

KILMACANOGUE SETTLEMENT PLAN

PROPOSED VARIATION NO. 2(i) TO THE WICKLOW COUNTY DEVELOPMENT PLAN 2010-2016

PROPOSED MATERIAL ALTERATIONS



**Report to the members of Wicklow County
Council under Section 13(6) of the
Planning and Development Act 2000
(as amended)**

DECEMBER 2011

Forward Planning Section
Wicklow County Council
County Buildings
Wicklow



Contents

Part 1	Introduction
Part 2	List of persons and bodies who made submissions
Part 3	Considering the submissions

PART 1

1.0 Introduction

At the Council meeting on the 3rd October 2011, having considered proposed variation No.2(i) to the Wicklow County Development Plan 2010-2016 (the draft Kilmacanogue Settlement Plan) and the Manager's Report on submissions received, it was resolved by the elected members to amend the draft Kilmacanogue Settlement Plan.

It was considered that three of these amendments constituted 'material alterations' to the draft Kilmacanogue Settlement Plan and therefore in accordance with Section 13 (6) of the Planning and Development Act 2000 (as amended), these proposed 'material alterations' were placed on public display from the 24th October 2011 to the 21st November 2011 in accordance with Section 13 (6) (ad) of the Act.

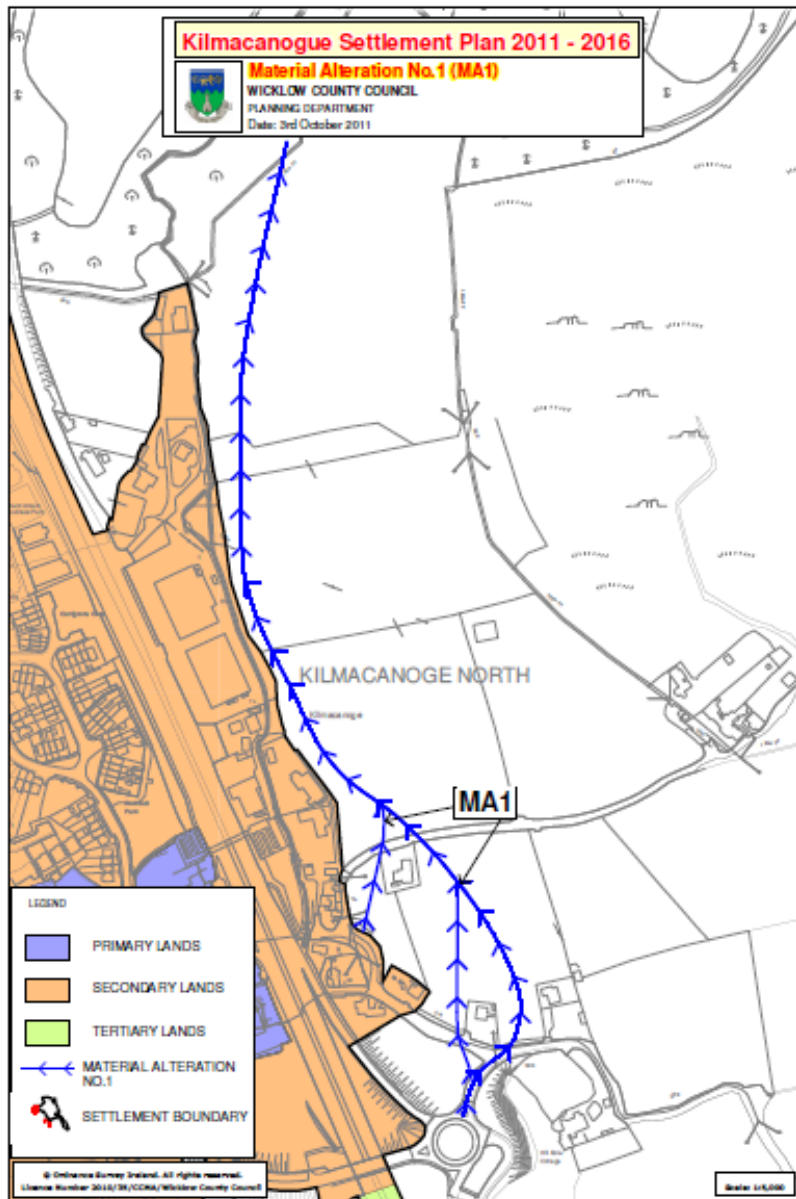
1.1 Proposed Material Alteration No.1 (MA1)

Under 'Settlement Objectives'

Add new objective **KM 7**

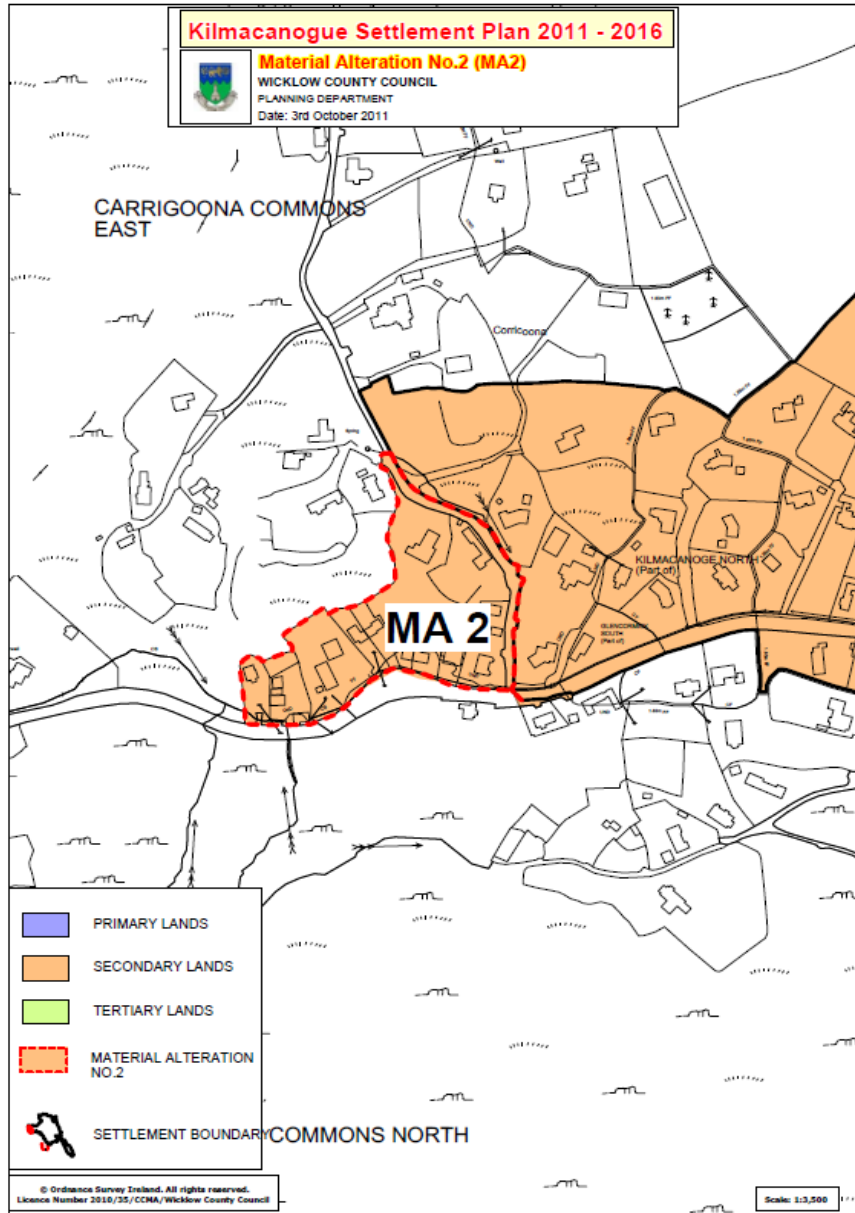
KM 7: To plan for a new distributor road, subject to a feasibility report, linking Kilmacanogue directly to Bray, along a line from the eastern roundabout of the Kilmacanogue N11 junction, across lands to the east of route N11, and to provide alternative access to properties currently accessed directly from route N11.

- Amend 'Kilmacanogue Settlement Plan' Map showing possible lines of this proposed road that should be reserved.



1.2 Proposed Material Alteration No.2 (MA2)

Amend 'Kilmacanogue Settlement Plan' Map by extending the settlement boundary to the west to include c. 2.5ha of additional lands and designating these lands 'Secondary Lands: Mixed Use Zone'.



