



Pre Draft Bray LAP Submission - Report

Who are you:	Private Individual
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Reference:	BRAYLAP-164623
Submission Made	December 17, 2024 4:41 PM

Topic

Compact Growth - Housing – Population Growth

Submission

Higher Densities in Urban locations, where there is good leisure infrastructure, parcs, green spaces, gyms etc. Increased height (but ensure that there are shared or communal spaces for socialisation .
Bray town centre above shops so that the town is a living space which would make it a safer space (perception), the 'old' superquinn shopping centre could be rethought.

Topic

Heritage – Biodiversity- Green infrastructure- Climate Action- Energy

Submission

Knocksink - and zoned lands above need deep and brave reconsideration.
All hedgerows are worth protecting and developments in rural areas should NOT be allowed plant quick growing ridiculous species like Cherry Laurel as an example.
Reduce the quantity of concrete and tarmac in all developments, increase green infrastructure and consider living building styles, rain water harvesting and use vegetation as modes of traffic calming.
Stop building in flood zones.

Topic

Infrastructure - Sustainable Movement – Transportation

Submission

Increase public transport infrastructure, invest heavily in clean, frequent, reliable cheap transport that is over interconnected offering choice and user person friendliness.
Reduce traffic in all towns, like plastic bag levies, make people get out of their cars, increase cyclepaths, and also have people living in towns above shops as an option, make our towns living spaces.
Perception is the problem for people in moving from car to public transport etc, Make them change and they will do it!

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Lorna Kelly

17th December, 2024

RE: Bray Area Development Plan – Public Consultation

Dear Madam/Sir

Thank you for the opportunity to make submission to Bray Area Development Plan. Below is for consideration as a matter of urgency, and as a matter of honourable statement by Wicklow County Council with regard to its declaration in 2018 that there is a Biodiversity and Climate Crises.

The information contained in this personal submission reflects wider concerns as expressed in detail by a joint submission from local residents.

I would be eager that consideration and approval be given to

- a) the **Rezoning AA2 Lands to Protect Knocksink Woods SAC and Enniskerry Village and**
- b) **for the compulsory purchase of lands locked in decay in the centre of the village for community gain and appreciation.**

Enniskerry Village, is a heritage-rich community surrounded by unique environmental and cultural landmarks. Knocksink Woods, a designated **Special Area of Conservation (SAC)** that hosts an ancient forest ecosystem. This SAC is protected under European and Irish law due to its significant ecological value, particularly its **Petrifying Springs with Tufa Formation** and **Alluvial Woods**, both of which hold "Priority Status" under the European Habitats Directive due to their vulnerability. Our Government through the National Parks and Wildlife Service (NPWS) is legally tasked with improving Knocksink Woods' conservation status from "Unfavourable" to "Favourable."

This goal is jeopardised by the planned development of high-density housing on nearby AA2 zoned lands, which slope directly into the SAC. Given the critical need to prioritise biodiversity in an era of ecological crisis, these AA2 lands should be rezoned to **CZ (Conservation Zone)**. This change will protect both the SAC and the cultural heritage of Enniskerry Village. It will be a large statement by our Council in ensuring that our high nature value landscapes and the ecosystem services they provide are valued into the future.

The decaying space in private ownership in the centre of Enniskerry Village could be utilised as a community space for numerous things.

Attached is a wider detail of concern and suggestive action.

Yours sincerely



Lorna Kelly

SUBMISSION DETAIL

A) Rezoning AA2 Lands to Protect Knocksink Woods SAC and Enniskerry Village

1. Knocksink Woods SAC: The Case for Rezoning

The Fragile Ecosystem of Knocksink Woods

Knocksink Woods SAC is an ecologically rich riparian zone home to diverse flora and fauna. Among its three qualifying conservation interests (QI's) , **Petrifying Springs with Tufa Formation** and **Alluvial Forests** are hydrologically sensitive and depend on unpolluted, stable water flows from adjacent lands.

- **Hydrological Sensitivities:** The springs and forests depend on groundwater flow from the surrounding lands, including AA2, which acts as a catchment area. Any disruption to water volume, flow, or quality could irreversibly damage these priority habitats.
- **NPWS Conservation Efforts:** The NPWS is working to reverse the SAC's "Unfavourable" status but faces significant challenges, especially with increasing visitor pressure. Residential development in AA2 would exacerbate these issues.

Scientific Evidence Against Development on AA2 Lands

Concerns from geologists and hydrology experts highlight the risks posed by housing development:

- **Dr. Robert Meehan (Geologist):** The sand/gravel layers in AA2 act as groundwater pathways to Knocksink Woods. Construction could disrupt these layers, altering water flow and potentially depleting the SAC's critical hydrological systems.
- **NPWS March 2022 Findings:** The Hydrological and Hydrogeological Assessment Report (HHAR) failed to prove that construction in AA2 would not adversely affect the SAC. Scientific uncertainty remains regarding potential damage to the hydrological regime critical to Petrifying Springs.

