

# LUGGALA

LUGGALA ESTATE LIMITED  
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## Draft County Development Plan

Forward Planning,  
Wicklow County Council,  
Station Road,  
Wicklow Town,  
A67 FW96

30<sup>th</sup> August, 2021

### Submission of view on the Draft County Development Plan 2021-2027 made on behalf of Luggala Estate Limited (LEL), Roundwood, Co. Wicklow A98 RH39

Dear Madam/Sir

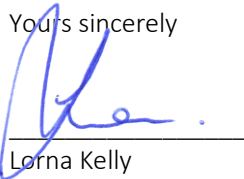
Luggala Estate Limited conducts the business of landscape environmental management, sustainable agriculture and agricultural related activity and hospitality on the private lands of Luggala Estate, Roundwood.

LEL is cognizant of the National Planning Framework (NPF) the Regional Spatial and Economic Strategy (RSES) and its consistency with conservation & protection of the environment, Project Ireland (2040), National Transport Authority (NTA) GDA 2016-2035 , National Climate Action Plan (NCAP) and the UN Sustainable Development Goals (2015) all of which feed the Drafted County Development Plan (2021-2027)

These policy documents inform the company in developing its own vision and mission; to be head of class in sustainable land management, in addressing climate action, economic stability & it's social and placemaking activities.

The attached document is our view and feedback to the Draft County Development Plan 2021-2027. It does not represent the personal views of the individual directors or personnel of the company.

Yours sincerely



Lorna Kelly  
LEL Exec.Admin

*(B.Sc Marine Sci. M.Sc Env. Protection, H.Dip Social Policy, Cert. Comm. Dev., Cert)*

**SUBMISSION FOR DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2021-2027**

**RE: Public Consultation concerning drafted Wicklow County Development Plan (2021-2027)**

**PREAMBLE:**

Luggala Estate Limited was incorporated in October 2019, and as such did not have an opportunity to make submission regarding the Stage 1 Pre-Draft Public Consultation Issues paper (Closing date 10 January, 2020).

Luggala Estate Limited is grateful to be able to make submission on the Drafted Wicklow County Development Plan (2021-2027).

Luggala Estate comprises Luggala Lodge, Lough Tay and 5,000 acres of surrounding land in the heart of the Wicklow Mountains – Natura 2000 – SAC & SPA. It is an ancient landscape and has historical, cultural & environmental significance for Wicklow and Ireland. The company is ultimately owned by Romito SA, Switzerland, a company with global investments and the forefront of environmental and heritage conservation. It is in this context that in March 2020 a comprehensive team with experience, knowledge and practical know how was brought together.

To date an ecological assessment, a comprehensive archaeological study and a drafted landscape environmental management plan are being worked. The maintenance and repair of the historical livestock infrastructure (50 km) of dry walls began, upland tree planting started, invasive species management actioned and a statement confirming the company's commitment to bog rewetting was issued and published (IT, June 2021).

Luggala Estate Limited will give this fragile region of the uplands a sustainable future. LEL looks forward to work with its neighbours on a landscape scale to achieve this, urging ongoing local, regional and national support frameworks and engagement.

**SUBMISSION FOCUS:**

Chapter 1 Introduction & Strategic Context.

**CHAPTER COMMENT:**

Chapter 11 Tourism & Recreation

Chapter 14 Flood Risk Management

Chapter 17 Natural Heritage and Biodiversity

Chapter 18 Green Infrastructure

**IMPORTANT STATEMENT:**

Luggala Estate Limited would recommend that Wicklow County Council lead in changing the narrative, by amending the title from WCDP to WCSDP. (Ref - UN world Commission on Environment & Development - Sustainability Goals.)

**Wicklow County Sustainable Development Plan (2021-2027).**

**SUBMISSION DETAIL:**

**Chapter 1 Introduction & Strategic Context**

A number of suggestions to strengthen the language at the onset of the document are recommended to reinforce Wicklow County Council commitment.

**1.3.2 Climate Action,**

Positive vegetation management is recognised as a legitimate mechanism to mitigate and adapt for climate change. In accordance with the objectives of the Climate Action Fund (CAF) this document and future policies should reflect this strategy.