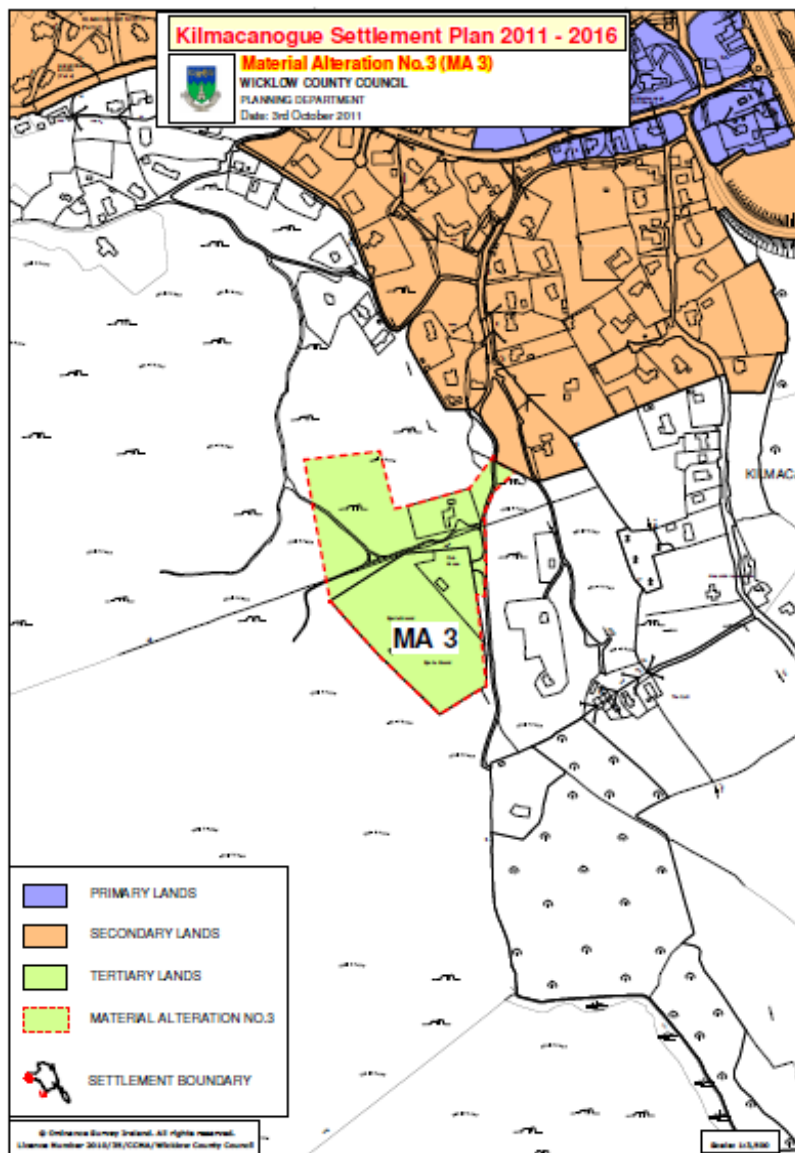
1.3 Proposed Material Alteration No.3 (MA3)

Under 'Zoning Objectives'- 'Tertiary Lands: Peripheral Zone'

Add new objective **KM33**

KM33 To preserve lands at Kilmacanogue GAA identified as KM33 for recreational and active open space use only.

- Amend 'Kilmacanogue Settlement Plan' Map by extending the settlement boundary to the south to include c. 4.7ha of additional lands at Kilmacanogue GAA grounds and designating these lands 'Tertiary Lands: Peripheral Zone' - KM33



1.4 Purpose of this Document

This Manager's Report is submitted under Section 13(6) of the Planning & Development Act 2000 (as amended). It is part of the formal statutory process of the making of a variation to the County Development Plan.

While the Planning Act (as amended) does not explicitly state the steps and timeframes that should be followed at this (new) stage of plan variation, it is recommended that the members follow the same steps and timeframes as set out in the preceding stage of making a variation i.e. that the Manager issues his report not later than 8 weeks after the start of the second public display and that the members consider the proposed 'material alteration' for a maximum of 6 weeks before making a decision on whether to make, not make, or amend the proposed variation.

This report includes the following:

- (i) A list of the persons or bodies that made submissions;
- (ii) A summary of the following:
 - a. Issues raised by the Minister;
 - b. Issues raised by the Regional Authority and the NTA;
 - c. Issues raised by other bodies or persons.
- (iii) The response of the Manager to the issues raised and the recommendation of the Manager in relation to the manner in which the issues should be addressed, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

It should be noted that a submission was received by the Minister for the Environment, Community and Local Government, NTA and the Regional Authority.

This report is now formally submitted to the Council for consideration. It is anticipated that this report will be on the agenda of the County Council meeting in January 2012.

1.5 Consultation Process

The proposed 'Material Alterations' were placed on display during the period of 24th October 2011 to the 21st November 2011. The aim of the consultation process was to enable the public and interested parties to give their observations on the proposed 'Material Alterations'.

A total number of 508 written submissions were received. The written submissions are held on file and are available for Council and public inspection. The list of prescribed bodies and members of the public that made submissions is set out in Part 3 of this report. For the purpose of clarity the submissions have been divided into five different categories as follows:

Group A: Prescribed bodies (1- 7)

Group B: Individual submissions (8 - 35)

Group C: Group submissions (36 - 458)

Group D: Brennanstown Riding School submissions (459 - 507)

Group E: Glencap Residents submission (508)

1.6 Considering the Submissions

The members of the Planning Authority are required to consider the proposed 'Material Alterations' as part of the proposed variation No. 2 (i) to the Wicklow County Development Plan 2010-2016 (Kilmacanogue Settlement Plan).

If the Planning Authority, after considering a submission, observation or recommendation from the Minister or Greater Dublin Area Regional Authority, decides not to comply with a recommendation made by either, it shall so inform the Minister or Regional Authority as soon as practicable by written notice and shall include the reasons for the decision.

Having considered the proposed 'Material Alteration' and the report of the Manager, the members of the Planning Authority may, by resolution, either:

- (i) refuse to make the plan altogether;
- (ii) make the plan without the proposed material alteration;
- (iii) make the plan with the proposed material alteration;
- (iv) make the plan subject to a further modification*.

*A further modification to the variation may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site, and shall not be made where it refers to an increase in the area of land zoned for any purpose, or an addition to or a deletion from the record of protected structures.

Formally, making a variation is done by resolution of the Council.

In making a variation to a development plan, the members are restricted to considering the proper planning and sustainable development of the area, the statutory obligations of a local authority and any relevant policies or objectives of the Government or any Minister of the Government.

PART 2 List of persons and bodies who made submissions

Group A: Prescribed Bodies (1 - 7)

No.	Name	Agent/ Representative
	Prescribed Bodies	
1	Department of Environment, Community and Local Government	Margaret Killeen
2	Environmental Protection Agency	Cian O Mahony
3	Department of Communications, Energy and Natural Resources	Carmel Conaty
4	Department of Education and Skills	Lorraine Brennan
5	Regional Authority for the Greater Dublin Area	Colm McCoy
6	National Transport Authority	Colin Clarke
7	National Roads Authority	Michael McCormack

Group B: Individual submissions (8 - 35)

No.	Name	Agent / Representative
8	Lily Brady	
9	Graham Bushe	
10	Kevin & Mary Cahill	
11	Joseph Clare	
12	David Cox (Fragrances of Ireland Ltd and Fernvard Ltd)	
13	Anne & Colin Cronin	
14	Ben Crowley	
15	Mark & Pauline Crowley	
16	Eamon de Buitlear	
17	Mr. & Mrs Dunn	Ameile Conway, Lawrence & Long Associates
18	John Flynn	
19	Helen Fox (Association of Irish Riding Establishments Ltd)	
20	Pam Goodwin	
21	Mary Greene	
22	James S & Joan E Gregg	
23	Holfeld Plastics Ltd	PD Lane Associates
24	Jane Kennedy	Brennanstown Riding School
25	Patrick Lawlor	
26	Rose & David Mahon	
27	Aimee O Caoimh	
28	Fia & Carina O Caoimh	O Caoimh & Associates
29	Josh O Caoimh	
30	Donal Pratt	
31	Darren Redmond	Frank O Gallachoir Associates
32	Resource Property Investment Fund (RPIF)	Coakley O'Neill Town Planning
33	Maeve & Keith Robinson	
34	David Ryan	
35	Sean & Theresa Sutton	

Group C: Group submissions (36- 458)

