WICKLOW

ENDLESS OPPORTUNITIES

Wicklow County Council Executive

Submission to draft Regional Spatial and Economic Strategy for the Eastern & Midlands Region

January 2019

1.0   General

While accepting that the Regional Spatial and Economic Strategy is a strategic, regional policy document, Wicklow County Council has a general concern that the draft RSES contains so little references to and information about the counties that make up the region. Each county has its own assets and strengths, as well as capabilities and opportunities, and it is considered that without setting these out and evaluating these as a starting point, it is not possible to develop a regional Strategy that allows counties to develop in a complementary way, without competing with each other, and contributing in the best way they can to the overall vision for the region.

We also find it somewhat anomalous that the RSES would include a piece on each of the regional growth towns and key towns in the region, but yet does not include a piece on each county. Therefore we would respectfully request that as part of the introductory / context section of the Strategy, a short section on each county is set out (perhaps one page per county) detailing:
-   Headline statistical data such as area, population, housing stock, demographic profile;
-   Key economic sectors as well as economic priorities for that county (based on the RAPJ and county LECPs);
-   Key environmental features and assets;
-   Existing and planned infrastructural assets;
-   The vision for each county within the region and its role / place in the wider regional strategy.

Wicklow County Council executive would provide any assistance required in drafting such additional sections for the final RSES.

2.0   Growth and Settlement Strategies

It is stated in Section 3.1 that:

'the draft RSES is tasked with the development of planning and economic development policy for future needs in the Region based upon consideration of the availability of land, resources, environment and infrastructure capacity. This will set the framework for the Development Plans of each Local Authority and subsequently the quantum of residential and employment generating zoned land required. Therefore the approach taken in the draft Regional Spatial and Economic Strategy is robust, evidence based, and driven by clear sustainability and quality of life objectives'.

In this regard, it is respectfully suggested, for the reasons outlined to follow (in sub-sections 2.1 and 2.2), that the draft RSES as currently formulated, would not provide for a sufficiently clear framework for the determination of the appropriate quantum of residential zoning required for the period of the Strategy and beyond. In this regard, it will therefore be difficult for local authorities in the region, post adoption of the RSES, to develop new Core Strategies and ensure consistency with the RSES.

2.1   "Asset based" approach

Wicklow County Council welcomes the 'asset based approach' to identify settlements that have the greatest capacity and potential for growth and to act as engines for the wider region. Section 3.1 of the draft RSES sets out the 8 factors utilised in this approach. However, it is not elaborated what data / metrics were utilised to 'measure' each of these factors, how values were ascribed to certain variables, what weighting / calibration factors were utilised, what thresholds / standards were applied, how towns compared against each other etc. Transparency about the data and methodology used would allow this to be robustly examined and would show how the evidence collected for the draft RSES informed the development of the draft strategy (as stated in Section 12.4).

In addition, we would welcome full access to the model utilised, as this would allow its replication in a consistent manner for towns lower in the settlement hierarchy, for the purpose of County plan core strategies at the next stage of plan making. It is only through the use of a consistent and universally utilised methodology or toolkit, drawn up in conjunction with the NPF team, can it be ensured that all counties will develop and adopt an appropriate and NPF / RSES compliant Core Strategy.

2.2   Taking account of existing plans

a.   Headroom

We would request that clarity is provided regarding 'headroom' as set out in this section; in particular, we would request that it is stated clearly whether this 25% headroom is to be applied to the population growth allowed for in each county, or is zoning headroom i.e. the amount of land zoned over and above the calculated amount needed to meet the population target (to allow for greater location choice or deal with any land supply inflexibility that might arise).

Furthermore, we would request clarity as to the period during which this 'extra' 25% is to be applied as it is suggested it is only applicable during the initial transitionary period to address population targets that are significantly above the NPF projection. In other words, the RSES should state clearly whether the NPF 2026 and / or 2031 growth target for each county should be increased by 25% for the purpose of preparing updated County Development Plans.

b.   Transfer of growth to wider metropolitan region

The draft RSES states:

"However, the scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026.

"The level of transfer may be determined at the regional or metropolitan levels and means that in addition to the 16 local authorities referenced on page 5 of the NPF Roadmap document, two further local authority areas adjacent to cities, but not subject to provision for headroom, Clare and Kilkenny, may target additional population growth in a metropolitan context, where this can be prioritised for delivery." (P40)

"The Core Strategies of the relevant Local Authorities should demonstrate consistency with the population targets expressed in the NPF and the Implementation Roadmap for the National Planning Framework July 2018. The NPF identifies a target population of 1.4 million people in Dublin City and Suburbs for 2031, an increase of some 220,000 people, and a target of 1.65m in the MASP an increase of some 250,000 people.