**p.4.**

**Climate Action Plan (CAP) – To Tackle Climate Breakdown 2019**

Line 1: Use the word emergency or a synonym of, instead of ‘challenge’ (the justification is in keeping with the WCC statement under section 2.2.1.5 2, from 9<sup>th</sup> of April, 2019)

**Local Authority Climate Action Charter (2019)**

The local authority ‘Climate Action Charter (2019) ensures Wicklow County Council embeds decarbonisation, sustainable development and climate resilience into every aspect of the work it does.

Systemic change is fundamental to a sustainable future and this should be lead at local authority level.

Line 2: add the word ‘change mitigation and’ between climate and resilience in ‘climate resilience’.

The sentence will read - The local authority ‘Climate Action Charter (2019) ensures Wicklow County Council embeds decarbonisation, sustainable development and climate change mitigation & resilience into every aspect of its planning.

Additional text which outlines the prioritising of nature-based solutions and the conservation and regeneration of degraded and degrading ecosystems, into every aspect of the planning policy and strategy of Wicklow County Council.

This sentence will read: The Local Authority Climate Action Charter is a key action in the Climate Action Plan and will ensure every local authority embeds decarbonisation, sustainable development and climate change mitigation & resilience, prioritising nature-based solutions and the conservation and regeneration of degraded or degrading ecosystems, into every aspect of its planning policy and strategy.

Line 7 p.5. (second bullet point) insert after ‘deliver a’ and before ‘50% improvement’, -‘minimum of’.

This bullet will read: deliver a minimum of 50% improvement in energy efficiency by 2030 (on the 2009 baseline);

Line 8 (bullet pt 3) remove: ‘low’ and insert ‘zero’.

Line 11 (bullet pt 3) delete: 'near'.

Line 13 (bullet pt 4) delete: 'd' at the end of the word 'evidenced', to read 'evidence'.

### **1.3.3 Our Rural Future: Rural Development Policy 2021-2025**

This section should make reference to the protection of biodiversity and necessary regeneration.

*'Environmental, social and economic' should be inserted before every incidence of the words sustainable or sustainability to ensure the 3 pillars of sustainability are considered equally and mutually.*

Line 17 (bullet pt 9) insert after 'heritage', 'prioritising the conservation and regeneration of natural heritage'.

### **1.3.4 Project Ireland 2040: National Planning Framework (NPF)**

*In order for Ireland to act proportionately with regard to the climate and biodiversity emergencies, the language of the National Planning Framework (NPF) and National Development Plan (NDP) should be revisited.*

*References to 'growth' must be replaced with 'sustainable development' where economic growth does not maintain its primacy over action to mitigate and adapt to environmental breakdown. Language in the CDP must then be adjusted accordingly.*

Line 14 insert after 'climate change objectives', 'and nature-based solutions that also conserve and regenerate degraded ecosystems'. Wicklow County Council should push for this to be addressed in the NPF and NDP.

## **Chapter 11 Tourism & Recreation**

### **11.2 Strategy for Tourism and Recreation**

Line 6 After 'approach' add 'with environmental protection, biodiversity and sustainable development underpinning key developmental decisions'.

## **Chapter 14 Flood Risk Management**

### **14.4.2 Strategic Flood Risk Assessment**

In the CPO's there are 'where feasible' should be removed as it offers a get out clause for not ensuring tightest measures are used.

## **Chapter 17 Natural Heritage & Biodiversity**

The significance of this chapter is of high importance.

There is no reference to a responsible agent within Wicklow County Council to push for the achievement of the strategies and objectives. The structure within the Council should be shaped to ensure that there is a Natural Heritage & Biodiversity officer (ecologist, environmental, or biological scientist) as part of the management structure within the council, with direct responsibility and accountability to members.

## **Chapter 18 Green Infrastructure**

Greenways

Greenway development should be driven by sustainable landscape development with biodiversity principals at the forefront, rather than an anthropogenic drive to move individuals (by foot, bike or other) through a space.

The default development of greenways has been to tarmac surfaces for the movement of people. Greenway infrastructure development should be lead from the onset of planning with the principals of conservation, enhancement and regeneration of ecosystems.

*end*