Key Quote from NPWS:

"Assessment cannot be regarded as 'appropriate' if it contains gaps and lacks complete, precise, and definitive findings and conclusions capable of removing all scientific doubt as to the effects of the proposed project."

Legal and Financial Risks

Under the Habitats Directive, Ireland must protect SACs or face severe penalties for non-compliance. The proposed development's failure to meet conservation objectives risks violating EU law, potentially leading to multi-million-euro fines.

2. The Impact on Enniskerry Village

Historical and Cultural Significance

Enniskerry is a planned neo-Tudor estate village dating back to the 1840s. Its architectural heritage includes the iconic clock tower, parochial hall, and Powerscourt Arms Hotel, and the stone wall village entry infrastructure. Overdevelopment poses a threat to its historic fabric, which is already noticeable.

Traffic and Infrastructure Challenges

Senior planners at Wicklow County Council (WCC) have raised serious concerns about Enniskerry's capacity to accommodate additional growth:

- **Traffic Impact:** The primary access road (L1011) to AA2 is steep, poorly lit, and lacks adequate footpaths or cycle lanes. Increased traffic from new developments would worsen congestion and erode pedestrian safety. Of course building such infrastructure would support housing development but this urban development action in a clearly rural mountainous landscape should be avoided.
- **Public Transport Deficiencies:** Limited public transport options force residents to rely on private vehicles, increasing carbon emissions and further stressing village infrastructure.

Of course if a reliable frequent bus service were to be offered this could be overcome. However, putting the horse before the cart should have happened in previous development plans.

Evidence of Overdevelopment

In the Wicklow County Development Plan (2022–2028), WCC highlighted Enniskerry's overzoning for housing. While the village's housing target is 91 units, existing zoning allows for 520 units, far exceeding sustainable growth limits.

The former CEO of WCC underscored this issue, recommending consolidation of existing developments rather than expansion.

3. Imaginative Uses for Rezoned CZ Lands

Rezoning AA2 lands as CZ offers an opportunity to enhance both conservation and community amenities:

- **Expansion of Knocksink Woods SAC:** Rezoning could allow the SAC to extend into AA2 lands, improving its ecological resilience and protecting critical groundwater flows.
- **Nature-based Amenities:**
 - Develop woodland trails and walking paths to alleviate visitor pressure on the existing SAC.
 - Establish links to Glencree and the Wicklow Hills to create a sustainable eco-tourism destination.
 - Support rewilding efforts, such as planting sessile oaks to restore ancient forest habitats.
- **Community Benefits:** These initiatives would support physical and mental well-being while fostering a deeper connection to nature.

4. Alternative Sustainable Housing Options

Sustainable housing can still be achieved in areas better suited to development. Two key sites near Enniskerry provide viable alternatives:

Fassaroe (3 km from Enniskerry)

- **Zoning and Accessibility:** This 161-acre site includes 90 acres zoned for residential use and is well-connected via the N11 with future plans for Park & Ride facilities.

- **Housing Potential:** The site can accommodate approximately 1,700 homes.

Old Connaught (Adjacent to Bray)

- **Development Plan:** The Dún Laoghaire-Rathdown Local Area Plan (2022–2028) designates 66.5 hectares for new residential communities.
- **Housing Potential:** Zoned land in Old Connaught can deliver approximately 2,005 residential units while preserving green spaces.

Advantages of Alternative Sites:

These locations provide the necessary infrastructure, including public transport and access to employment hubs and structured leisure and sport amenities, making them more sustainable and less ecologically damaging than AA2 lands.

5. The Case for Rezoning in the Context of a Biodiversity Crisis

Addressing Past Zoning Mistakes

Rezoning AA2 from residential to conservation is a proactive step toward rectifying past errors. It aligns with Ireland's legal and moral obligations to preserve biodiversity for future generations.

Long-term Vision for Enniskerry

- **Environmental Sustainability:** Rezoning safeguards Knocksink Woods' unique habitats, ensuring they thrive amid increasing ecological pressures.
- **Community Resilience:** By prioritising conservation and sustainable development, Enniskerry can maintain its cultural identity while embracing modern needs responsibly.

CONCLUSION

Rezoning the AA2 lands to CZ is essential for:

1. Protecting Knocksink Woods SAC from irreversible ecological damage.
2. Preserving the historical and cultural fabric of Enniskerry Village.
3. Offering imaginative conservation opportunities that enhance community well-being.
4. Redirecting housing development to more sustainable, infrastructure-ready locations.

In an era defined by biodiversity loss and environmental crises, and mental health and well being challenges bold decisions like this are critical. By prioritising conservation over development, we honour our responsibility to protect fragile ecosystems and ensure a sustainable future for Enniskerry residents and its visitors.

B) Village Centre – Decaying Space

There is a space at the heart of Enniskerry Village above the Cookstown River behind Main Street. That could be utilised for public and community gain, including social enterprise hub – bicycle repair, and maintenance space, bike racks, public shower spaces, bolt bike lock up and rental. Water fountain and recreational user picnic space, including opportunity for small entrepreneurial ideas. A village garden and other ideas not even considered.

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