No.	Surname	Forename	No.	Surname	Forename
36	Agnew	Michael	90	Conway	Harry
37	Aherne	Joe	91	Cooke	Helen
38	Alvey	John	92	Cormick	Patrick
39	Barr	Seamus	93	Cotter	Sean
40	Barrett	Mr. & Mrs.	94	Cotter	Carmelette
41	Barry	Marie	95	Cotter	Julie
42	Behan	Colm & Audrey	96	Cotter	Emily
43	Bennett	Mary	97	Cotter	Billy
44	Blackbyrne	Angela	98	Coughlan	Mary
45	Bolger	S	99	Coughlan	Aoife
46	Bownes	Niamh	100	Cowell	Jessica
47	Bradshaw	Kathleen	101	Cowell	Paulene
48	Bradshaw	M	102	Cox	Elizabeth
49	Brady	Fiona	103	Cox	Edward
50	Brady	Christopher	104	Cox	Edward
51	Brown	Jackie	105	Cox	Peter
52	Bushe	C	106	Cox	Jane
53	Bushe	Lucy	107	Camp	Theresa
54	Bushe	Graham	108	Creegan	Ursula
55	Busher	Kevin	109	Creegan	Luke
56	Butler	Geraldine	110	Creegan	Pat
57	Butler	Betty	111	Creegan	David
58	Byrne	Trish	112	Crimmins	Sinead & Martin
59	Byrne	Tracy	113	Cronin	Colin
60	Byrne	Oliver	114	Crowe	Deirdre
61	Byrne	Nancy	115	Cullen	Elaine
62	Byrne	Francis	116	Cullinann	Bernard
63	Byrne	Arthur	117	Curran	Aine
64	Byrne	Edward	118	Cullen	Richard
65	Byrne	Ed	119	Curran	M
66	Byrne	Una	120	Curtin	Joanne & Pat
67	Byrne	Peter	121	Curtis	Diane
68	Byrne	Alison	122	Curtis	David
69	Byrne	Marcella	123	Cusack	Una
70	Byrne	Jane	124	Dalton	David
71	Byrne	Ruth	125	Dalton	Michelle
72	Byrne	C	126	Daly	Katie
73	Byrne	Mary	127	Darcy	Philip
74	Cahill	Sandra	128	Davis	James
75	Cahill-Ward	Margaret	129	Davitt	Madge
76	Campion	Jill	130	Davitt	Katie
77	Carstairs	Christine	131	Delaney	Mike & Mary
78	Cash	Robert	132	Dempsey	Hugo
79	Cassidy	Susan	133	Dempsey	Lisa
80	Cassidy	Fiona	134	Devine	David
81	Cassidy	Barbara	135	Devlin	Caroline
82	Cassidy	Carol	136	Devlin	Tommy
83	Clare	Joseph	137	Devlin	John & Margaret
84	Clarke	Niall	138	Devlin	Sean & Peggy
85	Cleary	Carmel	139	Digby	June
86	Conniffe	Aoife & Derek	140	Doherty	Conal & Nuala
87	Condren	Charlotte	141	Dolan	Helen
88	Connolly	Collette	142	Donnelly	Angela
89	Colin	Norman	143	Donohoe	Jackie

No.	Surname	Forename	No.	Surname	Forename
144	Donohue	Michele	197	Gregory	David
145	Dooley	Pat	198	Griffin	Sean
146	Dooley	Pauline	199	Griffith	Colm & Rosie
147	Doran	Nancy	200	Hall	Anne & PJ
148	Dowling	Fearghal & Marie	201	Hammond	B
149	Dowling	Pat	202	Hanna	Maire
150	Downes	Margaret	203	Hardwick	Victoria
151	Doyle	Baba	204	Hay	Maryrose
152	Doyle	Catherine	205	Hayes	Conor
153	Doyle	Mary	206	Hayes	Martin
154	Duggan	Bernie	207	Healy	Geoffrey
155	Duggan	Brendan	208	Hind	Jane
156	De Meo	Marilena	209	Hind	David
157	Duivnan	Carol	210	Hind	Ruth
158	Dunne	Janet & Colin	211	Hind	Christien
159	Dunne	Ann	212	Hogan	Margaret
160	Dunphy	Jack	213	Holly	Noelle
161	Dwyer	P.O	214	Holmes	Danny
162	Eadaoin	Pierse	215	Horn	Sally
163	English	Dave	216	Horne	Junius & Sallyanne
164	Evans	Stephen	217	Houlihan	Kerry
165	Fahy	Joseph & Ann	218	Howley	M
166	Fahy	Joseph	219	Hynes	Gerard
167	Fair	John & Ann Marie	220	Jackson	Joan
168	Fanning	Clare	221	Jones	Kyra
169	Fanning	Bernard	222	Kavenagh	David
170	Farland	Annie	223	Keane	Justine
171	Farrar	Valerie	224	Kearnes	Denise
172	Farrell	Jessica	225	Keaveney	Shane & Anne
173	Farrell	Kim	226	Kelly	Bronagh
174	Fawsit	Anne	227	Keenan	C
175	Finnegan	Julie	228	Kelly	R
176	Fisher	Donal	229	Kelly	Colin
177	Flynn	James	230	Kelly	Shane
178	Flynn	Rosaleen	231	Kelly	Eddie
179	Forde	Diana	232	Kelly	S
180	Fortune	Jeanne	233	Kelly	Anthony & Clare
181	Fox	Pat	234	Kelly	Joshua
182	Friel	Jane	235	Kelly	Theresa
183	Gahan	Valerie	236	Kelly	James
184	Gallagher	Georgia	237	Kelly	John
185	Gallagher	Georgia	238	Kennedy	Tyrone
186	Gallagher	Hugh	239	Kennedy	Alvara
187	Gallagher	Sandra	240	Kennedy	Adrian
188	Galvin	Olivia	241	Kennedy	Jack
189	Gavin	Diarmuid	242	Kennedy	Margaret
190	Healy	Pottery Ltd	243	Kennedy	Noreen
191	Goodwin	Mr & Mrs	244	Kennedy	Liz
192	Gorman	Ray	245	Kenny	Susie
193	Gorman	Susan	246	Kenny	Michael
194	Goulding	Ham	247	Keogh	Michael
195	Greene	Maighraed	248	King	Dymhna
196	Greene	Margaret	249	King	Guy

No.	Surname	Forename	No.	Surname	Forename
250	Kingston	Ian	302	McNulty	Ann
251	Kingston	Sally	303	McNulty	Ann
252	Kingston	Brian	304	McQuillan	A
253	Kingston	Alison	305	McSwiney	Deirdre
254	Kinlan	Patrick	306	McTeman	M
255	Kinnelly	Edna	307	Mifrane	Don
256	Kompa	Jim	308	Mitchell	Teilim & Clare
257	Kompa	Leszek	309	Mitchell	Eddie
258	Lacey	Grainne	310	Molloy	Patricia
259	Lamb	Francis	311	Molloy	C
260	Lavery	Ann-Marie	312	Moloney	Moira
261	Lavery	Mary & Gerry	313	Moloney	Bernard
262	Lawlor	E	314	Mongan	P
263	Lawlor	Mary	315	Mooney	Sinead
264	Lawlor	A	316	Mooney	John
265	Lawlor	Jane	317	Mooney	Teresa
266	Ledder	Alison	318	Moore	Esther
267	Ledder	Vivienne	319	Moore	Yvonne
268	Lenehan	Frank	320	Moore	Acton
269	Lenehan	Frank	321	Moore	Acton
270	Linnane	John	322	Moore	Monica
271	Long	Martina	323	Moore	Rebecca
272	Longstaff	Jill	324	Morgan	Barry
273	Loughlin	Hazel	325	Mosse	L
274	Lynch	Rodie	326	Mulligan	Lenka
275	Mahan	Fred & Cheryl	327	Mullins	John
276	Maher	A	328	Murnane	Ruth
277	Mahon	Seamus	329	Murnane	Ben
278	Maher	L	330	Murphy	Donal
279	Marr	Barbara	331	Murray	W
280	Malone	Susan	332	Murray	J
281	Martin	Tess	333	Murray	Laura
282	Mason	James	334	Murray	Siobhan
283	Mason	Evan	335	Neary	Richie
284	McAlister	Sheila	336	Ni Chaoimh	Maura
285	McCabe	Monica	337	Nic Reaniainn	Marilyn
286	McCann	E	338	Nolan	Marie
287	McCarthy	Joe	339	Nolan	Rose
288	McCarthy	John	340	Nolan	Karen
289	McCarthy	Lucy	341	O'Brien	Dearbhla
290	McCormack	John	342	O'Connor	W
291	McCormack	Monica	343	O'Brien	Francis
292	McDonnell	E	344	O'Callaghan	Brendan
293	McEvoy	Hilda	345	O'Caomh	Fia
294	McGahon	Sarah	346	O'Connell	Sarah
295	McGrath	Mary	347	O'Connell	Sarah
296	McGrath	Jim	348	O'Connor	Daragh
297	McGrory	Neil	349	O'Connor	Alma
298	McKenna	Justin	350	O'Connor	Rebecca
299	McLoughlin	John	351	O'Connor	Mr. & Mrs.
300	McNamara	Brendan	352	O'Connor	Debbie
301	McNamara	Maura	353	O'Donnell	Bob