"The further breakdown of population projections to county level are in appendix B and shall be used by Local Authorities in the formulation of the core strategies of their development plans. There is a further allowance of transition population targets in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP. This shall apply only to the three Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors." (P78)

We request that the RSES states clearly what this meant by these statements for the identified key growth towns in the MASP area and in particular, we request that the RSES determines the level of transfer of the Dublin City and County target to the MASP settlements. Without this determination from the Regional Assembly, it will not be possible to draft new Core Strategies for the counties concerned, as will not be possible to determine population targets if there is uncertainty about population growth distribution.

2.3 'Corridor Approach' and Regional Linkages

We consider that the 'growth' and 'settlement' strategies (as detailed in Sections 3.1 and 4.2 with corresponding maps) would be enhanced by the development of a 'corridor' approach which integrated and linked the 'key towns' with the already identified key transport routes (particularly rail) and with the growth / settlement strategies of the other regions. While we acknowledge that the Dublin to Belfast corridor is detailed and has a heightened status due to its inclusion in the NPF, we would suggest that there is no reason why the regional strategy cannot identify 'lower tier' corridors within the region and indeed this would simply be a continuation of the corridors already identified in the MASP.

We would suggest the following corridors:

Dublin – Rosslare: Generally following the road (M/N11) and rail route down to Rosslare Europort and taking in the *key towns* of Bray, Wicklow – Rathnew, Gorey and Wexford, along with the significant towns of Greystones, Arklow and Enniscorthy.

Dublin – Waterford: Generally following the road (N7 – M9) and rail route down to Waterford.

Dublin – Cork & Limerick: Generally following the road (M/N7 & M8) and rail routes to Cork and Limerick.

Dublin – Galway & Sligo: Generally following the road (M/N4 & M6) and rail routes to Galway and Sligo.

Dublin – Cavan: Generally following the road (N/M3) and rail route.

We strongly consider and recommend that a **heightened status** should be afforded to the Dublin - Rosslare Europort corridor, which we consider will be of **national strategic importance** post Brexit.

Such a designation would also strongly align with proposed RPO 8.14:

RPO 8.14: *Support the improvement and protection of the TEN-T network to strengthen access routes to Ireland's ports, including investment in the ongoing development of the N11/M11 to improve connectivity to Rosslare and improvements to the Dublin-Wexford Rail line;*

and with the strategy and objectives of the (Draft) RSES for the **Southern Region** e.g.

Section 3.8 "Networks": *"Develop a Connection to the Dublin-Belfast Economic Corridor in consultation with the Eastern and Midlands Regional Assembly and other relevant public bodies with a view to an Extended East Coast Corridor from Rosslare Europort to Larne which would include Gorey, Enniscorthy and Wexford as strategic locations on the Corridor"* and

RPO22a: *"To strengthen the role of Gorey Town as an economic driver, leveraging its strategic location and accessibility to Rosslare Europort / proposed connection to Dublin - Belfast Eastern Economic Corridor (port, rail and road), build upon its inherent strengths including digital connectivity, skills, innovation and enterprise, tourism, culture and retail services".*

In any event, we would strong suggest the maps visualising the growth and settlement strategies emphasise more the road and rail links between the key towns in this and other regions.

2.4 'Eco-system services'

While we understand the concept that is being explained in this section (Chapter 3, Section 3.2), it is unclear how this approach is proposed to be integrated into the preparation of statutory land use plans. It is respectfully suggested that the methodology for preparing plans should be more properly left to Ministerial plan preparation guidelines which we understand are being prepared / revised at this time.

We would also like to draw your attention to the fact that the term 'ecosystem' is used in different contexts throughout the document; in some places referring to a biological community of interacting organisms and their physical environment whereas in others used in an economic sense to mean an economic network or interconnected system. While both uses are valid, we would suggest in the interests of clarity the definitions and meaning and consistent throughout the document or indeed that the two types of 'ecosystems' are clearly differentiated in some way in the language used.

2.5 Settlement Typology (Section 4.2)

With respect to the description of 'medium to large towns', namely:

"(i) Medium to large sized towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining

(ii) Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining"

it is respectfully suggested that the description is too narrow and does not account for medium to large sized towns with a strong employment role and higher order functions / infrastructure that service a wide geographical area and population. For example, the town of Arklow in Co. Wicklow (population c. 13,000) has a strong jobs ratio of 63% and is the administrative centre of the Arklow Municipal District, which covers a geographical area of 483 square kilometres and has a population catchment of c. 30,000 persons.

The description (and indeed the lack of identification of towns in this tier) does not reflect the capacity of some of the towns in this level of the hierarchy to grow and to be important providers of housing and employment in the region. In addition, a return on the significant investment in infrastructure in some of these towns over the last 15 years (many of which were designated as hinterland growth centres in the previous regional plan) may be not be realised if sufficient emphasis is not placed on their role in delivering important elements of the growth strategy. In this regard, it is suggested that the towns of Arklow and Blesssington in Co. Wicklow are identified in the RSES in the medium to large towns category.

