with excessive scenic views to the north and east as far as Bray Head and the Irish Sea, and to the bulky two-storey design of the proposed extension, it is considered that the design approach would not represent the most appropriate method of extending the house on this extensive site at this visually sensitive location. .... The proposed development would seriously injure the amenity of the area and of property in the vicinity...". It would be expected that this ruling will be respected for future planning permissions.
- c. The density of 156 units is too dense for a semi-rural environment. 100 units is more appropriate. There should be a cap on the number of units so that it is not possible for additional units to be built on this land in the future. It should not be possible to increase the density 'by stealth'.

- d. I question the logic of low density and agricultural plans for Cookstown and Monastery, but not for Parknasilloge.
  - e. Building should be on a phased basis starting on land closer to the village.
  - f. Connectivity. Currently local people from Kilmolin walk to Knocksink and the GAA field across the fields avoiding the main road. There should be a green public link path / natural strip around the edges of the development 1) to provide connectivity to the neighbouring fields and 2) so the public can still access some views that are being blocked by the new houses and 3) to provide a network of walks to attract tourism. There is a unique opportunity to develop a link path from Enniskerry to the Wicklow way without having to walk along the road.
  - g. I notice the land lying behind St Marys and St Gerards school and north of the GAA ground has been de-zoned from development since previous Enniskerry plans. This would have been close to the village and a good link from Parknasilloge to the village. Can you provide the rationale that prompted its exclusion.
  - h. Enjoyment of nature and exercise. The plans currently reduce walking facilities. The path I propose around the West and North edges of the development will mitigate the loss of amenity by enabling the public to walk beside a natural green corridor on the perimeter of the land.
3. The sense of place and character of the village will be diminished. We must protect Enniskerry's identity. The County Development Plan 2004 – 2010 categorises the landscape surrounding Enniskerry in all directions as an area of outstanding natural beauty.
- a. There must be joined up strategic planning and consultation between different government departments so there is a holistic view to protect the village into the future. For instance for sports, tourism, environment, heritage we must incorporate planning to harness the beauty of the area, we must incorporate planning for footpaths / cycle paths / tourist information / heritage sites / picnic places that will be a boon for future generations and make the village a viable destination from urban Dublin. It is about creating a 'destination' first and foremost from which everything else flows. New housing should not be built in areas that will diminish the attractiveness of Enniskerry.
  - b. Please refer to 2a regards mitigating the abrupt change from agricultural to suburbia. Currently as you leave the village on this road you can see you enter Wicklow countryside within half a mile. Once the AA1 area is developed there will be no feeling of entering countryside or entering a village as houses will block the fields and block views continuously all the way up the hill.
  - c. The view from the Glencree road, across the fields to the sea and mountains, enjoyed by locals, walkers, cyclists and tourists is the broadest view in Enniskerry. This is being ignored in favour of other 'protected' views in Enniskerry which benefit fewer people and are not available to the public. The design of the development on this land should not completely lose the view and sense of 'country' from the public road. Sensitive planning and landscaping is required.
  - d. There should be amenity borders included similar to those planned for the Cookstown area.

- e. There should be restrictions on the height and distance from the road of the new houses. The houses nearest the road (the highest land) should be bungalows. This will keep a sense of space and be in keeping with the character of the area.
- f. The existing grassy nature strips along the road maintained by locals on the Kilmolin side of the road should remain untouched. Any new concrete footpaths / pipes / wires should be on the development land and require a nature strip as there is at Kilgarron.

I attach photos of the land in question for the benefit of planners who have not actually seen the land.





C170

**Leonora Earls**

**From:** Patricia and Gary O'Leary  
**Sent:** 30 November 2015 21:14  
**To:** Planning - Development Plan Review  
**Subject:** Preservation Order sought for Large Tree in Temple Sportsfield, Vevay Road, Bray, Co Wicklow.  
**Attachments:** DSCN3728.JPG; DSCN3733.JPG; DSCN3734.JPG

Dear Sir/Madam,

I write to you as the Honorary Secretary of the Sugarloaf Crescent Residents Association seeking a preservation order for a large tree in our area and it is the wish local residents that it be included in the County Development Plan for such preservation.

The large tree is located just behind the palisade fencing between our estate and the Temple Sportsfield, Vevay Road, Bray. There were two big old trees there but one was felled a number of years ago for reasons unknown to us. The residents of Sugarloaf Crescent are very keen that the remaining large tree be protected and I hope you can assist us in this matter. The property on which the tree is located is owned by the Meath Estate, leased to Bray Municipal Offices and in turn sublet to the Wolfe Tone and District Youth Club. The late Lord Meath was very fond of this old tree and was adamant that it be preserved there. I am attaching photographs of the tree for your convenience.

If you wish to meet with me on site I would be happy to discuss the situation with you there.

Yours faithfully,

Patricia O'Leary  
Hon Secretary  
Sugarloaf Crescent Residents Assoc

*action needed  
R 11/2/15*















C171

Leonora Earls

**From:** Rory Kunz  
**Sent:** 18 February 2016 15:27  
**To:** Planning - Development Plan Review  
**Subject:** Re: Submission to Draft Wicklow Development Plan 2016-2022  
**Attachments:** MH16010SWCDP\_18-2-2016F01.pdf

Dear Sir/Madam,

RPS Planning & Environment, West Pier Business Campus, Dun Laoghaire, Co. Dublin has been instructed by our client, Targeted Investment Opportunities ICAV, Strategic Fund 25 – 28 North Wall Quay, Dublin 1 to prepare this submission in relation the Draft County Wicklow Development Plan 2016-2022. This formal written submission (attached) is made to Wicklow County Council in response to the request for submissions or observations in respect of the proposed Draft CDP during the public consultation period from Friday 27<sup>th</sup> of November 2015 to the 19<sup>th</sup> of February 2016.

The preparation of the new Wicklow County Development Plan is welcomed and supported by our client and we respectfully request that the suggestions and recommendations made in the attached submission are considered and taken into account by Wicklow County Council in the finalisation of the Wicklow County Development Plan 2016-2022.

I would appreciate confirmation of receipt of the submission and please contact me if there are any matters arising.

Best regards,

---

Rory Kunz BA (MOD) MScERM, MAT&CP, Dip EIA Mgmt., MIPI  
Associate Director of Planning - RPS  
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# Submission to Draft Wicklow County Development Plan 2016-2022

Formal Written Submission to Wicklow County Council

MH16010SWCDPF01

PREPARED ON BEHALF OF

Targeted Investment Opportunities ICAV

BY



**Planning & Environment**

West Pier Business Campus, Dun Laoghaire, Co. Dublin

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# Submission to Draft Wicklow County Development Plan 2016-2022

## Document Control Sheet

Client:	Targeted Investment Opportunities ICAV
Project Title:	Submission to Draft Wicklow County Development Plan 2016-2022
Document Title:	Submission to Draft Wicklow County Development Plan 2016-2022
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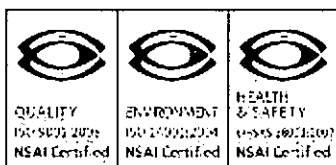
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## EXECUTIVE SUMMARY

RPS Planning & Environment, West Pier Business Campus, Dun Laoghaire, Co. Dublin has been instructed by our client, Targeted Investment Opportunities ICAV to prepare this submission in relation to the proposed Draft Wicklow Development Plan 2016-2022.

Our client recently acquired and is the owner of lands at Bray Retail Park, Bray County Wicklow. The acquisition of the lands has prompted the review by our client of the potential uses appropriate to the subject site and also having regard to the current review of the Wicklow County Development Plan and the signalled preparation of a new Bray Municipal District Plan for the north east portion of County Wicklow in mid-2016. The inclusion of the lands for residential calculations will assist in supplying residential zoned lands which will address the residential shortfall of 3,245 units for Bray set out in Table 2.7 of the core strategy of the Draft County Development Plan for the period up until 2025. Based on an average density of 30 units per hectare this would equate to a shortfall of some 108 hectares of land to deliver these units.

The key message of this submission is that appropriately located sites such as our client's lands located to the south of the southern Cross Road (R768), at Bray which is a Metropolitan Consolidation Town (under the Regional Planning Guidelines) will play an important role in securing the objectives as set out in the Core Strategy of the Wicklow County Development Plan 2016-2022 (County Plan) – particularly in respect of the provision of housing.

Both National and Regional Planning Guidance seek the location of new residential development in designated towns within the hierarchy of settlements contained in the National Spatial Strategy and the Regional Planning Guidelines (RPGs). Bray as a Metropolitan Consolidation Town should according to the RPGs continue to be developed 'at a relatively large scale as part of the consolidation of the metropolitan area.' It is submitted our clients' lands, located to the south of Bray Retail Park, meet the criteria for the location of development within the development footprint of the Metropolitan Consolidation Town of Bray.

We would highlight that the population of Bray actually fell between 2006 and 2011. It is clear that Bray has not contributed thus far to the objectives of the Regional Planning Guidelines in respect of its status as a Metropolitan Consolidation Town and that the population growth has not occurred in line with its designation and the long term target of up to 100,000 persons as set out in the Regional Planning Guidelines.

Our client's landholding to the rear of the Bray Retail Park comprise approximately 4 hectares and are well placed to provide a serviced landbank to secure the delivery of housing for Bray – identified in the core strategy of the Draft County Development Plan. From a strategic perspective, our client is seeking that the lands are considered for residential development in the future countywide calculations applicable to Bray.

Our client would respectfully request that the suggestions and recommendations made herein are considered and taken into account by Wicklow County Council in the finalisation of the Wicklow County Development Plan 2016-2022. We would also like to confirm that our client would welcome the opportunity to give any further information or detail in respect of this submission to the Planning Authority.

# 1 INTRODUCTION

- 1 RPS Planning & Environment, West Pier Business Campus, Dun Laoghaire, Co. Dublin has been instructed by our client, Targeted Investment Opportunities ICAV, Strategic Fund 25 – 28 North Wall Quay, Dublin 1 to prepare this submission in relation the Draft County Wicklow Development Plan 2016-2022 (herein referred to as Draft CDP).
- 2 Targeted Investment Opportunities ICAV's investment manager is Oaktree Capital Management which is a leading global investment management firm. Oaktree have been active in the Irish market over the last number of years with strategic acquisitions of a range of development and investments assets such as Greystones Marina.
- 3 This formal written submission is made to Wicklow County Council in response to the request for submissions or observations in respect of the proposed Draft CDP during the public consultation period from Friday 27<sup>th</sup> of November 2015 to the 19<sup>th</sup> of February 2016. This submission is made to Wicklow County Council in advance of the submission/observation deadline of **5pm on Friday 19<sup>th</sup> February 2016.**

## 1.1 SITE CONTEXT

- 4 The overall subject site contains a successful retail park and crèche as well as undeveloped lands located to the rear amounting to some 4 hectares. Existing residential areas are located adjacent to the north east at Deepdales. Additional residential areas are located further to the north at Ballywaltrim Grove (see figure 1.1).
- 5 Giltspur lane is located to the north of the site which includes some residential development. Further to the east along the Southern Cross, there is a substantial area of commercial lands at Bray Business Park and further residential areas. Kilruddery Demesne East and West is located to the south and east of the subject lands towards the Southern Cross and the R761 which connects Bray to Greystones.

## 1.2 PURPOSE OF SUBMISSION

- 6 Our clients recently acquired and are the owner of lands at Bray Retail Park, Bray County Wicklow. The acquisition of the lands has prompted the review by our client of the potential uses appropriate to the subject site and also having regard to the current review of the Wicklow County Development Plan and the signalled preparation of a new Bray Municipal District Plan for the north east portion of County Wicklow in mid-2016.
- 7 Overall the preparation and presentation of the Draft CDP by Wicklow County Council are welcomed and supported by our client. However, our client has comments in relation to certain elements of the proposed Draft CDP and has set out recommendation herein. Section 3.0 of this submission sets out our client's considered opinion and recommendation in relation to the proposed Draft CDP.

- 8 We would also like to confirm that our client would welcome the opportunity to give any further information or detail in respect of this submission to the Planning Authority.

### 1.3 PLANNING HISTORY

- 9 The main relevant planning applications in respect of the overall subject lands are outlined hereunder:-

#### 1.3.1 Bray Retail Park - Planning Reg. Ref. 03/8197

- 10 Under Planning Reg. Ref. 03/8197, Wicklow County Council granted permission to Markethaven Ltd., on the 12/12/2003 for development comprising the:-

*'Demolition of existing habitable dwelling. Retail warehousing in the form of a retail park comprising 4 no. retail warehouse units plus ancillary garden centre with a maximum parapet height from ground level of 10 metres. Creche. 503 no. public car parking spaces, internal service road, loading bays, signage, ESB substation and 31 no. staff car parking spaces.'*

#### 1.3.2 Access to Overall Lands - Planning Reg. Ref. 01630090

- 11 Under Planning Reg. Ref. 01630090 Bray Town Council granted permission to Market Haven Ltd., for a:-

*'new roundabout with associated roadworks on the Southern Cross Road and a new link road off the Killarney Road to the new roundabout.'*

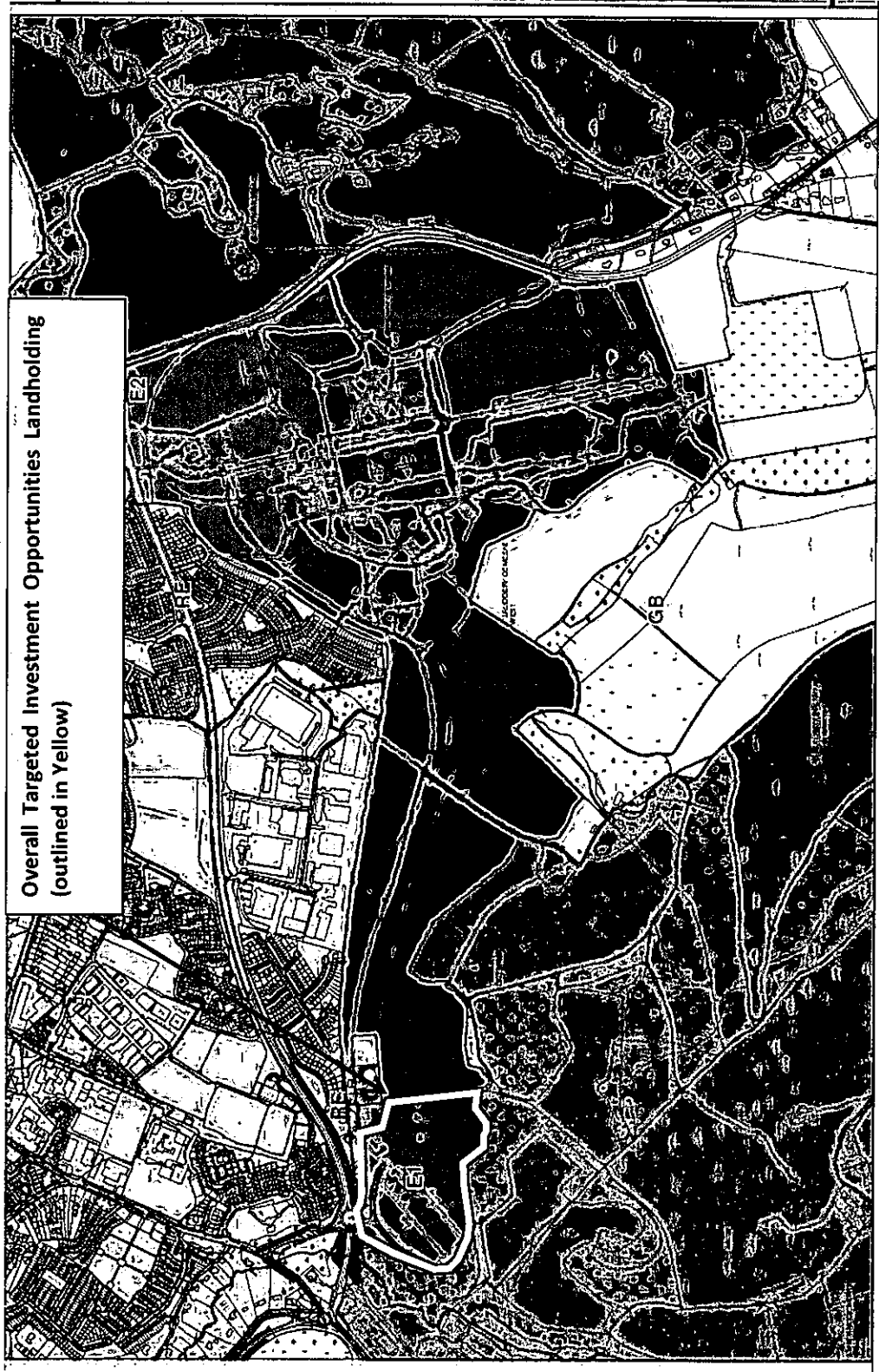
#### 1.3.3 Lands to South of Bray Retail Park - Planning Reg. Ref. 08/811

- 12 On the 7th of January 2009, Wicklow County Council granted permission for development to Markethaven Ltd., for development comprising:-

*'industrial and warehouse / distribution space in 22 no units in 7 blocks with associated offices, substation - switchrooms, associated site works, roads and landscaping.'*

- 13 The permission expired in 2014 and wasn't implemented. The site subject of this application relates to the undeveloped lands located to the south of the Bray Retail Park.

Figure 1.1 – Subject lands at Southern Cross



## 2 CONTEXT OF LANDS WITHIN POLICY FRAMEWORK

### 2.1 STRATEGIC CONTEXT

#### 2.1.1 National Spatial Strategy (NSS)

1 While the NSS is due to be replaced by a new National Planning Framework, the NSS still provides strategic guidance and objectives with respect to the sustainable provision of housing in urban areas:-

- *Concentration of development in locations where it is possible to integrate employment, community services, retailing and public transport.*
- *Mixed-use and well-designed higher density development, particularly near town centres and public transport nodes.*
- *The efficient use of land by consolidating existing settlements, focusing in particular on development capacity within central urban areas through re-use of under-utilised land and buildings as a priority, rather than extending green field development.*

2 The Strategy sets out the following broad evaluation framework to assess the most appropriate spatial locations for housing land:-

**The Asset Test:**

*Are there existing community resources, such as schools etc., with spare capacity?*

**The Carrying Capacity Test:**

*Is the environmental setting capable of absorbing development in terms of drainage etc.?*

**The Transport Test:**

*Is there potential for reinforcing usage of public transport, walking and cycling?*

**The Economic Development Test:**

*Is there potential to ensure integration between the location of housing and employment?*

**The Character Test:**

*Will the proposal reinforce a sense of place and character?*

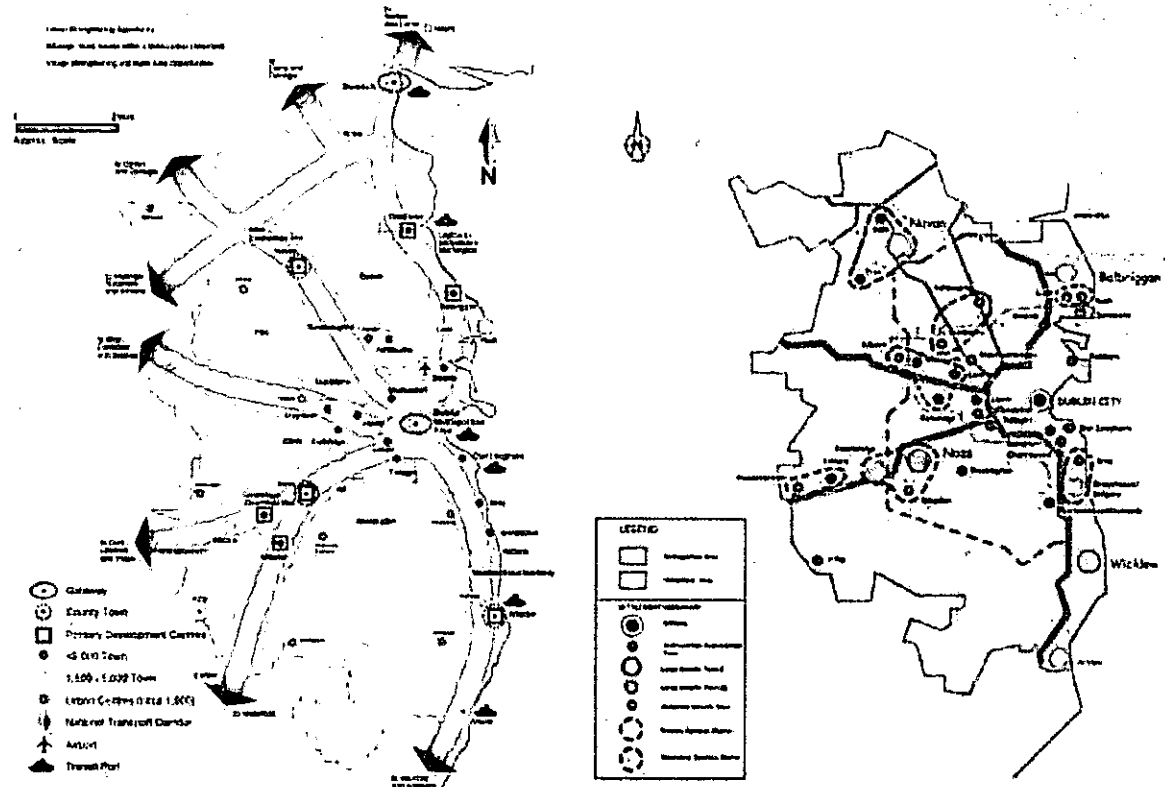
**The Community Test:**

*Will the proposal reinforce the integrity and vitality of the local community and services that can be provided?*

**The Integration Test:**

*Will the proposal aid an integrated approach to catering for the housing needs of all sections of society?*

**Figure 2.1 – National Spatial Strategy and Regional Planning Guideline Plans for Dublin Region**



**2.1.2 Regional Planning Guidelines**

- 3 Within the GDA, a distinction is made in the guidelines between the Metropolitan Area (existing built up area of Dublin and its immediate environs) and the Hinterland Area which comprises the remaining extensive areas of countryside containing a range of designated development centres specifically located on transportation corridors.
- 4 Bray is located in the Metropolitan Area and is classified as a Metropolitan Consolidation Town in the settlement hierarchy. Such towns are described as a *'strong active urban place within the metropolitan area with strong transport links.'*
- 5 The settlement strategy for the GDA aims to:-
  - Physically consolidate the growth of the metropolitan area of Dublin by focusing new housing within the existing footprint of the metropolitan area and planning expansion of the footprint in conjunction with new high quality public transport investment; and
  - To concentrate development in the hinterland into designated towns, along multi-modal transport corridors providing enhanced public transport linkages.

### 2.1.2.1 Metropolitan Consolidation Towns

6 According to the RPGs Metropolitan Consolidation Towns (MCTs) such as Bray are located close to Dublin City and function as part of the Gateway. The RPGs state that MCTs should continue to be developed 'at a relatively large scale as part of the consolidation of the metropolitan area,' and to continue to support key public transport corridors connecting these locations to the City, each other and the Large Growth Towns in the hinterland.

7 The RPGs highlight that towns such as Bray:-

*'should assess, specify and plan for the long term growth of these centres -up to 100,000 population, to take place over a series of Development Plans, so that the planning of new infrastructure fully takes into account the long term growth role of these centres; ensuring for the future the coordinated integration of all new services to serve future expansion.'*

8 It is important that the new Draft CDP for Wicklow has regard to the policies set out in the NSS and the (RPGs) which recognise the metropolitan area's key role in the economic and social development of the state.

9 Land is a finite resource and it must be used wisely. The policy of consolidation which is in the current Development Plan and which is both National and Regional policy will help towards ensuring that land use and transportation are integrated and that investment in other infrastructure is also used efficiently.

10 The policy of consolidation will help towards ensuring that land use and transportation are integrated and that investment in other infrastructure is also used efficiently.

11 It is submitted that consolidation with the aim of reducing urban sprawl and the inefficiencies associated with dispersed settlement patterns should be promoted in the new County Development Plan for Wicklow. It is important to ensure sufficient high quality housing is available in the right places, with good infrastructure, services and amenities, to improve the quality of life for the residents of Fingal and to attract new business.

12 It is submitted our clients' lands, located to the south of Bray Retail Park, meet the criteria for the location of development within the development footprint of the Metropolitan Consolidation Town of Bray.

## 2.2 COUNTY WICKLOW PLANNING CONTEXT

13 Our clients' lands are located within the area covered by the Bray Environs LAP 2009-2015<sup>1</sup>. In addition the zoning objective of our lands is set out in the Rathdown District No. 2 Plan which forms part of the current County Development Plan 2010-2016. The area covered by the District Plan is also included in the current list of settlements of the County Development Plan 2010-2016.

<sup>1</sup> Bray Environs LAP 2009-2015 extended to 2017 (14th April 2015).



- 14 The northern portion of our clients' landholding comprises the Bray Retail Park and also includes a crèche (Park Academy) located to the north. The Retail Park is anchored by Woodies DIY and includes other retail warehouse operators such as DID Electrical, Flannegan Kerins, Harry Corry, Hogan Interiors, House of Tiles & Maxi Zoo.
- 15 The site is elevated and is located to the rear of Bray Retail Park, on the southwestern side of Bray Environs. The site is accessed at an existing roundabout on the Southern Cross Road, which links to the N11/M1 Motorway. The existing access to the subject site was upgraded arising from the development of the Bray Retail Park (under Planning Reg. Ref. 03/8197).
- 16 According to Map 2 of the Rathdown District Plan, the zoning objective of the lands is currently is Employment (E1/E2/E3). Large retail warehouses are a 'normally permitted' use under the E1 zoning matrix of the Rathdown District Plan.
- 17 Our client has serious concerns in respect of the zoning status of the lands at Bray Retail Park in that the zoning is covered by the Rathdown District Plan which is no longer being continued as part of the list of settlements in the Draft CDP as is the case of the current Wicklow County Plan. Our client's lands which also form part of the Bray Environs LAP will be incorporated into a new Bray District Municipal Plan for the north of the County. While our client fully supports the future preparation of a new Municipal Plan, there are serious concerns in relation to the zoning status of the lands in the intervening period.
- 18 It is proposed that the appearance of the access arrangement to the lands to the rear of Bray Retail Park could be improved so as to align the look and feel of the entrance to that more suited to a residential use. Our client has indicated that they would be willing to improve the appearance of the access arrangement in the context of a residential use.
- 19 Having regard to the above, our client is keen to emphasise that the lands of some 4 hectares have a real function in terms of delivering residential development to the area and which would secure much needed social housing as a consequence.

### 3 REVIEW AND CONSIDERATION OF THE DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

- 1 Our client has examined the full details and particulars of the Draft CDP as published by Wicklow County Council.

#### 3.1 CORE STRATEGY AND SETTLEMENT HIERARCHY

- 2 Our client is of the view that the principles of the current core strategy are generally robust and that they should be used in the formulation of a core strategy for the new Wicklow County Development Plan 2016-2022.

- 3 Section 2.4 of the Draft CDP sets out the core strategy which is in accordance with the Greater Dublin Area Regional Planning Guidelines 2010-2022 (RPGs) and National Spatial Strategy (NSS). Bray is given the highest level in the hierarchy (in table 2.2) (Metropolitan Area Consolidation Town) and is also indicated as a *Metropolitan Area Consolidation Town* in the RPGs.

- 4 The Draft CDP outlines that a number of assumptions were made in respect of the calculation of the population targets for the County.

- 5 Our client is of the view that the delivery of new housing should be within the existing settlement boundaries of towns with the emphasis on the north east of the County (within the metropolitan area) where there is existing social infrastructure in place to serve new residential communities. Our client's landholding to the south of the Bray Retail Park is well placed to take advantage of the existing social infrastructure in the vicinity of the lands which include primary and secondary schools as well as community infrastructure such as Shoreline swimming pool. It is also noted there is an existing crèche operating in the northern portion of our client's land holding.

- 6 Our client notes the assumptions made in the calculations of the population targets and extending the date until 2028 as being substantially consistent with the spirit of the existing RPGs. It is submitted the approach of the Council is robust and will provide a realistic timeframe for the achievement of the provision of much needed housing for Bray as a metropolitan area consolidation town.

- 7 According to the Draft CDP (chapter 2 page 6) the settlement strategy for the GDA aims to:-

*'physically consolidate the growth of the metropolitan area of Dublin by focusing new housing within the existing footprint of the metropolitan area and planning expansion of the footprint in conjunction with new high quality public transport investment'* (emphasis added).

- 8 Our client's lands located to the south of Bray Retail Park are located immediately to the south of the existing built footprint of Bray and are located within the environs of Bray –



which is indicated for development. As such the lands are well placed to contribute to the overall housing need for Bray in the short to medium term.

- 9 We would highlight that the subject lands are located in proximity to existing public transport Dublin Routes on the Southern Cross Road and at Ballywaltrim – providing connections to Dublin City Centre. Bray is also served by the DART, which is connected to Dublin Bus routes.
- 10 The Draft CDP outlines that the RPGs require that 42% of the total growth allocated to County Wicklow be allocated to the Metropolitan Area settlements and that the 'majority' of the remainder be allocated to the Growth Towns, weighted towards the Large Growth towns in the settlement hierarchy and also particularly towards towns with rail based public transport i.e. c. 70% of total population growth to be directed towards the 'growth towns'.
- 11 Table 2.4 of the Draft CDP outlines the following population targets for Bray. Over the 17 year period 2011-2028 there is a population target of some 10,661 for Bray which equates to a 36% increase. Or to a *per annum* increase of some 627 persons.