No.	Surname	Forename	No.	Surname	Forename
354	O'Donnell	Amy	408	Saul	Teresa
355	O'Donnell	Phil	409	Saul	Harry & Theresa
356	O'Donnell	Gregory	410	Seery	Oliver
357	O'Donnell	Greg	411	Seery	Barbara
358	O'Donovan	Anita	412	Seery	Patrick
359	O'Farrell	Ken	413	Seery	Valerie
360	O'Farrell	Caralosa	414	Seery	Allan
361	O'Farrell	Eileen	415	Sheehy	Mena
362	O'Flynn	Patricia	416	Shortt	Deirdre
363	O'Grady	B	417	Sinnott	Angela
364	O'Keefe	Brendan	418	Sinnott	Glenn
365	O'Keefe	Ray	419	Sinnott	Glenn
366	O'Keefe	Maura	420	Smith	Lorraine
367	O'Loughlin	June	421	Smith	Aisling
368	O'Loughlin	Barry	422	Smith	Alan
369	O'Meadhra	Cian	423	Smith	Sinead
370	O'Neill	Margaret	424	Smith	John
371	O'Rourke	Luke	425	Smortar	Richard
372	O'Sullivan	Finbarr	426	Spendlove	Julie
373	O'Sullivan	Charlotte	427	Stack	Catherine
374	O'Sullivan	Niall	428	Stephenson	David
375	O'Sullivan	Karen	429	Sweeney	Michael
376	O'Toole	Rebecca	430	Sweeney	J
377	O'Toole	Sarah	431	Tallant	T & G
378	O'Toole	Laura	432	Tallant	Geraldine
379	O'Toole	Lesley	433	Taylor	Keith
380	O'Toole	Fergus	434	Taylor	Barbara
381	O'Toole	Cathy	435	Taylor	Tom
382	O'Toole	Shane	436	Teehan	Michael
383	Oudart	Jean-luc	437	The Watts Family	
384	Phillips	Louis	438	Thomas	Paula
385	Phillips	Pat	439	Tobin	S
386	Phillips	Joan	440	Treacy	Susan
387	Pierse	Emily	441	Uigh Uidhir	Suzanne
388	Prendergast	Veronica	442	Walsh	Y
389	Reall	Anne	443	Veale	Maurice
390	Redmond	Darren	444	Wainwright	Jean
391	Redmond	Holly	445	Waldron	Therese
392	Redmond	B	446	Walsh	Rita
393	Redmond	Sharon	447	Walsh	Noel
394	Redmond	P	448	Walsh	Fiona
395	Redmond	V.E	449	Ward	Mary
396	Pierse	Naornai	450	Waters	M
397	Repers	Colin	451	Waters	Andrea
398	Rice	James	452	Whelan	Sheila
399	Robinson	Mary	453	Wood	Karen
400	Roche	David	454	Woodcock	Anne
401	Roe	Sandra	455	Woodcock	Thomas
402	Ronan	Michael	456	Mojnar	Burschi
403	Rooney	David	457	Wojnar	Patricia
404	Russel	Joan	458	Ellis	Ann-Marie
405	Ryan	Helen			
406	Ryan	Andrew			
407	Ryder	Liam			

Group D: Brennanstown Riding School submissions (459 - 507)

No.	Surname	Forename
459	Bergin	Brendan
460	Bernet	Lara
461	Bloomer	Louise
462	Boyle	Priscilla
463	Bradley	A
464	Butler	Kay
465	Callinan	Mary
466	Cahill	Eloise
467	Clare	Julian
468	Carter	Louise
469	Cairns	Mary
470	Daly	Aoife
471	Doyle	Aisling
472	Earle	Sharon
473	Fannin	Claire
474	Finch	Arwen
475	Fitzgibbon	N
476	Glynn	Dervilla
477	Hanrahan	Laura
478	Hislip	Gordan
479	Hudson	Colette
480	Irvine	Ashlea
481	Irwin	Patricia
482	Keating	Holly
483	Kelly	W
484	Kelly	Rachel
485	Kelly	Susan
486	Kelly	L
487	Leijbrock	Ruth
488	Madden	Anne
489	Martin	Lucy
490	Massey	Sarah
491	McCarroll	Brigid
492	Mclan	Maurice
493	McNeill	Natasha
494	Moroney	Jemma
495	Ni Chaoimh	Eadaoin
496	Neil	Mona
497	McBrama	
498	O Caoimh	Aimee
499	O'Hanlon	Eithne
500	O'Keefe	Maura
501	O'Keefe	B
502	Simpson	Mark
503	Tracey	Siobhan
504	Vaiderwerff	Lisa
505	Warrington	J
506	Whitford-Smith	Dr. C.A
507	Williams	John

Group E: Glencap Residents submission (508)

No.	Surname	Forename
508	Lewis	Gordon

Late Submissions *

Surname	Forename	Date Received
Alvey	John	22/11/2011
Bolger	Sylvia	22/11/2011
Cosley	Pauline	28/11/2011
Devlin	Derek	22/11/2011
Devlin	Eoin	28/11/2011
Kearney	Marie	28/11/2011
Kelly	Geraldine c/o Kilmacanogue National School	28/11/2011
Kelly	Herbert	28/11/2011
Kennedy	Eileen c/o Kilmacanogue Residents Association	22/11/2011
O'Connell	Pat & Heather	22/11/2011
Seery	Patrick	28/11/2011
Seery	Pauline	28/11/2011
Stephenson	Sadie	28/11/2011
Stephens	John	28/11/2011

PART 3 Considering the submissions

For each of the submissions / proposed 'Material Alterations', the Manager will provide a summary of the issues raised, an opinion on the issues raised and a recommendation in relation to the issues. Where the Manager is recommending modifications to the proposed 'Material Alterations', these changes will be set out under each, with any new text proposed shown in red and deleted text in ~~blue strikethrough~~.

This part of the report is laid out as follows:

- Section 1: Submissions from Prescribed Bodies
- Section 2: Submissions relating specifically to MA1
- Section 3: Submissions relating specifically to MA2
- Section 4: Submissions relating specifically to MA3

Only submissions that addressed the published proposed 'Material Alterations' can be addressed at this stage. If any submission included additional issues, these are not summarised or addressed by the Manager in the section to follow. Where a submission was wholly about another issue, this will not appear at all in the following section.

* Late submissions have not been included in this report

Section 1: Prescribed Bodies

No. 1
Minister for the Environment, Community and Local Government
<p>The Minister has raised a number of points in relation to the proposed Material Alterations:</p> <p>Proposed Material Alteration No. 2</p> <p>The Minister has put forward that there is no clear reason provided for the extension of the boundary in this area. It is suggested that the Planning Authority would set out more clearly the reasoning behind the proposed alteration and how this extension contributes to the more sustainable development of Kilmacanogue. In relation to the ‘sustainability’ concept, this area is adjacent to a proposed NHA and any new development, if it was to occur, would more than likely require on-site waste water disposal facilities and would not entail connection to a public main. The land is on the edge of the settlement area and new development on these lands or consolidation of the existing development would not promote consolidation of development in or adjacent to primary lands as set out in objective KM 17.</p> <p>Proposed Material Alteration No. 3</p> <p>In relation to this material alteration, the Minister notes that as part of the extension of Tertiary Lands of approximately 4.7ha, 0.76ha of these lands falls within the adjacent proposed NHA. As the heath in this area is of European Conservation Importance, it is suggested that this portion of the extension would not be included in the extended plan boundary.</p>
Manager’s response
<p>Proposed Material Alteration No. 2</p> <p>In deciding to propose this extension of the plan boundary, the members indicated that it seemed logical to include these lands in the village boundary as they are already fully developed and are within the speed limit area. It was considered that this extension would appropriately consolidate this edge of the village and more clearly define the urban – rural edge, thus offering better protection for the rural area outside the boundary.</p> <p>In the event that permission for further development is sought in this area, any such application would be subject to the provisions of the plan which would address any possible adverse impacts namely:</p> <p>KM 7 Provide for a reliable and effective water, drainage, energy, waste management and communications infrastructure to service the existing and future development needs of the settlement, in an environmentally friendly manner, and to allow for the improvement of public services and public utility installations.</p> <p>KM8 Ensure that the density, design, scale and use of developments shall reflect the scale and context of the area.</p> <p>KM 9 Protect the amenity of existing residential properties.</p> <p>KM 19 In existing residential areas, to protect existing residential amenity and to provide for infill residential development at a density and design that reflects the established character of the area in which it is located.</p> <p>KM 20 To allow for new residential developments, including a mix of residential options within an attractive and accessible setting, at appropriate locations, which have safe access to the public road network, which have pedestrian links to the core area, and which are served by appropriate water services infrastructure and if possible are in proximity to community and public services.</p> <p>KM 21 Promote densities in the order of 15 dwelling units per hectare. A higher or lower density may be considered appropriate, having regard to the context of the site and the prevailing density in the vicinity of the site.</p> <p>Any application including proposals for an on-site effluent disposal system would be subject to current EPA standards, the application of which would preclude adverse impacts on ground / surface waters or adjoining residences.</p> <p>Proposed Material Alteration No. 3</p> <p>The Manager is in agreement with the Minister and does not recommend that the area of land to the north of the existing playing pitch, on undeveloped heath land, should be included as part of this material alteration.</p> <p>While the Strategic Environmental Assessment screening exercise carried out determined that this proposed material alteration would be unlikely to have an adverse impact on the Sugarloaf pNHA (subject to the application of mitigating objectives), the Minister in his submission has drawn attention to the possible adverse impacts on the heath area located in the extension zone which is of European Conservation Importance and has requested that this area of c. 0.75ha be removed from the extension area. The Manager agrees that this would be most appropriate action given</p>