2.6   Key Growth Towns

We would respectfully suggest that the sections on Bray and Wicklow - Rathnew could be enhanced and expanded as follows:

Bray

~~Bray is a large economically active town strategically located on the DART/rail line that provides a wide range of services, education and employment opportunities for north Wicklow.~~

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 and is the terminus of the planned Luas Green Line extension. 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.

Bray provides significant employment opportunities and although a significant number of the town's residents commute to Dublin for employment (due to the excellent transport links), the vision is for this trend to be reversed. The town has potential to provide significant employment, not only for the residents of the town but should be drawing workers into the town from other areas across the region; its employment catchment extends as far as Wicklow, Arklow and Gorey. Due to the presence of Ardmore Studios, the town has been the centre of the Irish Film Industry for the last 60 years. The town aims to have a concentration of major employment generating investment, particularly in the retail, services and industrial sectors. While the town would be attractive to all forms of industry and investment types, the town should primarily aim to attract high value foreign investment, focusing mainly on 'people' based industries at locations with easy access to public transport. Having regard to the limitations for expansion of employment facilities within the historic town centre, there is scope for the creation of new facilities at Fassaroe.

The town provides of all forms of higher order services and facilities, including high quality secondary and tertiary education services, health services, swimming pools, majors sports facilities, libraries, cultural and leisure facilities. In addition, the town is a major shopping destination for comparison goods, attracting people from the surrounding towns and villages, a function which is currently being significantly enhanced through the construction of the Florentine Centre in the heart of the town.

The town has the potential to be the most sustainable town in the County – a town which can most easily achieve the vision of 'walkable' communities whereby residents have access to local services and facilities including employment, shops, services, schools, playgrounds etc all within walking distance. In addition, all residents in the town have access to a good quality public transport system with local buses and DART services, thereby reducing the dependence of residents on private car use.

Bray is a significant visitor and tourism destination with attractions such as Bray Seafront, the Bray – Greystones cliff walk, Bray Head, Bray Sea Life Centre and Kilruddery House.

Growth in Bray has been modest compared to other similar settlements in the metropolitan area; and challenges remain in relation to public transport investment and congestion on the M/N11 as expansion of the town is constrained on all sides by the administrative boundary of Dun Laoghaire Rathdown to the north, the coast to the east, Bray Head / Sugarloaf mountains to the south and the N/M11 to the west. In order for Bray to fulfil its employment and housing delivery role in the region, lands at Fassaroe to the west of the N/M11 are targeted for new employment, housing and major community and sports facilities. The development of a new centre at Fassaroe is largely dependent on the delivery of roads and transportation infrastructure including upgrades to the N/M11 and the delivery of high quality public transport connections to Bray Town Centre and to Dublin City Centre. The development of lands at Fassaroe to the west of the N/M11 requires significant upgrades to transport infrastructure including new public transport connections to Bray and to Dublin. These are currently being addressed in a joint transport study between the Local Authorities and transport agencies.

Fassaroe has the potential to deliver significant employment growth and along with the development of the IDA strategic site in the nearby town of Greystones, offers an opportunity to strengthen the employment base and reduce commuting pressures in North Wicklow

In addition to growth at Fassaroe, there is significant potential for new development in the established town centre and other built up parts of the settlement, particularly since the completion of the River Dargle Flood Defence Scheme. Bray Golf Course and Harbour lands are designated and ready for significant, high density new identified as part of a mixed-use development with enhanced town centre functions and development of the seafront.

RPO 4.28: Support the continued development of Bray including the enhancement of town centre functions, including the development of major schemes at the former Bray golf course and Bray harbour, increased employment opportunities and the westward extension of the town, linked to the delivery of key infrastructure including Bray-Fassaroe public transport links by providing a lead role in the coordination of key agencies in the delivery of the required infrastructural supports.

RPO 4.23: Key Towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers.

RPO 4.XX: To ensure ongoing significant investment in public transport infrastructure, including the Luas green line extension to Bray and Fassaroe as a priority, to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity.

Wicklow – Rathnew

Wicklow-Rathnew incorporates both the county town of Wicklow and the town of Rathnew.

~~Located on the coast and in proximity to the M11 motorway, the town acts as a key population and employment centre for the surrounding hinterland. The town has experienced an increase in population growth in recent years and consolidation and regeneration shall be a key priority and objective for the development of the town, including consolidation of economic function and supporting services to meet population growth.~~

Wicklow Town – Rathnew is a key settlement within the hinterland of the Region. The town has a strategically important location on the M/N11 and rail corridor, at the centre point of the coastal area of Co. Wicklow. It is an economically active town that provides higher order services and facilities for the residents of the town and its catchment. Settlements within the catchment of Wicklow Town – Rathnew include Ashford, Glenealy, Roundwood, Rathdrum and a significant rural population. Within the settlement, Rathnew has a distinct identity and functions as a local service centre for its local community.

