

GAP (Greystones Area Planning) Community

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30.08.21

Re: GAP Community Submission on Chapter 6 Housing into Draft County Wicklow Development Plan 2021 – 2027.

We are a group of residents from Greystones and Delgany who have come together following the recent, significant developments that have taken place over the past number of years. We believe that these developments are unsustainable due to lack of investment in all other aspects associated with granting planning permission such as public services (schooling, medical, dental) transport infrastructure (traffic congestion), recreational facilities (lack of), residential issues resulting in an adverse impact into the biodiversity of the area.

Several these developments (Glenheron) have been approved under the Strategic Housing Development (SHD) process. We are also aware of the Carmelite development in Delgany which is under a Judicial Review and an upcoming SHD at Coolagad. We believe strongly that the SHD process is completely undemocratic as they bypass residents' rights to object to planning proposals in the normal manner – making representations to elected councillors and the county council. It has been reported by architect and surveyor bodies that SHD's have led to high density badly designed residential developments that tend to override democratically devised Local Area Plans (LAP) especially on density levels.

Greystones Area Planning Community welcomes this opportunity to input into the Wicklow County Development Plan 2021 – 2027 to try and ensure that planning of developments going forward is sustainable.

Our input is as follows;

CHAPTER 6 HOUSING

“It is Council policy to encourage higher residential densities at suitable locations in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). Locations that are appropriate for higher densities include sites that are particularly close to existing or proposed major public transport corridors and nodes”.

This statement needs to be revised for several reasons;

Higher density developments should only be considered in locations with access to public transport which provides and fast and frequent service. Housing that is located within 1km of a rail service or 500m of a bus stop will not necessarily provide a reliable and frequent public transport service. The proposed use of “bus stops” in the County Development as an indicator for increased density (up to 50 units per ha) makes little sense especially if the road infrastructure is insufficient as it stands. Additionally, Delgany as a small village cannot support frequent bus services.

Both Greystones and Delgany are currently serviced by the 84A which runs on an hourly timetable and the 84X which runs at peak hours. This can only be classified as a very limited and inefficient service given that it takes the bus close to two-hours to reach Dublin city centre. It renders it meaningless as an effective and efficient means of transport for commuters.

The use of the DART services in Greystones is limited to two trains per hour even at rush hour (because of the single track from Bray) and this service reached its capacity several years ago.

This leaves the car as the only viable option for commuters and there has been virtually no change in the road infrastructure in Delgany/Greystones, which has led to long and increasingly longer car commutes and more stressed residents. For the large number of hard-pressed residents who need to commute to work when offices re-open later this year, getting up 10 minutes earlier every few months to beat the ever increasing and earlier traffic is not good for their wellbeing, their family commitments nor the environment. This is not simply not sustainable on numerous fronts.

While working from home will become an important part of work in the future and the need to commute every day will be reduced, it will not be eliminated and the large number of new residents in East Wicklow will suffer loss of precious family time and much needed leisure time due to long and increasing commutes.

We endorse the principles outlined in section 6.3.1 Sustainable Communities. A social audit with subsequent action can have the potential to transform how we build housing in Wicklow. We strongly support the provision of housing for our older citizens as well as others who might require supported living.

CPO 6.18 is welcomed but will require more clarity to ensure that it is implemented correctly-

“Require all development proposals, including infill development, to include an analysis of the impact of building height and positioning of buildings on: The immediate & surrounding environment - streetscape, historic character; Housing Adjoining structures; Open spaces and public realm; Views and Vistas.”

How will this impact be assessed? We believe that full 3D tools should be used to see the impact on the local environment and surrounds.

Sequence and Phasing of Housing

CPO 6.20 “Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents. Where specified by the Planning Authority, new significant residential or mixed use development proposals (of which residential development forms a component), may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a Social Infrastructure Audit...”

The intent of CPO 6.20 is excellent but it needs to be strengthened, suggest replacing “may be required” with “**will be required**”.

The feedback and input in this submission is designed to improve / strengthen the Draft Wicklow County Development Plan 2021 – 2027 even further.

Yours Sincerely,
Greystones Area Planning Committee