<p>the commitments set out in national legislation and the County Development Plan to protect such areas.</p> <p>However, by removing this area, the remaining undeveloped area would not be suitable for active use due to its size and dimensions, which would not lend themselves to training usage. Furthermore, the works that would be required to make this space usable (i.e. flat) and avoid impacts on the adjoining protected land e.g. embankments, buffers etc would reduce this area even further.</p> <p>Therefore the designation of the currently undeveloped heath land would serve no purpose.</p> <p>Furthermore, the Manager does not consider these lands suitable for the development of further pitches due to the inadequate access available, which cannot be readily improved due to the location of dwellings, buildings and embankments in close proximity to the road carriageway.</p>
<p>Manager's recommendation</p>
<p>No change to proposed Material Alteration MA2</p> <p>Not to proceed with proposed Material Alteration MA3</p>

<p>No. 2</p>
<p>Environmental Protection Agency</p>
<p>The EPA's specific comments in relation to the proposed material alterations relate to Material Alteration No.1 (MA1). It has been queried whether the proposed Objective KM 7 replaces the existing objective KM7 or whether the new objective will involve a renumbering of the existing objectives (KM1-33).</p> <p>In relation to the provision of the distributor road it is suggested that the selection of the preferred location takes into account the environmental vulnerabilities within and adjacent to the plan area and that the provision of the road takes into consideration the requirements of the EIA and Habitats Directive.</p>
<p>Manager's response</p>
<p>Noted. Objective KM7 is a new objective and will involve a re-numbering of objectives KM 1-33.</p> <p>The alteration is merely to reserve road lines into the future; it is not a design and the decision of a final line for the provision of the distributor road will be subject to a full feasibility study and would also be subject to normal planning and statutory requirements.</p>
<p>Manager's recommendation</p>
<p>No change to proposed Material Alteration MA1</p>

<p>No. 3</p>
<p>Department of Education and Skills</p>
<p>The Department has expressed no objection to the proposed material alterations. There are no changes in projected population figures for the area and therefore no changes likely to future school provision for the area.</p>
<p>Manager's response</p>
<p>Noted.</p>
<p>Manager's recommendation</p>
<p>n/a</p>

No.4
Department of Communications, Energy and Natural Resources
No specific submission made regarding the proposed material alteration.
Manager's response
n/a
Manager's recommendation
n/a

No.5
Greater Dublin Area Regional Authority
The Regional Authority has indicated that it has no observation to make on the proposed material alterations.
Manager's response
Noted.
Manager's recommendation
n/a

No.6
National Transport Authority
<p>The NTA requests that the Local Authority would recognise that any proposed road developments will have to satisfy the objectives and policies within the NTA (draft) Transport Strategy and specifically the principles set out under measure ROAD1.</p> <p>Notwithstanding this the Authority supports the proposed inclusion of objective KM 7 and the proposed amendments to the settlement map to include possible lines, for reservation, of a proposed link road from Kilmacanogue to Bray.</p> <p>The NTA considers that the proposal would have a positive implication for the operation of both the national and non-national road network at this location; however there are a number of design features that need to be further developed at the design stage of the road. The Authority would welcome consultation with the Local Authority in the planning of this road.</p>
Manager's response
Noted. The provision of the distributor road will be subject to a full feasibility study and would also be subject to normal planning and statutory requirements. The purpose of including this material alteration was to i reserve lines into the future for a distributor road, detailed feasibility studies will have to be carried out amongst a number of key stakeholders in the finalisation of this proposed road.
Manager's recommendation
No change to proposed Material Alteration MA1

No.7
National Roads Authority
The NRA notes and welcomes Material Alteration No.1 (MA1) and the inclusion of Objective KM 7 and the amendment to the settlement map to include possible lines for the reservation of the proposed link road. It is noted from the wording of proposed KM7 that a feasibility report would form part of the more detailed planning for such a road and the NRA would welcome consultation on such a feasibility report.
Manager's response
Noted. The purpose of including this material alteration was to identify reserve lines into the future for a distributor road, detailed feasibility studies will have to be carried out amongst a number of key stakeholders in the detailed analysis of this proposed road. Obviously the NRA is the main stakeholder / proponent of this link road and not just a notional consultee as it is the NRA that carried out the "M11/N11 Merging Study" Report and the "N11 Corridor Review-Fassaroe Junction to Kilmacanogue, Co.Wicklow" Report and it was the NRA that requested the inclusion of the proposed objective.
Manager's recommendation
No change to proposed Material Alteration MA1

Section 2: Submissions relating specifically to proposed Material Alteration No. 1 (MA1)

Submissions opposed to MA1

No.	Name	Issues raised
8	Lily Brady	<p>The submitter is resident at 'The Haven' which is one of the dwellings located immediately north of the existing roundabout on the east side of the N11 which is located directly adjacent to the possible route options shown. The following observations are made:</p> <ol style="list-style-type: none"> 1. While improvements to road safety are welcomed, the new road would cause disturbance to this dwelling by reasons of noise, dust / dirt, light pollution, security concerns, property devaluation and impacts on privacy; the dwelling has already suffered disturbance during the course of previous N11 works; 2. The future plans for the dwelling are unclear were this road to proceed; 3. More direct consultation with the resident would be welcomed to see if an alternative route could be agreed.
9	Grahame Bushe	<p>The submitter is resident at 'Sugarloaf', Kilmurray. The following issues are raised:</p> <ol style="list-style-type: none"> 1. The submitter cannot see how the proposed road can be reconciled with the findings of the study and recommendations for the proposed SAAO; 2. This new road would transfer the existing traffic problems of the Bray Southern Cross to Kilmacanogue; these problems should be addressed where they occur; 3. There are already serious traffic problems in Kilmacanogue Village and changes to the road network in the village area will result in further problems; 4. The proposed road would result in destruction of the natural environment.
10	Kevin & Mary Cahill	<p>The submitters are resident at 'Riverside' which is one of the dwellings located immediately north of the existing roundabout on the east side of the N11 which is located adjacent to the possible route options shown. The following observations are made:</p> <ol style="list-style-type: none"> 1. The village of Kilmacanogue has already been seriously impacted by the upgrading of the N11 which result in the east part of the village being isolate from the rest of the village; this road would result in the dwellings east of the N11 being left on an 'island' surrounded by roads; 2. The new road would result in adverse impacts on residences due to noise and air pollution; 3. The N11 works previously carried out was not sensitively designed and left the east side of the road with a traffic hazard at the Topaz garage; 4. The proposed road would result in significant increases in traffic in the village; 5. The proposed road is a poorly thought out reaction to local traffic issues elsewhere along the N11, and in particular from problems associated with the Bray Southern Cross; 6. The amenity use of Barchuilla Commons will be lost; 7. The proposed road will damage the natural environmental and animal and plant species; 8. Views for the village to the Little Sugarloaf will be compromised; 9. The direct linking of Kilmacanogue to Bray would bring no advantage to Kilmacanogue and the proposed road will only increase this separation.