Wicklow has an important position as the 'County Town'. This is the centre which provides a significant role in the provision of administrative services, delivering the functions of local government from Wicklow County Council, the provision of tertiary educational facilities at the Wicklow County Campus at Rathnew (in conjunction with Carlow IT) and higher order health facilities at Wicklow Hospital and Knockrobin Primary Health Centre.

In terms of economic function, the settlement aims to capitalise on its existing assets such as the highly accessible commercial port, a third level college campus at Rathnew – Clermont and an excellent supply of zoned serviced employment land, as well as its location on the M/N11 corridor, with easy access to the markets and national transportation hubs of the Dublin area. There is significant potential for the town to promote economic development associated with the expansion of port and harbour activities and the town benefits economically from proximity to nearby Ashford Studios.

The town would benefit from improvements in public transport such as additional rail and bus services. In this regard, the NTA have identified the upgrading of the rail track south of Bray as a transport objective. Public transport improvements would improve the accessibility of the town to Dublin and wider area and would likely contribute to population and economic growth.

The town is sited at an attractive coastal location between the protected conservation sites of the Murrough cSAC/SPA and Wicklow Head SPA. While the ecological protection of these sites is a priority, there is potential to expand the range of recreational and tourist facilities associated with its coastal location. In addition, the town centre has an attractive streetscape, rich in Victorian architectural heritage with amenities including Wicklow Gaol and the Abbey Grounds.

RPO 4.35: Support an enhanced role and function of Wicklow-Rathnew as the County town, particularly as a hub for employment, training and education.

RPO 4.36: Support Wickow-Rathnew's role in the provision of third level education at the Wicklow County Campus Rathnew (in association with Institute of Technology Carlow) and in particular, to support the development of the campus as a hub for the Film Industry and Screen Content Creation Sector.

RPO 4.37: Support enhancement and expansion of Wicklow port and harbour, to expand commercial berthing and pleasure craft capacity subject to a feasibility study with particular focus on avoiding adverse impacts on the integrity of adjacent European Sites.

RPO 4.38: Support the development of Wicklow - Rathnew as a tourism hub having regard to its accessibility to key tourist destinations in the Region

RPO 4.XX: To ensure ongoing significant investment in rail infrastructure to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity.

Alternatively, we would suggest that the piece on each of the key towns could be reformatted and expanded following the format utilised in the draft Southern Regional Spatial and Economic Strategy.

2.7   Rural Areas (Section 4.8)

We welcome the commitment in the draft RSES to the management of urban generated growth in rural areas under strong urban influence. In this regard, we would request that the RSES would provide a visualisation/map of the zones of urban influence in the region, which should include the urban influence exerted by larger towns outside the ERMA region.

With respect to the rural area policy objectives:

RPO 4.50: *In Development Plan Policy Local Authorities shall prioritise the regeneration of rural towns and villages through identification of significant ready-to-go regeneration projects for rural villages and rural areas which could harness untapped assets with community and wider private and public sector support and investment including the Rural Regeneration and Development Fund.*

We would respectfully suggest that this objective requires wording improvement and clarification, as the intention of the objective appears to be the regeneration of settlements (*'rural towns and villages'*), yet the wording suggests that this regeneration can be carried out via the identification of regeneration projects for 'rural areas'.

3.0   MASP

3.1   Transport Infrastructure Investment

Rail: We consider it vital that the RSES promotes significant improvement and investment in rail infrastructure in the Dublin Metro area and is not limited by the existing NTA Strategy, which was based on a now superseded regional plan. In this regard, we particularly consider that the RSES should promote and strive to deliver **major enhancement** to rail (DART) services to Greystones, including major track capacity improvements south of Bray. We would request that the terminology set out in the draft RSES in this regard, which refers only to '*continuing to* **provide** *DART services......as far south as Greystones'* is wholly inadequate.

We would draw your attention to Section 8.4 (Table 8.2) of the draft RSES where the text refers to '*continuing to* **improve** *DART services on the SE line as far south as Greystones'*.

Roads: We would question some of schemes listed in this section, which do not appear to be at the same strategic scale as the other road projects listed. If it is the case that more localised improvement

schemes (albeit serving identified significant development zones) are to be included in the MASP, we would request the following additional projects be listed:

- Bray: Dublin Road and Dargle Road Improvements (serving major development area at Fassaroe)
- Bray: Fassaroe to Enniskerry link road
- Bray – Dub Laoghaire: Fassaroe Woodbrook link via Old Conna (link Fassaroe and Old Conna to Woodbrook station)
- DLR: Old Conna to Bride's Glen Improvements (Luas link pre extension to Bray)

Note: These are all schemes identified in the Bray Transport Study prepared by the NTA in collaboration with WCC, DLR and TII.

