



Draft Wicklow Rathnew Draft LAP Amendment Stage Submission - Report

Who are you:	Private Individual
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Topic

LAP - Proposed Material Amendments No 2 Submission

Submission

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30 March 2025

Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow

Re: Submission on Proposed Material Amendments to Draft Wicklow Town-Rathnew Local Area Plan 2025-2031
(Ref: Rathnew Local Area Plan 2025)

A Chara,

I wish to lodge a formal objection to the Proposed Material Amendments to the Draft Wicklow Town-Rathnew Local Area Plan (LAP) 2025-2031, with particular emphasis on the Rathnew Inner Relief Road (RIRR) and associated environmental risks. This submission builds upon previous concerns raised during earlier submissions and highlights continuing critical flaws in the current proposal.

1. Fundamental Objections to the Rathnew Inner Relief Road (RIRR)

(a) Traffic Management Failures

The RIRR (as proposed in SLO2 [Tinakilly/Newrath] and SLO7 [Rosanna Lower]) is not fit for purpose because:

It will not alleviate congestion but merely divert traffic, exacerbating existing bottlenecks at Aldi, Whitegates, and Broomhall.

Viable alternatives exist (e.g., upgrades to the Rocky Road [M11 J17] and R751/Marlton Road [J18]) that would disperse traffic more effectively without requiring new infrastructure in flood-prone areas.

There has been no consideration of existing egress routes from Wicklow that bypass Rathnew entirely, rendering the RIRR unnecessary.

(b) Unacceptable Flood Risk

The RIRR alignment traverses Flood Zones A and B (as confirmed by the Strategic Flood Risk Assessment [SFRA] and OPW flood maps), failing the Justification Test under the Planning System and Flood Risk Management Guidelines (2009):

The road is not essential for compact urban growth (Section 3.5 of Guidelines).
Alternative routes outside flood zones exist but have been ignored.
The SFRA (Addendum I, p. 33) explicitly states that development in these zones would not pass the test.

(c) Ecological & Cultural Harm

Murrough SAC/SPA at Risk: The Murrough Wetlands (SAC/SPA) are highly vulnerable to pollution from road runoff, yet Amendment No. 25 (p. 28) offers no enforceable mitigation measures.
Rathnew Stream Floodplain Destruction: The RIRR would fragment a critical ecological corridor, undermining biodiversity and natural flood attenuation.
Disregard for Local Opposition: Thousands of residents have petitioned against the destruction of Tinakilly Avenue, a priceless cultural and ecological asset. The Planning authority's persistence with this road demonstrates contempt for democratic process.

2. Proposals for Rathnew Stream Parkland & Walks

We strongly support retaining the Rathnew Stream corridor as Active Open Space (AOS) and Natural Areas (OS2) because:

Flood Mitigation: The floodplain's natural function must be preserved to absorb excess water (SEA Report, p. 10).
Biodiversity Protection: Riparian zones are vital wildlife corridors (SEA Report, p. 7).
Community Benefits: Greenways align with the "Community Driven" alternative (Section 4.3.5, p. 24), promoting health and recreation without exacerbating flood risks.

However, the current LAP proposal fails to guarantee:

Biodiversity Protection: Protected species such as red kites, kingfisher, hedgehog, otters, bats, badgers, salmon and trout young are and will be directly affected by the proposed RIRR and high density zoning of the area. Full consideration must be given to the protection of their habitats.
Tree Preservation: The 200-year-old trees along Tinakilly Avenue must be protected via Tree Preservation Orders.
Usable Green Space: Current "open space" designations include unusable wetlands; the LAP must allocate dry, accessible land for parks.
Cultural Heritage: The fairy tree (SLO2) should be preserved under a legally binding order.
Rights of Way: Residents' legal access must not be compromised.

3. Lack of Transparency & Legal Non-Compliance

No Detailed Road Layouts or Traffic Modelling have been provided, rendering the RIRR's efficacy purely speculative (p. 5).
The plan contradicts multiple Strategic Environmental Objectives (SEOs):
Biodiversity: Directs development into sensitive areas (Figure 1.1).
Water Protection: Rathnew Stream is already at "moderate" WFD status (SEA 4.9.4) and risks further degradation.
Climate Resilience: Ignores Wicklow's Climate Action Plan (2024-2029).

4. Recommendations

Abandon the RIRR and instead:
Upgrade existing routes (Rocky Road, R751).
Invest in public transport and active travel (per Amendment No. 12, p. 13).
Protect Tinakilly Avenue: Ensure unimpeded access for residents, farmers, and businesses.
Rezone Rathnew Stream Floodplain as OS2 (Natural Areas) (per Amendment No. 42, p. 46).
Legally Bind Protections for the Murrough SAC, fairy tree, and mature trees on Tinakilly Avenue.
Conclusion

The RIRR and associated amendments fail to meet legal standards under:

SEA Directive (flood risk, biodiversity).

Habitats Directive (Murrrough SAC/SPA).

Planning Acts (lack of public consultation, flawed traffic rationale).

I urge the Council to withdraw these amendments and revise the LAP to prioritise:

Sustainable transport solutions

Flood resilience

Biodiversity & cultural heritage protection

Yours sincerely,

Henry & Aoife Clarke, Seamus & Evelyn Ryan

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