



## Draft Wicklow Rathnew Draft LAP Amendment Stage Submission - Report

Who are you:	Group
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# Wicklow Planning Alliance



28th March 2025

We wish to draw attention to a few points that arise from the amendments proposed to the Wicklow Local Area Plan. Whilst we commend the work of Wicklow and Rathnew councillors to work together to require additional sports facilities in each of the SLOs we must oppose the idea that those amenities only come if residential zoning is brought forward from RN2 to RN1.

It has been suggested that, regardless of this Plan, once the new National Planning Framework is adopted the target for house building will come soon anyway, but we cannot know that for sure. Where the new houses in the Mid-East Region (including County Wicklow) will be built will be decided by the Eastern and Midland Regional Authority (EMRA) and our Wicklow reps on that body could stand against further car-dependent development in Wicklow. Certainly the Wicklow Planning Alliance will campaign against further development that can only put more cars on the N11/M50 because we all know it will be decades before, if ever, that commuting will get any easier. Until more houses are built in Dublin, and more industry and employment services are brought to Wicklow, the disruption for family life and business will continue.

Unfortunately, despite our lobbying over the years, Wicklow planners still use very limited indicators to monitor how well the spatial strategy plans are working. If we were to measure stress levels and other quality of life indicators we might come up with very different plans.

It is also interesting to note that there are other constraints that are not discussed and which suggest that further development at this time is premature and RN2 should remain for this plan period. The submission from the Inland Fisheries Ireland (IFI) is informative as ever. We note that the summary of the IFI submission does not include their concerns regarding drainage infrastructure. We also know that the pressure on the drainage infrastructure is increasing year by year as rainfall becomes more chaotic and intense. Indeed several members of the WPA have direct experience of the failure of the current Sustainable Urban Drainage system whereby surface water is not contained on site and pollution off the roads etc is not filtered out but enters the streams and rivers around Wicklow Town.

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See some quotes from the IFI submission below.

*...Because of the connectivity of the drainage network to rivers and streams and to the protected sites, it is recommended that the LAP recognises the importance for the maintenance of all existing and future drainage infrastructure. IFI are aware that the above referenced strategies, will be difficult to realise in their entirety and in a sustainable manner due to a number of factors, including:*

- Inadequate wastewater infrastructure, in particular the conveyance pipe network and pumping stations currently servicing the needs of the existing built environment both residential and commercial.*
- **Required maintenance of the existing drainage network, including all agreed SuDS measures in the new and existing built environment for which the Local Authority do have limited resources to maintain.***
- Some of the existing and proposed zoned residential lands within the LAP - RN1 & RN2 will require the installation of sewage pumping stations to facilitate the conveyance of sewage into a network that appears to be already hydraulically overloaded. IFI are increasingly concerned about the rising frequency of incidents within the sewage network, which have led to surcharging. These surcharging events have resulted the release of harmful substances into the aquatic environment.*

*...IFI would contend that while there may be adequate capacity within the Wicklow Town Wastewater Treatment Facility, there is inadequate capacity in the conveyance network, which has the potential to increase the number of overflow events into our rivers.*

- **All of the collected wastewater from within the Wicklow, Rathnew, Ashford agglomeration converges to central pumping station on the Murrough where there have been ongoing operational difficulties resulting in numerous complaints to the Local Authority and to the licencing authority, the EPA.***

*.....It is recommended that before considering future development within the LAP, Uisce Éireann should confirm that there is sufficient hydraulic capacity within the sewage conveyance network and pumping stations servicing the Wicklow, Rathnew areas, to convey foul waste to the Wastewater Treatment Plant without risk to the aquatic environment. Where it is identified that the wastewater infrastructure does not have sufficient capacity, the planning authority should be notified to ensure that no additional loading is added to this infrastructure until the necessary upgrades or remediation works have been completed. It is*

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***further recommended that the Local Authority conduct an audit of all the drainage assets in their charge, to ensure operational status, maintenance and repair requirements before considering any future development within these areas.***

Members of the Wicklow Planning Alliance repeat that development must be slowed down until a better spatial balance is achieved between housing and employment construction, Those amendments that rezone land to bring forward that development must not be accepted.

Kenneth Craig Bishop

Chairman Wicklow Planning Alliance