Park and Ride: We would request that it is clarified that a park and ride already exists at Greystones (and Carrickmines). It is requested that the wording of Section 5.6 be changed to *'New or **ENHANCED** park and ride locations at Swords, Finglas Dunboyne, Liffey Valley, Naas Roads, Carrickmines, Woodbrook and Greystones'* (cross reference RPO 8.12 in Chapter 8).

3.2   Housing Delivery

Housing and Regeneration Policy **Objective RPO 5.5** states: *Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the draft RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.*

We request confirmation that this objective is not suggesting that the development of Key Metropolitan Towns should be seen as 'secondary' in sequential planning or temporal terms to the consolidation of Dublin and suburbs.

3.3   Employment Generation (Section 5.8)

The draft RSES states that:

*"The MASP identifies a number of large-scale employment and mixed-use development areas within the metropolitan area, which should be developed in co-ordination with the sequential delivery of infrastructure and services. The MASP aims to continue densification in the city centre, re-intensify strategic employment areas within the M50 ring and to activate key strategic sites such as Cherrywood to complement existing employment hubs such as the city centre, Docklands and Sandyford Business District, **providing for a limited number of people intensive employment locations that are accessible to public transport**. Outside the M50 ring there is potential to re-intensify older industrial estates such as Naas Road/Ballymount and provide for high tech and research and development employment at strategic employment hubs such as Dublin Enterprise Zone in Blanchardstown and Grangecastle Business Park."*

It is respectfully suggested that the phrase marked in bold (our emphasis) is unclear in its meaning. It is stated that the MASP aims for 3 things (1) continued densification in the city centre, (2) re-intensify strategic employment areas within the M50 ring and (3) activate key strategic sites such as Cherrywood in order to *'to complement existing employment hubs such as the city centre, Docklands and Sandyford Business District'*. It is unclear where the phase in bold sits in this strategy, unless it is intention to state that it is an objective **'in addition'** to these three locations to **'also'** allow for

additional sites that are outside these areas. If so, this should be more clearly stated, and the sites themselves identified.

It is suggested that this vision piece, (in bold at the start of this section) should also include densification and re-intensification of economic activity / employment in the centres and built up parts of the Key Growth Towns of Swords, Maynooth and Bray, rather than addressing these locations in a secondary paragraph. We would request that the major IDA site in Greystones is also referenced as it is the key site in the MASP area in Co. Wicklow for major employment creation.

In Table 5.2, the following changes are requested:

North-South corridor (DART)	North County Wicklow (Bray, extension to Fassaroe, Greystones)	Re-intensification of commercial town centre functions in Bray including major town centre extension at former Bray golf club and new mixed-use district at Fassaroe. Redevelopment of IDA strategic sites at Greystones to strengthen employment base for North Wicklow

3.4   Green Infrastructure & Amenities (Section 5.9)

Please be advised that the map produced showing 'green' and 'amenity' designations for Co. Wicklow is not correct. We have supplied a correct map for the final document.

4.0   Economy and Employment

4.1   Introduction and Profile (Sections 6.1 & 6.2)

We would request that additional data is provided regarding the economic profile and strengths / opportunities of the region and in particular of the Eastern and Midlands SPAs. With respect to the Eastern SPA, of which Wicklow forms part, we can only find one sentence in this regard in this section– *"The Eastern SPA is strong in manufacturing, hosting a number of foreign owned investments of significant scale in the Technology and Pharmaceutical sectors."*

We would point out that this sentence is not aligned with the graph provided, which shows that the largest employment sector in the Eastern SPA is in fact wholesale and retail, with manufacturing comprising only 15.5% of local jobs.

(Please be advised that the Irish Film Board (referenced on p85) has been renamed 'Screen Ireland').

4.2   Asset Maps

It is requested that these maps should identify the higher education institute location in Wicklow / Rathnew – IT Carlow Campus at Clermont and the IDA business park at Bray.

4.3   Engines & Opportunities (Section 6.4)

Sectoral opportunities for 'Dublin and Eastern SPA' are laid out in one section. It is respectfully suggested that such analysis skews this section towards Dublin based sectoral engines, and is not reflective of the opportunities in the wider Eastern SPA. Furthermore, this section appears to list

almost every sector as an opportunity, therefore lacking focus and vision, and ultimately any real value.

In this regard, we would suggest that reference is made the objectives that have been prioritised in the **Regional Action Plan for Jobs** for the Mid East to 2020 which identifies the following for the mid-east region:

- Developing the Mid-East as a hub for the Screen Content Creation Sector;
- Developing a Network of Innovative Workspaces;
- Building an ecosystem framework to support the Agri-food sector.