**Table 3.1 – Population Targets for Bray**

Designation	Town	2011	2022	2025	2028
Metropolitan Consolidation Town	Bray	29,339	36,237	38,119	40,000

Source: Wicklow Draft CDP

- 12 Our client supports the structure of Wicklow's settlement hierarchy and the preferred development strategy which was informed by the Regional Planning Guidelines (RPGs) and the environmental sensitivities of the county. It is based on building strong urban centres while protecting the rural hinterlands. It is important the new Wicklow County Development Plan continues with the emphasis on developing on serviced land within the metropolitan area of Wicklow. - particularly Bray, which is at the top of the hierarchy for the County as a Metropolitan Consolidation Town.

**3.1.1 Population Trends**

- 13 From the results of the 2011 Census the population of the State grew by 8.1% from 4,239,203 to 4,581,269 between 2006 and 2011; broadly in line with the two previous inter-censal periods. The 2011 population of 4,581,269 is the highest recorded population in Ireland since 1861. The figures indicate that the population of the State grew from 3,917,203 to 4,239,848 persons between 2002 and 2006, representing an increase of 8.2%.
- 14 We would highlight that the population growth in Bray has been relatively modest over the past 10-15 years, and indeed fell between 2006 and 2011. As outlined in Table 3.2 2 using the data from Table 7 of the Census of Population the number of persons in the town of Bray (as defined by the CSO and which includes areas within Dun Laoghaire-Rathdown) increased

from 30,951 in 2002 to 31,901 in 2006, a 3.1% increase, while between 2006 and 2011 the population fell by -0.1% to 31,872.

- 15 Excluding the element of Bray located within the administrative area of Dun Laoghaire-Rathdown, the fall in population was more pronounced between 2006 and 2011 at -0.8%, while between 2002 and 2011 the increase in population was 2.2%. This compares to an increase in population of 19.2% for the County of Wicklow between 2002 and 2011.

**Table 3.2 – Population at State and Local Level 2002, 2006 & 2011**

Area	2002	2006	2011	% Change 2002-2006	% Change 2006-2011	% Change 2002-2011
State	3,917,203	4,239,848	4,581,269	8.20%	8.10%	16.9%
County Wicklow	114,676	126,194	136,640	10.0%	8.3%	19.2%
Bray (CSO town)	30,951	31,901	31,872	3.1%	-0.1%	3.0%
Bray (Wicklow)	28,002	28,814	28,592	2.9%	-0.8%	2.1%

Source: Census of Population, 2002, 2006 & 2011. Note Bray CSO town includes areas within administrative area of Dun Laoghaire Rathdown.

- 16 It is clear that Bray has not contributed thus far to the objectives of the Regional Planning Guidelines in respect of its status as a Metropolitan Consolidation Town and that the population growth has not occurred in line with its designation and the long term target of up to 100,000 persons as set out in the Regional Planning Guidelines.
- 17 Our client is seeking that the overall strategic hierarchy and planning framework is maintained for the county which will support and underpin the principles of locating development proximate to existing social services and infrastructure as well as good transportation links. All with the aim of reducing car dependency and commuting times within the Greater Dublin Area.
- 18 It is our considered view that the conclusions in respect of the allocations of population as set out in the Draft County Development Plan and the constraints identified *vis a vis* expansion further to the south and east/north of Bray, is an increase in appropriate areas in the environs of Bray. Our client's lands to the south of Bray Retail Park are ideally placed to deliver much needed serviced land for housing – all in line with strategic policy.

### 3.2 POPULATION AND HOUSING

- 19 It is submitted that the best way for the new County Plan for Wicklow to cater for future growth is to build upon the existing settlement hierarchy and core strategy which is focused on the delivery of new housing and population within existing settlements, predominantly in the metropolitan area in towns such as Bray and Greystones/Delgany. Thus the strategy for the new County Plan should be to direct new population growth to such areas.

- 20 The new County Plan should place an emphasis on the benefits of locating new population growth within settlements which have the benefit of existing infrastructure (transport and sewerage) as well as social infrastructure such as schools, doctors etc. Such settlements are capable of absorbing such growth in a managed fashion and would be best able to deliver upon the population growth in the County over the lifetime of the new Wicklow County Plan.
- 21 By directing new population growth into towns with existing infrastructure in place maximises the return on the investment in services. The location of new development within the footprint of existing settlements in a sequential manner to existing services and infrastructure from a town centre outwards is preferable than providing new infrastructure on more remote sites.

### 3.2.1 Future requirements for the County and Bray

- 22 It is noted that the current Regional Planning Guidelines (RPGs) will be replaced in 2016 with a Regional Spatial and Economic Strategy (RSES). The RSES will provide a detailed framework for spatial and economic development at local government level. The new RSES will also provide new population targets. Whatever the new population targets will be it is important that the new County Plan continues to support the metropolitan area of the county for new residential development – all based on a sequential approach to development from the existing residential areas outwards.
- 23 **From a strategic perspective it is evident that Bray is not performing or contributing fully to its designated role and function in the settlement hierarchy as set out in the County Plan and the RPG/GDA.**

### 3.3 SETTLEMENT STRATEGY

- 24 According to the Draft CDP, the population of Bray is targeted to increase from 29,339 in 2011 to 40,000 in 2028.
- 25 The Draft CDP set out that Bray is the largest town in County Wicklow located in a strategically important position within the metropolitan area and at the eastern gateway to the County. The town has the best transport links in the County, with access to the N/M11 transportation corridor (including M50), DART/ rail line and quality bus service. It is a strong active town that provides a higher order economic and social function for its local residents and for residents from other surrounding towns and villages.
- 26 The Draft CDP acknowledges that *'further expansion of the town is severely constrained on all sides by the administrative boundary of Dun Laoghaire Rathdown and the coast to the north and east, Bray Head / Sugarloaf mountains to the south and the N/M11 to the west.'*
- 27 In this regard, it is considered that our client's undeveloped lands on existing (E1) zoned lands located to the south of the existing Bray Retail Park, provide an opportunity to allocate a future residential zoning to the lands as they are serviced, and located in proximity to Dublin Bus public transport options and existing social infrastructure. We would highlight

that there are extensive employment generating lands located along the Southern Cross and as such the employment generating potential of the area will not be materially affected by a change to the zoning status to residential development. Figure 3.1 shows the employment generating lands in the southern area of Bray. Other lands within Fassaroe to the west of Bray also currently include employment lands. It is submitted a degree of flexibility would be appropriate to allow for a residential use on our clients lands.

Figure 3.1 – Existing Employment Lands in Southern Area of Bray



Source: Bray Town Development Plan 2011

### 3.3.1 Settlement Strategy Objectives

28 The Draft CDP outlines a number of settlement strategy objectives which include:-

**SS1** To implement the County Wicklow Core Strategy and Settlement Strategy, having regard to the availability of services and infrastructure and in particular, to direct growth into the designated metropolitan growth centre and the large, moderate and small growth towns in the Greater Dublin hinterland area.

**SS3** To ensure that all settlements, as far as is practicable, develop in a self sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.

**SS4** To require new housing development to locate on designated housing land within the boundaries of settlements, in accordance with the development policies for the settlement.

**SS6** To prepare new local plans for the following areas during the lifetime of this development plan: Bray Municipal District, Wicklow-Rathnew, Arklow, Rathdrum, Newtownmountkennedy, Greystones-Delgany and Kilcoole, Blessington.

- 29 Our client is supportive of the objectives outlined above. With regards to SS1, it is critical that the adopted Plan for the county recognises the critical link between the delivery of much needed housing at appropriate locations which are serviced by existing infrastructure. It is important the location of zoned residential land has the ability to be serviced quickly using existing infrastructure. The benefit of this is to maximise the return made by the taxpayer on the services servicing areas.
- 30 The recognition that growth should be directed into metropolitan consolidation town of Bray is also welcomed by our client. In this regard, the development of the lands to the south of the Bray Retail Park are consistent with Policy SS1 in that they are serviced and located within a metropolitan town, which are identified as locations 'to direct growth' into. We would highlight that there is sufficient physical and social infrastructure in the area including schools, retail, commercial as well as community facilities such as schools including a crèche on the lands owned by our client. As such the use of the lands for residential purposes is considered to be in accordance with Policy SS3.

### 3.4 HOUSING

#### 3.4.1 Introduction

- 31 Chapter 4 of the Draft CDP acknowledges that one of the principal functions of a development plan 'is to put in place a framework for the delivery of new housing'
- 32 The aim of the framework is to ensure *inter alia* that:-
- *new housing development is encouraged and facilitated, in the correct locations;*
  - *adequate zoned and serviced land is available in these locations to achieve the growth required;*

- 33 Our clients' lands located to the south of the existing Bray Retail Park are ideally placed to provide the recorded need for residential lands for the north east of the County of Wicklow.

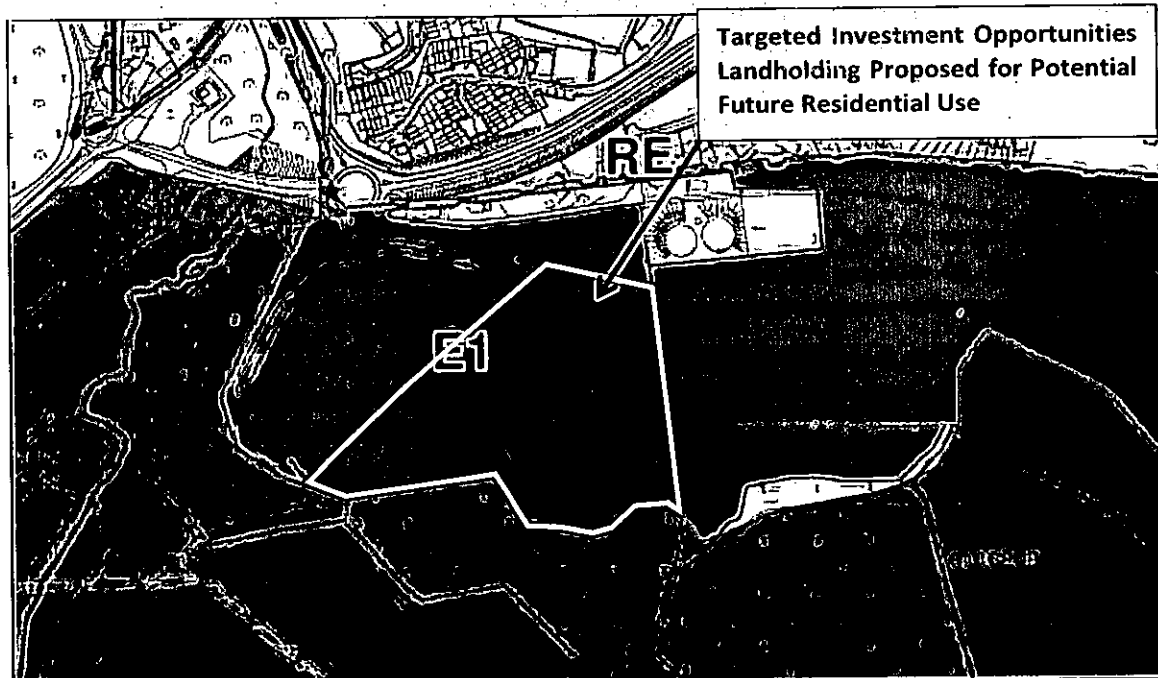
- 34 With regards to the objective of providing sustainable communities, the Draft CDP includes a number of locational criteria. It is submitted the lands located to the south of the existing Bray Retail Park would be able to avail of the existing social infrastructure in the area such as community and commercial facilities.

#### 3.4.2 Zoning

- 35 Section 4.3.2 of the Draft CDP highlights that new housing development shall be required to locate on suitably zoned / designated land in settlements. While our clients lands, located to the south of Bray Retail Park, are undeveloped, they are currently zoned E1 under the Rathdown District No. 2 Plan.



Figure 3.2 – Zoning Objective relating to lands



Source: Rathdown No. 2 Plan 2010-2016 Wicklow Development Plan

- 36 The Draft CDP correctly seeks to locate new residential development in designated town and village centres, neighbourhood centres through the densification of the existing built up area, as well as locating development on brownfield sites.
- 37 The Draft CDP acknowledges the *'challenges presented by such sites'* and notes that *'new housing development shall also be permitted on greenfield lands that are zoned / designated for housing.'* The Draft CDP outlines a number of principles for the zoning/designation of greenfield land for new housing. Our clients lands located to the south of the existing Bray Retail Park adhere to the principles and we outline how as follows:-

***Application of the 'sequential approach' whereby zoning extends outwards from centres, contiguous to the existing built up part of the settlement;***

- 38 The lands adjoining the subject lands are developed and include the Bray Retail Park (which includes a crèche) and are located adjacent to existing residential development located on Giltspur lane. Existing residential lands at Deepdales (to the east) as well as RE zoned lands on Giltspur Lane and Ballywaltrim Grove (on the northern side of Bray Southern Cross Road) confirm that the subject site is in accordance with the *'sequential approach'* to the zoning of lands as the subject site extends from the existing built up footprint of Bray. We would also highlight that there are dwellings on Giltspur lane which are covered by the E1 zoning objective and that a more appropriate zoning would be to extend the RE zoning southwards to include our clients lands.
- 39 The application of the *'sequential approach'* is required by the Sustainable Residential Development in Urban Areas which were issued under Section 28 of the Planning and

Development Act 2000, as amended. As such the Planning Authority is required to have regard to the guidance.

- 40 From a strategic perspective it is important that the Council follows not only Government Guidance, but also the principles of locating development sequentially from the developed footprint outwards.

***Promotion of the concept of 'walkable' neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritized;***

- 41 The lands are located in proximity to existing social infrastructure, public open spaces and within easy range of public transport. The existing Bray Town Development Plan has a substantial area of NS1 lands located c. 1km to the east on the Southern Cross Road. The NS1 lands zoning objective is:-

*'To provide for a neighbourhood retail development, comprising of a supermarket of not more than 2500 sq.m of net retail floor space, and other ancillary neighbourhood uses.'*

- 42 While currently undeveloped, given the extent of residential development located along both sides of the Southern Cross Road, it is considered the NS1 lands, will provide an excellent location for the development of a retail hub serving the southern environs of Bray.

- 43 We would also highlight that there are a number of neighbourhood centres located along the Boghall Road to the north (including an Aldi) as well as Tesco on the approach to the Bray Main Street. Closer, the 'Topaz' garage, located at the end of the Killarney Road, performs a local 'top up' retail function for newspapers, milk etc. The lands are also located within easy walking distance of significant social infrastructure in the form of primary and secondary schools (as well as religious institutions) in the southern area of Bray. In addition there are significant areas of open space and community facilities such as the swimming pool located to the immediate north.

***Promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of any rail or light rail stop or 500m of bus routes will be prioritized;***

- 44 The lands are located in close proximity to the 84X Dublin bus route which provides an express route linking to Dublin City Centre, is located on the Bray Southern Cross, (200 m to the north). The Dublin Bus route 145 located c. 400m to the north at Ballywaltrim, links to Bray Main street, Shankill, Cornelscourt, Stillorgan, Donnybrook, Leeson Street, before terminating at Heuston Station. In addition the Bus Eireann Route no. 133 is located further to the north on Killarney Road. Bray Dart station is also accessible from Dublin Bus services.

***Lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritized;***

- 45 The subject lands were subject to a planning application which received permission (under Planning Reg. Ref. 08/811) in 2009 for an industrial/warehouse and office development of some 7,200 sq. m. The permitted development proposed to connect to the existing phase 1 lands (now comprising the Bray Retail Park). As such it is considered that there is sufficient capacity for a residential development on the subject site, and that an alteration to the zoning of the c. 4 hectares is appropriate and should be considered by the Planning Authority in the formulation of the Bray Municipal District Plan for the north east area of Wicklow County Council.

***Cognisance will be taken of the need to provide utmost protection to the environment and heritage, particularly of designated sites, features and buildings;***

- 46 The subject lands were subject to a planning application which received permission (under Planning Reg. Ref. 08/811) in 2009 for an industrial/warehouse and office development of some 7,200 sq. m. A residential development would have less of an impact (eg. visual) given the reduced massing and scale of the structures which would accrue arising from the development of the lands for residential development. It is submitted that a residential development would sit comfortably into the context of the landholding.

***The need to maintain the rural greenbelt between towns;***

- 47 The lands are currently zoned E1 under the Rathdown District No. 2 Plan. Our client is seeking the inclusion of the undeveloped portion of the lands in the future residential quantum of lands. It is submitted the proposed alteration from E1 to 'New residential' lands respects the rural greenbelt and will not result in an encroachment of development between towns. As such it is considered that the use of these lands for residential development is appropriate, and should be factored in the preparation of the new Bray Municipal District Plan for the North East of the county. It is submitted the use of the lands for residential purposes is a logical extension of the residential use located to the north east and indeed within the existing E1 zoned lands adjacent to the north.

***Promotion of the development of lands adjacent to existing or planned community and social infrastructure, such as schools and open space sites/zones.***

- 48 The subject lands located to the south of Bray Retail Park are located to existing community and social infrastructure such as St. Killians Community school as well as Bray Sports and Leisure Centre, which is located adjacent on the northern side of the Southern Cross Road. In addition, there is an existing crèche (Park Academy) located within the overall landholding.

### **3.4.3 Phasing**

- 49 Our client welcomes the commentary in section 4.3.3 of the Draft CDP which notes that the development of zoned / designated land should generally be phased in accordance with the sequential approach. The lands under the control of our client are located close to public transport routes and are contiguous to existing developed areas. Thus, if developed, would not comprise 'leapfrogging to a peripheral area'.

## 4 CONCLUSIONS AND RECOMMENDATIONS

- 1 The preparation of the new Wicklow County Development Plan is welcomed and supported by our client. Our client recently acquired and is the owner of lands at Bray Retail Park, Bray County Wicklow. The acquisition of the lands has prompted the review by our client of the potential uses appropriate to the subject site and also having regard to the current review of the Wicklow County Development Plan and the signalled preparation of a Bray Municipal District Plan for the north east portion of County Wicklow in mid-2016. The inclusion of the lands for residential calculations will assist in supplying residential zoned lands which will address the residential shortfall of 3,245 units for Bray set out in Table 2.7 of the core strategy of the Draft County Development Plan for the period up until 2025. Based on an average density of 30 units per hectare this would equate to a shortfall of some 108 hectares of land to deliver these units.
- 2 The key message of this submission is that appropriately located sites such as our client's lands located to the south of the southern Cross Road (R768), at Bray which is a Metropolitan Consolidation Town (under the Regional Planning Guidelines) will play an important role in securing the objectives as set out in the Core Strategy of the Wicklow County Development Plan 2016-2022 (County Plan) – particularly in respect of the provision of housing.
- 3 Both National and Regional Planning Guidance seek the location of new residential development in designated towns within the hierarchy of settlements contained in the National Spatial Strategy and the Regional Planning Guidelines (RPGs). Bray as a Metropolitan Consolidation Town should according to the RPGs continue to be developed 'at a relatively large scale as part of the consolidation of the metropolitan area.' It is submitted our clients' lands, located to the south of Bray Retail Park, meet the criteria for the location of development within the development footprint of the Metropolitan Consolidation Town of Bray.
- 4 We would highlight that the population of Bray actually fell between 2006 and 2011. It is clear that Bray has not contributed thus far to the objectives of the Regional Planning Guidelines in respect of its status as a Metropolitan Consolidation Town and that the population growth has not occurred in line with its designation and the long term target of up to 100,000 persons as set out in the Regional Planning Guidelines.
- 5 Our client's landholding to the rear of the Bray Retail Park comprise approximately 4 hectares and are well placed to provide a serviced landbank to secure the delivery of housing for Bray – identified in the core strategy of the Draft County Development Plan. From a strategic perspective, our client is seeking that the lands are considered for residential development in the future countywide calculations applicable to Bray.
- 6 Our client would respectfully request that the suggestions and recommendations made herein are considered and taken into account by Wicklow County Council in the finalisation of the Wicklow County Development Plan 2016-2022. We would also like to confirm that our client would welcome the opportunity to give any further information or detail in respect of this submission to the Planning Authority.

C172

Leonora Earls

**From:** Bradshaw, Simon i  
**Sent:** 19 February 2016 15:07  
**To:** Planning - Development Plan Review  
**Subject:** Tesco Ireland Ltd. Submission on the Draft Wicklow County Development Plan 2016-2022  
**Attachments:** 160218\_Wicklow Submission.pdf

To whom it may concern,

Please see attached a submission on behalf of Tesco Ireland Ltd. on the Draft Wicklow County Development Plan 2016-2022.

The main details of this submission are as follows;

- The contact name & address is Muirenn Duffy, Bilfinger GVA, 2nd Floor Segrave House, 19-20 Earlsfort Terrace, Dublin 2.
- The submission is made on behalf of Tesco Ireland Ltd., Gresham House, Marine Road, Dún Laoghaire, Co. Dublin.

No map is provided with this submission as the document does not relate to site specific matters.




Should you have any queries with regard to the above, please do not hesitate to contact us. We would be grateful if you could confirm receipt of this submission by email.

Kind regards,

**Simon Bradshaw, Planner, Bilfinger GVA**

Email: [eb@www.gva.ie](mailto:eb@www.gva.ie)

National Number:

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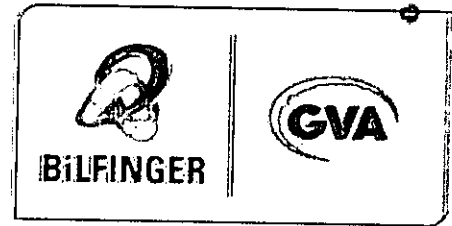
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# Draft Wicklow County Development Plan 2016-2022

Submission to the Draft Wicklow  
County Development Plan 2016-2022

On Behalf of Tesco Ireland Limited.

February 2016



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Prepared By: Muirenn Duffy  
Draft Date: February 2016

**For and on behalf of GVA Planning and Regeneration Limited**





# 1. Introduction

Bilfinger GVA has prepared this submission on behalf of our Client, Tesco Ireland Ltd., Gresham House, Marine Road, Dún Laoghaire, Co. Dublin in response to the publication of the Draft Wicklow County Development Plan, 2016-2022 (hereinafter Draft CDP). Tesco, being a recognised part of the retail environment in Wicklow, welcomes the opportunity to comment on the Draft CDP.

As recognised by the Draft CDP, retailing is a key contributor to the vitality and viability of centres in Wicklow. In this regard, the retail sector makes a major contribution to the urban structure of the County and acts as an economic anchor. The requirements of retailers should thus be recognised and provided for in the adopted CDP.

Our Client recognises that the Draft CDP provides a general planning policy framework which seeks to facilitate economic development and promote the growth of employment opportunities in all sectors including retailing by strengthening existing employment areas and revitalising designated centres. With regard to retail, the Draft CDP aims to promote a healthy competitive retail environment across the County and encourages the redevelopment and rejuvenation of ageing centres.

Tesco Ireland Ltd. is committed to the enhancement of its offer in its existing stores in Wicklow, particularly the main stores in Bray, Wicklow and Greystones where these stores have extant permissions for their redevelopment<sup>1</sup>. While it is the intention that overall redevelopments of the stores may progress in the future, flexibility is required to ensure the delivery of refurbishments and floorspace reorganisation in the short term to improve the existing retail offer at these locations.

Our Client made a submission during the Pre-Draft public consultation phase and welcomes that matters, such as car parking standards have been included in the Draft CDP. Our Client however, still has some concerns with some provisions of the Draft CDP and these are to be addressed as part of this submission.

## Summary of issues addressed in this submission are as follows:

- 1) The cap on comparison goods in supermarkets which is contrary to the Retail Planning Guidelines, should be removed as a retail objective in the forthcoming County Development Plan
- 2) Policies relating to the restriction of convenience shops with part off-licences should be removed.

<sup>1</sup> Reg. Ref. Nos. 08/1057 (Extension of duration Ref No. 15/109), 12/6147, 11630020, 12630008, 10623409

## 2. Submission Issues

### 2.1 20% cap on Comparison floorspace

It is our view that the existing cap on comparison goods in foodstores, as outlined in objective RT25, should not be retained in the final County Development Plan. It is considered that the application of this objective is contrary to the Retail Planning Guidelines (RPGs) which have been updated since the inclusion of this objective in the current Development Plan. In this regard, there is no specific policy within the RPGs to support the implementation of a floorspace cap or restriction on comparison space within foodstores. Indeed, it is submitted that the RPGs recognise that foodstores play a vital role in maintaining the quality and range of shopping and as such they are;

*"...an accepted element of retailing in cities and large towns. They provide primarily for the weekly convenience goods shopping of households<sup>2</sup>"*

In this regard, the comparison element generally contains essential household products which are purchased while a weekly food shop is being carried out. The comparison element is therefore complementary to the convenience element as they both are a similar household goods shopping experience for the consumer.

The only floorspace caps referred to within the Guidelines are those relating to the large convenience floorspace cap that is set at 4,000m<sup>2</sup> for the four Dublin local authority areas; 3,500m<sup>2</sup> for the four other main cities and 3,000m<sup>2</sup> for the remainder of the State. As stipulated by the Guidelines;

*"These floorspace caps apply to new retail stores or extensions to existing stores which will result in an aggregate increase in the net retail floorspace of the convenience element of such retail stores. In this regard, while some stores may retail convenience goods only, in other cases, stores may retail convenience and comparison goods. In these mixed comparison/convenience retailing stores described above, there is therefore no cap on the amount of non-grocery or comparison space delineated for the relevant store, for example on the planning application drawings.<sup>3</sup>"*

As such, it is submitted that the objective to cap comparison floorspace within large foodstores is unsupported by the National Retail Planning Guidelines, 2012. Similarly there is also no such cap outlined in the Retail Planning Strategy for the Greater Dublin Area.

Having regard to the important retail role foodstores and large supermarkets play, it is considered that the Draft CDP should provide flexibility for larger foodstores, and it is therefore, inappropriate to apply

<sup>2</sup> Guidelines for Planning Authorities, Retail Planning, 2012, Section 4.11.1, pg.35

<sup>3</sup> Guidelines for Planning Authorities, Retail Planning, 2012, Section 2.4.1, pg.13

a 20% cap on the level of comparison floorspace. Furthermore, the Draft CDP outlines that there is a need to expand the amount of comparison floorspace in a number of centres in Wicklow. An example of such a centre is Bray where the indicative additional comparison floorspace requirement is 30,000-35,000m<sup>2</sup>. Other centres also require a relatively high level of increase in comparison floorspace and these are detailed as part of Table 6.3<sup>4</sup> (see below).

<b>Indicative additional floorspace requirements in County Wicklow up to 2031</b>		
<b>Centre</b>	<b>Total Convenience net m<sup>2</sup></b>	<b>Total comparison net m<sup>2</sup></b>
Bray	7,000	30,000 - 35,000
Bray-Fassaroe	2,500	1,000
Wicklow-Rathnew	5,000	12,000 - 17,000
Greystones	2,000	7,000 - 10,000
Arklow	2,000	4,000 - 5,000
Blessington	2,000	1,500 - 2,000
Ballinglass	1,500	1,500 - 2,000
Newtownmountkennedy	1,500	1,500 - 2,000
Rathdrum	1,500	1,500 - 2,000
<b>Total Level 2 and 3 centres</b>	<b>25,000</b>	<b>60,000 - 70,000</b>
<b>Level 4 centres</b>	<b>4,000</b>	<b>3,000</b>
<b>Total</b>	<b>29,000</b>	<b>63,000 - 79,000</b>

Table 1: Indicative additional floorspace requirements in County Wicklow up to 2031

The removal of objective RT25 could allow for an increase in the provision of lower/middle order comparison floorspace as part of the development of new or expanding foodstores. This would also be unlikely to impact on the primacy of town centre locations as town centres usually provide a higher order convenience offer which would not be available in our Client's stores.

As part of Chapter 6, it is noted in the specific policy objectives for Wicklow (pg. 110) that it is necessary to develop the retail comparison offer in Wicklow, so as to redress the high level of trade leakage that currently occurs. In fact, one of the key strategic objectives of Chapter 6 outlines the following aim;

*"to reduce leakage of expenditure from County Wicklow to other counties, through a significant expansion in the amount and range of comparison floorspace within the County, which will provide for a significant amount of the comparison shopping needs of existing and future residents up to 2031."*<sup>5</sup>

<sup>4</sup> Table 6.3, "Indicative additional retail floorspace requirements up to 2031", Section 6, pg. 113 of the Draft Wicklow County Development Plan 2016-2022

<sup>5</sup> Section 6.2.2, pg. 111, Chapter 6, Draft Wicklow county Development Plan 2016-2022

Based on the above we would therefore suggest that, due to the requirement for increased comparison floorspace to be delivered over the lifetime of the that plan, objective RT25 should be removed as it would assist in the development of comparison floorspace as well as addressing on-going leakage of trade to other surrounding counties, as highlighted above.

The removal of objective RT25 could therefore, allow for an increase in the provision of lower/middle order comparison floorspace as part of the development of new or expanding foodstores. This would be unlikely to impact on the primacy of town centres, as units which locate in such areas usually provide a higher order comparison offer, which would not be in competition with supermarkets.

Concerns relating to the impact on the primacy of town centres could be addressed as part of the development management process through the submission of a retail impact statement with such applications. This approach would be preferable to a general cap on the level of comparison floorspace which is a blunt planning instrument and could lead to be a disincentive to investment in the county.

Further to the above we would request that Objective RT25 is removed from the Draft CDP and if considered necessary, that it be replaced with an objective requiring the submission of a retail impact statement addressing the primacy of the town centre zoned lands and the potential impacts therein.

