



Variation No.6

Who are you:	Private Individual
Name:	Tina Roche
Reference:	VAR6-191649
Submission Made	January 13, 2026 7:20 PM

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Administrative Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96

Re Variation No.6.

Dear Wicklow County Council Administrative Officer,

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.

In the previous plan table 6.1 had Enniskerry as a 'Small Village/rural town'. In the new plan table 6.1 Enniskerry is now in with Key towns/Large towns even though the village has no supermarket, one bistro/pub and a doctors' practice which takes three weeks to get an appointment. It should be in small village/ rural town and all that that entails. The density of any development should be under 20 per hectare and as Enniskerry has had more development than planned in the last plan the capacity for further development should be minimal.

In table 3.1 you are stating that the zoned lands would hold another 455 houses on top of all the houses that have been built and those that are in the planning system. This would more than double the number of houses already present in Enniskerry. This would be unconscionable and unsustainable. To take a small village and develop it so it can neither be serviced properly or the trafficked managed in a way to make life tolerable. Your own CEO and previous planners agree with this view.

1. In table 3.4 it would appear that the total number of dwellings being built in Enniskerry is $113+17 = 130$, the number under JR 129 and the number which could possibly still be built on the 13ha (wherever those ha are) is 455 – a total of 714 dwellings.

Table 3.4 Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)

Level	Town	Units under construction as of Q3 2025	Units permitted yet to be commenced	Units permitted but subject to current appeal / JR	Zoned land with no live permission ⁷ (ha)	Estimated capacity of zoned land with no live permission (units)
	Enniskerry	113	17	129	13	455

But as shown above the original plan was for just 125 dwellings. And the number of buildings in Enniskerry was just 648 (the census figures was 667 in 2022). So, the increase proposed between 2022 and 2031 was 20% - and this is now 107%!

Introduction

Our community supports sustainable housing, as is testified by the 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 proposed changing Enniskerry status to a 'Key Town / Large Town or 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.
- 2) Our village is being classified as a Large Town compared to Roundwood which has a far more facilities including a village store. It is classified as a 'Small Medium Town edge' with density per hectare of 25 to 40. It would be useful for our community to understand why this is.

Impact to Enniskerry Village:

- 1) The densities proposed require High-Capacity Public Transport. Enniskerry is served only by low-frequency bus routes.
- 2) The 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 vehicle 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.
- 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.

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 fabric of the village.
- 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:

- Align Enniskerry to no greater than Small Medium Town in Table 6.1.
- Maximum density cap of 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)*),

END.