



# Variation No.6

Who are you:	Private Individual
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Reference:	VAR6-134424
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## SUBMISSION TO VARIATION NO.6 OF THE WICKLOW CDP 2022-2028

To whom it may concern

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 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 percent according to the Table 6.1 in the Proposal, are of deep concern.

### **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 five forestry sites west of the village and the only exit for HGV trucks is through the village.
- 3) Increasing density by two to five 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 already experienced material development growth that is having adverse effects on the fabric of the village.
- Knocksink Woods SAC is a protected nature reserve under the EU Habitats Directive and so cannot be undermined by not adhering to the evidence stated above.
- 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 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)*),

Thank you