11	Joseph Clare	The proposed road would result in loss of <ol style="list-style-type: none"> 1. A recreational amenity to walkers; 2. Natural scenic landscape.
13	Anne & Colin Cronin	The submitters are resident at 'Hillside' (which may be the dwelling located immediately south of the existing roundabout on the east side of the N11). The following observations are made: <ol style="list-style-type: none"> 1. Previous N11 works have resulted in significant disruption and further roads will lead to more traffic, increased noise and deterioration in living standards; 2. The proposed road would detract from the village and its natural surroundings; 3. The function of the proposed road appears to be to address the traffic problems at the Kilcrouney junction; this problem should be addressed by modifications to that junction; it is questioned whether other solutions have been examined; 4. It is questioned if there is any statistical information of traffic volumes to justify the new road; it is questioned if there is proof that the new road would eliminate rather than exacerbate or relocate traffic problems; 5. Traffic volumes in the village would be likely to increase at an already dangerous turn off at the Post Office; 6. The proposed road would result in noise, visual and monetary impacts on the submitters property; pedestrian access to the village would be impaired; 7. The proposed road would tip Kilmacanogue one step closer to being a suburb.
14	Ben Crowley	The submitter is resident at 'Bramley Cottage' which is one of the dwellings located immediately north of the existing roundabout on the east side of the N11 which is located directly adjacent to the possible route options shown. The following observations are made: <ol style="list-style-type: none"> 1. The proposed road would result in noise and night time disturbance to this property; 2. Any road development may result in wall building that may reduce light entering this property; 3. The privacy of this dwelling would be affected, particularly if the new road is used by buses; 4. The development of a new road may impact on childrens' and pets' safety in the area.
15	Mark & Pauline Crowley	The submitters are resident at 'Bramley Cottage' which is one of the dwellings located immediately north of the existing roundabout on the east side of the N11 which is located directly adjacent to the possible route options shown. The following observations are made: <ol style="list-style-type: none"> 1. The proposed road would be very close to a number of residences; the road would result in loss of privacy / security, noise and light pollution and would consequently devalue the submitters property and affect their overall quality of life; 2. The reasoning behind the road is unclear, particular so close after the adoption of a new County Development Plan which did not make reference to any such road; 3. Having regard to existing traffic problems on the east side of the N11 in Kilmacanogue, consideration should be given the forcing properties with direct access onto the N11 to redirect their traffic up onto the roundabout; 4. The interface of the new road with Bohilla Lane is unclear; 5. The development of this road may result in increased traffic using Bohilla Lane to access Delgany and Greystones; 6. The proposed road would result in the further isolation of Bohilla Lane from the village; 7. The road would affect the scenic nature of the area and require substantial tree felling; 8. The development of this road could be a precursor to new development along the route thereby further damaging the rural qualities of the area; 9. The proposals for a new road runs contrary to the objectives of the Rathdown No. 2 Plan and to the confirmation that these lands have sufficient ecological, historical and amenity value to warrant the provision of a SAAO.

16	Eamon de Buitlear	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The land proposed for reservation are situated in an Area of Outstanding Natural Beauty (AONB) as defined in the County Development Plan; there is only a small section of the Wicklow Mountains AONB to the east of the N11 and that it is important that the character of these lands be retained as they provide an effective greenbelt between the large urban settlement of Bray and the village of Kilmacanogue; 2. The provision of another road in Kilmacanogue, which has already been severely disrupted by previous works, will only further divide the village; 3. The provision of an new road at this location will lead to pressure for further development to the east of the village and between the village and Bray, which will erode the existing greenbelt and change the village into suburb of Bray; 4. The proposed road is likely to compromise listed view No. 7 of the Little Sugarloaf and the objective of creating a SAAO; 5. The proposed road would be likely to result in the loss of mature woodland, which would have impacts on scenic amenity and habitats; 6. The proposed road would impact on rural activities in the area including the operation of Brennanstown Stables; 7. It is suggested that the Council was incorrect to state that proposed road need not be subject to Strategic Environmental Assessment or an Appropriate Assessment under the European Union Habitats Directive particularly given the proximity of the project to Kilmacanogue Marshes NHA.
17	Mr. & Mrs Dunn	<p>The submitters are owners of Hollybrook Hall (east portion). The following observations are made:</p> <ol style="list-style-type: none"> 1. While it is unclear from the Material Alteration (MA1) the full extent of the proposed distributor route, extrapolation of the route to the roundabout on the Bray Southern Cross Road would result in the road being within 170m of Hollybrook Hall. The house, its associated gate lodge and entrance gates are on the Record of Protected Structures. It is suggested that the proposed road would significantly impact on Hollybrook Hall and its architectural setting and its relationship with a folly in the grounds; 2. The proposed road may also impact on an existing area of marsh between Kilmacanogue and Bray.
18	John Flynn	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The submitter makes reference to the objectives of the Rathdown No.2 District Plan which specifically refers to the need to retain the distinct village character of Kilmacanogue, and the need to ensure that the entire Bray, Enniskerry and Kilmacanogue area does not develop into a large urban conglomeration; 2. It is suggested that the proposed new objectives would be contrary to that objective.

19	Helen Fox (Association of Irish Riding Establishments Ltd)	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The road is proposed to be constructed on the foothills of the Little Sugar Loaf through lands belonging to the Brennanstown Riding School. The road would compromise the business particularly by separating it from its main attraction the Little Sugarloaf and surrounding lands; 2. The new road would seriously diminish a high amenity area which is an important tourist attraction and an existing green belt at the entrance to Wicklow.
20	Pam Goodwin	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed road will increase the levels of traffic in and around Kilmacanogue village and will simply relocate the traffic congestion from the Southern Cross Road directly to the Kilmacanogue area; 2. The proposed road would result in the loss of a local amenity in the form of the lower slopes of Barchuilla Commons which contain a rich habitat of natural species; 3. The existing views from Kilmacanogue village to the Little Sugar Loaf will be affected if the road is constructed; 4. Kilmacanogue has an identity in its own right and is not a suburb of Bray; the proposed roadway will link the village of Kilmacanogue to Bray in a manner that brings no advantage to Kilmacanogue, but places a great burden of disadvantage on residents of Kilmacanogue.
21	Mary Greene	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed roadway will bring greatly increased traffic to Kilmacanogue Village; 2. The proposed roadway will simply relocate the existing traffic congestion from the SCR directly to the Kilmacanogue area. The existing roundabouts in Kilmacanogue will not be able to cope with the likely increased traffic volumes. Traffic may back up on th N11 and life in the village will be adversely affected; 3. The lower slopes of Barchuilla commons are a valuable local amenity for walkers; 4. The lower slopes of Little Sugarloaf are a rich and diverse habitat which is home to successful and stable populations of deer, pheasant, otter and lizard. The proposed roadway would devastate these habitats; 5. The existing views for Kilmacanogue over the Little Sugarloaf will be compromised; 6. Kilmacanogue has an identity in its own right and is not a suburb of Bray; the proposed roadway will link the village of Kilmacanogue to Bray in a manner that brings no advantage to Kilmacanogue, but places a great burden of disadvantage on residents of Kilmacanogue; 7. The village has already been destroyed by road building and the community has been divided.
24	Brennanstown Riding School	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed road will traverse the lands which are currently being utilised as part of the riding school thereby impacts on facilities and grazing land; 2. The proposed road would effectively isolate the riding school from the lands over which clients have enjoyed riding for the last 38 years; this would have a devastating effect on the business; 3. The proposed road and resulting noise and emission pollution would have a devastating effect on the natural habitats of the area, which is home to many wild species; 4. The proposed road would destroy views around the area; 5. The proposed road would adversely impact on protected structures in the area including an intact 60ft folly tower; 6. The proposed route will be contrary to objectives and policies of the Kilmacanogue Settlement Plan 2011-2017 and the Wicklow County Development Plan 2010-2016, namely objectives BD7 and AW1.

25	Patrick Lawlor	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed road scheme does not appear to have been well thought out and aims to correct an existing and long term problem created by Wicklow County Council N11 designers themselves, namely the Kilcrouney interchange; 2. Taking into account the actual construction costs of the proposed road, along with associated CPO, the cost must be greater than the more simple solution of creatively redesigning the Kilcrouney off-ramp and roundabout together with buying out Hills garage to facilitate better access to Killarney Road and the SCR; 3. The proposed road would have the effect of diverting all northbound N11 traffic heading for Bray or Greystones off at Kilmacanogue post office and then routing them via the flyover to the new road. This will vastly increase traffic in the village.
26	Rose & David Mahon	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed roadway will simply relocate the existing traffic congestion from the SCR directly to the Kilmacanogue area. The existing roundabouts in Kilmacanogue will not be able to cope with the likely increased traffic volumes which will make life immensely difficult for people living in the village; 2. The lower slopes of Barchuilla commons are a valuable local amenity for walkers; 3. The proposed road will spoil views over the Sugarloaf.
27	Aimee O Caoimh	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed road would detract from the village and its natural surroundings and would have an effect on the natural habitats (rabbits, pheasants, otters, deer and ducks).
28	Fia & Carina O Caoimh	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The lower slopes of Little Sugarloaf are a rich and diverse habitat which is home to successful and stable populations of deer, pheasant, badger and lizard. The proposed roadway would devastate these habitats; 2. The proposal is completely at odds with Wicklow County Council's previous intention to award SAAO status to these lands, as set out in the County Development Plan; 3. The proposed road scheme does not appear to have been well thought out and is a reaction to problems elsewhere on the N11 and the SCR; these issues should be dealt locally by updating the Kilcrouney interchange; 4. While it is understood that it is an objective of WCC and the NRA that local traffic be kept off the N11, it seems that only a very small number of cars travel from Rocky Valley Road towards Bray – the vast majority appear to head on directly to Dublin. Therefore the proposed road is unnecessary and waste of money; 5. The proposed roadway will simply relocate the existing traffic congestion from the SCR directly to the Kilmacanogue area. The existing roundabouts in Kilmacanogue will not be able to cope with the likely increased traffic volumes. Traffic may back up on the N11 and life in the village will be adversely affected; 6. The existing views for Kilmacanogue over the Little Sugarloaf will be compromised; 7. The topography of the area would not lend itself to easy road construction and a more appropriate approach should be taken in the terrain; 8. This road would result in the dwellings east of the N11 being left on an 'island' surrounded by roads, which will cause great suffering for residents in that area; 9. Increase traffic in Kilmacanogue Village resulting from this proposal will seriously impact on the safety of vehicles and pedestrian access Kilmacanogue national school; 10. The proposals would not stand up to a 'cost-benefit' analysis – it is an extravagant and expensive solution to a problem that does not exist. 11. The material alteration was not displayed in Kilmacanogue Village Hall; 12. The lower slopes of Barchuilla commons are a valuable local amenity for walkers;