## 2.2 Restriction on Off Licences as part of Convenience foodstores

Section 5, Appendix 1 of the Draft CDP outlines a number of items that are to be considered when the Planning Authority is making a decision on planning applications for retail developments. Whilst our client generally welcomes this approach, as it provides more certainty to applicants, we are specifically concerned with regard to the section that intends to restrict the provision of convenience stores incorporating off-licences, which is outlined on pg. 38 of Appendix 1 of the Draft CDP.

Our Client wishes to raise a number of concerns with this proposed approach. In the first instance, we would note that section of text relating to the provision of convenience stores incorporating off-licences (pg. 38 of Appendix 1<sup>6</sup>) is a negative approach which seeks to restrict the number of off-licences in an area. Our Client is specifically concerned with the potential of this restriction, as a part off-licence<sup>7</sup> is ancillary to the main store and has become an intrinsic part of a retailers offer. In this regard, it would be unusual for a convenience store not to provide some form of alcohol sales and we would request that Wicklow County Council consider this as part of their assessment of such applications.

<sup>6</sup> "Take aways, fast food outlets, amusement centres, night clubs / licensed premises, betting offices, charity outlets, discount outlets, cash-for-gold shops and convenience stores incorporating off-licences etc.", pg. 38 of Appendix 1, Wicklow County Development Plan 2016-2022

<sup>7</sup> A part off-licence is an off-licence provided ancillary to a convenience store

In relation to the absence of specific guidance as to what is an over-concentration of a use, the Planning Officer is required to make a subjective decision as to whether a proposed off-licence is appropriate or if it should be located elsewhere. This leads to inconsistencies in decisions from one application to the next and discourages investment in Wicklow, as such inconsistencies lead to an unacceptably high level of risk for applicants when they are considering future investments. For this approach to be effective it would be necessary to specify what an over-concentration of a particular use is.

It should be noted that most new off-licences/part off licences are only allowed in designated retail centres and as such, it is difficult for operators to avoid selecting sites that may be in close proximity to existing off-licences, therefore, conflicting with the above proposal to restrict the number of part off-licences in an area as outlined on pg. 38 of Appendix 1.

As the intention of this approach is to restrict the over-concentration of uses in certain locations, this places new entrants to the market at a competitive disadvantage. By also not defining what would constitute an excessive concentration, it introduces a high level of uncertainty into the site selection and investment process. In this regard, we would request that the section of text which refers to the restriction of part off-licences<sup>8</sup> is reconsidered and more certainty is provided with regard to the provision of part off-licence use in the functional area of Wicklow.

<sup>8</sup> "Take aways, fast food outlets, amusement centres, night clubs / licensed premises, betting offices, charity outlets, discount outlets, cash-for-gold shops and convenience stores incorporating off-licences etc.", pg. 38 of Appendix 1, Wicklow County Development Plan 2016-2022

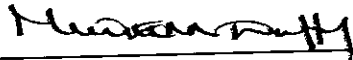
### 3. Conclusion

We trust that the above comments and recommendations will be taken into account as part of the preparation of the Wicklow County Development Plan 2016-2022. We welcome the opportunity to comment on the Draft CDP and this submission respectfully requests the following:

- That the existing 20% cap on comparison goods within large foodstores be omitted from the new County Development Plan as it is contrary to national retail policies.
- That the restriction of off-licences as part of convenience foodstores should be amended as the proposed text on this matter provides uncertainty for applicants and provides a disincentive for development.

We are available for discussion on any of the matters referred to above. We would also appreciate if you could confirm receipt of this submission by return.

Yours sincerely,



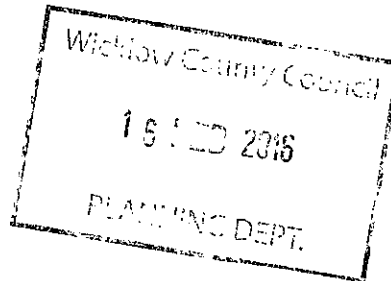
**Muirenn Duffy**

Associate

For and on behalf of **GVA Grimley Ltd.**

C173

14<sup>th</sup> February 2016



Dear Sir/Madam,

Re: Sloan Terrace, Meath Road, Bray, Co. Wicklow  
REF NO: NIAH 16301032

I would agree that the above should be included on the Record of Protected Structures, as recommended by the Minister through the NIAH survey of Co. Wicklow.

Sloan Terrace is a fine example of Victorian architecture. The very highly decorative iron gates and railings are one of the few remaining examples of Victorian ironmongery in Bray and should be protected and preserved.

Yours faithfully,

*Vincent Tighe*  
VINCENT TIGHE  
LORRAINE  
CONVENT AVE.,  
BRAY





C174

**BALLYCURRY  
ASHFORD  
CO WICKLOW**

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow

WICKLOW COUNTY COUNCIL  
18 FEB 2016  
PLANNING DEPT.

19 February 2016

Dear Sir

We wish to make a submission on the Draft Wicklow County Development Plan 2016-2022, and in particular relating to the Draft Ashford Town Plan.

We are very concerned about the future development of Ashford. While we realise that the Village needs to grow, we would like it to be developed in keeping with its character. We feel that it is essential to ensure that any new development does not have a detrimental effect on the established history of the area and that all of our village's heritage is protected.

From the Ashford Village/Town Plan Map, you can see that there is a natural boundary between the townlands of Clora, Ballinahinch and Ballycurry Demense. Our field, in the townland of Clora (5.27ha approx.) located to the east of zoned land SL04 and to the north west of SL03 is currently in agricultural use and it is becoming clear that as the village of Ashford is set to grow substantially, this field is and will be land locked. We urge Wicklow County Council to rezone the lands marked on the attached map to include this field together with a further 3 fields which measure 2.81ha, 1.83ha and 4.05 (approx.). By doing this, the future development would be more spread out, the housing would be of a much lower density (10 units/ha), more in keeping with the village character of Ashford. There would still be enough units to pay for the services required and there would be less opposition from the current local population.

We propose Wicklow County Council adopt the enclosed map, increasing the zoned area to encourage a housing density which is:

More in keeping with the area;

Satisfies draft plan chapter 4 – housing (4.1) "new housing development is encouraged and facilitated, in the correct locations";

Satisfies draft plan chapter 4 – housing (4.1) "adequate zoned and serviced land is available in these locations to achieve the growth required";

Satisfies draft plan chapter 4 housing (4.2) Wicklow County Housing Strategy "ensuring proper planning and sustainable development of the area";

We would also draw your attention to draft plan chapter 4(3.4) in relation to 'densities': "in existing residential areas, infill development shall generally be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties".

There is a planning application by Moffash for 178 units on 8.75ha in SL03, This application which is in 'further information' stage, represents a large density of 20 units/ha, which far exceeds any existing density in this area. We would request that this parcel be rezoned to accommodate 10 units/ha – which represents an increase of almost double that of Bramble Glade, which is very near.

We propose that Wicklow County Council amend the draft plan for Ashford Town to include the extra land between SL03 and SL04 to ensure no land is landlocked. The revised plan follows a natural boundary bordered by trees to the north. The advantage to this proposed change to the plan would be that the proposed housing density of 10 units per ha would satisfy housing needs in the village/town while maintaining a density that is not entirely out of keeping with surrounding existing housing estates.

Another advantage of zoning this area this way is by extending the proposed new major road (with cycle tracks and pavements) from Ballinahinch straight across existing Roundwood road (R764) down to SL03 would provide access to future and existing community (sporting/social/educational and church) facilities, thus integrating the whole village/town plan and would enable children to walk/cycle safely to either National School through the area, without the need to walk along the busy R763/R764. This will also help to ease the excess traffic at drop-off and pick-up times at both schools.

We wish to remind Wicklow County Council that the approximate housing density, of the current housing estates, in this area of Ashford are as follows:

Bramble Glade	6 units/ha
Carrig Park	5 units/ha
Mount Alto	5.5 units/ha

We recognise these densities are considered low and would urge Wicklow County Council to consider a maximum density of 10 units/ha to be more appropriate and more in character with our Village/Town for new development of housing in this area.

Justification of the proposed changes to the draft plan:

It would provide a suitable scale of development, including neighbourhood facilities and a possible neighbourhood centre to serve the west of Ashford Town.

In light of the predicted population growth, these lands can serve to provide suitable additional residential accommodation yet remain close to Ashford Town Centre.

The development of these lands can be seen as an infill development therefore not extending the Ashford Town footprint and providing consolidated sustainable development within a serviced area.

The development of these lands would adhere to the need to concentrate development in existing residential sectors.

Due to the existing residential development located adjacent to the side, residential use is the only sustainable land use for the site.

In relation to our 5.27 ha field, the agricultural use of this field will no longer be feasible due to noise, lights, trespass, worrying of livestock, dumping, etc.

Conclusion

We request Wicklow County Council to extend zoning to the suggested area between SL03 and SL04. We believe these lands are suitable for residential zoning and development in the medium to long term. We urge Wicklow County Council to keep housing density in the area to no more than 10 units/ha.

We note that Ashford village is set to become Ashford town, and accept that development is inevitable. As long term inhabitants, we welcome the opportunity to make our suggestions for a positive and sustainable town development, and hope Wicklow County Council will take note of our submission and adopt same.


Yours faithfully,



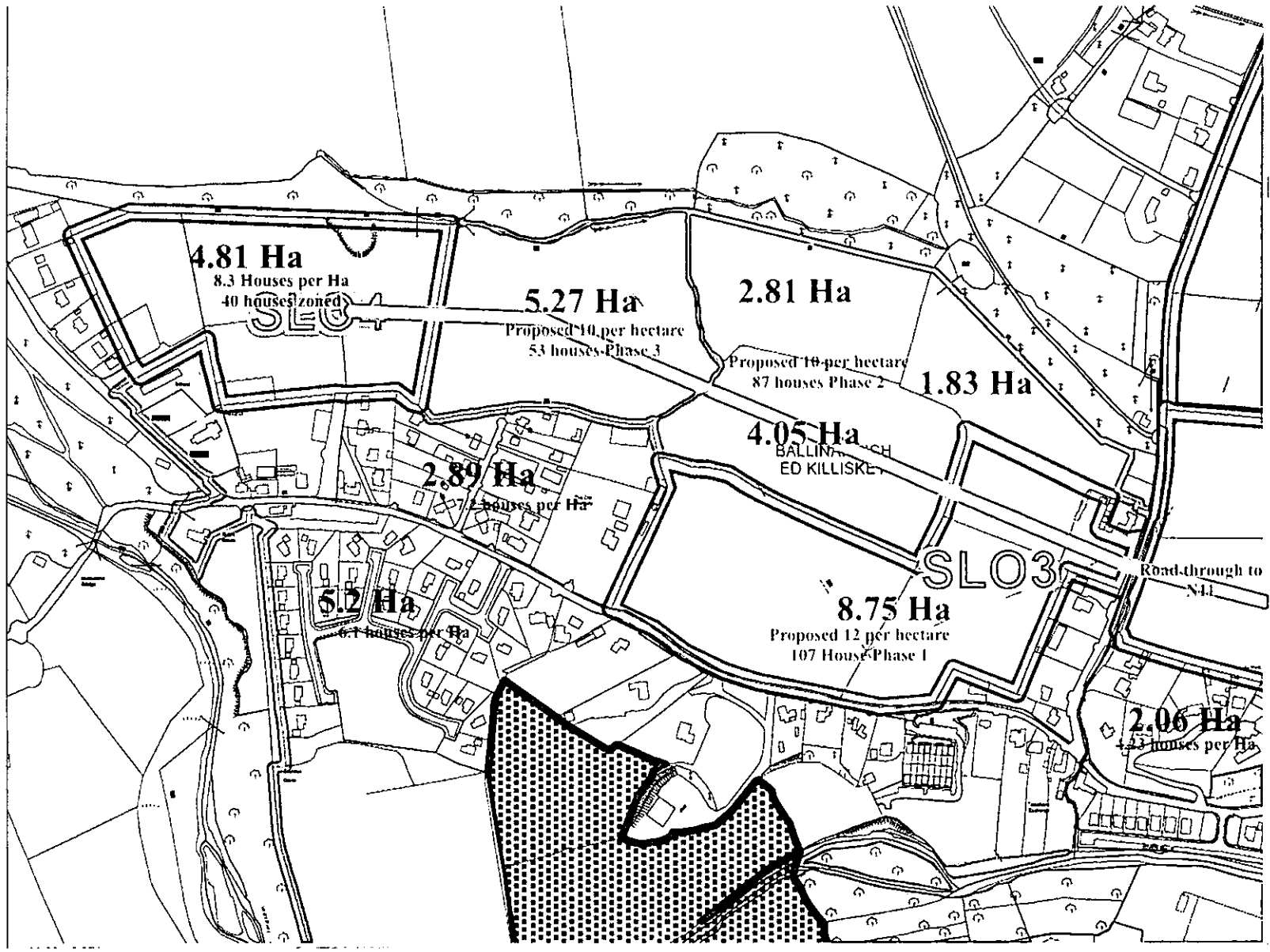
Charles Tottenham



Kathryn Tottenham



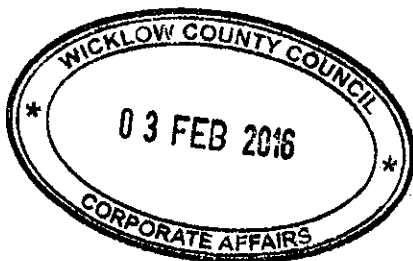
Lucy Tottenham



C175

County Development Plan Review  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow Town

31<sup>st</sup> January 2016



Dear Sir/Madam,

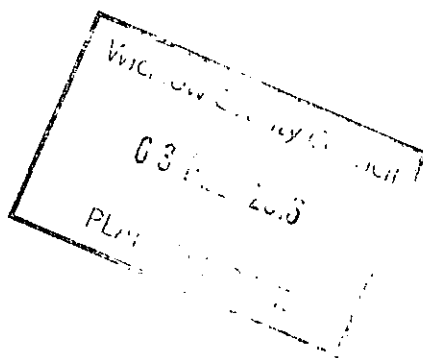
**Re: Sloan Terrace, Meath Road, Bray, Co. Wicklow REF NO:NIAH 16301032**

Sloan Terrace, Meath Road, is a fine example of Victorian architecture, dating from c. 1880. The houses remain very much as they were built and the original, wrought iron decorative gates and railings are one of the finest examples of Victorian ironmongery in the Bray area. Many of these original, decorative railings have been removed from Bray residences and Sloan Terrace and Earlsbrook Nursing Home are now two of the only remaining examples on Meath Road.

I would agree that the above should be included on the Record of Protected Structures, as recommended by the Minister through the NIAH survey of Co. Wicklow.

Yours faithfully,

*Rosen Venables  
White Lodge  
Delgany  
Co Wicklow*



C176

**Leonora Earls**

---

**From:** Carmel vickers /  
**Sent:** 06 December 2015 13:59  
**To:** Planning - Development Plan Review  
**Subject:** Dolmen

Hi

With the planned development in Enniskerry. I would like to draw your attention to a Dolmen site in parknasilloogue opposite Kilgarron park. This I presume will be protected. It has a very old Hawthorn tree beside it which as we all know were planted at these burial sites of Kings.

Thank you

Carmel Vickers

Sent from my iPhone

*acknowledged*  
*[Signature]*

**Leonora Earls**

---

**From:** Carmel vickers  
**Sent:** 05 December 2015 12:25  
**To:** Planning - Development Plan Review  
**Subject:** Re Enniskerry plan

Dear planners

I would like to highlight a problem in our area which you may like to consider when reviewing your development plans.

It is the road from Enniskerry to Kilmacanogue from Tinnahinch through Ballybawn areas on to Kilmacanogue. The R760

There are 2 problems :one is large vehicles such as buses and trucks are being directed to Powerscourt from the m11 through Kilmacanogue and down this road to Ballybawn and Tinnahinch to Powerscourt. R 760 These are completely unsafe on the already very narrow roads as a bus takes up the width of the road and because of the amount of bends cannot be seen by car drivers.

These vehicles can easily be changed to take the main bus routes into Enniskerry village off the n11. The route of the 185 for example is a safe one and shorter.

The other problem to business in the village is that tour buses don't stop which affects business.

So my proposal would be to direct these buses up the 185 route or the newly planned route at Fassaroe to the bog meadow for parking and let tourists enter the shops in the village. They will arrive safely and business can be improved in the centre.

Thank you very much

Carmel Vickers

Sent from my iPhone

*acknowledged*  
*[Signature]*



C177

14<sup>th</sup> February 2016

Dear Sir/Madam,

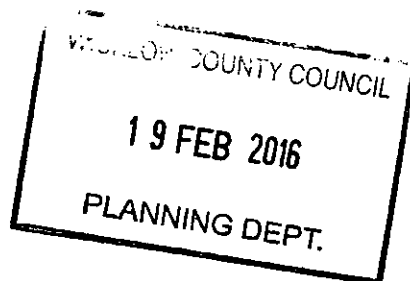
Re: Sloan Terrace, Meath Road, Bray, Co. Wicklow  
REF NO: NIAH 16301032

I would agree that the above should be included on the Record of Protected Structures, as recommended by the Minister through the NIAH survey of Co. Wicklow.

Sloan Terrace is a fine example of Victorian architecture. The very highly decorative iron gates and railings are one of the few remaining examples of Victorian ironmongery in Bray and should be protected and preserved.

Yours faithfully,

Mary Meehan Bayview, Meath Road, Bray.



C178

Leonora Earls

---

From: Mike Walker  
Sent: 18 February 2016 16:37  
To: Planning - Development Plan Review  
Subject: RE: County Development Plan Review Submission  
Attachments: County Development Plan - Enniskerry - Walker.pdf

Dear Sir/Madam,

Please find attached a submission to Wicklow County Development Plan 2016 -2022 Review.

Kind reagrds,  
Mike

--

@maerkelig

## Submission to the Draft Wicklow County Development Plan 2016-2022 ("the CDP")

This submission focuses on the proposal for the Enniskerry Town Plan (Volume 2, page 103).

In general we welcome the vision for the village described. How it recognises the importance of its heritage and the surrounding natural environment, and how these are important components to retain for both the existing and future residents, and in order to exploit the economic potential of the village.

The related proposed development strategy includes many laudable objectives e.g.:

- Reinforcing and improving the visual appearance of the central area of the settlement with particular attention on the town centre area which is an architectural conservation area, and encouraging development that will enhance the town's vitality and vibrancy.
- Improving linkages between the town centre and its environs.
- To ensure that lands at risk of flooding are not designated for new development.
- To create functional public spaces and pedestrian routes linked to new development that maximise the natural features of the area.

However, in order to realise these and the potential of the village, we would like to see the following issues accommodated in the proposed development plan:

1. Enniskerry is a planned estate town that comprises a significant architectural heritage asset to the county. It is not a suitable location for self-contained suburban housing estates poorly integrated into the existing street network and of insufficient design quality. Given the standard of design achieved in similar housing estates in area and elsewhere in the county since the 1990s, how will the council ensure high design standards will be achieved in the future?
2. Enniskerry is described as a level five town/Small Growth Town. Table 2.1 indicates that under the National Spatial Strategy such towns should have good public transport links and be within 10km of Large Growth Towns (Wicklow, Greystones or Arklow as per table 2.1 of the draft plan). Enniskerry has two bus routes none of which terminate in Wicklow, Greystones or Arklow. According to this definition does Enniskerry qualify as a Small Growth Town? Given this and because of the sensitive natural and built heritage assets, should Enniskerry not be classed as a village?
3. The National Spatial Strategy designates the north of County Wicklow as a 'stronger rural area' (including villages close to the main urban areas experiencing strong pressure for development), as outlined in section 2.2 of the draft plan. Here urban generated housing should be directed into the urban centres and minimised in the rural area and that any development within the villages of the stronger rural area should be respectful of their character. Enniskerry is described as a Small Growth Town, but would be better served by being designated a village with housing development reflecting this, and its architectural heritage.
4. The draft plan indicates that Enniskerry currently has a housing stock of 642no. houses and that this would increase by up to 475no. by 2022. This represents a 73 percent increase in the housing stock over a 11 year period that may not be sustainable in the context of urban generated demand, highly sensitive natural and built heritage, limited public transport, existing difficulties with congestion and inadequate sewage treatment works.
5. There is a European designated SAC within the village boundary and adjacent to land zoned for residential development. An appropriate assessment screening has been prepared for the plan, but because it covers the whole county, it lacks detail. It is not clear that it complies with the

requirement to base such assessments on the best available scientific evidence. In particular the geology of the area and the risk of both pollution of ground water and flooding brought on by climate change related projected greater rainfall. Also how the significant number of large trees around the village will be conserved and protected.

Thank you,  
Walkers

Glentor,  
Cookstown Road  
Enniskerry  
A98 FK60

February 18<sup>th</sup> 2017

Leonora Earls

CPA

From: walshccm  
Sent: 31 January 2016 14:23  
To: Planning - Development Plan Review  
Subject: Wicklow Development Plan re Donard

I am a resident of Donard for the last 26 years and I feel strongly about its development

- Donard is a unique Wicklow Village rich in history and heritage and should continue to be listed as a Village of Special Interest - definitely not re designated as a TOWN.

- DONARD REQUIRES SUPPORT AND ENCOURAGEMENT

- In maintaining its architectural heritage - e.g. its remaining fine stone walls and the ruins of the St Paladius Church and Cemetery which occupies an important position in the village + its unique Village alignment.

- To maintain and enhance the natural wild life and flora in all future development in this area.

○ The approaches to the Village which are truly special and beautiful must be acknowledged and preserved.

- In developing a network of walks from the village sympathetic to the wonderful hill walks further out.

- I feel this part of West Wicklow is a relatively undiscovered resource from a tourist point of view and deserves the maximum help when looked at by Wicklow Development Planners.

Sincerely ----- Claire Walsh.

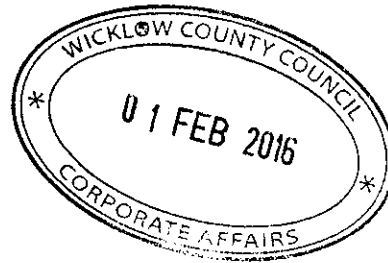
S. Walsh SP.

51 Convent Court, Delgany, Greystones,  
Co. Wicklow, A63 T677, Ireland

C180

1 February 2016

County Development Plan Review,  
Planning Department,  
Wicklow County Council,  
Station Road,  
Wicklow Town.



**Draft Wicklow County Development Plan 2016-2022**

Dear Sirs,

I am pleased to have my say as requested.

The draft plan is full of admirable objectives and plans to which I would fully subscribe, except that, it is based on a false premise. Although within the Greater Dublin Area, geographically, Wicklow County does not enjoy the GDA transport infrastructure on which the plan and the overarching RPG and NSS are based. This will cause extreme difficulties in meeting the objectives set.

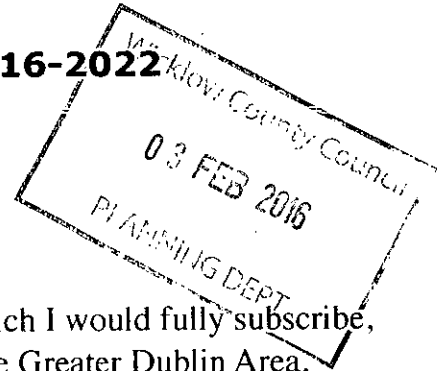
There is a poor transportation link to Dublin as already noted in the Draft LECP. See Weaknesses and Threats, pg. 15. It is spelt out in more detail in the recent Co. Wicklow PPN Representative Report: **Notes on the Transportation, Water & Environmental Services SPC meeting held on 30/11/2015**. It is most unlikely that the transport links can be improved much within the timescale of the CDP. We are stuck with a single line railway link and only one main road.

There is, in particular, a serious error in the statement regarding Greystones/Delgany.

Chapter 3 pg. 32 states

"Greystones is a strong growth town located within the metropolitan area of the GDA, served by high quality transport links to surrounding towns and Dublin area. The town is located on the DART/rail line and has good quality bus links and has easy access onto the M/N11 road." This is patently, not so.

In the Draft Plan, Core Strategy Ch. 2.3, Vision and Goals, 1, pg. 12., the first item is Consistency. It states "To be consistent as far as practicable, with higher order national and regional development objectives ...". It is obvious to me that it will not be practical to be consistent with those higher order objectives, while, at the same time, being true to Wicklow County environmental and heritage objectives and sustainable development. Planners will have to regularly curtail planning applications to keep them practical. A more conciliatory



"Consistency" statement is required. Furthermore, the exclusion of Greystones/Delgany and possibly Bray from the Dublin Metropolitan Area should be seriously considered when the RPGs are reviewed. I would prefer to see consistency with the LECP than with the Regional Planning Guidelines. There are, in fact, in the introduction to the CDP, several references to the need for this consistency between CDP, and the LECP. See CDP, Chapter 1, Para. 1.5 pg. 1. These Wicklow County objectives should take preference over those of the Dublin Metropolitan Plan.

I respectfully suggest you add a statement such as follows to the Introductory Chapter pg. 1.

*Whereas the Council will endeavour to be consistent with the NSS and RPG guidelines and objectives, the current transport infrastructure in Wicklow County will make this exceedingly difficult, at least with respect to the area of the county included in the Dublin Metropolitan Area. The LADP for this area will have to be moderated in order to cope with local restrictions while meeting as far as possible all objectives of the LECP.*

I hope that the review of the RPGs will take a realistic approach and make allowance for the currently intractable nature of the transport infrastructure, preferably excluding all parts of Wicklow county from the DMA.

Yours faithfully



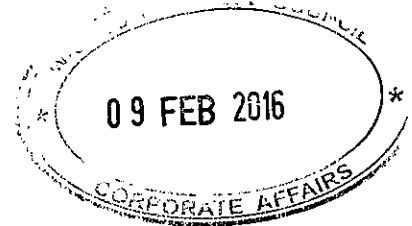
David J Walsh C. Eng.



C181

31<sup>st</sup> January 2016

Dear Sir/Madam,



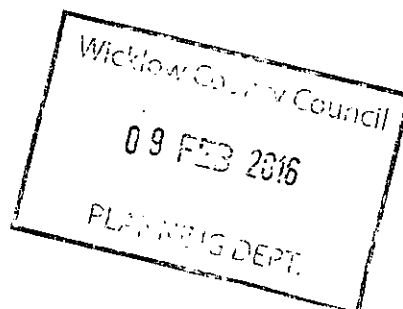
**Re: Sloan Terrace, Meath Road, Bray, Co. Wicklow**  
**REF NO:NIAH 16301032**

Sloan Terrace, Meath Road, is a fine example of Victorian architecture with very attractive, original, wrought iron decorative gates and railings.

I would agree that the above should be included on the Record of Protected Structures, as recommended by the Minister through the NIAH survey of Co. Wicklow.

Yours faithfully,

*Tom Walsh*  
VIRGINIA  
MEATH ROAD.  
BRAY.



C182

Laoghaire Earls

**From:** Malcolm Lane  
**Sent:** 19 February 2016 10:43  
**To:** Planning - Development Plan Review  
**Subject:** draft County Development Plan submission  
**Attachments:** Dev Plan Sub 2016.pdf; Site Location Plan.pdf

FAO:

**County Development Plan Review**

Planning Department, Wicklow County Council

On behalf of **WARMRIDGE LTD**, see attached submission for lands at Timore, Newcastle.

Yours Sincerely

Malcolm Lane  
PD Lane Associates

BA MRUP MA(UD) MIPI MUDG  
Town Planner & Urban Designer

1 Church Road	T +353 1 287 6697	architecture
Greystones	F +353 1 287 0109	urban design
Co.Wicklow	E info@pdlane.ie	planning
Ireland	W www.pdlane.ie	engineering

Submission to:  
**WICKLOW COUNTY COUNCIL**

Review of:  
**DRAFT WICKLOW COUNTY DEVELOPMENT  
PLAN 2016-2022**

In respect of:  
**LANDS AT  
TIMORE  
NEWCASTLE  
CO. WICKLOW**

Prepared on behalf of:  
**WARMRIDGE LIMITED**

By:  
**PD LANE ASSOCIATES  
ARCHITECTURE & ENGINEERING  
PLANNING & URBAN DESIGN**

**FEBRUARY 2016**

## **GROUNDS OF SUBMISSION**

This report, prepared on behalf of Warmridge Limited is made as a formal submission to Wicklow County Council on the draft County Development Plan in preparation of the Wicklow County Development Plan 2016-2022 (the draft 2016-2022 Plan'). This submission comprises part of the landholding in the ownership of Warmridge Limited that was an old golf club and then subsequently a timber storage and manufacturing facility – see map attached ('the Subject Lands').

The Subject Lands (0.6821 hectares) are currently a disused yard and are more than 100m from the M11/N11 National Route to the east. The Subject Lands were part of a proposed Employment Uses zoning in the draft County Development Plan 2004-2010.

It is submitted that the Subject Lands should be designated for Light Industry / Employment uses due to the history of indigenous industry on the site, employment generating potential and strategic location with good access onto local, regional and national road infrastructure.

## **COMMERICAL CONTEXT**

Warmridge Limited intend to grant Abwood a long lease to use the site if rezoned for employment purposes (subject to planning permission) to allow them expand their current operations in the area for assembly and storage of timber products.

Abwood is a local indigenous company that has been manufacturing timber products such as garden sheds, fencing and timber buildings in the locality of Timore, Newcastle, Co. Wicklow since the 1980's. Approximately 80 people were employed during the company's busiest period 2002-2007. This has now reduced to 20 employees due to the economic downturn and lack of available local premises.

The company has survived the economic downturn and is now looking to expand and position itself once again as a leading supplier of timber products to the trade and retail markets. The company has had long standing commercial relationships with Woodies, Brooks Thomas and Chadwicks, and more recently have been approached by B&Q and other major retailers to supply timber products.