4.4   Specific sectors / drivers for growth (Sections 6.5 and 6.6)

We request that the **film industry** as a growth sector be included in the RSES. The Regional Action Plan for Jobs sets out the following in respect to this sector:

The ways in which screen content such as video, audio and animation is created, produced, disseminated and consumed has altered dramatically in the past decade. These rapid changes internationally in the Screen Industry are set to endure, as the requirement for content continues to escalate, technology advances, and consumers change how they consume content. The opportunities for content creators are significant and continue to grow rapidly, across all forms of content, including short videos, episodic programmes, and full feature films.

The Screen Industry in Ireland has developed an international reputation and makes a significant economic contribution. A recent report by consultants Olsberg SPI with Nordicity found that the Irish Audio-Visual Industry supported 14,370 full-time equivalent jobs in 2016; with Gross Value-Added amounting to €857 million and an estimated €191 million in export earnings for Ireland. The Irish film, television and animation industry is experiencing a period of sustained success and critical acclaim providing valuable cultural exports reaching substantial global audiences and bringing benefits to other industries such as the tourism sector.

Reflecting the established strengths in Ireland in the Screen Industry, Irish government policy has identified the economic opportunity, in terms of jobs potential, revenues, exports and regional development, that the Screen Industry presents, to enable Ireland to become a global hub for screen content creation and doubling employment in this sector within the next five years.

Within the Mid-East Region, Wicklow and the East Coast has an established screen creation sector with an existing internationally recognised screen industry cluster, a long tradition of content creation for the film and television industry, the presence of two of the major studios in Ireland, a large number of skilled crew and talent living in the area, and an attractive connected location. The screen creation cluster in Wicklow represents a strong best practice model.

5.0   Environment

5.1   Biodiversity and Natural Heritage – National Parks

The draft RSES incorrectly states that the Wicklow Mountains National Park shares a visitor centre with the nearby monastic site of Glendalough. This is in fact incorrect – the national park information centre is located close to the Upper Lake approx 2km from the OPW Glendalough Visitor Centre. We would be obliged if this would be corrected in the final document.

5.2   Green and Blue Infrastructure

As per section 2.4 above, please be advised that Map 7.3 for Co. Wicklow is not correct; in particular please be advised that there no land 'zoned' for GI in County Wicklow. We have supplied a correct map for the final document.

With respect to Table 7.1:

- under the heading 'maritime towns and beaches', Wicklow Town should be included;
- under the heading 'lakes, rivers and canals' we would suggest that the following river – lake systems be included / referenced: Lough Tay - Lough Dan on the Cloghoge River (leading to Avonmore); Vartry Reservoir (part of River Vartry system); River Slaney and tributary the Derry River which rise in Co. Wicklow and forms part of the River Slaney system (designated cSAC).
- under the heading 'Greenways, Blueways and Peatways' we would request inclusion of the 'Blesssington greenway';
- under the heading 'national and regional parks', Avondale and Kilmacurragh should be included.

Under the heading 'Development of Greenways, Blueways and Peatways' and box entitled *'there are significant opportunities to develop a number of flagship greenways in the region'*, the Blesssington Greenway is listed but with no accompanying text whatsoever to describe what it is or what opportunities it presents. This is a significant project in the West Wicklow – East Kildare Region; it is envisaged that the local annual economic impact of the Blessington Greenway is likely to range between €3,035,478 and €5,091,310 per annum.   Based on a ratio of 27 jobs being created per €1,000,000 of tourism income generated this equates to the creation of an additional 81 to 135 new jobs.

We request that the following information regarding the Blesssington greenway be utilised in drafting appropriate additional text for inclusion in the final RSES:

The existing Blessington Greenway walk links the historic town of Blessington with the Palladian mansion at Russborough House; the trail starts at Blessington and leads south along the shores of Blessington Lakes and through forest and natural woodland. The approved extension to the greenway will extend it around the Blessington Lake, taking in the surrounding villages of Lackan and Ballyknockan. This offers the potential to attract people to work and visit the area of Blessington and surrounding villages and provide employment opportunities in a co-ordinated and sustainable way. The Blessington Greenway presents an opportunity for enhanced health, social interaction and mental wellbeing, strengthened local economy through increased tourism spend and growth in bed-nights and tourism-related job creation, integrated activity and tourism resources, the centre-piece for tourism itineraries and connected communities.

We also request that the Arklow – Shillelagh Recreational Trail be listed in the RSES – this trail follows the line of a disused railway line and is partially completed (Tinahely section).

5.3   Climate Change

It is respectfully suggested that the RSES should avoid setting of prescriptive objectives for climate change studies / actions / measures to be carried out by Local Authorities, particularly where no agreed methodology is in place and resources have not been conferred on the Local Authorities to carry out such actions. For example, Objective RPO 7.37 states:

*"Local Authorities **shall** consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in Local Authority areas **shall** be carried out and statutory planning documents **shall** identify local waste heat sources." (our emphasis)*

In this regard, all Local Authorities in the region are or will be preparing Climate Change Adaptation Strategies in accordance with EPA Guidelines and it is respectfully suggested that the RSES should not prescribe certain elements of said strategies in advance of their preparation.