		<p>13. There is a poor history of planning in the Kilmacanogue area and the previous N11 upgrade was marked by insensitivity which destroyed the town, by traffic hazard;</p> <p>14. Kilmacanogue has an identity in its own right and is not a suburb of Bray; the proposed roadway will link the village of Kilmacanogue to Bray in a manner that brings no advantage to Kilmacanogue, but places a great burden of disadvantage on residents of Kilmacanogue.</p>
29	Josh O Caoimh	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed road would destroy the village and its natural surroundings and the local deer population would leave; 2. There would be increased levels of noise as a result of the proposed road; 3. The views of the local area are an important asset and the road as proposed would diminish these views; 4. The proposed road would impact on pedestrian movements in the village.
30	Donal Pratt (Avoca Handweavers Ltd)	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed road is not necessary as it is considered that the existing road infrastructure can accommodate the volumes of traffic that are generated. When traffic delays persist it is often as a result of natural incidents and such delays would not be improved by the proposed new road; 2. To adversely impact on the Little Sugarloaf in such a way would be a crying shame; 3. It is suggested that if the justification for the proposed road is to address the traffic issues at the existing service stations, then it would be more beneficial to relocate these service stations rather than construct a new road.
31	Darren Redmond	<p>The submitter is resident at Kilfenora Road, Kilmacanogue North and the proposed road reservation runs both sides of his home. The following observations are made:</p> <ol style="list-style-type: none"> 1. The area is designated a rural greenbelt in the Rathdown No. 2 Plan – it is the policy in such areas to protect and enhance the open nature of the greenbelt between Kilmacanogue and Bray; 2. The proposed road reservation is located entirely within in the area proposed for consideration as a SAAO and is in an area designated an Area of Outstanding Natural Beauty; 3. The proposed road would be in the foreground of Listed View No. 7 of the Little Sugarloaf when viewed from the N11; 4. The proposal is premature, unnecessary and environmentally unsustainable – it is premature given that its feasibility has not been established, it is unnecessary as the existing designations in this area would result in little development that might impact on route options, and it is environmentally unsound as it contravenes Council policies in relation to the protection of this amenity area; 5. The project may not be financially viable as there is little local development occurring or planned to generate funding. There is a danger that the proposed road would attract development zonings and new development adjoining it; this would be the only way the road could be developed i.e. funded by private development; 6. The EIS for the Kilmacanogue – Glen Of The Downs project in 1991 previously considered road development at this location and concluded that such works would create a severe scar on the landscape, would intrude on the Little Sugarloaf and would be visually obtrusive when approaching the village from Glendalough; 7. The legal standing of the objective is suspect because <ul style="list-style-type: none"> - the reservation and objective refer to lands outside of the plan boundary; - the public notice does not refer to the fact that the objective is outside the plan boundary; - the road reservation also affects Bray environs and public / landowners in that area and they may not have been adequately informed; - the objective contravenes the Wicklow County Development Plan.

32	Resource Property Investment Fund (RPIF) Plc	<p>For the purpose of clarity there has been two submissions made by the Resource Property Investment Fund Plc in relation to the impact of the proposed material alteration on the Glen Fuels Depot and the Topaz Station respectively. However, the same general issues are raised in relation to both properties as follows:</p> <ol style="list-style-type: none"> 1. It is put forward in the submission that the wording of proposed objective KM7 which specifically refers to the intended function of the new road '<i>to provide alternative access to properties currently accessed directly from route N11</i>' does not derive from the studies carried out by the NRA, which was the catalyst for the inclusion of the proposed alteration. In particular, attention is drawn to the fact that the NRA studies provided for a slip lane along the mainline of the N11 for these properties; 2. It is put forward that this inconsistency threatens to undermine any future proposals to redevelop the Glen Fuels site and the owners of this site subject to the inclusion of any objective that threatens the access arrangements or the depots future development potential; 3. It is therefore requested that the wording be amended such that reference to alternative access for properties on the N11 be omitted, that it be made clear that further detailed study of the route options would be required and that full consultations with stakeholders would form part of that process.
33	Maeve & Keith Robinson	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The reference in the Strategic Environmental Assessment document published that "<i>No significant environmental impacts resulting from the proposed "material alteration" or developments that arise from it have been identified</i>" is not accurate - if the road were to proceed it would result in significant environmental and economic impacts on the quality of life of the local people; 2. The full route of the proposed road from Kilmacanogue to Bray has not been identified and therefore impacts have not been fully evaluated; 3. The proposed road would have adverse social, economic, health and environmental impacts and could result in additional development/industrialisation of the area; 4. It is unclear from the document submitted as to what the elected members of the Council are being requested to consider i.e. are the Councillors being requested to agree the "planning of a new road which has already been decided upon", or are they being requested to "keep the option open for a decision on a new road to be made sometime in the future"; 5. There is a lack of data/information contained in the documents published to explain the reasoning behind the Local Authorities decision to include this new objective KM 7; it is queried as to whether there has been detailed studies carried out to explain and justify the new objective KM 7 and is there factual data to back up the proposed objective KM 7.
34	David Ryan	<p>The following observation is made:</p> <ol style="list-style-type: none"> 1. The proposed distributor road along the Barchuilla Commons will destroy this natural resource that contains a rich habitat of lizards and is used as a walking route.

36 - 458	Group C	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed roadway will bring greatly increased traffic to Kilmacanogue Village; 2. The proposed roadway will simply relocate the existing traffic congestion from the SCR directly to the Kilmacanogue area. The existing roundabouts in Kilmacanogue will not be able to cope with the likely increased traffic volumes. Traffic may back up on the N11 and life in the village will be adversely affected; 3. The lower slopes of Barchuilla commons are a valuable local amenity for walkers; 4. The lower slopes of Little Sugarloaf are a rich and diverse habitat which is home to successful and stable populations of deer, pheasant, otter and lizard. The proposed roadway would devastate these habitats; 5. The existing views for Kilmacanogue over the Little Sugarloaf will be compromised; 6. Kilmacanogue has an identity in its own right and is not a suburb of Bray; the proposed roadway will link the village of Kilmacanogue to Bray in a manner that brings no advantage to Kilmacanogue, but places a great burden of disadvantage on residents of Kilmacanogue.
459- 507	Group D Brennanstown Rising School	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. The proposed road will cut the riding school off from a vital trekking area; 2. A roadway accommodating HGVs and fast moving cars is incompatible with the activities of the rising school; 3. The existing riding school is an important tourist amenity and the proposed road would destroy its setting; 4. The proposed road would devastate FAS work training programmes that have been ongoing for many years; 5. The proposed road would destroy the rich and diverse habitats of the area; 6. This proposal would not support and nourish this local business.
508	Group E Glencap Residents	<p>The following observations are made:</p> <ol style="list-style-type: none"> 1. This proposal has little merit and will increase the levels of traffic in the Kilmacanogue area especially at peak times; 2. The existing junctions at the Kilcroney roundabout should be examined and improved rather than constructing a new road; 3. The proposed road would have a negative impact on the natural habitat of the area, as well as on adjacent dwellings and the Sugarloaf landscape.

Submissions in favour of MA1

No.	Name	Issues raised
12	David Cox (Fragrances of Ireland Ltd and Fernvard Ltd)	<p>The submitter supports the proposed new road for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposed distributor road would allow an alternative access to the Lavender Field which would remove the need for direct access onto the N11 thereby improving traffic safety and allowing for improvements to this enterprise; 2. The proposed distributor road would similarly allow an alternative access to other properties on the east side N11 which could reduce traffic hazard posed by existing access points.
35	Sean & Therese Sutton	<p>The submitters are the owners of a dwelling named 'Massabielle' which is located on the east side of the N11 just south of the Lavender Field. The following observations are made:</p> <ol style="list-style-type: none"> 1. The present entrance to the house onto the N11, which is shared with the Lavender Field, is extremely dangerous in terms of the lack of sightlines and an inadequate merging lane; 2. A new distributor road would provide for an alternative safer access route in and out of the village and onto the N11.

Manager's opinion

All of the issues raised have been considered in detail and are duly noted.

