



Variation No.6

Who are you:	Private Individual
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Submission to Variation No.6 of the Wicklow CDP 2022-2028

Thank you for asking for submissions on the Proposed Variation (No.6), to the County Wicklow County Development Plan. I would like to make the following submission.

Introduction

Our community supports sustainable housing, as is testified by the large number of developments completed and in progress to date, in and around Enniskerry Village.

However the risks of further overdevelopment that the adoption of the proposed variation No.6 will cause, is to further damage the fabric of the village including the community life using the village. The number of developments that have mushroomed up in the area over the last 6 years has gone beyond the numbers specified in previous development plans. As a result Wicklow County Council population forecasts have also increased well over the number forecast up to 2028!

The proposed changing Enniskerry status to a 'Key Town / Large Town/ Suburban extension, from Small / Medium Town Centre, along with increased densities of over 100% according to the Table 6.1 in the Proposal, are of deep concern.

My observations are as follows:-

The published Proposal for Variation No.6

- 1) The explanation for calculation of these huge increases in density relating to Enniskerry is not given and is thus confusing.

Our village is being classified as a Large / Key Town/ Suburban extension. By way of comparison Roundwood is classified as a small/ Medium town. There are far more facilities there, it is bigger and includes a village store, as it stands Enniskerry does not have one. The density there, per hectare is of 25 to 40.

Kilmacanogue, also classified in the same category as Roundwood, has superior multiple bus links and services per hour connecting it to Bray, Dun Laoghaire, Dublin, the **airport**, Wicklow and Wexford.

- 2) Our community urgently needs clarification as to why our '**jewel in the Wicklow crown**', Victorian designed village, which sits in the mountains and is adjacent to the 'Wicklow National Park' is being classified as specified above, along with constant reference to it as an extension of metropolitan areas'. Enniskerry is a village set in a valley, with no proper infrastructure.

Impact to Enniskerry Village:

1). The densities proposed require High-Capacity Public Transport. Enniskerry is served by a very low frequency public transport. The Go Ahead Ireland service that is supposed to link Enniskerry to Bray rail / Dart and other links to Dublin and beyond is an abysmal service. For 6 years there have been continuous complaints made to our public representatives, the Minister for Transport, NTA, GA Ireland. An Oireachtas Committee meeting was also held to gain insight into the poor service levels with the aim of improving them. However, despite all of these petitions and meetings there has been no improvement to this route. Recent completed housing developments, along with those that are currently in the process of being built, have/are been sold on the basis of 'an excellent public transport service'. New houses that are currently being built in Enniskerry are priced above 750,000 to over a million plus bracket, these do not fall under the current government housing initiatives.

Alas this is more fantasy than reality. Sadly when residents go to use this service they are finding that it doesn't turn up at designated key commuting times, leaving these residents to get taxis or get back into their cars! Environmentally and financially costly. Workers have been late for work. Primary / secondary and college students have been late, by up to 2 hours, due to random cancellations at key morning times. Residents have missed important medical appointments. At a time of growing mental health issues community groups are being disconnected from activities and those who they need connection with. A proper transport system has to be in place, as it stands the majority of people have to drive to access every basic need here. Selling an area based on its location when the N11 and M50 are maxed out is not proper planning.

2). Enniskerry village has no rail or DART link. The high densities noted in the proposed variation will further increase the traffic gridlock on the R117 and R760, creating a public safety risk for emergency vehicles access. These routes are also served by Coillte who have over 5 forestry sites west of the village and the only exit for HGV trucks is through the village, which is a serious health and safety concern.

3). Increasing density by 2 to 5 times without a costed plan for a proper sustainable infrastructure for transport result in an unsustainable surge in traffic contradicting the Wicklow County Councils Climate Action Plan 2024.

4). Enniskerry is part of the Wicklow 100/200k annual national and international road cycling race. As the village is already a traffic danger zone any more increases in local traffic could jeopardise our privileged part in this. Also many local and national road cycling groups/ individuals pass through Enniskerry en route to higher mountain peaks on a daily and weekly basis. Any more increases in vehicle traffic will cause a financial loss to many of the local cafes as these cyclists will avoid the village.

5). Due to its very close proximity to both the 'Wicklow Way' and the 'Wicklow National Park' Enniskerry attracts many group and individual walkers along with campers on a daily basis. Again any more increases in traffic will jeopardise local businesses as these individuals bypass the village due to how dangerous it

will become not to mention there are no places to park. It will become a drive through village.

6). As a village set in a valley in the mountains, Enniskerry has unique habitats and ecosystems which are already under threat due to recent overdevelopment and which the community here has a responsibility to protect. Any more damage to these environmental systems will result in serious damage/ extinction resulting in negative environmental issues along with high fines.

Impact to Knocksink Woods SAC

It is inconceivable in the environmental assessments supporting the Proposed Variation that higher densities will not significantly or otherwise negatively impact the Tufa Spring regime, (protected under EU Habitats Directive and Irish Law,) in Knocksink Woods, Special Area of Conservation (SAC). The evidence and concerns provided by independent experts and NPWS have clearly stated to the contrary.

In conclusion

- The Proposed Variation No.6 is ambiguous and confusing.
- Enniskerry has experienced material development growth that is having adverse effects on the very fabric of the village.
- Recognise that due to its primarily mountainous location set in a valley, Enniskerry will never have the required infrastructure to support current government housing initiatives and may need it's own unique classification.
- Knocksink Woods SAC as a protected nature reserve under the EU Habitats directive cannot be undermined by not adhering to the evidence stated here in our observation. Allowing increased density levels near this Special Area of Conservation will only further increase the risk of damage to its qualifying interests and incur penalties from the EU.

I ask that the proposed Variation No. 6 be amended to:

- o Align Enniskerry to no greater than Small Medium Town in Table 6.1.
- o Maximum density cap of 20-25 units per hectare.
- Revisit the environmental Appropriate Assessment for Knocksink Woods and reflect the view of the National Parks and Wildlife Service in their previous submissions in relation to planning matters at AA2 lands, Parknasillogue.

(Ref. (Department Submission dated 10 March, 2022 to An Bord Pleanála)