With respect to the paragraph on p135:

"Local Authorities should harness the potential of renewable energy in the Region across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy",

the reference to publicly owned peat extraction should be reframed to reflect the opportunity of these areas, but to ensure there is no discrimination against other opportunities that don't offer direct, local alternatives to the peat extraction. It is right that transition needs to be managed, but the peat extraction areas should not be favoured above other areas, e.g. coastal, offshore wind, wave, etc. These other areas may offer earlier access to renewable or alternative sources of energy.

6.0   Connectivity

6.1   Integration of land use and transportation (Section 8.3)

While we agree fully with the principles outlined in the box entitled *'Guiding Principles for integration of land use and planning'*, this section goes further than setting out 'principles' and in fact includes a methodological requirement for the preparation of future land use plans by stating: *'The predicted impact of the potential land use and transport infrastructure on modal split and transport greenhouse gas emissions should be assessed to deliver on national and regional targets'.*

At this time, we are not aware of any agreed methodology for carrying out such assessments and furthermore, no new resources or expertise has been allocated to Local Authorities to carry out such studies. As set out in Section 1.3 of this submission, it is respectfully suggested that the methodology for preparing plans (and the assessments that accompany them) should be more properly left to Ministerial plan preparation guidelines which we understand are being prepared / revised at this time.

6.2   Transport investment priorities (Section 8.4)

Rail

Again, we respectfully submit that it is vital that the RSES promotes significant improvement and investment in rail infrastructure in the region and should not be not limited by the existing NTA Strategy, which was based on a now superseded regional plan.

In this regard, we particularly consider that the RSES should promote and strive to deliver major enhancement to rail services to the south-east, including major track capacity improvements south of Bray. We would request that the terminology set out in the draft RSES in this regard, which refers only to 'provide for an appropriate level of commuter rail service in the ... south-east' is wholly inadequate.

In light of both (a) the identification of Wicklow – Rathnew, Gorey and Wexford Town as 'key towns' in both the EMRA and SRA areas and (b) the forthcoming challenges presented by Brexit, we suggest that there is an imminent and essential necessity to enhance transport infrastructure, including rail, along the Dublin to Rosslare corridor (see Section 1.2 of this submission).

It is suggested that the RSES should promote and encourage the assessment of the existing rail network to provide freight/cargo transport off peak to assist in reducing reliance on road based transport and to reduce the need for investment in roads infrastructure e.g. N11 corridor, to take advantage of existing rail corridor before further investment in N11 itself.

Roads

With respect to Table 8.4 'Road Projects for the Region', it appears that this list includes a number of projects / improvements that do not appear to have a regional or strategic importance and we would query their inclusion on this list; in addition, some of the projects listed are listed twice and in both this list and the following list 'significant regional road schemes'.

While we do not question the need for these schemes, a number of these appear very 'localised', do not relate to identified strategic sites or key towns and would more appropriately be listed in the following table 'significant regional road schemes' or in other location in the document (e.g. MASP).

Furthermore, projects that would appear to be a similar scale of significance are not included on this list e.g. road improvements in 'The North Fringe', Donabate, Shanganagh – Bray, Bray – Fassaroe (all metro area strategic locations – of similar standing to the other projects listed).

With regard to the second table 'significant regional road schemes', please be advised that the N81 project listed is not a 'regional road' scheme, but rather a project on the national road network.

It is also pointed out again that some schemes are in this list twice, and indeed that the first 5 schemes listed also appear in both lists. It is respectfully suggested that road projects listed are categorized in separate lists according to their road type (national primary, national secondary, regional, local etc) with their strategic regional function and necessity stated. It is vital that such lists are correct and properly calibrated and emphasized, as they are likely to form the basis for investment decisions for the duration of the RSES.

Park and Ride

We would suggest that the RSES makes reference also to potential **bus** park and ride locations on national road corridors and in key towns; for example, a pilot project is underway in Co. Wicklow to develop a bus based park and ride at 'The Beehive' on the N11 west of Wicklow Town (a 'town team' lead project, in cooperation with the landowner and Wexford Bus) and furthermore, the development of a bus park and ride in south Bray / Bray southern cross is an objective of the NTA.

It is also suggested that the RSES should lead the way in promoting the provision of EV charging in park and ride locations, to complement RPO 7.41.

