

Burnaby Residents Association

Clashleigh

Erskine Road

Greystones

Co. Wicklow

Development Plan Consultation

Wicklow County Council

Planning Department

24 August 2021

Submission by the Burnaby Residents Association to the draft Development Plan for County Wicklow

Dear Sirs,

The Burnaby Residents Association (the Association) wishes to lodge a submission to the draft Development Plan for County Wicklow.

The Association has a particular interest in the protection, preservation and enhancement of the built heritage of the Burnaby Estate, which is now encompassed within the Burnaby Architectural Conservation Area.

The Burnaby

The Burnaby Estate is a residential area located close to the centre of Greystones Town.

The Burnaby is an historic residential suburb of national architectural interest and represents a form and style of urban development which is extremely rare in Ireland.

The area was developed from the 1890s in the Domestic Revival Style and reflects a range of architectural styles from the Victorian and Edwardian eras.

The ACA for the Burnaby recognises some relevant aspects that contribute to the architectural character of the area including;

- Large plots with buildings set back from the edge of the plot and street
- Large gardens with mature trees and large shrubs which cumulatively create a wooded green character
- A streetscape that is characterised by leafy and green suburban style streets

- The green character being intrinsic to what is distinctive and valued in the character of the Burnaby

In recent years there has been considerable interest in the history of the Burnaby Estate with guided tours, publications and exhibitions mounted by the Association to bring wider attention to the Estate and some of the significant historical figures and families who have lived in the Estate since it was established at the end of the 19th Century. The social history of the Burnaby Estate is very much a reflection of the social and political history of Ireland since 1890.

To assist the Association and the local authority in reviewing the strategic planning documents relevant to the Burnaby ACA, the Association commissioned a review of the Burnaby Architectural Conservation Area by a leading Grade 1 Conservation Architect, Fergal McNamara of 7L Architects. A copy of this Report is appended to this submission and contains a significant review of the condition of the ACA and matters that need to be addressed from a strategic planning perspective in the context of a review of the County Development Plan and the Local Area Plan. The Report was prepared primarily in the context of a review of the Local Area Plan for Greystones and Delgany, which was due to expire in 2019. However the review of the LAP has been deferred pending the conclusion of the County Development Plan. This Report raises issues of concern that should be addressed in the Development Plan and the revised Local Area Plan.

Summary of key issues relating to the Burnaby ACA

The Report by 7L Conservation Architects is significant in two key respects – first it notes the built and cultural heritage of the Estate and secondly it makes recommendations for additions and amendments to the Local Area Plan (and by extension the County Development Plan) and the ACA.

The built and cultural heritage of the Burnaby Estate

The 7L Report notes the following key findings concerning the Burnaby Estate;

- The Burnaby is of national cultural interest as an early example of a “garden suburb” of townscape interest and a repository of fine domestic architecture from the turn of the 19th into the 20th century.
- The current Burnaby ACA document lacks sufficient detail and guidance to ensure that it is effective in ensuring the conservation of the Burnaby.
- All planning applications and public works within the ACA should include an Architectural Heritage Impact Assessment.
- A full inventory of the built and landscape heritage of the Estate, including photographic records should be carried out.
- Houses within the Estate which are included in the NIAH survey for Co Wicklow should be considered for inclusion in the Record of Protected Structures as is the practice elsewhere.
- Extensions to houses should be proportionate and sympathetic to the form and massing of the original dwelling and its relationship to its garden and neighbouring properties.
- An objective for increased density in the Burnaby Estate conflicts with the ACA designation and if carried into the next LAP there is a real risk that the historic character of the area will be irretrievably lost or obscured.
- The existing zoning objective (R10) fails to protect the historic character of the Estate and should be replaced with R5, R2.5 or RE zoning that would reflect the prevailing density and historic character of its immediate surroundings.

- The existing infilling of plots and subdivisions of sites has already added 50% to the existing housing stock since the Estate was first substantially completed in 1915. Continued subdivision will gradually erode the special interest and character of the Estate.
- Recent road schemes within the Estate by the local authority have resulted in loss of historic fabric and character – for instance original granite and concrete kerbs should be repaired and restored, rather than replaced with motor way grab concrete kerbing.
- Where mature trees are lost the local authority should ensure that they are replaced by semi mature trees and protected.
- The Report notes that of particular concern is the possibility that new housing density and building height guidelines could result in apartment developments on sites in the Burnaby. The current LAP contains an express restriction against apartment developments in the Burnaby and this needs to be maintained.
- The 7L Report notes that the principal risks to the Burnaby arise from the current R10 zoning objective, insufficient oversight and enforcement of statutory protections as well as a lack of detail in the ACA document. The report urges that these are reviewed as part of the LAP (and by extension the CDP) so that the Burnaby as a place of national historical significance is preserved for future generations.