More recently there has been a noticeable increase in demand from the construction and landscaping sectors and Abwood are well positioned to take advantage of this and to potentially double their workforce. The Sales & Display office is located at the junction of Timore Lane and the old N11 and the Storage & Pick Up area is located on the eastern side of the M11/N11, however both premises are at capacity.

## STATUTORY CONTEXT

Chapter 7 'Enterprise and Employment' of the 'current Wicklow' County Council Development Plan 2010-2016 states:

*Providing the infrastructure and zoned land necessary to attract inward investment and growth in indigenous industry;*

*Supporting and facilitating to the highest degree possible (subject to environmental and other relevant planning considerations) all forms of employment generation.*

*Promote economic growth and potential employment opportunities in the rural areas of Wicklow in order to sustain vibrant and sustainable rural communities.*

Chapter 5 'Economic Development' of the draft 2016-2022 Plan sets out the following 5 overarching goals for economic development within County Wicklow:

- 1. Develop infrastructure and measures that are positive and supportive to investment, enterprise, innovation and knowledge creation in strategic locations.*
- 2. Sustain existing enterprise and develop quality employment and income opportunities for the wide range of employment needs in the County with possibilities for reversing commuting patterns.*
- 3. Support training and labour activation measures based on analysis of employment trends and the skill needs of employers.*
- 4. Support a shift towards low carbon and climate resilient economic activity reducing energy dependence and sustainable use of resources and leading the Smart Green economy.*
- 5. Harness efficiently the full resources of the County and reduce duplication and unnecessary overlap.*

Chapter 5 'Economic Development' of the draft 2016-2022 Plan also states the following as Rural Employment Objectives:

**RUR1** *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.*

**RUR2** *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.*

## CONCLUSION

In conclusion, it is our submission that the Subject Lands be designated for Light Industry / Employment uses in the forthcoming Wicklow County Development Plan 2016-2022, in line with the abovementioned overarching goals for Economic Development within County Wicklow and Rural Employment Objectives.

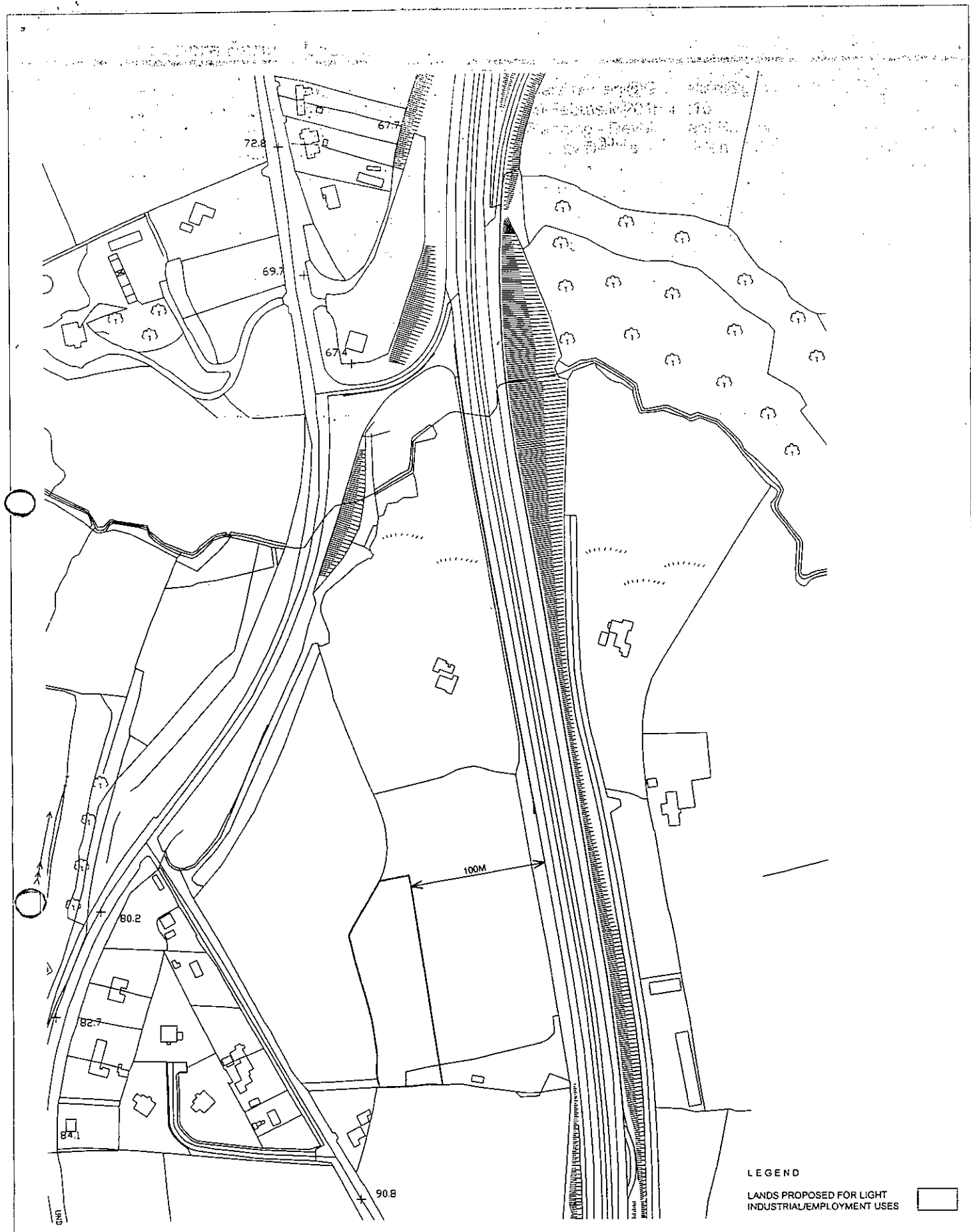
The proposed designation of the Subject Lands in the upcoming Wicklow County Development Plan 2016-2022 would facilitate the future development of this strategic location and indigenous industry in accordance with the policies and objectives of the county plan, as laid out in the above submission.

*Malcolm Lane*

---

Malcolm Lane  
Town Planner & Urban Designer  
BA, MRUP, MA (UD)  
**PD Lane Associates**  
Date: February 2015

**Appendix:**  
Site Location Plan



ORDNANCE SURVEY IRELAND LICENCE NO. AR 0002115  
© ORDNANCE SURVEY IRELAND / GOVERNMENT OF IRELAND



**pd lane**  
associates

1 Church Road T +353 1 287 6697  
Greystones F +353 1 287 0109  
Co. Wicklow E info@pdlane.ie  
Ireland W www.pdlane.ie

architecture  
urban design  
planning  
engineering

PROJECT	LANDS AT TIMORE, NEWTOWNMOUNTKENNEDY, CO. WICKLOW.		DRAWING NO.
CLIENT	WARMRIDGE LTD.		REVISION NO.
DESCRIPTION	DRAFT COUNTY DEVELOPMENT PLAN SUBMISSION		
STAGE	DATE	12 / 10 / 2015	
SCALE	1 / 2500 (A3 page)	DRAWN BY	



C183

Leonora Earls

From: Kevin Warner m]  
Sent: 18 February 2016 20:57  
To: Planning - Development Plan Review  
Subject: Observations on draft plan

A Chara,

I wish to submit a number of points in relation to the Wicklow County Development Plan for 2016-2012, mainly in relation to the Enniskerry area where I live, but also in relation to the lack of walking rights-of-way proposed for the county as a whole. My address is Valley Lodge, Kilgarron Hill, Enniskerry, Co. Wicklow, A98 TH79. My mobile number is 087-253 9995.

### 1. The sloping field behind St. Mary's Church

In relation to Enniskerry, I welcome the designation in the draft plan of the large sloping field behind St. Mary's Church as 'passive open space'. I would urge that this designation be retained in the final version of the plan for the following reasons:

- (a) An Bord Pleanala have consistently and rightly refused permission for housing in this area for a variety of reasons, including the fact that it would take from the backdrop to the historic St. Mary's Church, which is the first neo-Gothic church to be built in Ireland.
- (b) An Bord Pleanala have also noted this field's proximity to Knocksink Woods, a Special Area of Conservation. You are right to recognise the need for this buffer area around the SAC, the better to comply with EU regulations.
- (c) Enniskerry's geology has an inordinate number of springs which are unmapped and unknown. This is particularly so in this field. The building of two houses above the field some years ago disrupted groundwater to such an extent that severe flooding resulted and the effects of this development can still be seen in the lower part of the field to this date.

It is important to see this large field as integral to Knocksink Woods, which is an important and much-used amenity in the village. There are good walking paths in Knocksink Wood itself and also across the road from its main entrance in Bog Meadow. I would support the proposal which I understand Enniskerry Forum are making for the construction of a walkway under the high bridge near the front of St. Mary's Church that would link Bog Meadow to Knocksink Woods. This amenity could then be enhanced further if WCC ensured walking access across the field in question from Kilgarron Hill. There should be such access in at least two places, both above and below the GAA pitch. This arrangement would establish a very attractive network of walking paths around the village.

Finally, the varied stand of trees at the top of this field, which include magnificent lime, horse chestnut, Scots pine, oak, beech and others, should be subject to a preservation order (if this has not already happened).

### 2. Walking paths in the Enniskerry area

Walking is important to the residents of Wicklow and to many of the hundreds of thousands who visit the county each year. However, this activity needs to be facilitated by means of elaborate networks of good undisputed walking paths in all areas - the kind of networks that one finds in virtually every area of any other country in Europe. Such networks should be seen as part of the vital infrastructure for the county, essential for its economic wellbeing through tourism and for the health and recreation of its residents.

The fact that WCC propose, in the draft development plan, a mere nine rights-of-way in the entirety of our large and scenic county is a dereliction of its duty to underpin tourism in particular. Why should keen

walkers come to Wicklow when they can go to Scotland, for example, where they will be facilitated and welcomed by walking access *everywhere*? And why should residents of Wicklow be denied the access to countryside and the opportunity to recreate *in their locality* that is the norm in any other country?

Hundreds of thousands come to Enniskerry each year, primarily to visit Powerscourt. It is pathetic that WCC suggest only one right-of-way in this area (i.e. Lovers' Leap), and this a very short 'there-and-back' walk rather than a circular one. There should be far more rights-of-way in this area, including the following:

(a) An access route to the Wicklow Way.

There is an urgent need for an attractive walking path that would provide off-road access from the village to the Wicklow Way. Visitors arrive in Enniskerry all the time, usually on the 44 or 185 bus, intent on walking the Wicklow Way, only to discover that it is over 5 km away up a busy road with hardly any footpath. The best means of providing this access is probably via Knocksink Woods to Ballybrew and on to Curtlestown via the Old Road - this could be a delightful and splendid access route.

(b) A safe walking route from Powerscourt House and Gardens to Powerscourt Waterfall.

Throughout the year, one sees visitors to Enniskerry or the main part of the Powerscourt Estate setting out to walk to Powerscourt Waterfall. They can only do this by a road that includes *an extremely dangerous narrow section* between high walls that runs from Powerscourt Gates to Tinahinch Bridge. WCC should commence discussion with Powerscourt Estate to ensure a safe and more attractive walking route. The best option would be to follow the River Dargle through the grounds of the estate. But at the very least Powerscourt Estate should facilitate a safe off-road path parallel to the road at least as far as Tinahinch Bridge, and preferably to the junction of the roads to Roundwood and the Waterfall. The lovely off-road walkway between the Upper and Lower lakes in Glendalough could be a model for this.

(c) The mass path to Kileagar

Why is the mass path to Kileagar graveyard and ruined church not included in the rights-of-way for the county? It is clear, in continuous use for centuries and undisputed.

**3. Walking paths in the county at large**

In the county as a whole, the following are just some examples of routes that should be included as rights-of-way:

(a) The Wicklow Way from the Dublin border to the Carlow border.

(b) The 110 walking paths deemed to be rights-of-way by Wicklow County Council in a landmark survey of just the north-east corner of the county around 1987 to 1990.

(c) All the routes splendidly marked and maintained by the OPW in the Glendalough area - and, in particular, the wonderful Spink route. I think there are at least 12 of these.

Best regards,  
Dr Kevin Warner

C184

**Leonora Earls**

---

**From:** richardwebb@  
**Sent:** 23 January 2016 17:41  
**To:** Planning - Development Plan Review  
**Subject:** County Development Plan Submission  
**Attachments:** Wicklow County Development Plan 2016 observations.docx

Attached are my comments on the Draft County Development Plan which I hope will be helpful to you.

Regards

Dr. Richard Webb  
Bray Grow It Yourself (GIY)

## Wicklow County Development Plan 2016-2022 – Observations

The whole plan is produced to a high standard and includes many of the proposals that one would expect to enhance planning within the county and to encourage sustainability and a low carbon economy.

The following comments are made on the above.

### Chapter 4. Housing

There appears to be no mention of a Traveller housing policy.

No guidelines for energy efficiency

No analysis of lands owned by the Council

### Chapter 5. Economic Development

There are detailed guidelines on the role of land use planning in economic development and in determining the appropriate amount of land zoned for employment. However, the zoning location maps at the end of this chapter show that these guidelines appear to have been ignored by Councillors in selecting sites for development and as such run counter to the objectives of both the county development plan and regional guidelines and the requirements of the NRA in terms of development close to national routes and junctions.

### Chapter 8. Community

The section on children's play should make mention of the need to create child-friendly communities.

### Chapter 9. Infrastructure

Section 9.2.3 Wastewater – should permit the use of wetland treatment systems in rural areas that conform to EPA guidelines on small scale treatment systems.

Section 5 p. 194 Wind Energy Objectives should prioritize community energy projects

Solar Energy – Solar PV energy for domestic and commercial buildings should be supported.

Guidelines are needed for solar PV farms; there are significant visual impacts and a number of such farms may be proposed within the lifetime of the Plan.

Section CCE15 should include integrated community energy schemes.

## Wicklow County Development Plan 2016-2022 – Observations

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Section CCE15 should include integrated community energy schemes.

*Richard Webb*

WICKLOW COUNTY COUNCIL

15 JAN 2016

PLANNING DEPT.

C185

Leonora Earls

---

From: Harry Webster  
Sent: 19 February 2016 16:42  
To: Planning - Development Plan Review  
Subject: Re Co Development Plan

Dear Sir ,

NH42 should be taken out of the plan. This objective should not be included in the plan until after there has been consultation and agreement with all landowners, companies, commercial interests and clubs affected.

Yours Sincerely,  
Harry Webster  
Seaview House  
Silver Strand  
Wicklow Town

Silver Strand Caravan Park Ltd  
Seaview House  
Dunbur Upper  
Co. Wicklow

**Leonora Earls**

*acknowledged*  
**CLUB**  
~~CLUB~~

**From:** Matthew Weiss  
**Sent:** 13 December 2015 12:18  
**To:** Planning - Development Plan Review  
**Subject:** Submission from Matthew Weiss

I would like to submit the following objection to the draft plan on my behalf. (I will have a further submission on behalf of the Rivervartry Protection Society but wish to separate the personal issue from this)

1-  
My property at RiverRun Studio is located on the left of map 1 below SL04. The complete property has always been Zoned with the house as Existing Residential community of Ashford, and the property with the border on the West being the river, running from Nun's Cross Bridge down to where the river turns towards Ashford, being part of AA2. This has always been so and I refer you to map1 of the previous LAP 2010-2014 of Ashford.

Your justification for this I understand was that this land was cut off from AA2 by the green space property below Bramble Glade. This is not so, since my property is adjacent to the AA2 on the other side of the river. There is no real reason that this should have been done and my land de-zoned unless you de-zone all of AA2. Making AA2 SLR indicates that this is what you would have liked to do but this would risk large lawsuits from the current owners for de-zoning.

I put to you that this land that I own, was zoned when I bought the land 20 years ago. It was always my security for my old age, in the event that I might need it, to build modestly without disturbing the nature of the land. I have six children and this was also a possibility that some of them might avail themselves of part of the land to build dwellings at some time and be available to look after us. This possibility was there when we bought the land and now is revoked by yourselves in this plan leaving us without the fallback plan we have been depending on should we not have sufficient savings for a self-pension.

This is a financial loss of value of our property solely caused by your revoking of our right to build. If we wished to sell our land, or wished to build on our land the value has diminished greatly. We have been singled out against the whole of AA2 and as such believe that there is cause for compensation.

We ask you to put back the planning as it has always been, removing the burden from us to seek another solution to securing our old age.

2- The area below Bramble Glade and our immediate neighbour to our property is marked as Green Space correctly in the LAP. This is not correct in the current map and needs to be amended. We hold the original document that is not changeable, designating it as permanent green space by the councillors at the time, including Counsellor Fox. We have supplied this document to the council at the time of the previous LAP but the document is in your archives in Dublin and can be ordered by you. ( I can supply you with the copy again if need be). The deeds for Bramble Glade includes this declaration that this land would never be build on and that the owners of homes in Bramble Glade have access to the river via this land.

Please change this back to Green Space as it should be.

Thank you for consideration of these two issues and can you acknowledge receipt of this submission when possible.

Best Regards,

Dated this

ARDAL CONTRACTORS LIMITED

-with-

WICKLOW COUNTY COUNCIL

WICKLOW COUNTY COUNCIL  
15 DEC 2015  
PLANNING DEPT.

=====

A G R E E M E N T

=====

CROWLEY MILLAR  
Solicitors,  
15, Lr. Mount St.,  
Dublin. 2.



LAND REGISTRY

FOLIO 8329F

COUNTY WICKLOW

THIS INDENTURE made the \_\_\_\_\_ day of \_\_\_\_\_  
One Thousand Nine Hundred & Ninety-Two BETWEEN: ARDAL  
CONTRACTORS LIMITED of 5/6, George's Quay, in the City of Dublin  
(hereinafter called "the Owners") of the One Part and the COUNTY  
COUNCIL OF THE COUNTY OF WICKLOW with Offices at County  
Buildings, Wicklow in the County of Wicklow, the Planning  
Authority for the County of Wicklow (hereinafter called "the  
Council") of the Other Part.

WHEREAS:

(a) The Owners hold the lands outlined with a red line on the map hereunto annexed (hereinafter called "the said lands") in Fee Simple which said lands are part of the lands comprised in Folio 8329F of the register of Freeholders County Wicklow.

(b) Pursuant to the provisions of the Local Government (Planning and Development) Acts 1963 to 1983 the Council on the 30th day of October, 1987 issued a Notification of Grant of Permission under Planning Register Reference 3286/87 subject to 24 conditions set out in the Schedule thereto.

(c) Condition No. 1 as set out in the Schedule hereto.

(d) The owner is agreeable to enter into these presents for the purposes of giving effect to such conditions.

NOW THIS INDENTURE WITNESSETH as follows:-

1. That in consideration of the said Permission the Owne hereby for themselves, their heirs, executors, administrator and assigns will not at anytime thereafter in respect of the sai

lands without the prior written consent of the Council or its successors as such Planning Authority use the said lands which is the subject of the Permission Reference 3286/87 other than in accordance with the terms of the schedule hereto.

2. The Owner hereby consents to the registration of this Agreement has a burden on the said Folio and for this purpose the Owner hereby undertakes with the Council that immediately following the execution of this Agreement by the parties hereto he will lodge it in the Land Registry.

IN WITNESS whereof the Owners have hereunto set their hands and affixed their seal and the Council has caused its seal to be hereunto affixed the day and year first herein written.

SCHEDULE

Condition No. 1.

Before development commences, the developer (or land owner) shall enter into a legal agreement with the Planning Authority restricting the use of lands to the rear of the site i.e. between the site outlined and the river to agricultural, open space or playing field uses.

PRESENT WHEN THE COMMON SEAL  
of ARDAL CONTRACTORS LIMITED  
was affixed hereto:-

*Irene Shirley*  
15, W. Mount St.  
Dublin 2.  
Secretary

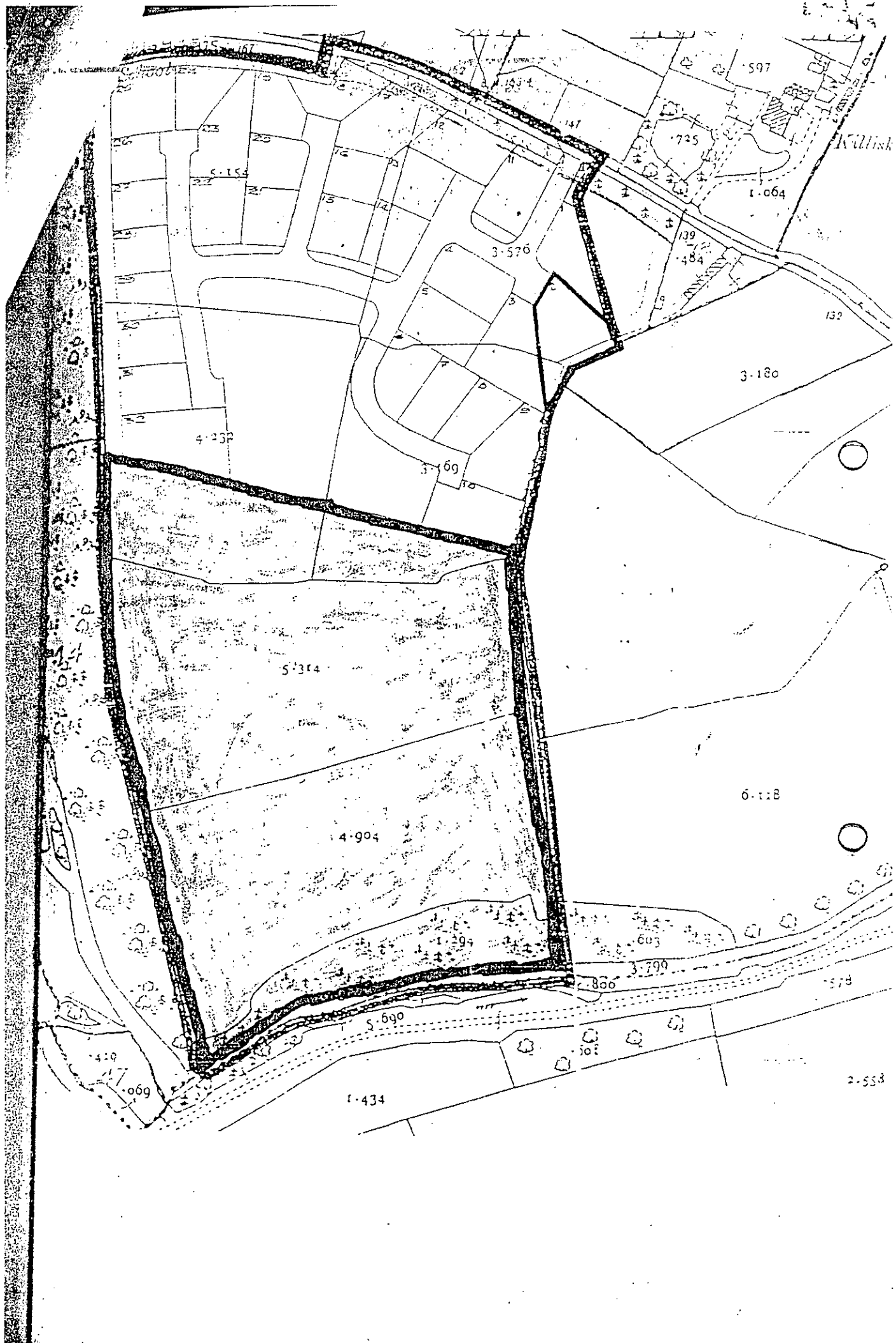
*J. Castillo*  
W/Secr. Castillo

PRESENT WHEN THE COMMON SEAL  
of THE COUNTY COUNCIL OF THE  
COUNTY OF WICKLOW was  
affixed hereto:-

*S. J. Madh*  
County Manager

*John G. ...*  
Nominatee Member

*Walter ...*  
A/C Secretary



C 186

Stephen Willoughby

From: Matthew Weiss  
Sent: 13 December 2015 12:18  
To: Planning - Development Plan Review  
Subject: Submission from Matthew Weiss

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Please change this back to Green Space as it should be.

Thank you for consideration of these two issues and can you acknowledge receipt of this submission when possible.

Best Regards,

C187

Leonora Earls

**From:** Michelle White  
**Sent:** 11 February 2016 13:34:00  
**To:** Planning - Development Plan Review  
**Subject:** Wicklow County Dev Plan 2016-2022  
**Attachments:** planreview.doc 2016.doc; ATT00001.htm

To whom it may concern,

Please find attached a submission in relation to the upcoming review of the Wicklow County Development Plan 2010-2016 and preparation of the new plan for 2016-2022.

Regards  
Ian & Michelle White



[planreview@wicklowcoco.ie](mailto:planreview@wicklowcoco.ie)

Ian & Michelle White  
36 Ledwidge Crescent  
Bray  
Co Wicklow.

10/02/2016

To whom it may concern,

We are contacting you to-day with regard to your open submissions policy in relation to the upcoming reviewing of the Wicklow County Development Plan 2010-2016 and preparation of the new plan for 2016-2022.

Our submission lies around the TPO's currently in existence for the Bray area, specifically the ones in place at Ledwidge Crescent.

We reside at 36 Ledwidge Crescent, and our concerns only are specific to the tree that is in our garden **not the tress on the communal green area.**

We are requesting that the mentioned tree in our garden be removed from the TPO listing under the new development plan for 2016-2022. Our reasons for this request outlined below.

1. There are currently building works under way at St Peters Primary school, which will when completed will run along side our house and the mentioned tree. I have submitted concerns separately to the planning office re the impact of the build works on the tree and have been advised that my concerns surrounding the impact of this development so close to the tree are of a speculative nature. Although back in 2002 the planning office considered a "speculative objection submission" in relation to the damage to the tree that the proposed development could cause, (this submission coming from a councilor) when the previous owners of the house were seeking planning permission to build in their garden. Planning permission was refused to the then owners and the grounds for the refusal were all in relation to the tree. Permission was refused in 2002 due to the "speculative" damage to the tree, but yet approval given in 2015 for a full larger school build in the same proximity with no detailed reports that the tree would not sustain any long term damage.
2. In our opinion the tree is now way too big to remain so close to a residential home and a public school. The tree is of a huge scale height and width, with very large overhanging branches. When the tree is in full foliage it is very dense and totally blocks the light to the side and front of our home.

3. In the redesign of the layout of the new school it will now have the main access for all cars now driving along the side of the tree on a constant basis to the back of the new school car park.
4. The side and the front of our house is now going to be overlooked by the new building and the Tree forming one big obstruction right along side our house. We have very limited natural light on the side and none on the front of the house now because of the tree but there will be none at all now either on the side or to the front of the house once the build is complete, effecting not only our quality of living but also will have a financial impact on the value of our home. We are unable to keep any planting/ hanging baskets in the front garden as when the sun comes around the side of the house to the front the light is totally blocked by the tree and now will be even more so by the new build. The tree is a nuisance to us as when the huge volume of leaves fall they are all over our garden front and back, and are damaging to the trampoline equipment that we keep in our garden for our son who has autism. It is impossible to maintain and keep our garden free of the leaves, and we have to dispose of them also at a cost to us. The removal of the tree would greatly improve the opportunity for natural light on our house when the sun comes around in the afternoon.
5. The tree will now be blocking natural light to the school also, its overhanging branches will be very close to the school when full build complete. Not only will the tree be blocking the natural light to our home and the school, but the school now will also be blocking light to the tree and our home. Although the comments recently from the planning dept re our concerns around the impact of the building works on the tree have been referred to as being speculative, I don't think honestly anyone can say for certainty that no underlying damage has been done to the tree with the recent build works, and I think that we would have all have to agree that our concerns re the impact of the tree remaining in our garden will continue to have a negative impact on the natural light and value to our home are not speculative but indeed factual.
6. The tree because of its scale and size creates a shelter for anti social behavior, drinking and drug taking and now even more so with the school building running adjacent to it providing even more of a shelter for this kind of behavior to continue.
7. Whilst we understand and appreciate the amenity value and environmental value trees give, they are living organisms and therefore will not last forever, and we feel that this tree because of the mitigating factors mentioned should be removed from the TPO listing to allow us to remove the tree from our garden. There are plenty of trees on the

communal green in front of our house both old and newly planted trees which will still give plenty of amenity value to the area.

We are hoping that our concerns are taken seriously and due consideration and a favorable outcome will come of this submission. We are willing to meet at our house to further outline and show you the impact that the tree is having on our lives.

Please confirm receipt, and also confirmation of the expected timelines involved in this process.

If you should require anything further please do not hesitate to contact us.

Kind regards

Ian & Michelle White



C188

**Leonora Earls**

**From:** WDSL CHAIRMAN  
**Sent:** 19 February 2016 13:57  
**To:** Planning - Development Plan Review  
**Cc:**  
**Subject:** 2016-2022 Plan Review inclusion Please  
**Attachments:** Public Advertisement.pdf; WDSL GROUNDS 2016 PLAN.pdf; WDSL WICKLOW COCO LETTER 2016 PLAN.pdf

Dear All

Please see attached submission from the Wicklow District Schoolboy/girls League.

We appreciate your help in helping us to develop children through sport and recreation,  
Any more information required after the reading of the initial submission can be provided  
Sent 1.57pm Friday 19<sup>th</sup> of February 2016

Kind regards

Peter Porter  
WDSL Chairman



Wicklow & District Schoolboys/girls League



This email has been sent from a virus-free computer protected by Avast.  
[www.avast.com](http://www.avast.com)



Wicklow & District Schoolboys/Girls League

**Wicklow & District Schoolboys/girls League**  
**Kilcoole**  
**Wicklow**  
**Co. Wicklow**

**Wicklow County Council**

County Development Plan  
County Buildings  
Whitegates  
Co. Wicklow

19<sup>th</sup> February 2016

Dear All,

My name is Peter Porter, I am the new chairman for the League and my goal is to get lands for the league, so the children of Wicklow who play soccer have a place to call home.