6.3 International Connectivity (Section 8.5)

We have made reference already in this submission to the vital importance of the Dublin to Rosslare corridor, particularly in the post Brexit scenario. With the threat of a 'hard border' with Northern Ireland, it is vital that our transportation connections to continental Europe are strengthened. In this regard, while we note Objective RPO 8.14:

"RPO 8.14: Support the improvement and protection of the TEN-T network to strengthen access routes to Ireland's ports, including investment in the ongoing development of the N11/M11 to improve connectivity to Rosslare and improvements to the Dublin-Wexford Rail line";

We suggest that this section of the RSES would benefit from a new sub section on the connections of the EMRA region to Rosslare (and Cork) ports, the benefits associated with same and the infrastructural improvement / investment priorities with regard to these connections.

7.0 Quality of life

7.1 Commuting

'Quality of Life' is one of the key assets when promoting a place to live, work and do business. In this regard, we consider that one of the key factors affecting quality of life in our region is commuting. It is estimated that 21,000 - 25,000 people commute from Co. Wicklow on a daily basis, and many of these travel for over 2 hours daily to and from work in Dublin. In the wider region, this figure would appear to amount to in excess of 100,000 persons commuting from the Dublin hinterland area on a daily basis.

We consider that more emphasis needs to be placed on meaningful actions to reduce commuting and that this should be addressed as a clear sub-section within Chapter 9. There is considerable overlap in this regard with Chapters 6 and 8. Suggested measures could include the promotion of the development of local second sites, digital hubs and co-working spaces in towns and villages outside of the metro area, to allow the towns within the region to become self sustaining.

(Please find attached the recently completed Wicklow Commuter Study)

7.2 Promoting healthy and attractive communities

We fully support the goals of the draft RSES to promote the development of healthy and attractive communities. We would respectfully suggest however that the preparation and implementation of 'age friendly' and 'family friendly' strategies would be more appropriately integrated into the LECP process or the strategies of each local authority's Community – Social Development Section, rather

than the development plan process (RPO 9.1[1]) which is essentially land use plan and can only address the land use related aspects on the needs of these groups.

It is suggested that it should indeed be an objective of the RSES for Local Authorities to prepare such strategies (Wicklow County Council having prepared an Age Friendly Strategy in 2017), which address a wider range of factors beyond land use, and that development plans should in their strategies and objectives, support the delivery and implementation of such wider strategies.

7.3   Social inclusion

The emphasis on social inclusion in the draft RSES, especially regarding those with disabilities, those at risk of poverty and minority groups including non-Irish nationals and travellers is very positive. The fact that this emphasis is mirrored in other areas throughout the RSES, such as economic development, demonstrates social inclusion as an underlying theme and recognises that it is multi faceted in nature and requires a multi-faceted response.

While it is rightly stated that access to services is key to addressing social exclusion and inequality, the fear is that services are contracting in many areas. Social Enterprise can help to fill some of the gaps regarding local service provision and thus deserves some attention in the RSES.

7.4   LECP

The LECP is the work of <u>both</u> the Local Authorities and the Local and Economic Development Committees (LCDC) and this should be reflected in the RSES such as in Objective RPO 9.14.

8.0   Infrastructure (Chapter 10)

8.1   Water Supply

With respect to RPO 10.1 *"Local Authorities shall include proposals in Development Plans to ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment,"* we would respectfully remind the Regional Assembly that Local Authorities no longer have a remit over the development of water services infrastructure and therefore it may not be appropriate to include proposals in Development Plans for particular projects that may or may not be part of Irish Water's investment plan.

8.2   Energy Infrastructure

With respect to RPO 10.14 *'Smart Grids and Smart Cities Action Plan'*, it is suggested that this objective should be expanded to ensure less developed rural and lower order towns should develop a smart grid plan to ensure development can take advantage of smart grid technology to build in resilience and also to be prepared for alternative energy sources such as micro-

---

[1] **RPO 9.1:** *Local Authorities shall ensure the integration of age friendly and family friendly strategies in Development Plans and other relevant local policy and decision making, including provision for flexible housing typologies, buildings and public spaces that are designed so that everyone, including older people, disabled people and people with young children can move around with ease, avoiding*

generation. This is a far more sustainable approach to development than trying to retro fit smart grid technology.

Support for the SMART Villages initiative would be welcome also, in a way that is connected to SMART Cities, thus creating interconnected SMART regions. The National Rural Network (NRN), under the EU Action for SMART Villages, supports this initiative.

8.3   Waste Management

With respect to RPO 10.20 *"Development Plans shall identify how waste will be reduced, in line with the principles of the circular economy and how remaining quantums of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food"*, we would respectfully suggest that such an objective would be more appropriate addressed in a waste management plan, rather than a development plan.

9.0   Implementation and Monitoring

9.1   Review of City and County Development Plans

It is respectfully pointed out that there appears to be an error in this section where it refers to 'previously extended Town Plans'. If this is a reference to 'Town Development Plans' prepared for former Town Councils under Part II Chapter I of the Planning and Development Acts 2000-2018, please be advised that there is no provision in law to extend the timeframe of such a Town Development Plan.