The effect of the inclusion of the proposed road objective would be simply to keep open the option of the road being provided in the future if it were deemed necessary and appropriate at this location. Any definitive proposals to provide such a road would be subject to all planning and statutory requirements, which would necessitate providing justification for the road as well as full assessment of all traffic, environmental, visual, heritage and social implications. Such a process would be open to public consultation and legal approvals where the owners of any affected properties / businesses would have the right to comment and seek clarification on the affect that the road would have on their property / business.

It is logical that route options / locations of possible future infrastructure be indicated on development plans to ensure that future development does not impede necessary infrastructural improvements.

With regard to some of the more specific issues raised:

1. This possible future road is not being considered as a solution to existing problems at the Kilcronee Interchange – this is a more long term reservation to provide for connectivity between settlements without the need to utilise the N11 and associated interchanges for regional and local trips. In particular, the residents of Kilmacanogue currently have to use the N11, and have to execute hazardous weaving movements of joining and then leaving the N11 lanes to access their local higher order retail and service centre of Bray. Plans are already under consideration to address Kilcronee which are not dependent on this proposed link road; nor will such a link address the congestion of the Bray Southern Cross Road which is a function of traffic heading northwards of Bray.
2. The land between the proposed Kilmacanogue Settlement Plan and the Bray Environs Local Area Plan are designated a 'greenbelt' under the Rathdown No.2 Plan (part of the County Development Plan 2010-2016) with an objective to seek a SAAO on parts of the land. This greenbelt designation does not preclude the development of necessary infrastructure and the proposal to designate some of the lands as a SAAO has been rejected by the elected members of Wicklow County Council. In any case, the lands that are the subject of these road reservations were not included in the draft Special Amenity Area Order that had been prepared and not adopted by the members of Wicklow County Council.

The lands on which the road reservations are delineated were evaluated for their landscape, ecological, geological archaeological, cultural and amenity significance / vulnerability as part of the Atkins Study carried out for the proposed SAAO. This study found these lands to comprise 'improved agricultural grasslands' mainly used for grazing and arable use, with lands further north along the route towards Bray being identified as 'mixed broadleaf conifer woodlands'. In bringing together all of the analysis carried out, the report identified areas with the 'highest geological, landscape and ecological significance' (the 'core' area), areas with value as a 'buffer' zone for the core i.e. areas that would provide protection from encroachment into the core by undesirable developments or activities and finally areas with insufficient geological, landscape and ecological significance to warrant designation. The area that is the subject of this road reservation was identified as being either of insufficient significance or only sufficient significance to be a buffer zone of the proposed SAAO.

In light of this detailed study, it is therefore considered that these lands are not of such high ecological status that should preclude the development of necessary infrastructure where such a need is identified.

3. There is no intention in the reservation of route options linking Kilmacanogue to Bray to somehow render Kilmacanogue a formal 'suburb' of Bray or to earmark this land for future development. The provisions of the Rathdown No. 2 Plan will continue to apply in this area, wherein these lands are zoned 'Greenbelt' with a specific objective to 'protect and enhance the open nature of lands between settlements'. This objective will ensure the ongoing maintenance of open lands Kilmacanogue and Bray and will prevent their coalescence.
4. Wicklow County Council is the competent authority to make determinations under the Strategic Environmental Assessment and Habitats Directives and it has been determined that full Strategic Environmental Assessment / Appropriate Assessment is not warranted for this proposal at this stage. Wicklow County Council carried out a full and proper assessment, in line with the regulations and guidelines governing SEA/AA and concluded that no

significant adverse impacts would arise from the implementation of this objective, subject to appropriate mitigation measures.

5. Notwithstanding the fact that this objective is outside the proposed development boundary of Kilmacanogue, as this plan forms part of the County Development Plan 2010-2016 and is proposed to be adopted through the variation process, it is not considered that there are any procedural or legal reasons why this objective cannot be adopted. It is considered to be an intrinsic part of the overall long term development strategy for the settlement, as its core purpose is to address deficiencies in Kilmacanogue's road infrastructure.
6. While the catalyst for the inclusion of this objective was the NRA studies, Wicklow County Council is not bound by these studies in determining what the appropriate wording and purpose of the objective should be. The objectives are framed in the context of the proper planning and development of Kilmacanogue. With regard to the submission regarding businesses with existing direct access onto the N11, the development of a new road to the east of the existing N11 may allow for alternative and safer access to these properties, but the objective does not preclude the delivery of any other solutions to the traffic problems that exist at this location and cannot impose entrance closure without following all planning and statutory requirements and having full regard to property rights.
7. With regard to the comment made in Submission No. 28 regarding public consultation carried for the proposed 'Material Alterations' it is incorrect that all previous stages of plan making prior to this stage involved display of documents in the village. All stages of the plan making process were advertised in the local media and on the Council's website, with copies of documents being available for viewing in the Council's offices in Wicklow Town, in Bray Town Council and in Bray library. There clearly is wide local knowledge of this process and the proposed 'Material Alterations' given the number of submissions received.

Manager's recommendation

No change to the proposed Material Alteration MA1

Section 3: Submissions relating specifically to proposed Material Alteration No. 2 (MA2)

No.	Name	Issues raised
508	Group E Glencap Residents	No detailed comment is provided other than to question the necessity of the proposed material alteration.

Manager's opinion

In deciding to propose this extension of the plan boundary, the members indicated that it seemed logical to include these lands in the village boundary as they are already fully developed and are within the speed limit area. It was considered that this extension would appropriately consolidate this edge of the village and more clearly define the urban – rural edge, thus offering better protection for the rural area outside the boundary.

Manager's recommendation

No change to the proposed Material Alteration MA2

Section 4: Submissions relating specifically to proposed Material Alteration No. 3 (MA3)

No.	Name	Issues raised
22	James S. Gregg & Joan E. Gregg	The submitters own the dwelling located immediately north of the GAA, which has been included in the boundary of the proposed extension area. It is requested that their property be removed from the proposed material alteration area and tertiary zone.
25	Patrick Lawlor	The submitter is opposed to the proposed material alteration for the following reasons: <ol style="list-style-type: none"> 1. The GAA previously 'land grabbed' commonage for its current facility and this maybe another attempt by the GAA; 2. The development of these lands may impact on water supplies to houses in this area which comes from the mountain across the lands in question; <p>It is suggested that there be a number of conditions attached to the area proposed to be extended i.e.</p> <ol style="list-style-type: none"> (a) The land should remain 'Common Land' and no title is to issue; (b) The land should be available to use by all sporting organisations and codes; (c) No construction involving buildings or surfaces, either permanent or temporary, on the additional lands; (d) No fencing of the additional land should be allowed; (e) No use of existing or additional land on a commercial basis i.e. no charge may be levied for entrance or use.
508	Group E Glencap Residents	This group are opposed to this proposed material alterations for the following reasons: <ol style="list-style-type: none"> 1. There is no justification for this area of land to be designated for recreational use – it already has that status by ordinary usage; 2. The access route to this land is totally inadequate for vehicular traffic; 3. While it would be advantageous to develop a route for walkers to climb the Great Sugarloaf, this would not require this proposed material alteration; 4. The area of land proposed to be included as part of this material alteration is very similar to a previous planning application made by the local GAA under file reference 05/4320 for a new pitch; therefore the group can only surmise that this material alteration is part of an attempt to submit another planning application by the GAA in the future. It is pointed out that it was a condition of an earlier application on these lands (PRR 86/2349) that no further development occur on the site.

Manager's opinion

The Manager does not recommend this proposed material alteration, particularly the designation of the area of land to the north of the existing playing pitch, on undeveloped heath land. The Manager agrees with Mr. & Mrs. Gregg that their property should not be included in the area subject to this material alteration.

While the Strategic Environmental Assessment screening exercise carried out determined that this proposed material alteration would be unlikely to have an adverse impact on the Sugarloaf pNHA (subject to the application of mitigating objectives), the Minister has drawn attention to the possible adverse impacts on the heath area located in the extension zone which is of European Conservation Importance and has requested this area of 0.75ha be removed from the extension area. The Manager agrees that this would be most appropriate action given the commitments set out in national legislation and the County Development Plan to protect such areas.

However, by removing this area, the remaining undeveloped area would not be suitable for active use due to its size and dimensions, which would not lend themselves to training usage. Furthermore, the works that would be required to make this space usable (i.e. flat) and avoid impacts on the adjoining protected land e.g. embankments, buffers etc would reduce this area even further.

Therefore the designation of the currently undeveloped heath land would serve no purpose.

Furthermore, the Manager does not consider these lands suitable for the development of further pitches due to the inadequate access available, which cannot be readily improved due to the location of dwellings, buildings and embankments in close proximity to the road carriageway.

The Manager does recognise that additional sports pitches are necessary in this settlement and provision has already been made in the plan for new pitches on the northern side of the village.

Manager's recommendation

Not to proceed with proposed Material Alteration MA3