We ask the development committee to include land for the WDSL in Wicklow. An ideal piece of land would be 10 acres that would allow the league to develop the required facilities to look after the children in Wicklow via soccer and future growth.

Presently we are one of the few leagues in Ireland that does not have facilities and a centre of excellence to encourage, maintain and develop our children. As you are aware there is a series of downturn of children staying in sports, many reports outlining this, and we have a duty to provide a centre for children to develop and be encouraged to stay in sports.

We as a league provide children with football, over 170 games per week are played up and down the county. However, as we do not have our own grounds we have to rent from clubs at a cost of 12K+ per year. We can only rent space when available and not in the way we would like for it to be done, which stops us from developing the children correctly.

The advantages of us having our own land is that we can apply for grants that are available from the Sports Capital Grant, F.A.I and of course Private bodies. We cannot gain Sports Capital grants without having land, so chicken and egg situation.

WDSL- Chairperson  
Gormanstown  
Kilbride  
Wicklow  
Co. Wicklow

WDSL-Secretary  
Noel Morrissey  
7 Druids Brook  
Kilcoole  
Co. Wicklow

WDSL-Treasurer  
Brian Kavanagh  
1 Woodlands Vale  
Arklow  
Co. Wicklow

Committee Members.

.ie  
.ie



**Wicklow & District Schoolboys/Girls League**

**Wicklow & District Schoolboys/Girls League  
Kilcoole  
Wicklow  
Co. Wicklow**

Once we have our land we can develop the grounds like attached. Also renaming the grounds to Wicklow Centre of excellence. We then would be in control of the training of the children of Wicklow and can work 7 days a week. The facility would also be offered to the FAI as a centre of excellence at a cost, for training as currently Wicklow players have to travel to Bundlody to do same.

Again once we have our grounds we can do so much to help with Sports and recreation in Wicklow. The facility would offer employment as we would have a shop, gym and caretaker required. Also be an area where visitors to the county would travel to see, and of course Wicklow People to be proud of.

As mentioned in the games provided for at the moment we can grow on that by introducing a Disability Football Development Strategy and Ladies Football Development Strategy both of which are areas that need to be provided for and we would like to do so, but having no facilities and relying on renting grounds for a few hours a week will not help us to develop.

Please look at this submission positively and I look forward for the WDSL to be included in the development plan. Any questions or more detailed information required please do not hesitate to contact me.

Yours sincerely

Peter Porter

WDSL Chairperson

WDSL- Chairperson  
Gormanstown  
Kilbride  
Wicklow  
Co. Wicklow

WDSL-Secretary  
Noel Morrissey  
7 Druids Brook  
Kilcoole  
Co. Wicklow

WDSL-Treasurer  
Brian Kavanagh  
1 Woodlands Vale  
Arklow  
Co. Wicklow

Committee Members  
Mary Browne  
Joanne Browne

Jimmy Hackett  
an Copeland

Grounds Development Plan WDSL

Wicklow District Schoolboys / Girls League 10 Acre Plan



Minimum of 10 Acres required as each full size pitch is approx 2 acres

Wicklow is one of the only few counties in Ireland to have no Facilities

Development of Centre of Excellence for Girls/Boys abled and disabled is the goal

Over 10,000 kids play Soccer week in week out through out wicklow league/schools etc

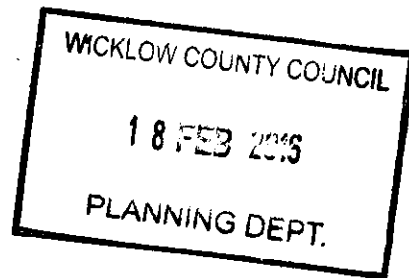
Can bring more Counties to Wicklow for Competition Match's

Planning permission to change to sports grounds with 99 year lease to W.D.S.L.

The W.D.S.L. will work with the FAI & Sports Capital to build on grounds over a 5 year period

**C189**

**Wicklow Head Preservation  
Group**



**Submission**

**To the Wicklow County Draft  
Development Plan 2016-2022**

**Submitted 18<sup>th</sup>. February 2016 by Sam Conway  
Seaview Road Wicklow Town 0404-62785**

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# Vision Statement

Wicklow Head is an area of outstanding natural beauty. The whole area which includes Brides Head and Dunbur Head has the wonderful combination of a beautiful coastline, rolling countryside and three lighthouses. It is a very special place of peace and tranquillity.

Although the site is not specifically designated for its habitat it is nevertheless rich in biodiversity e.g. Peregrine Falcons and other birds of prey, over wintering Lapwing and Field Fare, Stoats and numerous varieties of flora.

Wicklow Head Preservation Group and its very many supporters deem this area to be a priceless jewel which must be kept in its unspoilt natural state for the benefit of the local community and visitors to the area. We deem the purchase of in excess of one hundred acres of land at Wicklow Head by the then Wicklow Town Council to be a wonderful acquisition, albeit initially for the wrong reasons.

In this submission we have set out proposals and plans for the area which we deem to be constructive and achievable. If implemented what we are advocating would open up the area for non-sports orientated recreation and a whole host of environmentally friendly leisure activities, such as painting, photography, bird watching, astronomy, the study of flora and fauna, meditation and the simple observation of farm animals in their natural surroundings. The proposals would not only provide wonderful facilities for the people of Wicklow Town and its environs but they would attract tourists to the area, giving a much needed boost to the business community and in turn create employment, if there is a will to look at the big picture combined with progressive thinking and political courage what we are suggesting can be made to happen.

# Proposals

## Sli Na Slainte

### Viewing Area

### Pure Mile Walk

### Loop Walk

## Plans.

**Sli Na Slainte:** When Wicklow Town Council purchased the land it was their intention to create a Sli Na Slainte across a section of the land (see letter, appendix 1), but this never happened. We now ask Wicklow County Council to develop the Sli Na Slainte with some wooden seats placed at intervals along the route. We suggest that the trail could run around the periphery of the land on the right hand side of the Lighthouse lane down at the last cattle trap and over to the field bordering the R750 and back again. This route would necessitate building a small wooden bridge over the gorge and stream at the bottom of the R750 field.

**Viewing Area:** At the highest point of the Council owned lands, create a viewing area again with some wooden seats. This viewing area would give visitors 360 degree spectacular views that would put the Bay of Naples in the halfpenny place. On a clear day the Welsh coast would be visible and possibly even the mountains of Mourne. To get to the viewing area, a simple pathway of flag stones could be put in.

**Pure Mile Walk:** In 2012, with the permission of the Irish Lights, Wicklow Head Preservation Group entered the Lighthouse lane in the Pure Mile Competition and the entry won the Best Natural History Award (see appendices 2,3 and 6). We accept that for this proposal to become a permanent feature,



Wicklow County Council would have to enter into discussions with the Commissioners of Irish Lights and perhaps agree to share the costs of maintaining the lane.

**Loop Walk:** We are suggesting a Loop Walk that would run from the Glen Strand car park down through the Glen corridor, along the coast to Brides Head, up to the exit onto the Lighthouse lane at the last cattle trap, back along the Lighthouse lane and finally down the Dunbur Road to the starting point at the Glen car park. It should be noted that we are saying 'along the coast' as distinct from the Cliff Walk. The cliff Walk is not for the faint hearted and in its present condition it is actually dangerous. To create the coastal section of our proposed Loop Walk would require that it be pulled inland a small way and run through what is mainly Wicklow Golf Club land. Except for the section up over the Glen Strand where two tee boxes are situated, most of the Club's land that would be affected is mainly gorse and bracken and of no real value to the Club. The two tee boxes in question would have to be relocated to facilitate the walk and some reconfiguration of the course would be required.

Some time ago the Golf Club were interested in buying a section of land near Brides Head from the then Wicklow Town Council, in order to carry out such a move (see again appendix 1 letter). We suggest that this idea be revisited but this time with a view to a land swap, allowing the tee boxes to be moved and the creation of a safe coastal section of the Loop Walk, accessible to the majority of people.

Regarding the Dunbur Road section of the walk, the only footpath back to the car park is on the opposite side of the road, but there are kerb stones on the other side running right back to the Glen car park. It would seem that it may have been the original intention to create a footpath on that side. This could now be done and it would mean that walkers could complete the loop without having to cross the Dunbur Road twice. The same would apply if visitors just wanted to go straight to the Lighthouse lane to avail of the other walks and the viewing area.

**Lighthouse Lane:** It will be noted in all of the above proposals that the Lighthouse lane plays a role in all of them, but the lane is wholly owned and maintained by the Irish Lights, with a right of way for residents, land owners and the emergency services. The Irish lights have no problem with people walking the lane but they are concerned about the volume of unauthorised vehicular

traffic using it. Some years ago all the stakeholders considered installing electronic gates to deal with this problem. If the gates were installed it would mean that walkers could use the lane in relative safety. As already stated the Irish Lights would have to be consulted on all of the proposals and nothing could be implemented without their full approval.

**Glen Car Park:** All visitors in cars wishing to avail of the proposed facilities would park their vehicles in the above car park, avail of the picnic area if they so wished and proceed on foot either to the Loop Walk or via the Dunbur Road to the Lighthouse lane. One of the main reasons for creating these facilities would be to get people out of their cars to take exercise and breath in pure fresh air.

**Tourism:** To sustain the Country's recovery, it is accepted that tourism will play a major role. It goes without saying that tourists will only visit an area if there is something special to attract them. We strongly contend that the whole area of Wicklow Head would be a wonderful attraction if the proposals in this Submission are brought to fruition. A further long term project would be to reinstate the middle Lighthouse and its dwellings and gardens to their original working condition. This would be a big project and would require the setting up of a company to raise funding, carry out the works and finally run it as a tourist attraction like Wicklow Gaol. Thousands of people visit Hook Head Lighthouse every year. Wicklow Head has much more to offer by virtue of its beautiful scenery and three Lighthouses.

**Closing Statement:** Contrary to what is stated in the Recreation and Amenity Chapter of the Wicklow Development Plan 2007-2013 Wicklow Town is not well served with informal open spaces. The only real open space available to the public for non-sports orientated leisure activities is the Murrough. Sadly, the Murrough has been used and abused down through the years. A long stretch of the outer Murrough has running along it, a dilapidated factory building, a very busy road and high bridge, a railway line, a scrap yard with its twin peaks of scrap metal, the old Chemical Works buildings, piles of waste left behind by a now defunct waste disposal company, a timber terminal and treatment plant, warehouses, and finally a sewage treatment plant which emits odours that are nauseating. On top of all this is the severe damage caused by the

storm just after Christmas. In all probability the Murrough will never return to what it was and will always be under threat from further erosion.

The wonderful acquisition of the land at Wicklow Head gives Wicklow County Council a glorious opportunity to create unique and beautiful facilities where people can escape to, away from the hustle and bustle of everyday living and densely developed housing estates. If created, these facilities will be a monument to progressive thinking and of immense benefit to the inhabitants of Wicklow Town and the surrounding areas for generations to come.

## **Wicklow Head Preservation Group**

Wicklow Head Preservation Group formed in 2009 as a result of the huge ground swell of opposition to Wicklow Town Council's planning application to build a sports complex at Wicklow Head. The Group has a one item agenda, with the sole aim of ensuring that Wicklow Head is preserved in its unspoilt natural state and is only used for non-sports orientated recreation combined with a range of passive leisure activities.

The Group has at its core a relatively small 'kitchen cabinet' that holds regular meetings to interpret and act upon the wishes of the hundreds of people who support the cause. When the need arises we can call upon professionals from outside the Group who have legal, planning and local government expertise to advise us.

It has never been the Group's policy to simply object to any other plans put forward for the Council owned lands at Wicklow Head and leave it at that. We have always put forward our own ideas for Wicklow Head as evidenced by this new Submission. Any expenses incurred by the Group in furthering its objectives are borne by the core members out of their own pockets and we have never burdened the public with a request for funds.



# COMHAIRLE CHONTAE CHILL MCHANTÁIN

Wicklow County Council

MN/AM

Your Ref: 24<sup>th</sup> May 2010.  
Our Ref:

Aras An Chontae  
Cill Mhantáin  
Telefón : (0404) 20100  
Fax No : (0404) 67792  
Intl VPN : 181 2100  
E-Mail: [housing@wicklowcoco.ie](mailto:housing@wicklowcoco.ie)  
Web: [www.wicklow.ie](http://www.wicklow.ie)

**Wicklow Head Preservation Group**  
C/o Sam Conway  
Cois Farraiige  
Seaview Road  
Wicklow  
Co Wicklow.

**RE: Wicklow Town Council property at Dunbur**

A Chara,

Thank you for your recent letter in connection with the above property and the Council's plans for same. I regret the delay in replying to your letter but as you can appreciate I was required to consult the Council's Law Agent prior to issuing a reply due to the comprehensive list of queries raised by you.

The Town Council took the innovative step to acquire this large portion of land (circa 100 acres) in an effort to provide much needed training and playing facilities for a number of sporting clubs in Wicklow Town. It is quite unusual for any local authority, especially a relatively small Town Council to acquire land to address the needs of Sporting Clubs but Wicklow Town Council, conscious of the benefits that accrue from involving young people in sporting activity, took this decision having been approached over many years by many different clubs, desperate for more training facilities to cater for their increasing membership. It is a proven fact that the more you involve young people in sports, the less chance there is of them becoming involved in other anti-social behaviours.

The lands in question are really only suitable for recreational purposes and the Council intended to develop a number of playing pitches, full-sized and training pitches together with changing facilities, viewing stands and carpark. The lands were comprehensively investigated and surveyed with a view to establishing their suitability for playing pitches. Pre-planning meetings were held with the Planning Authority (Wicklow County Council) and discussions took place with a number of sporting clubs in the town, the F.A.I., and the G.A.A. A planning application was lodged with the Planning Authority and unfortunately they were not in a position to grant planning permission for the application submitted. We have carefully studied their reasons for refusal and following further discussions with the Planning Authority, we hope to be able to address the shortcomings in a modified planning application. In effect, we will be scaling back the proposals and dealing with the other concerns of the Planning Authority.

In the meantime, we advertised the lands for letting and presently, all of the lands are let and generating some income for the Council. The Golf Club have also expressed an interest in acquiring some of the lands which adjoins their own land on which to develop two new holes and we are in discussions with them in this regard. It is also our intention, hopefully, to develop a walking route, perhaps even a "Sli na Slainte" walking trail across the lands and we are investigating this at present.

In summary, the Council's purchase of these lands has secured and protected them from any potential inappropriate development and we still hope to provide much needed facilities for sporting organisations in our town.

I trust this clarifies the situation for you.

Yours sincerely,

MICHAEL NICHOLSON  
DIRECTOR OF SERVICES/TOWN MANAGER

APPENDIX I

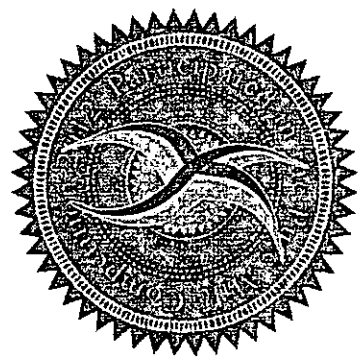


*Certificate*  
**The Pure Mile 2012**

**BEST NATURAL HERITAGE MILE**

**The Wicklow Head Pure Mile**

Best Natural Heritage Mile Award in The Pure Mile Competition 2012  
 Presented by: The PURE Project



APPENDIX 2.

PURE, Wicklow Mountains National Park, Kilafin, Laragh, Bray, Co. Wicklow.  
 Tel: 0404 45547 Email: info@pureproject.ie Web: www.pureproject.ie



## THE WICKLOW HEAD "PURE MILE" 2012<sup>1</sup> – FULL DESCRIPTION OF STOPS.

The Wicklow Head Pure Mile runs through an area of outstanding natural beauty. Although, the complete route from the R750 Brittas Bay Road to the sea cliff at Wicklow Head is a little over 1 mile long, it is worth going to the end for the fantastic sea and coastal views on arrival.



It is best appreciated by walking because of the narrow single track road without verges. It has some gentle climbs. The laneway goes through rolling farmland, then wild heathland, and finally salt tolerating grasses on the rocky cliffs<sup>2</sup>, all of which provide habitats for interesting flora and fauna. Highlights include three heritage lighthouses on the way<sup>3</sup>!

Being the most Easterly point of Ireland and 275ft high the Headland affords excellent views out to sea and along the coast. For ease of use the 10 stops on the route are marked where possible by physical structures like cattle grids or gates. Species names of flora and fauna have been given a capital initial letter for easy reading.

### **START: Red painted metal barred gate to Lighthouse laneway on R750**



The start of our walk is approx 1 mile to the South of Wicklow Town. To reach it follow the coast road, R750, South, out of town, straight along Dunbur Road, passing Wicklow Golf Club entrance on the left then through the sharp downhill left hand bend at the "Glen Turn". Wicklow Golf Course is now on your left. About 300 yards on, there is a bungalow on the left then an entrance with a bright red swing gate (like one pictured left).

Wicklow Head is a "green lung" for Wicklow Town and environs. It has provided a traditional leisure walk for locals and visitors for centuries.

The coastline here is an EU "Special Protection Area"<sup>4</sup>. Although the entrance gate is marked "Private" by the Commissioners of Irish Lights, access has always been possible for respectful visitors. The Commissioners are responsible for painting all the gates a jolly bright red.



### **Please follow the COUNTRY CODE:**

- Keep all dogs on leads, in case of annoyance to wildlife or sheep.
- Take all your litter away, especially plastic bottles and dog droppings.
- Do not trespass on private property, fenced farmland, or interfere with livestock.
- Do not pass DANGER signs. The cliffs around here can be slippery and steep!

<sup>1</sup> This document has been written by The Pure Mile Sub-Committee of the Wicklow Head Preservation Group. It may not be used without permission.

<sup>2</sup> More can be found on AskAboutIreland.ie which has an interesting section on Wicklow Head and its Reef  
<sup>3</sup> Aerial photo above is © WicklowCoast.com, an initiative of the Heritage Office of Wicklow County Council

<sup>4</sup> EU Directive on Wild Birds 79/409



### STOP 1. First Cattle grid with red gate.

On the left is an area exposed when Wicklow Golf Club built a new tee in 2011. The rapid colonisation of the new sandy bank by red and white Clovers, yellow Vetch, pink Fumitory and Poppies is amazing. This area now attracts summer Swifts who dart to the puddles for a drink. In August and September butterflies enjoy the warmth and shelter here, including Tortoiseshells, Common White, occasional Painted Ladys and the Red Admiral (pictured right).



The next section is a walk up Lacey's Hill, the steepest part of our Pure Mile. On the right there is sheep farming with the Jacob variety providing cross-bred sturdy upland lambs varying in colour from white, white with brown patches to black. The Jacob ram, if present, has huge curled horns. Lambing starts at the end of January. (Please keep dogs on leads!).



The high slope of the field boundary to the left is covered with Bracken Fern, Brambles and Gorse. Looking back there are views across Wicklow Golf Course, Town and Bay. On a clear day one can see Howth, 40 miles North.



For maintenance reasons the verges are occasionally sprayed. However, both the native and introduced plants soon re-appear. In mid Summer, at the top of the hill on the left, one can see blue Speedwells, white lacey Stitchwort (pictured) and four petalled yellow Tormentil, as well as the more common Vetches and Buttercups. The path now levels out until you come to a wide entrance to a farm on the Right.

### STOP 2. Second Cattle grid with red gate.

If you are quiet and look carefully Left and Right from here, playful but quickly frightened rabbits are often spotted at the field boundaries where there is cover. Look out for rabbit runs and holes along the road too. Foxes are also occasionally seen.



This section of road has tidy hawthorn hedges covered with white "May Blossom" in late Spring (pictured below left). Underneath you often see clumps of Violets.

Look into and under the Hawthorn bushes to see patches of bright yellow Lichen on the bare bark (below right). In Autumn, the sharp eyed can even see cup-like orange fruiting bodies on the frilly edges of this apparently flat growth.







On the verges in early Summer one sometimes sees a pretty pale blue flower. This is Flax, an escapee from local farmers' crops (pictured left).

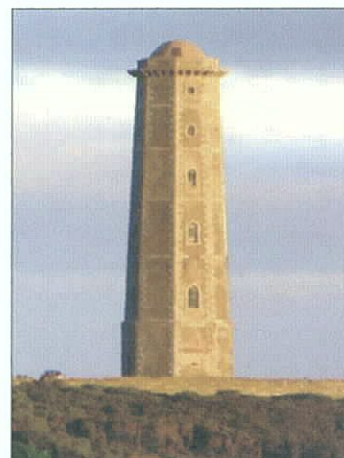


In the hedges and on overhead wires there are a range of small birds. These include tiny Wrens, Sparrows, Blue Tits, Great Tits (with distinctive black and white head and yellow chest), pink chested Linnets (pictured above right), Chaffinches, Bullfinches, and even the occasional beautiful Goldcrest, among many others. Robins will often appear to follow you curiously along the road, perhaps hoping you will produce a spade and turn over a worm!

Just before the next cattle grid there is more white Stitchwort and pretty pink Herb Robert on the right. The lobed edged leaves of Herb Robert turn bright red in winter.

### **STOP 3. Third Cattle grid with red gate.**

From this point one gets the first good view of the sea South-Eastwards, and a line of seven wind turbines. The 2002 Arklow Bank wind farm was the first to be built in Ireland, and the first use of 3.6 megawatt wind turbines in the world. Built by GE and Airtricity they were intended to both assess the technology and provide power to the national grid. Small from here, the turbines are actually a massive 240ft tall and have three 50ft blades each. However, the larger project of nearly 200 turbines along the East coast was cancelled in 2007, in part due to the impairment of sea views.



This is also the first good view of the the octagonal lighthouse, built as one of a pair in 1781<sup>5</sup> to distinguish Wicklow Head from Howth or Hook Heads, which only had one light each.

In Spring and early Summer, the cattle grid is usually full of water and has lots of frogspawn, followed by tadpoles which later become tiny Frogs (pictured below left). No other cattle grid on the route stays wet enough to attract frogs.



From this point on look carefully at any stones in ivy covered walls, or rocky outcrops that are warm with sunlight. They attract the rarely seen Common Lizard (pictured right), one of the "serpents" that St Patrick failed to banish!



<sup>5</sup> Taken from article in Wicklow Historical Journal "Wicklow Head Lighthouses" by Jimmy Cleary, based on local knowledge and Commissioner for Irish Lights Journals "Beams" Vol 6 & 7, and "Subsea" No 71.



The same rocky spots offer a habitat for small clumps of Navelwort ( below left ) with its spikes of yellow flowers.



The hedges are now composed mainly of Gorse (pictured right), brilliantly yellow coloured in Spring. (But some have been cut back recently)



There are also brambles, or Wild Blackberries, which are covered with white to pink flowers in late Summer followed by fruit which provides handfuls of excellent refreshment on the walk in early Autumn.

#### **STOP 4. Fourth Cattle grid with red gate (beside farm with sheds).**

The walk around the cattle grid has a hedge covered with green Goose Grass "Cleavers" in the summer. This plant is unusual in that it seeds itself by literally sticking to a host. Touch it to feel its stickiness, caused by tiny hooks on the hairs of the leaves – acting just like Velcro!

A short way along and there is a good view of the second lighthouse on the Head, built in 1818<sup>6</sup> to replace the seaward twin of the Octagonal tower. Around the lighthouse are the remains of walled compounds and ancillary houses. A look-out post / radio station was established in the 20<sup>th</sup> century, which you can see on the rock above. It is still operational.

Soon one gets a good view of the sea coast North of Wicklow Head. Interestingly, the water currents seem to divide at the Head. All the beaches to the North as far as Dublin Bay are grey shingle. All the beaches to the South as far as Rosslare are fine golden sand.

Hawthorn hedges give way to banks of Gorse and Brambles on the Left but wire fencing and grass verges on the Right give clear views Southwards. In the verges are clumps of yellow and purple Vetches, Violets, yellow Tormentil (below left), white flowered Plantain spikes (below right), pink Fumitory, as well as inky blue Black Horehound in late summer. The meadows Southwards are full of familiar wild flowers such as buttercups, clovers, daisies and dandelions, with rabbits playing under the field boundaries.



<sup>6</sup> Jimmy Cleary article, as above





After the crest of a small rise one can get sea views Northwards across Wicklow Bay to Bray Head, and beyond that across Dublin Bay to Howth, 40 miles away. The bare rocky outcrop on the left has plants of the succulent, red leaved Stonecrop (pictured left), a variety of sedum which opens to pretty pink flowers.

**STOP 5. Fifth Cattle grid with grey gate and masonry gate posts to Right.**

(NOTE: If using accompanying Diagram Map please note that the scale changes at this point for clarity.)



Just before this stop, a new sand path leads off downhill to the left. It provides access to a track through the heathland along the coast. It passes stunningly beautiful cliff scenery with sea arches, coves with ancient Lime Kilns, caves and bays, as pictured on left. However, the track across the cliffs can be slippery and passes close to dangerous cliff edges so extreme caution must be taken.

It is hoped that the local authority will improve the cliff walk in due course as a tourism attraction for County Wicklow. When that happens, the Wicklow Head "Pure Mile" will be a potential link in a 5km Circular walk from the Harbour, past Black Castle (pictured right) to Wicklow Head then back inland for Wicklow Gaol and the attractive shopping streets of the County Town



This coastline is a breeding ground for Grey Seals (pictured right). Colonies of them complete with white furry pups can be seen at local Brides Bay in late Autumn. (Do not approach!). Full grown males can weigh 300kg. Seal hunting was banned in Ireland by the Wildlife Act 1976<sup>7</sup>.



To the Right of the cattle grid in late Summer there is a patch of tall Rosebay Willow Herb, a bright magenta pink (pictured below left). In the Spring, along the bank to the Right you can sometimes see patches of Primrose and wild Bluebells. Yellow Tormentil and blue Speedwell (pictured below right) can be seen throughout Spring and Summer.



<sup>7</sup> Taken from leaflet "Seals of Ireland" produced by Notice Nature and the Dept of Environment, Heritage and Local Government



At the right hand bend look Northwards (to left) and see a cliff face with black birds silhouetted against the sea. These are Cormorants and Shags which can be seen diving into the sea for fish. In Summer, they often stand with black wings outstretched to dry in the sun.

Now the walk becomes parallel to the coast with lovely views out to sea to the left. The vegetation here changes to coastal heathland. In Summer, creamy white Burnet Roses (pictured below left) appear amongst the Bell Heather (pictured below right). Both species are typical of County Wicklow uplands and exposed coasts. However, one can also see some "garden escapees" here like the bright pink Oxalis (wood sorrel). Birdlife includes some typical heathland species, including Whitethroat and Stonechats.



From this point the heathland around Wicklow Head is a "proposed Natural Heritage Area". Although this designation has been superseded by other EU designations (the key tool in protecting important species and habitats) the County Development Plan endorses it. The Plan has an Objective "to maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) in Wicklow"<sup>8</sup>.



The local rock type is a silver grey Mica Schist. Geological pressure has caused extreme folding which can be seen in rocky outcrops at the surface. This has been the cause of the caves and arches along the coast. Heathland butterflies like Speckled Woods, Fritilleries, Common Blues and Cinnabar Moths (pictured left) can be seen in September.

In early Summer the noise now soon alerts you to the fact that Wicklow Head is an important sea bird breeding site. Once parallel to the coast in the Spring and early Summer you can hear a noisy screeching from numerous nesting sites on the cliffs.

The coastal heathland habitats are easily disturbed. Thus from Stop 5 onwards both sides of the Wicklow Head Pure Mile route are described as a "High Vulnerability Area" by environmental consultants Natura who have analysed possible development impact at Wicklow Head<sup>9</sup>. It is certainly the case that car parking is causing erosion of the heathland just before the next stop, as well as littering.

Just before the next stop there is a brown barred gate to the right marked by a sign saying "DANGER- FARM MACHINERY". Look South here for good views along the coast, but do not enter as this is private property.

<sup>8</sup> [www.npws.ie/protectedsites/naturalheritageareasnha/](http://www.npws.ie/protectedsites/naturalheritageareasnha/)

Any proposals for development must be notified to The National Parks and Wildlife Service.

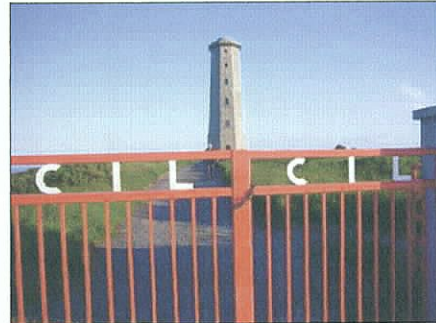
<sup>9</sup> Taken from "Ecological Assessment of Playing Fields and Ancillary Clubhouse Facilities on Lands at Dunbur Road" Natura Ltd, 2009



**STOP 6. Commissioners of Irish Lights (C.I.L.) red double gates with pedestrian "kissing gate" to Right.**

Just inside the gate, look Right along the boundary wall to see Lichens and tiny Ferns growing in cracks.

To the Left, inside the gate, are the first good views of the seabird nesting sites on Wicklow Head cliffs. Take a detour for a better view following the boundary wall downhill. Due to the distance, tripods will still be needed for good photographs. However, do not venture too far as the surface is slippery and the cliffs very steep. After looking, retrace your steps to the paved road.