Comments concerning the draft Development Plan.

- Active management of Architectural Conservation Areas

The Draft Development Plan maintains the ACA designation for the Burnaby and this is welcomed by the Association. However for the ACA designation to have meaning and to truly contribute to the intended purpose of such designations to preserve the character of such a place, there needs to be active management of the ACA, rather than mere static designation of the area and it should be an objective of the Development Plan to ensure that this occurs.

An area covered by an ACA designation can be a fragile place with the character which merited protection constantly under threat by development pressures, the introduction of inappropriate land use (commercial in a residential area), unauthorised developments, insensitive public realm works, poor public utility interventions and a failure to view the area through the prism provided by the ACA. Merely allocating the ACA designation every 4 years in a Development Plan, is not a sufficient protection or support for maintaining the character of an ACA. The Local Authority needs to be more ambitious and active in the management of the ACA to preserve its character.

- Works by public utilities

Works by public utilities within an ACA (especially by the local authority) should respect the character of the area as an ACA and not be carried out in the absence of proper regard for the conservation designation. In the Burnaby ACA considerable damage has been done to the character of the ACA by “road improvements” carried out by the local authority – for instance on St Vincent Road, where original granite kerbing was removed and motorway grade concrete kerbing introduced.

Similarly lighting, planting and traffic management schemes (including parking) and the erection of street furniture needs to recognise the conservation objectives of an ACA. Regrettably in the Burnaby and Church Road ACAs works by the Council have not taken any heed of the ACA and fundamentally undermined their character. The County Development Plan should contain an

objective for the local authority to take active account of the ACA designation of areas when carrying out public works and to remediate existing inappropriate or insensitive works carried out within ACAs.

- Development management within the ACA

The Local Authority should be active in controlling development within ACAs and ensure that any developments are properly authorised and applications supported by conservation reports from suitably qualified professionals. Planning Enforcement needs to be carried out swiftly where breaches are notified to the Council.

Maintaining and supporting the character of an ACA area does require vigilance and action by the local authority, both in terms of its own actions and concerning the actions of others. Small incremental changes can collectively act to undermine the character of an ACA and it is vital that the local authority is alive to these challenges and pressures. For instance, one disturbing development within the Burnaby ACA in recent years has been the use of the old service lanes at the back of houses as parking lots, thereby undermining the use and character of the lanes. The Council has a role in enforcing such unauthorised use and should commit to this in the context of preserving the character of an ACA as an objective in the Development Plan.

- Housing and Density issues

The zoning objective which has been applied to the Burnaby ACA currently requires a land use zoning density of 10 houses per hectare. This objective has been provided in the LAP with the intention of ensuring that there is no over intensification of development given that the area covered by the ACA is a low density area of historical and architectural interest composed mainly of large style family homes on generous sites. This is a core element of the character of the Burnaby ACA. The 7L Report notes that the existing R10 zoning objective is facilitating extensive development and is failing to preserve the historic character of the Estate. The 7L Report argues that the Z10 zoning should be replaced with a lower density zoning such as R5 or R2.5 or an RE zoning which reflects the prevailing density and the historic character of the Estate within an ACA. The Association supports this recommendation but would go further and recommend a specific zoning objective for ACAs which notes the prevailing density and established character of its immediate surroundings, taking additional account of the historic character applying within an ACA.

Any new development within the Burnaby ACA will generally be by way of infill development. The current Development Plan (2016 – 2022) when dealing with housing densities noted;

“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.” 4.3.4 of the Development Plan.


While a similar statement is contained in the current Draft Development Plan at 6.3.5, it appears in the context of an emphasis on increased densities.

For the avoidance of any doubt the draft Development Plan, should expressly state that lower housing densities will be applied in ACAs in circumstances where they are necessary to preserve the established historic character and prevailing density of the area.

We hope that Wicklow County Council will take these observations into account in the framing of the Draft Development Plan and are grateful for the opportunity to represent the concerns of the Association as part of the public consultation process.

Yours sincerely



 Liam Sweeney

Chairperson
Burnaby Residents Association