There is also a well-used short-cut track through the vegetation which starts just inside the CIL gates to the left. This takes a corner off the paved route but is steeper, can be wet, and misses 2 of our Stops. However, Burnet Roses, Bell and Ling Heather can be seen close up.

The 1781, 95ft tall Octagonal Lighthouse now in front of you was built as the rearward one of a pair. It was decommissioned in 1818 but kept as a daytime navigation mark. Unused and empty for years it was refurbished by the Irish Landmark Trust in 2000 and can now be rented for holidays<sup>10</sup>. Inside it is charmingly furnished with two pretty double en-suite bedrooms, a lounge and a kitchen (at the very top!). Visitors come from all over the world. The 5ft thick walls and tight windows make the tower very cosy even in the worst gales.

The heathland bank below and East of this Lighthouse was marked with 20ft high letters made of whitewashed rubble spelling EIRE during World War II, when Ireland was neutral. They assisted pilot navigation to prevent overflight, and possibly bombing. EIRE signs were also made at other lighthouses around the coast and some signs have recently been cleared and refurbished, as at Loop Head, pictured<sup>11</sup>, Malin Head and Baltimore. The large scale of each letter can be seen from the wheelbarrow beside the "E". However, attempts to re-discover the letters in the vegetation below the lighthouse have so far failed, despite local knowledge that they did exist.<sup>12</sup>



Following the paved path around the next left hand bend one can see a flatter patch of land down to the Right, walled all round. This was once used by the lighthouse keepers for growing vegetables.

<sup>10</sup> [www.IrishLandmark.com](http://www.IrishLandmark.com)

<sup>11</sup> Photo taken from the Clare Herald, 29 April 2012. Other information from a post and photo regarding Malin Head from a 2002 BBC "COAST" programme. Information on the Baltimore sign, which also had a number above it, came from <http://www.islandtripper.com/tours?id=14>. Please contact me to share my research at [EIRE@lindasaunders.com](mailto:EIRE@lindasaunders.com)

<sup>12</sup> Mentioned in an issue of the Wicklow Historical Society by Jimmy Cleary.



### STOP 7. Look-Out Point / Radio Station.

After a short distance there is a clear vehicle track to the Right going uphill through the grass. This is a worthwhile detour which will allow you to see the 1818 lighthouse and its outbuildings up close. The lighthouse was de-commissioned in 1865, replaced by a light ship. It is currently closed but could be re-opened as a further tourist attraction in the future.

Climb up to the Look-Out Point for excellent 360' views, with undisturbed Summer-time patches of pink Sea Thrift (below left), yellow Vetch and blue Cornflowers (below right).



From the top of the concrete steps to the Look-Out Post (No Entry), you can see and hear further sea bird colonies on cliff faces to the South, including Cormorants or Shags silhouetted at cliff edges.

A good photo point is beside the railing just below (with the NO ENTRY sign). From here it is dangerous to continue as there are steep drops all around. So retrace your steps to the paved road.

### STOP 8. The Second (1818) Lighthouse.

The second of the original pair of 1781 lighthouses was built on a WNW bearing from the first, so that sailors who knew the bearing could estimate their location. That tower was demolished but its original foundations can still be seen around the base of the "new" lighthouse which replaced it in 1818 (pictured right).



Over the years lighthouse technology changed considerably. The 1781 lighthouses relied on 2lb candles and glass reflectors but the 1818 lighthouses used oil lamps.

On the Left, a short distance further, 5 stone steps emerge from the grass, at the end of the short-cut from Stop 6. Now look out for a section of wall on the left, then a wire fence with red posts.



### STOP 9. Viewpoint at Wire Fence with red posts (just before Rock Cut-through).

Stop beside the wire fence to look seawards for the closest view possible of part of the seabird nesting site at the cliff face, pictured right.

You can also see the old lighthouse jetty where Cormorant or Shags often sit. The noise of breeding birds can be deafening in May and June. Close scrutiny with a bird identification book is needed but the following species are usually present:-



- Common Gulls (Grey above and white below with straight beaks and yellow legs)
- Kittiwakes (like Common Gulls but with black legs)
- Guillemots (Dark grey above and white below with black legs)
- Black Guillemots (Jet black with straight beak and bright red legs)
- Razorbills (like Guillemots but with black & white banded arched beak)
- Cormorant (much larger bird, black with white and yellow face, with upright stance)
- Shags (like Cormorant but all black)

The wild unspoilt sea coast around Wicklow Head is an EU Special Protection Area (SPA)<sup>3, 13</sup>. This offers very strong protection for the colony of nesting seabirds that has developed, mainly since the 1970s, with nationally important populations of Kittiwake and Guillemot, and regionally important populations of Fulmars and Razorbills. The site also supports a pair of breeding Peregrine Falcons.

Puffins have also been spotted and a pair of Kestrel is believed to breed in the area<sup>14</sup>. Red Kites were recently re-introduced in Co Wicklow and can be spotted by their red underwings as they glide high above on warm air currents, as pictured right.



The laneway now cuts through the rocky headland. Blast charges were placed in the rock into drilled channels. Several of these are visible on both sides of the cut. (as pictured left).

<sup>3</sup> As above

<sup>13</sup> [www.npws.ie/protectedsites/specialprotectionareasspa/wicklowheadspa/](http://www.npws.ie/protectedsites/specialprotectionareasspa/wicklowheadspa/)

<sup>14</sup> Our thanks to Richard Nairn of Natura Ltd and Steve Newton of The Irish Wild Bird Trust for advice on birds.



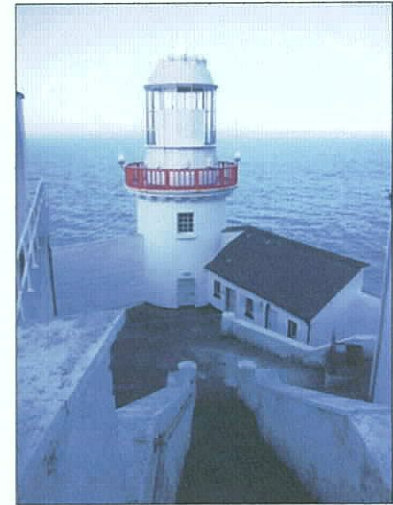
White Sea Campion grows on nearly bare rock in the cut and is also seen on the tops of walls further on. (pictured right). Pink Sea Thrift is also present here along with Navelwort and Stonecrop. The cut has a microclimate which is noticeably colder than surrounding areas. Being almost aligned East-West it stays in darkness longer and wind whistles through as in a wind tunnel.



The lane now meanders downhill with a well made stone wall to the left. At the next sharp left hand turning there is a good viewpoint on the right by the grey metal barred fence with a sign that says DANGER. Please observe these signs.

This is an excellent vantage point for the Round Ireland Yacht Race which begins and ends at Wicklow Harbour and takes place at the end of June every second year. The grassy banks around this point have lovely drifts of undisturbed wild flowers throughout the year.

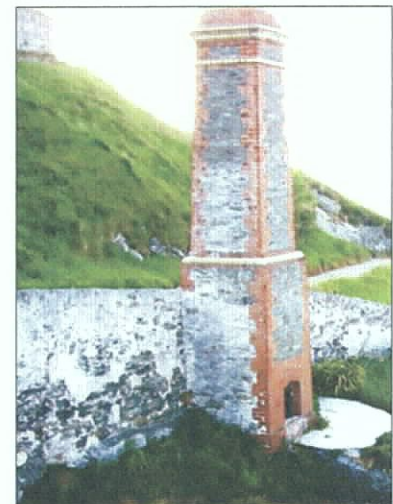
Lighthouse No 3. Continuing downhill, you pass steps on the Right to the third Wicklow Head Lighthouse, the one which is currently operational ( pictured right) It was built in 1818, 120ft above sea level, as a pair to the one seen at Stop 8. Always freshly painted white and red it is a lovely sight at the end of the walk.



*The mile for the "PURE MILE" ends approximately here.*

After lighthouse technology moved on from oil lamps, a gas plant was set up in 1868 to make fuel for the gas fired lamp here. The raw materials were landed at a little jetty and gas was made in the walled compound with red brick chimney, that you can see further downhill. The brick chimney is pictured below right. The light flashed by raising and lowering the gas jets!

In 1906, the gas light was replaced by an oil burner and an apparatus revolving on a bed of mercury was installed. This could be seen at a range of 17 miles. Constant operation was assured by a clockwork process. A weight had to be rewound every 30 minutes, day and night, with an alarm alerting the keeper. In 1976 the oil was replaced by electricity and a radio beacon was added pulsing out WK in morse code for Wicklow every 6 minutes.



In 1994 the light was fully automated and a lighthouse keeper was no longer needed. The families that once lived here left and their cultivated vegetable plots reverted to wild meadows of Bluebells or Rosebay Willow Herb.

The surrounding buildings including the keepers house and the coastguard station are now privately owned.



**STOP 10. Viewpoint over Lighthouse Jetty** (*not in same position as map in brochure*),

This last viewing point, (*although beyond the strict definition of a mile for the PURE MILE Competition*), completes the walk. It is at the stone wall on the final right hand bend a few yards past the brick chimney. Do not go beyond the wall or the DANGEROUS CLIFFS sign. The grass is slippery and the slopes treacherous, although knowledgeable locals sometimes go down to fish from the small jetty below.

The very fast seas and an upwelling current just off the Head make the sea here extremely dangerous. At the Head the currents are exceptionally strong and can be up to 6 knots with dangerous eddies according to sub-aqua divers<sup>15</sup>. One of the saddest local accidents happened in 1911<sup>16</sup> when three 3 local brothers aged 22, 25 and 27, and a friend aged 29 lost their lives while long-line fishing from a boat off Wicklow Head. Their bodies were never recovered but the remains of their boat, the "Maria", was found on the Scottish coast 2 weeks later.



At Stop 10 you can sit on the low wall and get a lovely view, as pictured on the right. It covers the coast Northwards right up to Bride's Bay, where there is an ancient Lime Kiln and a gravel beach where Grey Seals often come ashore.

Grey Seals are often seen swimming in the water just below this viewpoint. If they notice you they rise to the surface to look with their dog-like faces. They have big limpid eyes that are designed to see well underwater in the dark kelp seaweed beds. In the bird breeding season they can be seen competing for fish, indeed diving birds appear to be equally favoured prey!



This is the end of the traditional route loved by residents of Wicklow and their visitors for centuries. Wicklow residents have always counted themselves extremely lucky to have such a stunning walk close by, through an area of Outstanding Natural Beauty complemented by three Heritage Lighthouses!

You must now retrace your steps and return to the main Brittas Bay R750 road.<sup>17</sup>

**END**<sup>18</sup>

<sup>15</sup> More details on currents and eddies from [www.ecskc.eu/trip-planning/oileain/53-wicklow-head](http://www.ecskc.eu/trip-planning/oileain/53-wicklow-head)

<sup>16</sup> From an article in the Wicklow Historical Journal "Lost at Sea" by John Finlay

<sup>17</sup> Alternatively, you can take the detour mentioned (at the sand path beside Stop 5) for a cliff edge walk back to the Glen Strand and thence to Wicklow Town by road. However, this goes very close to precipitous, dangerous cliffs and extreme caution is needed.

<sup>18</sup> Please note. All photographs except the first are the Copyright of Linda Saunders 2012





APPENDIX 4





APPENDIX 5.



# DIAGRAM OF WICKLOW HEAD PURE MILE

R750

R750

**1.** On new bank 50m to L see new colony of plants. Butterflies in September incl. Red Admiral, Common White, Tortoiseshell, Painted Lady. Half way up Lacey's Hill look back for lovely views across Wicklow Bay.

**5.** New sand track just before grid leads to cliff edge path (Caution!). At next RH bend get views to Cliff face with Cormorants. After bend you enter the "proposed Natural Heritage Area" with unspoilt, undisturbed heathland covered with grasses, gorse, bracken ferns, bell and ling heather.

**3.** Look in water in Cattle Grid to see tadpoles in Spring, later froglets. Halfway along section look R for views to Arklow Bank Wind Turbines

**2.** Views of sheep farmland with lambs in Spring. Also Jacob Ram with horns. Look L and R along field boundaries to see rabbits. Occasional foxes. Woodland and Grassland flowers like violets and fumitories on verges and beneath hedges. Yellow lichen on bark of hawthorn hedges.

**4.** Cattle grid near Farm Buildings. White Charolais Cattle often in fields on R Note mica-shist rock outcrops after a while on left where Common Lizards sometimes bask. On L wild blackberries offer lovely refreshment in season. Pretty white Stitchwort under hedges. Hedgerow birds include Robins, Blue Tits, Great Tits, Linnets, Chaffinches, Bullfinches and Goldcrests.

**6.** Inside CIL gates see lichens & tiny ferns on wall to R. Walk a little way down beside wall on L to get view of Seabird nests on cliffs. In front: the 1781 Octagonal Lighthouse, now an Irish Landmark Trust property. Plants include white lichen on path, burnet roses in heath land. Sadly, the World War II "EIRE" sign is no longer visible in grass.

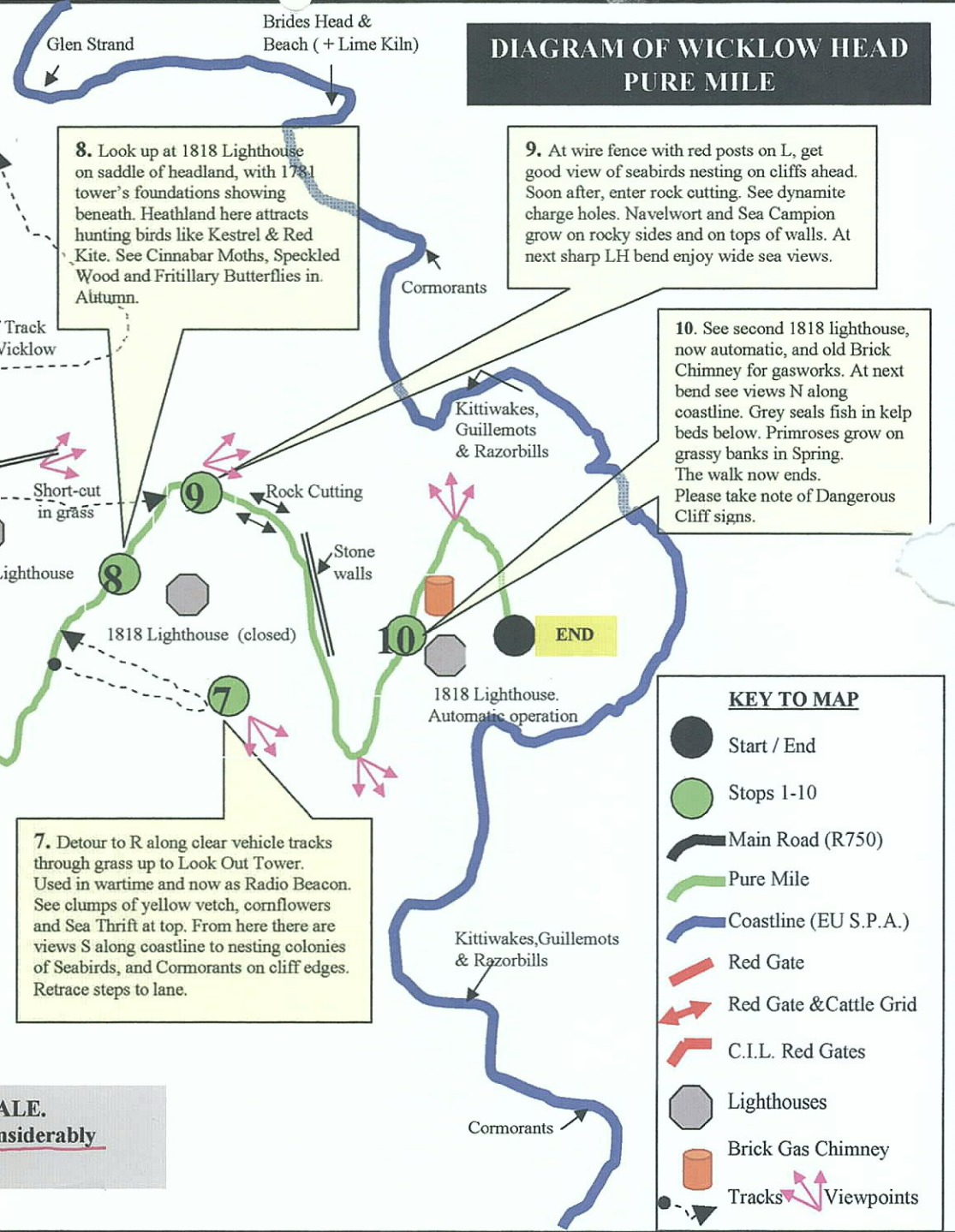
**7.** Detour to R along clear vehicle tracks through grass up to Look Out Tower. Used in wartime and now as Radio Beacon. See clumps of yellow vetch, cornflowers and Sea Thrift at top. From here there are views S along coastline to nesting colonies of Seabirds, and Cormorants on cliff edges. Retrace steps to lane.

**8.** Look up at 1818 Lighthouse on saddle of headland, with 1781 tower's foundations showing beneath. Heathland here attracts hunting birds like Kestrel & Red Kite. See Cinnabar Moths, Speckled Wood and Fritillary Butterflies in Autumn.

**9.** At wire fence with red posts on L, get good view of seabirds nesting on cliffs ahead. Soon after, enter rock cutting. See dynamite charge holes. Navelwort and Sea Campion grow on rocky sides and on tops of walls. At next sharp LH bend enjoy wide sea views.

**10.** See second 1818 lighthouse, now automatic, and old Brick Chimney for gasworks. At next bend see views N along coastline. Grey seals fish in kelp beds below. Primroses grow on grassy banks in Spring. The walk now ends. Please take note of Dangerous Cliff signs.

**NOTE: This diagram is NOT TO SCALE. The Right half has been expanded considerably to allow more features to be shown**



**KEY TO MAP**

- Start / End
- Stops 1-10
- Main Road (R750)
- Pure Mile
- Coastline (EU S.P.A.)
- Red Gate
- Red Gate & Cattle Grid
- C.I.L. Red Gates
- Lighthouses
- Brick Gas Chimney
- Tracks
- ↗ Viewpoints





**THE WICKLOW HEAD PURE MILE GROUP IS A PART OF THE WICKLOW HEAD PRESERVATION COMMITTEE.**

**OUR AIM IS TO ENSURE THAT THIS AREA OF OUTSTANDING NATURAL BEAUTY AND HERITAGE IS PROTECTED AND CHERISHED. WE HOPE THAT IT WILL REMAIN A BEAUTY SPOT FOR GENERATIONS TO COME AS IT HAS BEEN FOR GENERATIONS PAST.**

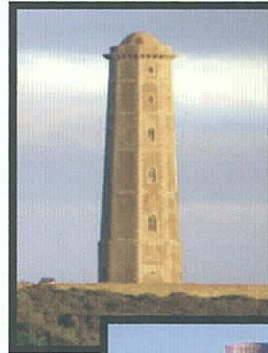


**THE MAP IN THE CENTREFOLD GIVES DETAILS OF THE BEAUTIFUL "PURE MILE" ROUTE. THE 10 TRAIL MARKS TELL YOU ABOUT THE FLORA, FAUNA AND HISTORY YOU ARE LIKELY TO SEE AS YOU GO.**

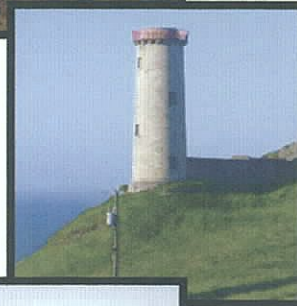


**PLEASE RESPECT THE COUNTRYSIDE AND THE PRIVACY OF ALL LANDOWNERS. ALL DOGS SHOULD BE KEPT ON LEADS. DO NOT LITTER OR LEAVE DOG DROPPINGS. PLEASE OBSERVE ALL SAFETY NOTICES, THE CLIFFS AROUND THE HEAD CAN BE SLIPPERY AND DANGEROUS.**

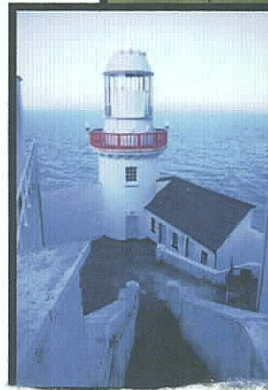
**THE HISTORY OF THE 3 HERITAGE LIGHTHOUSES ON WICKLOW HEAD**



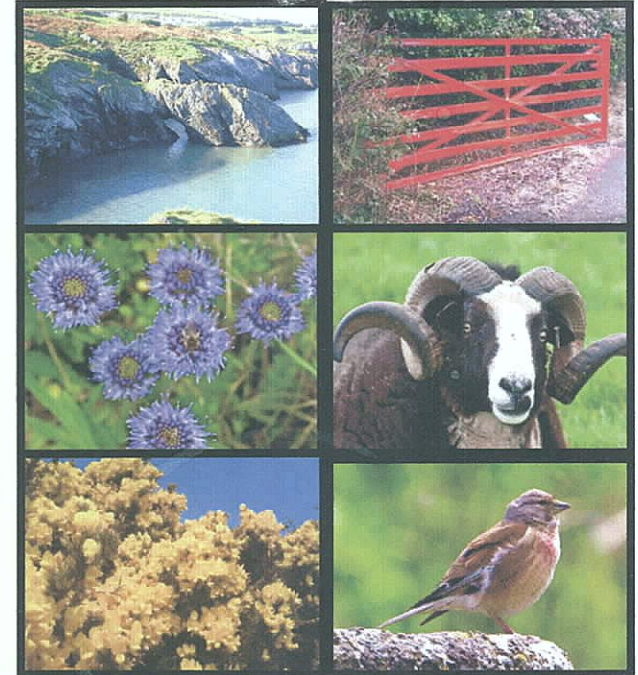
**The first lighthouse** was built in 1781 as one of a pair, to distinguish Wicklow Head. It was powered by 2lb candles. When a new pair was built this one was left as a daytime landmark. In 2000 it was refurbished as a rental home by the Irish Landmark Trust.



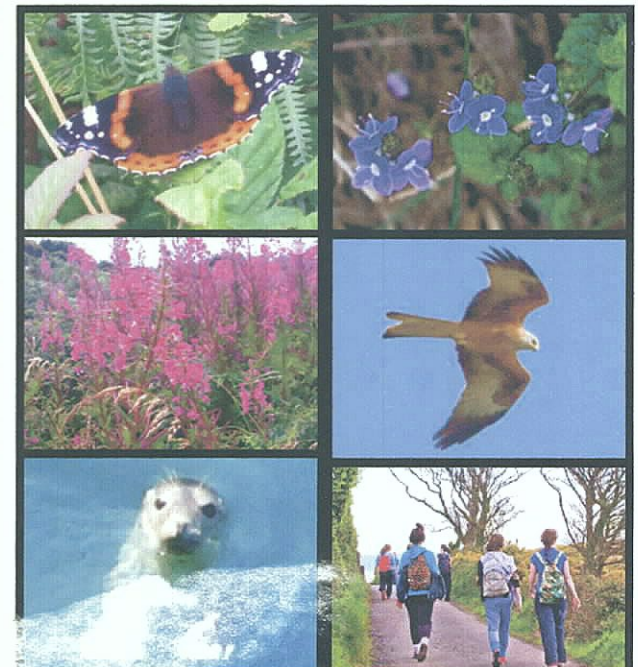
**The second lighthouse** was built in 1818, again as one of a pair. It has lost its lantern and is now disused and closed up.



**The third lighthouse** is 120ft up the cliff face. Built in 1818, it was originally built to use a gas light, so a gas "factory" was built in the adjacent compound. Only the square red-brick chimney remains. The lamp is now automatic, powered by electricity



**WICKLOW HEAD "PURE MILE" MAP & BROCHURE**



NOT FOR PUBLICATION - DRAF



C190

Leonora Earls

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**From:** Craig Bishop  
**Sent:** 18 February 2016 13:30  
**To:** Planning - Development Plan Review  
**Subject:** Submission on the Wicklow County Development Plan 2016 - 2022  
**Attachments:** County Development Plan - Submission From WPA (2).pdf

Dear Sir  
A submission from the Wicklow Planning Alliance.

Craig Bishop  
Secretary

Submission  
from  
Wicklow Planning Alliance, ("WPA")  
On  
The Wicklow County Development Plan 2016-2022 ("the CDP")

## CHAPTER 1- Introduction

The Introduction explains as follows:

- The Planning and Development Act 2000, as amended ("the Act") requires Wicklow County Council ("WCC") to prepare a County Development Plan
- The CDP should be consistent with such national plans, policies and strategies as the Minister determines relate to proper planning and sustainable development.
- The CDP in the main focuses on 'big picture' planning issues. The plan is not a 'spending plan';
- The CDP should 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.
- Wicklow County Council is a planning authority within the Greater Dublin Area (GDA)
- The CDP should be consistent with the transport strategy of the National Transport Authority.
- The CDP should be consistent with conservation and protection of the environment.
- The Local Government Reform Act 2014 put into effect reforms set out in the Government's 'Putting People First - Action Programme for Effective Local Government' which was published in 2012. 'Putting People First' sets out a programme for the overall reform of the local government system.

## CHAPTER 2 - VISION AND CORE STRATEGY

The CDP claims to be "consistent with higher order strategic policy documents including"

- the 'National Spatial Strategy 2002-2020',
- the 'Regional Planning Guidelines for the Greater Dublin Area 2010-2022'

- the National Transport Authority's 'Draft Transportation Strategy for the Greater Dublin Area 2011-2030'.

The CDP explains as follows:

- The National Spatial Strategy 2002–2020 (NSS) aims to achieve balanced regional development over the country of Ireland within the period up to 2020, in a way that is internationally competitive, socially cohesive and environmentally sustainable.
- Under the NSS, County Wicklow is included in the 'Dublin and Mid East Region' (the Greater Dublin Area). The NSS strategy sets out the following role for the region:

*"Enhancing the competitiveness of the Greater Dublin Area (GDA), so that it continues to perform at the international level as a driver of national development, means physically consolidating the growth of the metropolitan area i.e. Dublin City and suburbs. At the same time, development in the hinterland of the metropolitan area is to be concentrated in strategically placed, strong and dynamic urban centres, i.e. the 'Primary Development Centres' identified in the Strategic Planning Guidelines. These development centres have a unique role in Irish terms, given the scale of the Dublin City region and the need for internal balance between the city and its surrounding counties".*

- The NSS recognises the role of the towns across the County of Wicklow and identifies Wicklow Town as a 'Primary Development Centre' and Arklow as a town with 'Urban Strengthening Opportunity'. The N/M11 route is identified as a National Transport Corridor
- In brief, the settlement strategy for the GDA aims to:
  - physically consolidate the growth of the metropolitan area of Dublin by focusing new housing within the existing footprint of the metropolitan area and planning expansion of the footprint in conjunction with new high quality public transport investment; and
  - concentrate development in the hinterland into designated towns, along multi-modal transport corridors providing enhanced public transport linkages

In the opinion of WPA the CDP undermines the settlement strategy for the GDA in a number of respects but most particularly by targeting Newtownmountkennedy and Kilpedder, Ashford and Kilmurray for significant growth and by targeting the locations shown on maps 4.01, 5.01, 5.06, 5.07, 5.08, 7.04, 8.01.

The CDP also explains as follows:

A Draft Transport Strategy for the GDA was produced by the National Transport Authority ("NTA") for the period 2011-2030. The strategy sets out policies and measures required to support the GDA in realising its potential as a competitive,



sustainable city region with a good quality life for all. The transport strategy objectives include the following:

- adoption of a hierarchy of transport users with pedestrians, cyclists and public transport users at the top of the hierarchy. Consequently these users should have their safety and convenience needs considered first.
- A requirement that land use planning and transport planning be considered together in the overall development of the GDA region.
- The designation of Bray and Wicklow as Designated Towns. Greystones, Arklow, Newtownmountkennedy and Blessington are categorised as Designated Districts.
- A requirement that land use planning promote sustainable travel patterns both within the Designated Towns and Districts and also between the centres.
- A requirement that land-use measures focus person-trip intensive development, particularly to key destinations such as retail and offices, into Dublin City and Designated Town centres within the GDA (i.e. Bray and Wicklow);
- Focus any person-trip intensive development outside Dublin City and Designated Town centres to locations served by stations on the existing and proposed rail network (particularly Metro and DART). Development should take place at these locations in advance of other locations.

In the opinion of WPA the CDP undermines the NTA's transport strategy for the GDA in a number of respects but most particularly by targeting Newtownmountkennedy for significant growth, by targeting the locations listed on page 92 of the CDP and the locations shown on maps 4.01, 5.01, 5.02, 5.03, 5.04, 5.05, 5.06, 5.07, 5.08, 7.04 and 8.01. The CDP's land use measures put the car at the top of the hierarchy of transport users and it puts pedestrians at the bottom.

The CDP claims repeatedly throughout the document that Wicklow has easy access to the main commercial and employment centres of the Metropolitan area. This claim ignores entirely the congestion on the M/N.11 and the misery that commuters to work in Dublin endure. As early as 5.30 every weekday morning there is a continuous stream of traffic all the way from Greystones exit 11 to the city and by 6.45 am that stream of traffic often becomes congested and simply stops moving.

In the opinion of WPA the CDP's vision should be to consolidate growth in no more than three designated towns and create the mass necessary to make it attractive for investors and workers to turn around on the N11/M11 and commute from Dun Laoghaire, Shankill and other places in the GDA to places of work in Arklow, Wicklow town and Bray.

Bray has the potential to be the most beautiful town in the whole country. It has a stunning location, an extensive promenade and (throughout the town), several different terraces of architectural significance and character. Bray needs minding, care and attention. It is astounding that Bray has no Architectural Conservation Areas ("ACA") since it has a great number of buildings and street-scapes that in any other county or country would be cherished with pride. For example, maybe if the promenade had ACA designation something with the scale and mass that the Barracuda has would not have been permitted on the seafront; maybe there would

be more active planning control on the erection of big tents for smokers and the sort of advertising that is on the seafront.

Next the CDP looks at the Sustainable Rural Housing – Guidelines for Planning Authorities issued by the Minister

The CDP refers to pressure for housing in the open countryside and includes measures that diminish existing controls on rural housing. WPA opposes the relaxation of existing controls not least because of the likely impact on the County's ability to achieve statutory targets for generation of green energy. We will return to issue later in our submission.

Next the CDP looks at regional and national population targets as set out in the Regional Planning Guidelines ("RPGs") and the NSS and the associated need for housing land. In this regard it is important to note that whereas the RPGs and the NSS allocate a total figure to County Wicklow, they do not require a spatial distribution to every settlement in the county as is proposed in the CDP. In fact such disparate scattering of the population is entirely contrary to the requirements of the RPGs and the NSS and the CDP makes it clear that it is knowingly ignoring those requirements.

Paragraph 2.4.3 of the CDP refers to Population Distribution:

The CDP explains that RPGs require that 42% of the total growth allocated to County Wicklow be allocated to the Metropolitan Area settlements and that the 'majority' of the remainder be allocated to the Growth Towns, weighted towards the Large Growth towns in the settlement hierarchy and also particularly towards towns with rail based public transport i.e. c. 70% of total population growth to be directed towards the 'growth towns'.

The CDP resists adherence to these distribution requirements because it wants to allocate growth to the 15 other towns in the County (Levels 5 and 6 in the CDP's hierarchy). The CDP considers the population distribution requirements promoted by the RPGs "retrograde". It therefore sets housing targets for all 21 'towns' in the County up to 2028. This is a flagrant flouting of the RPG principles.

The CDP then blames its failure and inability to manage growth in any particular settlement on other Statutory Bodies, namely, Transport Infrastructure Ireland, ("TII") (formerly National Roads Authority and the Railway Procurement Agency), and Irish Water. The CDP ignores the fact that Irish Water is a relatively new body and that before its existence WCC was responsible for water services and the CDP's zoning proposals simply subvert TII's work by spilling more and more cars on to the N/M11 and its express acceptance of likely continuing car dependency to access the metropolitan region.

Paragraph 2.4.5 of the CDP refers to Zoning

The CDP provides 'zoning' for 13 separate settlements. The remainder of the settlements have their own stand-alone 'Local Area Plans', ("LAPs"), which will be reviewed after the adoption of the CDP.

The CDP alleges that the majority of current LAPs do not have sufficient zoned land available to meet the CDP's 2025 population target (the exceptions being Blessington and Rathdrum which are very slightly 'over-zoned' to the tune of 2-3 hectares each).

Paragraph 2.4.6 of the CDP refers to Transport. It states as follows:

- The transportation strategy (set out in the National Spatial Strategy), of developing 'Strategic Radial Corridors', 'Strategic Linking Corridors' and 'Strategic International Access Points' are translated to the regional level through the Regional Planning Guidelines for the Greater Dublin Area and NTA Greater Dublin Area Draft Transportation Strategy 2011-2030.
- The NSS identifies the N11-M11 as Strategic Radial Corridor from Dublin to the south-east of Ireland.
- The RPGs identify the N11 -M11 as a Multi-Modal Transport Corridor.
- The N11/M11 national primary route / motorway serves the eastern coast area of the County, while a second national route, national secondary route N81, serves the west of the County along the border with Kildare and Carlow

The CDP's strategy undermines the designation of the N11-M11 as a national primary route and Strategic Radial Corridor. The CDP converts the N11-M11 into a commuter run to Dublin.

The CDP adopts a policy of continuing car dependency to access the metropolitan region; it acknowledges deficiencies in N11-M11 capacity but expresses an intention to facilitate and encourage measures to improve capacity and efficiency of the national routes and facilitate the improved use of the national routes by public transport. It prioritises upgrade of the N11 from the Dublin border as far as Kilpedder and in particular improvements to the M50 / M11 merge which is deficient in capacity, and all interchanges serving Bray. The CDP ignores the fact that currently congestion is a problem from exit 11 which is much further south of Kilpedder. The new zoning proposals for Newtownmountkennedy on maps 4.01 and all of the zonings proposed for Mountkennedy Demesne at Kilpedder, Kilmurray North and South, Rathmore, the Kilpedder Interchange and Ashford as listed on page 92 of the CDP and shown on maps 5.01, 5.02, 5.03, 5.04, 5.05, 5.06, 5.07 and 5.08 are an egregious exacerbation of congestion on the N11-M11 and thwart any speed limit that might be expected on a national primary route.

Even if Luas Light Rail is extended to Bray it will do nothing to take traffic off the N.11 south of Bray. We agree that more and more Park-and-Ride facilities are needed but current facilities are expensive; the cost of Park-and-Ride should be greatly reduced.

Paragraph 2.4.7 of the CDP refers to Economic Development.

The CDP explains that a key economic aim of the NSS and the RPGs is to enhance the competitiveness of the Greater Dublin Area, so that it continues to perform at the international level as a driver of national development. A key aim of the RPGs is to promote a balance between jobs and population in settlements throughout the GDA region; to improve the jobs ratio in County Wicklow.

The CDP then lists its objectives as follows:

- Support the development of key economic infrastructure, including transport, telecommunications, energy and waste management.
- Develop strategic reserves of land for enterprise development and adopt the least restrictive enterprise land use approach to the zoning of land.
- Increase land use densities in proximity to public transport.
- Improve capacity for innovation, with a focus on third level education and research facilities.
- Promote a high quality built and natural environment that is attractive to industry

In the opinion of WPA the CDP's strategies for economic development in County Wicklow undermines the economic aims of the NSS and the RPGs because the CDP is choking the N.11- M11

#### Employment Growth

We agree that Wicklow residents are currently highly dependent on jobs located elsewhere in the region. We agree that the County should be more self-sufficient. We agree that it would improve the quality of life of Wicklow residents if their employment location was closer to where they live. This will not be achieved by scattering zoning of land for development across the county. It could be achieved if growth were consolidated in no more than three designated towns.

Paragraph 2.4.8 of the CDP refers to Retail and claims that subject to the inclusion of Newtownmountkennedy and Rathdrum in Level 3 its retail strategy is consistent with the GDA Regional Retail Strategy.

In the CDP Bray, Greystones, Newtownmountkennedy, Wicklow and Arklow are all described as having strategic locations on or close to the M/N 11 with ease of access to Dublin and Rosslare; all are seeking to attract employment generating investment; all seeking to target investment from foreign as well as local sources; all seeking to be retail magnets. Each of these five settlements will be competing with each for retail tenants and shoppers. In addition the new zonings will make it impossible to apply a "*sequential approach*" to new development because land owners are entitled to clarity and certainty; land is either zoned or not zoned. The new zonings will impact adversely on existing core retail locations, contributing to further decline, waste and physical ruin in existing town centres.

WPA is of the opinion that three areas only should be prioritised for growth and investment, i.e. Bray, Wicklow and Arklow and possibly, Blessington if the CDP co-ordinated and collaborated with the county development plans for Carlow and Kildare.

### Chapter 3 - the CDP's Settlement Strategy

The same phrases keep recurring in Chapter 3. No matter what town the CDP is talking about, be it the County town of Wicklow, (population 13,468) or the largest town in the county, i.e. Bray, (current population 30,000) or the one street location that is Newtownmountkennedy, (current population 3,000) the CDP strategy is the same; it always recommends that the town aim to attract a concentration of major employment generating investment and should target investment from foreign and local sources in a mixture of 'people' and 'product' intensive industries. In addition, the town should provide for the retail needs of its population and its catchment. In each case reference is made to the town's strategic location on the M/N 11.

The CDP seems confused and puzzled as to why most of the residents in these towns who work end up on long slow commutes on the N11 into Dublin City for jobs and why places like Greystones, notwithstanding its 'liveability' factor, and notwithstanding the availability of a large amount of vacant zoned and serviced employment land have not been successful in attracting employment facilities.

It is the view of WPA that to attract major employment generating investment a settlement needs a critical mass of educated people. The effect of the CDP is to disperse the population among too many settlements throughout the county.

Instead the CDP strategy should be to direct the projected population growth to no more than three main locations, i.e. Bray, Wicklow and Arklow. If the CDP co-ordinated and collaborated with the county development plans for Carlow and Kildare Blessington could also carry more growth. The proposed expansion of Newtownmountkennedy is particularly perverse. It subverts consolidation. It is not viable (economically or environmentally), to have so many disparate locations at hierarchy levels 1 to 5 competing with each other for investors, anchor tenants in shopping centres etc. This does not mean the hinterland has to decay; the hinterland just needs a strategy that is different from that to be allocated to the Metropolitan Area and Large Growth Towns. The NSS stipulates that growth in the hinterland should be for local need only. We do not agree with the CDP's changes to residency definitions/requirements as set out on page 75 since the effect of same is to defy the NSS principles. On the longer term it is the hinterland that will teach us how to live sustainably and adapt to Climate Change.

Spatial distribution exacerbates the need for vehicular travel, long journeys to work, school and college and congestion. It puts pressure on infrastructure such as water, roads, schools and health care facilities.

A "Strategy" should use resources in the way that is most efficient and effective. A strategy that allocates zoning to 13 separate settlements and aims for growth in 21 separate towns is not using scarce resources efficiently and effectively. In its introduction, the CDP says it is not a spending plan but it certainly has an impact on spending and creates expectations as regards spending.

The CDP should have provided guidance for the design of development that would be regarded as appropriate in villages in rural settings. We are opposed to the proposed expansion of settlement boundaries as shown on pages 51 to 68.

We are not in favour of any relaxation on current housing occupancy controls or any relaxation on current growth controls in rural locations.

#### CHAPTER 4 - HOUSING

The "Introduction" in paragraph 4.1 and the key principles in paragraph 4.3.1 should make express reference to the need to cater for children and young people, Travellers and Climate Change.

Paragraph 4.3.6 dealing with the "Design of New Developments" should include a reference to Climate Change, require district heating systems and prohibit reliance on oil or gas or any other fossil fuel as a primary source of energy for heating.

The CDP is full of contradictions; on the one hand paragraph 4.3.1. on page 70 mentions "sustainable communities" and lists principles that include "

- the efficient use of land and of energy, and minimise greenhouse gas emissions;
- provide a mix of land uses to minimise transport demand
- prioritise walking, cycling and public transport, and minimise the need to use cars;

but the CDP's wide Spatial distribution is not consistent with any of these principles.

On pages 70 and 71 the CDP sets out some good zoning principles, for example, it promotes the "sequential approach", walkable neighbourhoods and a sustainable transportation pattern; it encourages infill and emphasises that development should be contiguous to existing developed areas but then it goes on to undermine and contravene all of these principles by its proposed zonings for example in Newtownmountkennedy.

Paragraph HD8 is not satisfactory. It mentions only the needs of future residents. It ignores how new development impacts on the residential amenity of existing residents and diminishes existing social infrastructure like the ability to walk and cycle in your community. It takes no account of the cumulative impact on existing residential areas when a number of different developers develop separate sites in



the one settlement with no responsibility for community infrastructure and in the absence of a social infrastructure audit by anybody. This is happening in Delgany and Enniskerry. The public should be entitled to see how every cent of planning levies are spent because some communities are receiving absolutely no community gain notwithstanding that they are bearing most of the impact of development. The CDP is supposed to have the "common good" at its heart and Local Government is supposed to be putting people first.

Paragraph HD11 should be amended to delete "normally" in the last line. The CDP should not use words or phrases like "normally" or "as far as practicable" because such wording creates ambiguity and uncertainty and also expectations on the part of landowners.

In Paragraph HD17 on page 75 the distances for Level 8 Small Villages should be reduced.

The Special Zoning for Newtownmountkennedy in paragraph HD24 on page 78 subverts all basic planning principles (Map no. 4.01).

On pages 77 and 78 a paragraph reads "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". The effect of this is to "privatise" protected views. There is no point whatsoever in having a protected view if this paragraph remains in the CDP.

## CHAPTER 5 - ECONOMIC DEVELOPMENT

Goal number 4 at the top of page 81 of the CDP is taken from the Local Economic and Community Plan; it reads as follows: "Support a shift towards low carbon and climate resilient economic activity reducing energy dependence and sustainable use of resources and leading the Smart Green economy".

However, the CDP's economic plan then proceeds to ignore Goal number 4 at the top of page 81 of the CDP.

We agree that Greystones-Delgany and Blessington exhibit a high degree of out-commuting in excess of 80%, to a wide range of locations, particularly in Dublin. We do not agree that this out-commuting can be fixed by "giving everybody in the audience" or every settlement in the county a bit of zoning for economic development.

We agree that Bray, Wicklow-Rathnew, Arklow, Greystones-Delgany, Newtownmountkennedy and Blessington all have the "common characteristics", set out on page 86 of the CDP namely:

- A significant trend of out-commuting, with a higher percentage of residents with third level education or higher, working outside of these settlements than within them;

- a high level of unemployment in those persons aged under 25 years, in particular within the Arklow and Wicklow areas;
- the pattern of people at work by SEG is very similar across all settlements with the highest proportion of people working within each settlement being employed in 'Non-manual' labour; and
- there is a strong dependency on the categories of wholesale, retail, trade, transportation, storage and the education sector for employment within each of the settlements.

We agree the key trends within these settlements highlight the significant leakage of Wicklow's educated workforce predominantly into Dublin City and the south/south west Dublin areas, with Greystones-Delgany in particular demonstrating a significantly higher level of leakage with 56% of residents with a 3<sup>rd</sup> level education or higher working outside this area.

We do not agree that these genuine difficulties can be remediated or even ameliorated by zoning and designating Bray, Wicklow-Rathnew, Arklow, Greystones-Delgany, Newtownmountkennedy and Blessington all as the key focus for economic growth within the County. Such a policy infers that residents with a 3<sup>rd</sup> level education or higher would not be thrilled to find work in Bray, Wicklow or Arklow rather than sit in traffic to get to Dublin. What the workers and the investors that might create jobs need is a critical mass of people and activity, a consolidation of economic activity, a hub or cluster of disparate skills in one location. Smart young people especially, the young techies like to work collaboratively in physical proximity to other smart young people. They inspire each other and generate an energy that you do not get in a small town. Jargon like "*Open for Business*" or branding such as "*The Garden County*" will do nothing to reverse the leakage of Wicklow's educated workforce into Dublin City. The N11-M11 could operate as a "*strategic transport corridor*" if it carried the workforce south to work in Bray, Wicklow or Arklow; travelling north, the N11-M11 is just a congested commuter run.

WPA is of the opinion that only three areas should be prioritised for growth and investment, i.e. Bray, Wicklow and Arklow.

Because of the mountains much of Wicklow looks to Kildare and Carlow. A strategy for growth in Blessington could be justified but only if the CDP co-ordinated and collaborated with the plans for Carlow and Kildare. It is ludicrous for the three counties to be competing with each other.

All of the zonings (for Mountkennedy Demesne Kilpedder, Rath East/Knockloe, Kilmurray South, Kilmurray North, Scratenagh crossroads, Kilpeddar Interchange, Rathmore, Ashford, Ballyhenry, Kellystown, Courtfoyle and Ballyduff Lower in Ashford) proposed on page 92 of the CDP and shown on maps 5.01, 5.02, 5.03, 5.04, 5.05, 5.06, 5.07 and 5.08 are perverse; they are entirely contrary to and inconsistent with the principles set out national plans, policies and strategies relating to proper planning and sustainable development. They will exacerbate the deficiencies and weaknesses that the CDP is supposed to remedy. These zonings will confer a private windfall gain on individual landowners. They are not in the interests of the overall common good; these zonings are not consistent with the 'Putting People First - Action Programme for Effective Local Government' envisaged

by the Local Government Reform Act 2014. If these zonings proceed the developers should be required to pay much higher than normal (a multiple) planning levies in exchange for the private windfall gain that the zoning confers. Nobody blames a landowner for seeking a zoning; that is perfectly normal. It is up to the planning system to manage those demands in the interests of the overall common good. We repeat that a "Strategy" should use resources in the way that is most efficient and effective.

WPA does not agree with the proposal in EMP7 to allow relaxation of normal development standards. Instead, to promote redevelopment of brownfield sites WCC should exercise its powers under the Derelict Sites legislation and proactively collect all the fines and charges it is entitled to collect.

EMP11 should be amended to require all new developments to be of passive standard. In American cities most new modern commercial developments have photovoltaic systems that harness solar energy not just for the particular building but for the city generally and the community in which the building is located.

#### Wicklow County Campus, Clermont House

EMP20 states in relation to Wicklow County Campus, Clermont House ("Clermont") that it is the objective of the Council to "*further*" develop Clermont in conjunction with the Carlow Institute of Technology and other stakeholders as a third level education facility and as a centre of excellence for enterprise development, education, training, research and development.

WCC has owned Clermont for ten years. Currently, Clermont is not "*a centre of excellence*" for anything. Excellence implies something unusually good, something that surpasses ordinary standards. Clermont does not meet even ordinary standards. A very small part of the overall campus is allocated to the partnership with Carlow IT. Everything is structured around "*part time*" not by reference to part time students but in relation to when libraries and such facilities as exist on the campus are open and accessible. A lot of the time the campus is just not open at all.

WPA would have no objection if Clermont were devoted to enterprise development, education, training and research especially if that research and development related to areas relevant to sustainable living, for example, invention of the type of batteries we need to store energy generated by solar panels or "handsome" looking wind-turbines. Many science and engineering graduates and post-graduates in academia and living in south county Dublin or Wicklow would like to go into industry or set up their own business but they need help and support in finding cheap but well serviced places to work and do business. WPA does not wish to be prescriptive but Clermont House Campus could aim to offer serviced work spaces to start-ups close to free of charge for an agreed start-up period; the Clermont Campus could include a start-up incubator space.

EMP21 in the CDP refers to the Film Industry and expresses an intention to facilitate and support the film industry in the County, including the development of production

facilities at appropriate locations and the use of the County for film locations, including the erection of temporary structures and services.

The Clermont Campus would be a perfect location to facilitate and house developments in the Film industry. A great number of our young people are interested in animation. They need somewhere to go after they finish their courses in Dublin. Clermont should not try to compete with the universities in Dublin. It should offer something different.

It is not just our graduates and post-graduates that require help to start up business. We have many young people that left school early and deserve a second chance at vocational training; others lost their jobs since 2008. WPA is impressed with the variety of small businesses in Germany that focus on recycling. As an example, we mention what they do with used vehicle tyres. When broken down into its component parts an old tyre can produce a variety of materials that can be re-used to create entirely new different products.

In short the plan for the Clermont should put the people first, be shaped by the interests of the overall common good, be devoted to supporting local communities in innovation, entrepreneurship, micro-enterprise and social innovation; it should facilitate communities in developing the skills, capacities and projects needed to enable them to have a greater say in the management of their own futures.

There is no map anywhere in the CDP that zones areas for social and community facilities.

Parts of Clermont Campus should be reserved for the development of new social and community infrastructure, for example, a Youth Centre, a Community Resource Centre, Indoor and outdoor Sports and Recreation Facilities, playing pitches and simple open green space.

Parts of the Clermont Campus should be allocated for allotments.

Taxpayers have been generous to local Authorities, they have taken debt off Local Authorities' books; they gave Nama the money it needed to buy bad loans from the banks. Many of those loans would never have been approved if local authorities had been more prudent in zoning practices. It is time to give something back to the people.

## **Climate Change**

The most glaring deficiency in the CDP is its lack of understanding about Climate Change. Climate Change is not mentioned at all until page 46 of the CDP and then only in passing. It is referred to again on later pages, for example, goal number 4 on page 81 and on page 188 and again in an Appendix but not in a way that manifests any true understanding of the interests of the overall common good or statutory and international obligations.

WPA suggests that WCC read the judgment of the Court in Urgenda Foundation against the State of the Netherlands. Across the world Governments will be asked to account for failure to take measures to avert the danger to their people posed by Climate Change.

Article 43.2 of the Irish Constitution states that the exercise of private property rights "*ought in civil society to be regulated by the principles of social justice*" and that "*the State accordingly may as occasion requires delimit by law the exercise of the said rights with a view to reconciling their exercise with the exigencies of the common good*".

In December 2015 the Minister for Communications and Energy published a white paper on energy.

The Minister explained that fossil fuels currently comprise 92% of energy use in Ireland. By 2050 the carbon footprint must fall by 80 – 95%. At the very latest, Ireland must be wholly fossil free by the end of the century.

In order to be consistent with the proposals set out in the White Paper Wicklow County Council should set out in the CDP a wide range of solutions for replacing fossil fuels as a primary source of energy in absolutely all new buildings whether in the residential or commercial sector. This is not difficult. The technology exists and is no longer new or expensive. The CDP should make it clear that no new building should be reliant on oil or gas or any other fossil fuel as a primary source of energy for heating. The former PD Minister, Pat Cox, has talked about how he heats his home without fossil fuel and was correct when he said no Government or Local Authority should be burdening its people with bills for gas or oil or coal. The sun and the wind do not send us bills.

The CDP should do all of the following:

- publish guidelines for solar farms.
  - promote district heating systems in all new developments
  - promote and facilitate new community projects that can sell energy to the network
  - prohibit reliance on oil or gas or any other fossil fuel as a primary source of energy for heating in all new buildings whether residential or commercial,
  - Require all new buildings to meet the standard to qualify as "passive"
  - Maintain existing housing occupancy controls and growth controls in rural locations so as not to permit a spatial distribution that will effectively sterilise wide areas against the siting of electricity transmission lines and wind turbines.
  - Promote the use of electric vehicles and vehicles using gas and biofuels
- Spatial distribution

Page 15 of the CDP mentions "Heating" but not in a way that addresses in a serious manner the challenges posed by Climate Change and Ireland's international obligations in this regard.

The CDP should be a vision for a low carbon urban future. It could be exciting; a new Industrial Revolution based on modern digital connectivity and clean energy. The CDP should be promoting energy co-operatives like they have in Germany. All over the county we could have thousands of people producing their own energy and selling it to the grid. Wind energy will eventually comprise more than 80% of Ireland's renewable energy but wind energy does not have to be about wind farms owned by big corporations

Wicklow County Council should take inspiration from the "A Vision for Galway 2030" document and from "[transitiontownkinsale.org](http://transitiontownkinsale.org)" and from [transitiontowntotnes.org](http://transitiontowntotnes.org)

Climate Change resilience and sustainability should be central to all Wicklow County Council's work and planning. It should turn the Clermont campus into a specialist training centre for some of its staff and the public.

WCC should follow the lead of Dun Laoghaire and measure Wicklow's carbon emissions.

The World Bank has warned that Climate Change is the number one risk to long term growth and economic security. We need to develop the skills and innovation required to meet the challenges posed by Climate Change

## Conclusion

WPA requests the following amendments to the CDP:

1. Delete all new zonings proposed for
  - a. Mountkenedy Demesne at Kilpedder,
  - b. Kilmurray North
  - c. Kilmurray South,
  - d. Rathmore,
  - e. the Kilpedder Interchange and
  - f. Ashford
  - g. Rath East/Knockloe
  - h. Scratenagh crossroads
  - i. Ballyhenry
  - j. Kellystown
  - k. Courtfoyle
  - l. Ballyduff Lower



m. Newtownmountkennedy  
as shown on maps 4.01, 5.01, 5.02, 5.03, 5.04, 5.05, 5.06, 5.07 and 5.08,  
7.04, 8.01

2. Delete expansion of settlement boundaries as shown on pages 51 to 68 of the settlement.

3. Delete zonings proposed for
- a. Baltyboys Golf Club,
  - b. Annamore Fish Farm,
  - c. Druids Glen,
  - d. Ballinahinch Lower NMK,
  - e. Brook Lodge,
  - f. Rathsallagh House,
  - g. Castletimon
  - h. Jack Whites Cross

As shown on maps 7.01, 7.02, 7.3, 7.04, 7.05, 7.06, 7.07, 7.08

4. Limit all new zonings for Level 5 Towns i.e.

- a. Ashford
- b. Aghrim
- c. Baltinglass
- d. Carnew
- e. Dunlavin
- f. Enniskerry
- g. Tinahely

The NSS stipulates that growth in the hinterland should be for local need only.

5. Limit all new zonings for Level 6 settlements, i.e.

- a. Avoca,
- b. Donard,
- c. Kilmacanogue,
- d. Newcastle,
- e. Roundwood,
- f. Shillelagh
- g. Glendalough Settlement

The NSS stipulates that growth in the hinterland should be for local need only.

6. Delete relaxation on current housing occupancy controls or any relaxation on current growth controls in rural locations.

7. Amend Paragraph HD11 to delete "normally" in the last line.

8. In Paragraph HD17 on page 75 reduce the distances for Level 8 Small Villages.

9. On pages 77 and 78 delete the paragraph that reads "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".

10. Delete EMP7 which allows relaxation of normal development standards.

11. Amend EMP11 to require all new buildings whether residential or commercial to be of passive standard.
12. Stipulate that no new building whether residential or commercial should be reliant on oil or gas or any other fossil fuel as a primary source of energy for heating
13. Publish guidelines for solar farms.
14. promote district heating systems in all new developments
15. promote and facilitate new community projects that can sell energy to the network
16. prohibit reliance on oil or gas or any other fossil fuel as a primary source of energy for heating in all new buildings whether residential or commercial,
17. Maintain existing housing occupancy controls and growth controls in rural locations so as not to permit a spatial distribution that will effectively sterilise wide areas against the siting of electricity transmission lines and wind turbines.
18. Promote the use of electric vehicles and vehicles using gas and biofuels
19. Follow the lead of Dun Laoghaire and measure Wicklow's carbon emissions.

SIGNED for and on behalf of Wicklow Planning Alliance by .....

*KC Bishop*

K. Craig Bishop

Secretary

DATED 18<sup>th</sup> February 2016

C191

From: Wicklow SPCA  
Sent: 22 December 2015 14:57  
To: Planning - Development Plan Review  
Subject: Development plan

Dear Sir/Madam

Wicklow SPCA is a non for profit animal charity based outside Rathdrum. Our registered charity number is CHY11863. Our interest and work in the community has driven us to make a commitment to erect a community dog park. Detailed plans were drafted and available. The park would be on our premises. We have secured some sponsorship and are determined to make this dream a reality and would be very interested if the park could be supported by our local Council as overall development of dog welfare in County Wicklow.

Looking forward to any ideas or suggestion you may have on the matter.

Yours truly,

Anne Fitzpatrick

anager

Wicklow SPCA

C192

**Leonora Earls**

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**From:** John McCall,  
**Sent:** 18 February 2016 09:51  
**To:** Planning - Development Plan Review  
**Cc:** Ruth O'Neill  
**Subject:** Submission from Wicklow Swimming Club RE: Wicklow County Draft Development Plan 2016-2020  
**Attachments:** WSCSubmissionWicklowCoDevPlan2016-2020 (2).pdf

FAO:

**County Development Plan Review**  
Planning Department  
Wicklow County Council

Dear Sir / Madam,

I write further to the above and attach below a detailed submission and observations on behalf of Wicklow Swimming Club concerning the Wicklow County Draft Development Plan 2016-2020.

I would be obliged if you would confirm receipt of this email and attachments.

Kind Regards

--

**John McCall**, Chairman  
**Wicklow Swimming Club**  
[www.wicklowsclub.com](http://www.wicklowsclub.com)

CC: Ruth O'Neill, Secretary, Wicklow Swimming Club, 62 Wicklow Heights, Wicklow Town



Submission to Wicklow County Council

in respect of

Wicklow County Draft Development Plan  
2016 - 2020

on behalf of

**Wicklow Swimming Club**

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Wednesday, 17 February 2016



Dear Sir / Madam,

I write on behalf of Wicklow Swimming Club in reference to the proposed Wicklow County Development Plan 2016 - 2020. In addition to the sporting strategy elements of Chapter 7, Tourism and Recreation, I refer in particular to Cells 6 and 7, Chapter 11, Coastal Management Zone and would make the following observations:

**Ref: Cell 6 - Kilcoole to Wicklow (The Murrough): Objective CZ6**

- Wicklow Swimming Club fully endorses and supports proposals to change the status of The Murrough and its associated hinterland to Special Area Amenity Order in order to provide for increased protection for the natural habitat.
- The entirety of the reports prepared by Shane Beacom, Marine Engineer, comprising his initial assessment and technical recommendations and subsequent further analyses, all as listed in the associated Appendices attached below, should be implemented to correctly reinstate the shoreline, shingle substrate and walkways which have been eroded over recent years, but markedly so during late 2015. Construction of breakwaters, as recommended by these and additional reports should be similarly effected.
- The Murrough is not only a walk-way and natural wetland, but also an active beach providing public bathing facilities as well as many other water-based sports. Full access to the bathing areas at the current end of the rock armour (not the temporary defense works recently carried out) must be reinstated, ideally by way of in-situ concrete ramps and steps.
- Similarly, the historic Victorian Promenade along the sea front originally provided an ideal bathing location for residents and visitors to the town. Permanent access to the bathing waters should be re-established in line with the 2007 report by RPS Consulting Engineers recommending the installation of breakwaters parallel to the shore (cf: fig. 5.6 in the RPS Murrough Coastal Protection Study (part 2/2) in the attached Appendix). The civic amenity afforded by the reinstatement and/or construction of access to such bathing areas cannot be underestimated.
- Ladder access and egress from the New Pier to Wicklow Bay is dangerously inadequate; this area has for generations been a popular bathing spot but deferred maintenance of the ladders, coupled with the rock armour works installed some decades ago mean there is no safe emergency egress from the water for anyone falling in, let alone anyone choosing to swim there. Consequently, a metal platform, similar to that seasonally installed on the harbour side, should be installed on the north-facing, bay elevation. Additional ladders, extending sufficiently below the low-water mark should be installed at intervals not exceeding 300m around the perimeter of the New Pier.



**Ref: Cell 7 - Wicklow Town & Environs: Objective CZ7**

As a long-established, lifeguard-supervised bathing location for the general public, and the staging location for numerous local and national swimming and water-based events, Wicklow Harbour is a natural amenity of enviable calibre and one that is growing in popularity and admiration. It stands to reason it should be protected and promoted. To this end:

- ① Specifically in reference to Objective CZ7(3), Wicklow Swimming Club, as the largest sea swimming club in Ireland has a long-established tradition over generations of promoting swimming and water safety in Wicklow Town and environs. The lack of changing facilities (similar to 'the shelters' which were once a feature of the Victorian Promenade), public toilets and water supplies for showering, present substantial challenges to the effective running of many clubs, including our own. We would urgently request adequate focus be placed on the provision of these, both for club and also wider public use. Failing the repurchase and re-purposing of the original sports centre building (now Crossfit Wicklow) by Wicklow County Council, the portion of land directly adjacent to Wicklow Rowing Club's premises, and also the area currently housing the lifeguard hut represent obvious locations for a discrete development which would serve these purposes and not detract from the visual amenity of the locale.
- ② The seasonal installation of the platform and raft within the harbour - previously the responsibility of the Wicklow Town Council - should be effected no later than the start of May and run until the end of September each year. This is to facilitate the great numbers of public using these facilities and who rely on them.
- ③ The Promenade, shoreline and environs are insufficiently served by public lighting. This facilitates anti-social behaviour, particularly in winter months and consideration must be given to addressing this in a substantive manner.
- ④ The civic amenity of the New Pier would be greatly enhanced by the provision of lighting along it and allow for better use year-round.
- ⑤ Furthermore, as a bathing location attracting thousands of local residents and visitors each year, an improved life-guard station is an urgent requirement. The existing portacabin arrangement has no water or drainage facilities, is not secure and must be improved.

We thank you for your attention to the above submission and anticipate a favourable reception to our observations.

Sincerely, on behalf of Wicklow Swimming Club,

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**John McCall**  
Chairman, Wicklow Swimming Club





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## Appendices

Shane Beacom, Draft Erosion Report; January 01 2016

[http://friendsofthemurrough.com/Beacom\\_draft\\_erosion\\_plan.pdf](http://friendsofthemurrough.com/Beacom_draft_erosion_plan.pdf)

Shane Beacom, Analysis of RPS Consulting Engineers Report, 2007; January 06 2016

<http://friendsofthemurrough.com/RPS%20erosion%20report%20critique.pdf>

RPS Consulting Engineers, Murrough Coastal Protection Study, 2007 (Part 1 of 2)

<http://friendsofthemurrough.com/The%20Murrough%20Coastal%20Protection%20Study%201.pdf>

RPS Consulting Engineers, Murrough Coastal Protection Study, 2007 (Part 2 of 2)

<http://friendsofthemurrough.com/The%20Murrough%20Coastal%20Protection%20Study%202.pdf>

C193

Leonora Earls

From: Aishling Carroll  
Sent: 19 February 2016 12:10  
To: Planning - Development Plan Review  
Cc:  
Subject: Draft Wicklow County Development Plan 2016-2022  
Attachments: County Development Plan Submission 19 February.docx

A Chara,

In response to your call for submissions on the Draft Wicklow County Development Plan 2016-2022, Wicklow Town & District Chamber of Commerce **Economic Development Committee** would like to make the following submissions.

We thank you for the opportunity to comment on the plan.

Kind regards,

Aishling Carroll  
Chamber Assistant

**On behalf of Economic Development Committee**  
Wicklow Town & District Chamber of Commerce  
Wicklow Enterprise Centre  
The Murrough  
Wicklow

Tel: (0404) 66433

Fax: (0404) 66464

[www.wicklowchamber.ie](http://www.wicklowchamber.ie)



Chamber Sponsors 2015

## Housing

Encourage greater diversity in house types to provide a range of visual and architectural choice.

Encourage the use of basements to provide storage space.

Remove planning levies for basement developments as they are not living areas and have very limited natural light, however they could provide extra space for storage and plant as is done extensively on the continent.

### VOLUME 1 CHAPTER 2 – VISION & CORE STRATEGY

#### 2.3 Vision and Goals (page 12)

Point 7 Infrastructure – incorporate 'maritime infrastructure' into this paragraph:-

*"To protect and improve the county's transport, water, waste, energy, communications **and maritime infrastructure** whilst having regard to our responsibilities to respect areas protected for their important flora, fauna and other natural features."*

#### 2.3 Vision and Goals (Table)

##### Transport

To integrate land use planning with transportation planning, with the dual aim of reducing the distance that people need to travel to work, shops, schools and places of recreation and social interaction; **facilitating the sustainable transportation of goods facilitating** and the delivery of improved public transport.

### CHAPTER 5 – ECONOMIC DEVELOPMENT

#### 5.4 The Role of Land Use Planning in Economic Development (viii) Supporting key sectors for growth Maritime (page 89)

##### 5.4 (viii) Supporting key sectors for growth

**Maritime** - The maritime sector in Wicklow benefits from a host of assets and activities capable of expansion and development including: shore-side services, shipping services, repairs and maintenance, fishing, tourism and leisure, servicing of the offshore renewable energy industry, maritime financial services etc. The County Wicklow Economic Think Tank Action Plan and the Local Economic and Community Plan support the identification and realisation of the economic opportunities within the maritime sector.

### CHAPTER 11- COASTAL ZONE MANAGEMENT

#### 11.1 Introduction (Page 270)

**N.B.** 'For the avoidance of doubt, any objectives set out in this chapter shall override any other objectives set out in this plan.' This may conflict with other objectives e.g economic objectives

## 11.2 Coastal Zone Management Objectives (Page 270)

**CZM1 N.B.** The Murrough is constituted of gravel – this paragraph introduces restrictions on the removal of such material.

Insert the word 'unauthorised' to read ultimately:

*"To ensure that there is no unauthorised removal of sand dunes, beach sands or gravels through application of the provisions of the Foreshore (Amendment) Act (1992), in close co-operation with the Department of Communications, Energy & Natural Resources and the Department of Environment, Community and Local Government."*

### **CZM3 (Page 270)**

This paragraph prohibits any new building or development within 100m of 'soft shorelines'.

Consider additional clause at end of paragraph:

*"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 excepting infrastructural development that incorporates intrinsic coastal protection."*

### **Cell 3 CZ3 Page 272**

Reduce the rate of erosion on Greystones North Beach and Cliffs by measures including land drainage'.

## **Infrastructure**

Ports, Harbours Marinas and aviation objectives (TR 39 TR 40)

*"This plan supports the sustainable expansion of Wicklow port to the North and East of the existing commercial harbour area in the interest of employment, Shipping, leisure and tourism activities. Any Development, policy or strategy which would adversely affect this objective or be an impediment to this objective should be prevented".*

C194

Leonora Earls

From: joseph wilson  
Sent: 10 February 2016 18:03  
To: Planning - Development Plan Review  
Subject: Enniskerry plans response  
Attachments: Jresponse to Enniskerry plans Joe wilson

**Wicklow County Council  
Draft County Development Plan  
2016-2022**

**Submission**

**From Liz McMahon,  
Braeburn, Kilmolin,  
Enniskerry.  
10/02/16**

Enniskerry is described as a compact picturesque settlement. Landscape plays a large part in the town's character and development. The County Development Plan categorises the landscape surrounding Enniskerry in all directions as an Area of Outstanding Beauty.'

*Action area 1 to be developed for a small business park / employment zone, car-park and up to 156 residential units, ('town centre' type densities), needs consideration to ensure that the character of the picturesque settlement is maintained whilst expanding residential, employment and community buildings. Part of the field at the opposite side of the road from Parnasillogue Court has also been changed to become residential.*

*Careful planning will be needed to avoid continuous heavy density housing for 2 km to Enniskerry on the L1010 Glenree to Enniskerry road on both sides of the road blocking the outstanding beauty. Currently there are beautiful views of mountains and sea.*

*We need to ensure that the Enniskerry settlement does not become swamped by large housing estates. The outstanding beauty can still be observed on this route L1010 to the centre. Planning needs careful designing in consultation with professional landscape designers to keep some of these views.*

*'To ensure a high quality living environment for existing and future residents' The assets of living in Enniskerry are outstanding due to the natural landscape and access to it. Enniskerry is a playground for all with Knocksink Wood, Ballyman Glen and Bog Meadow and the GAA grounds etc. The access is important for the residents to enjoy a quality living environment. Bogmeadow has fantastic recreational assets - football fields and tennis courts. Developed walkways are maintained by the local community around the playing fields and courts, to river banks and woods. These pathways connect up to Knocksink wood. With a growing population these kind of assets need to grow as also. Connecting up our natural areas to all newly built up areas is very important to keep Enniskerry a wonderful place for families to grow. Educators and health personnel are now realising the importance of outdoor living for families to combat obesity and children to learn in the environment. This is a growing area. Children do not only need a corralled manmade playground for exercise. They learn far more in the natural environment where the whole family can share exercise. Enniskerry has this and we need to maintain and have access for all.*

**'Vehicular movement**

The roads in the town centre are generally of good quality and traffic moves reasonable well.'

Currently there are problems with traffic movement during school times, mass times, weddings and funerals at the road that crosses the L1010 as it reaches Enniskerry town centre zone. During these times cars park on the Library side of the road. Cars can only drive in one direction at a time. This can be both hazardous and slow. The road here is marked with a solid white line.

To drive straight through the crossroads to the town centre is equally problematic as again cars park on the left hand side leaving room in only one direction at a time. This currently works on a "politeness" basis.

The new planning for houses and business on the L1010 could mean 200 more cars on those roads every day putting increased pressure from regular traffic on these black spots.

'To create functional public spaces and pedestrian routes linked to new development that maximise the natural features of the area.'

'Ensuring the protection of natural habitats (in particular the protected habitats at Knocksink Wood and Ballyman Glen), cultural heritage, ecological resources and quality landscapes and the protection and enhancement of biodiversity.'

#### *Suggestion*

*At AAI site beginning at the top of Kilmolin a green walk-way, cycle track could be developed along its northern field perimeter to the current GAA site. Existing trees on the boundaries could be preserved and new stone walls and native trees planted.*

'**ENN8** To support and facilitate in co-operation with relevant bodies and landowners, the provision of tourism amenity routes around the town.'

*This would pass beside the Parknasilloge Chambered Grave. The megalithic tomb is as yet unclassified. It could be a Cist or maybe a disturbed Wedge tomb, as there are a number of small boulders lying around the chamber. Presently the tomb is being over run with brambles and a fallen tree lies next to the tomb. Hopefully this would encourage the relevant bodies to attend to this site.*

*The track could connect into the GAA grounds opening up possibilities to connect to the village at a later date.*



Enniskerry Town plans, 2016/22  
Response from Joe Wilson, Kilmolin, Enniskerry

Red type - "Enniskerry town plan quote"  
black type - Joe Wilson response

## 6. Enniskerry Town Plan

6.1

"Enniskerry is a picturesque settlement" .....

"The compact settlement of Enniskerry" .....

"The County Development Plan categorises the landscape surrounding Enniskerry in all directions as an Area of Outstanding Natural Beauty." .....

"Develop the tourism potential of the area as a visitor/ tourist destination in itself and in its role as a 'gateway' linking the east and southeast of the County and the Wicklow Mountains." .....

Enniskerry has long been considered as a gateway to the Wicklow mountains and their environs. This should obviously be maintained and improved. Rights of access to the hills are at the moment very limited – certainly for 'walkers'. This aspect appears to be neglected in the plans for Enniskerry's development.

"Car parking: This is a problem in the town centre due to lack of regulation and long term users occupying on- street locations. The facilitation of proper traffic management to create a more pedestrian friendly environment, with adequate off-street parking facilities should further improve the attractiveness of the town for both visitors and the local community.

The "picturesque" nature of Enniskerry village has long been an attraction to tourists. If this is to be maintained then serious attention will have to be paid to the nature, position, density and appearance of houses, recreation facilities, businesses etc. For example if, as intended in AA 1, there are to be approx 156 units of housing, plus community & education areas, plus employment units !! then the increase in daily traffic through Enniskerry village – which is already under enormous pressure, especially at weekends and in the tourist season, will become totally unmanageable. Sensitive planning with advice from experts in the field of design will be essential. If Enniskerry village is not to become an isolated enclave surrounded by urban sprawl which has happened to very many "villages / small towns" all over the Dublin area North, South, East & West

"To create functional public spaces and pedestrian routes linked to new development that maximize the natural features of the area." .....

Enniskerry already has very rich and varied public places such as Knocksink Wood, Bog Meadow. These provide access not only to recreational facilities (eg tennis, soccer) but also very valuable access to the river banks, natural woodland, historical elements. A positive improvement here would be a walking / cycling access say from Parknasilogue along the northern perimeter of AA 1 down to Knocksink. This would be a much more pleasant, quieter and safer route than the main road (L1010). Also if the development of AA1 goes ahead as planned which would involve extra access to AA1 from L1010 the road will become inevitably much, much busier than it is at present. The introduction of a footpath along this road will not make the walk any pleasanter!

Joe Wilson  
Feb 10 2016

**Leonora Earls**

**From:** Michael Browne ]  
**Sent:** 19 February 2016 15:34  
**To:** Planning - Development Plan Review  
**Attachments:** 4254\_001.pdf

Hi

Please find submission attached

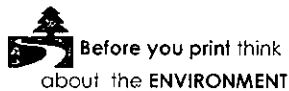
Kind Regards,  
Michael Browne

**bba architecture**

Suite 3 Eden Gate Centre, Delgany, Co. Wicklow.

**Tel:** +353(1) 2876949 **Fax:** +353(1)2873521

**Email:** [michael.browne@bba.ie](mailto:michael.browne@bba.ie)



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Ref:CO94CDP16/YS

Wicklow County Council,  
Planning Department,  
County Buildings,  
Wicklow Town,  
Co. Wicklow.

19<sup>th</sup> February 2016

**RE: WICKLOW COUNTY DEVELOPMENT PLAN**

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Dear Sir/Madam,

On behalf of York Securities, we wish to make the following submission for consideration in relation to the above.

Introduction

York Securities is the owner of the lands at Kilquade Hill, Kilcoole, Co. Wicklow. The lands are in use as grazed agricultural lands.

Description of the lands

The lands comprise of approx. 17.5 acres currently grazed as agricultural lands. They are generally relatively flat/level lands to the west of the current Kilquade Hill settlement. They also contain approximately 1.25 acres at the southern end of Kilquade Hill which formally contained a sewerage treatment plant to cater for Kilquade Hill. Our clients York Securities de-comissioned this plant and Kilquade Hill is now on mains sewerage.

The lands are serviceable as there is now mains sewerage in Kilquade Hill and mains water supply. Surface water can discharge to the stream to the south of the site.

It is proposed that these lands be zoned for low density housing. The lands are suited to same as per the attached sketch layout plans.

Please note:

- The lands are serviceable
- The proposal will cater for a sector of housing market current not be supplied
- A large central open space are in being proposed which would cater or the existing Kilquade Hill development and the proposed. Existing open space in Kilquade Hill is remote from most dwellings and slopes significantly.

Suite 3, The Eden Gate Centre, Delgany, Co. Wicklow.  
Telephone: + 353 (1) 287 6949 Facsimile: + 353 (1) 287 3521 email: info@bba.ie

**Contact**

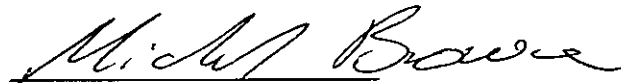
Michael Browne	Chartered Engineer, M.I.E.I M.I. Struct. E., Dip. Const. Law, Dip. EIA Mgmt.
Luis Reis	B Arch. M.R.I.A.I
John Healy	Dip Arch. Tech.
Stuart Bell	M.Sc. Arch. Project Mgmt. R.I.A.I Arch Tech

- The site is adjacent to Kilcoole and greystoens and abuts the LAP boundaries for same.
- We suggest that the boundaries of the Local Kilcoole/Greystoens LAP be extended to include Kilquade Hill and the proposed lands.

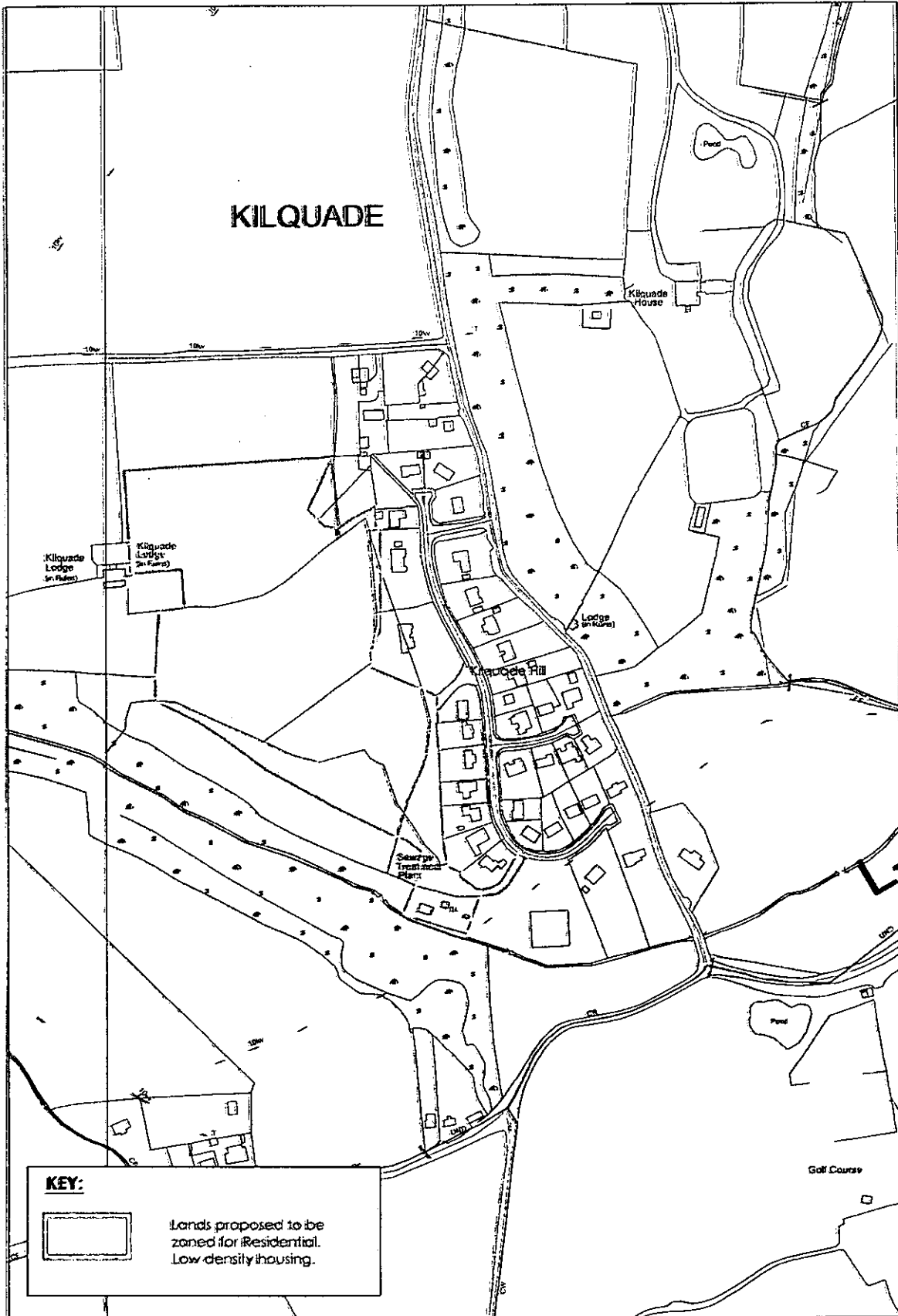
We suggest that this modest zoning for low density housing will consolidate the existing Kilquade Hill development and will cater for residents in the Kilcoole/Greystones area wishing to trade up to larger family houses. This will face up badly needed units of the housing market.

The proposed we suggest is in keeping with the proper planning and sustainable development of the area.

Yours sincerely,



Michael Browne  
For bba architecture



**LANDS AT KILQUADE, CO. WICKLOW (Scale 1:5000)**

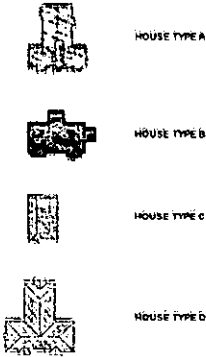
**NOTE:**

Map produced for diagrammatic purposes only. Do not scale off.

**bba** architecture

301E 31EDRY GATE CENTRAL DUBLIN, CO. WICKLOW  
 TEL: 2876949 / 2876950 FAX: 2873321

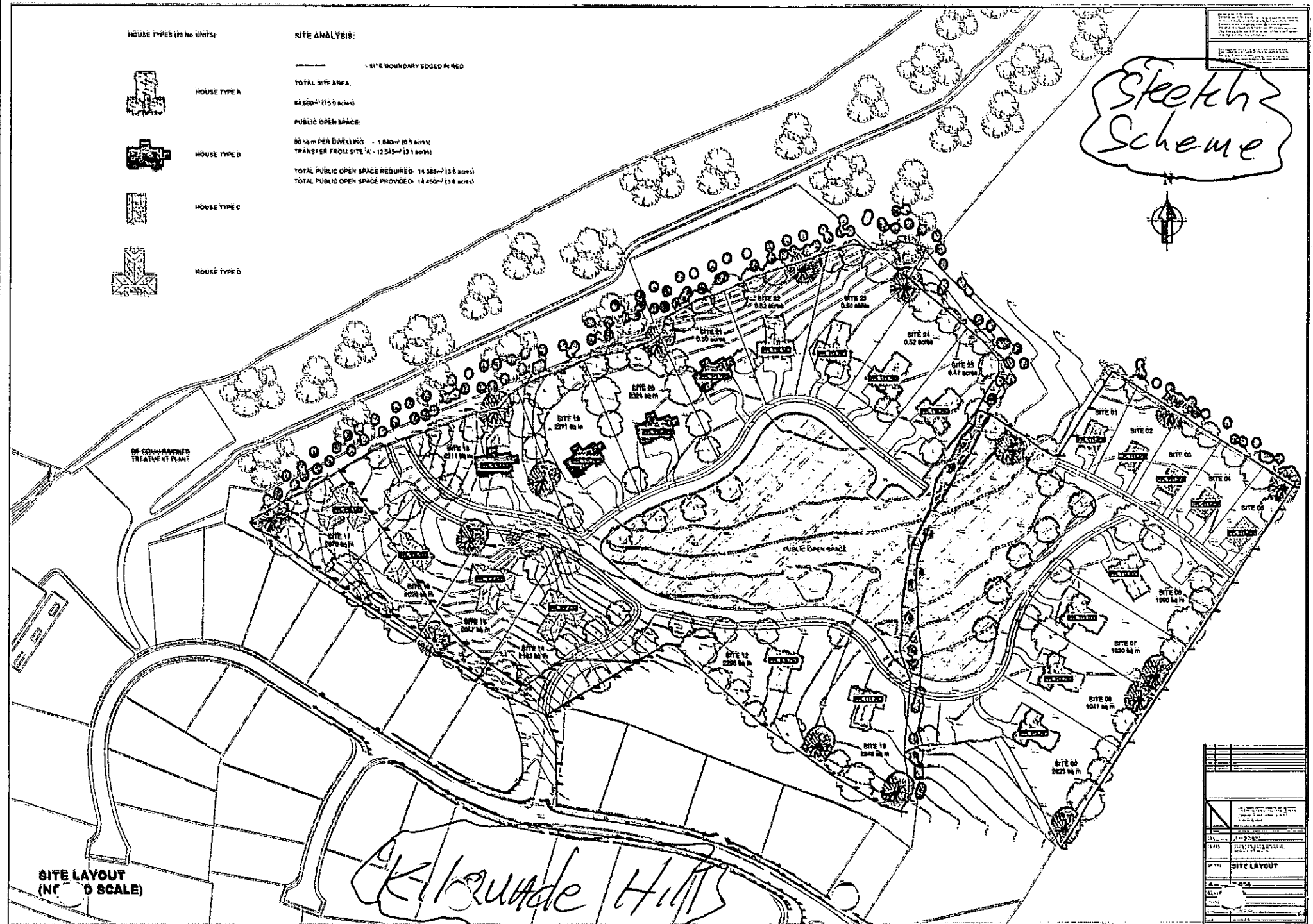
HOUSE TYPES (25 No UNITS):



SITE ANALYSIS:

— SITE BOUNDARY EGGED IN RED  
 TOTAL SITE AREA: 81 600m<sup>2</sup> (19.9 acres)  
 PUBLIC OPEN SPACE:  
 86 sq m PER DWELLING = 1,840m<sup>2</sup> (0.5 acres)  
 TRANSFER FROM SITE 'A' = 12 545m<sup>2</sup> (3.1 acres)  
 TOTAL PUBLIC OPEN SPACE REQUIRED = 14 385m<sup>2</sup> (3.6 acres)  
 TOTAL PUBLIC OPEN SPACE PROVIDED = 18 450m<sup>2</sup> (4.6 acres)

*Sketch Scheme*



SITE LAYOUT  
(NOT TO SCALE)

*Kelbourne Hills*

Client	
Project	
Site	
Scale	
Date	
Drawn by	
Checked by	
Approved by	
Project No.	056
Sheet No.	
Sheet Title	SITE LAYOUT

C196  
D106

**Leonora Earls**

---

**From:** Ian McGahon  
**Sent:** 19 February 2016 14:33  
**To:** Planning - Development Plan Review  
**Subject:** Submission on Wicklow County Development Plan  
**Attachments:** IMG WCD.docx

Dear Sir/Madam

Please find attached my submission on the Wicklow County Development Plan

Kind Regards

Ian McGahon



58 Seabourne View

Greystones

Co Wicklow

19<sup>th</sup> February 2016

Submission on draft Wicklow County Development Plan 2016 -2022.

Dear Sir/Madam

I am writing to give you some feedback on the Wicklow County Development Plan 2016 -2022.

Firstly I very strongly support Section 6.3 and believe that Wicklow County Council members must pass this so that schoolchildren are not specifically targeted by large companies.

“Exclude any new fast-food outlets which offer foods that are high in fat, salt or sugar from being built or from operating within 400m of the gates or site boundary of schools, parks or playgrounds, excluding premises zoned town centre”

Secondly I am extremely worried about the area known as "The Rocks" and the planned dump in this area.

In the county Development plan for 2010 – 2016 it stated that the vision for development of the Greystones-Delgany /Kilcoole area can be achieved by “The retention of a suitable green belt buffer between Greystones–Delgany and Kilcoole”. (ref 2.2)

In this area there is a valley known locally as ‘**The Rocks**’ with a unique heritage of natural biodiversity and ecosystem dating from the ice age, 10,000 years ago, which contains a glacial melt water channel, the stream from which makes its way to the breeches almost two miles away (part of the Murrough SAP). This area has escaped human development due to its unsuitability for agriculture or other human activity.

We wish to have the **core objective stated by the Council** (Greenbelts HER 10) in their development plan (2010-16) to “generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity” retained and clearly stated in the local area development plan for 2016-23. Specifically we wish that ‘The Rocks’: a unique heritage of **natural** biodiversity\* in an irreplaceable landscape connected to the Murrough SAP be specifically named, identified and defined within the plan for the purpose of protection. This goal is consistent with the Rural Environment Protection Scheme (REPS) for which Wicklow County Council can be proud. The biodiversity within ‘The Rocks’ is of far greater significance than hedgerows as it acts as a biodiversity link. In addition the EU has as policy that remaining glacial valleys be protected.

*\*Species associated with ‘The Rocks’ includes some that are protected and threatened. These include: bat species, badger, owl, finches, yellowhammer (which have undergone dramatic declines), foxes. Buzzard-red kite has been seen in The Rocks.*

Thirdly

I generally support the overall section on community development but believe it needs to be much stronger in supporting disadvantaged groups . I believe that this part of the plan needs to be more specific in naming targeted groups: people with disabilities, travellers, unemployed people, homeless people, migrant and minority communities, the LGBT community.

In particular most documentation produced by the council needs to be written in plain English in order to allow everyone understand the council workings. Also where there are largescale public consultations happening on issues such as asking for public views on the Wicklow County Development plan these must be accompanied by meaningful meetings with presentations explaining what the consultation is about.

In regard to Education in this part of the proposed plan I believe the Greystones experience of educational facilities being placed so far away from new housing developments is horrednous planning and that new educational facilities in County Wicklow must always be placed near where the new population growth is.

Finally

I believe Wicklow County Council should introduce participatory budgeting with public consultation in each Municipal District.

It has many benefits including

- improving accountability and transparency in governance by making the budgeting process public
- empowering citizens to take a more active role in their communities,
- increasing citizens' knowledge of the roles and responsibilities of government officials
- helping citizens understand the limitations of local government, the cost of public projects, and the nature of trade-offs in priorities
- Increasing local government efficiency,
- reducing corruption
- increasing social justice by providing a platform for traditionally excluded members of society to have a voice in decision-making processes, potentially leading to more just and equitable governance
- improving the living conditions of the poor