



Pre Draft Bray LAP Submission - Report

Who are you:	Private Individual
Name:	ALEX PIGOT
Reference:	BRAYLAP-074622
Submission Made	December 10, 2024 8:20 AM

Topic

Heritage – Biodiversity- Green infrastructure- Climate Action- Energy

Submission

> How do we continue to develop the area while protecting and enhancing its natural heritage and biodiversity?

Rezone the AA2 lands at Kilgarron / Parknasilloge, Enniskerry to CZ

1. Firstly, to protect Knocksink Woods SAC and Enniskerry Village.

Knocksink Woods Nature Reserve is an EU designated special area of conservation (SAC) and any development on Kilgarron Hill threatens more than one of the priority interests that this SAC offers.

Those interests which are designated Priority, under EU Habitats Directive and Irish Law (Special Areas of Conservation are designated under the Conservation of Natural Habitats and of Wild Fauna and Flora Directive 92/43/EEC (Habitats Directive) which is transposed into Irish law by the EC (Birds and Natural Habitats)

Regulations 2011 (S.I. 477 of 2011). are: -

- Petrifying springs with tufa formation and

- Alluvial Forests

Both priority interests are highly water dependent. Petrifying Springs with tufa formation are particularly sensitive to pollutants and changes of water volume and flow and the topography of the zoned lands AA2 has a direct impact on the welfare of the springs.

The surrounding lands that protect the SAC should never have been zoned and this is now better understood in the age of a biodiversity crisis.

The expert views are as follows (given in relation to a proposed development by Capami Ltd on Kilgarron Hill (Proposed Strategic Housing Development (SHD): Capami Ltd: 219 no. residential units (135 no. houses and 84 no. apartments): Killgarron Hill, Parknasilloge, Enniskerry, Co Wicklow):

Dr. Robert Meehan (EurGeol, B.A., Ph.D., PGeo.) Soil, subsoil and landscape geologist states in relation to the AA2 zoned lands:

"that the sand/gravel units act as preferential pathways for groundwater flow to the springs/seepages and therefore might contribute some groundwater flow to the otherwise small catchments (i.e. distinct and focused pathways)".

The National Parks and Wildlife Service have also come to this conclusion in March 2022:

"the Hydrological & Hydrogeological Assessment [HHAR] has shown that the sand/gravel layers underlying the proposed development site are discontinuous, and interspersed with dense clay and silt subsoils. The HHAR has not ruled out the possibility that the sand/gravel units act as preferential pathways for groundwater flow to the springs/seepages and therefore might contribute some groundwater flow to the otherwise small catchments (i.e. distinct and focused pathways).

These sand and gravel units have not been delineated and therefore it is unclear whether they will be avoided during construction and operational stages of the proposed development. This would be necessary to reduce the risk of catchment alteration and to ensure that pathways for groundwater flow are maintained and groundwater continues to flow unimpeded. 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". (underline inserted).

The Department considers that it has not been shown beyond reasonable scientific doubt that this development will not have adverse effects on Knocksink Wood SAC, in light of the site's conservation objectives, in particular Petrifying Spring Conservation Objective attribute 'Hydrological regime: height of water table; water flow' and target 'Maintain appropriate hydrological regimes'."

The above statement incorporating 'appropriate' and 'scientific doubt' is most important as this must comply to the wording of the EU Directive (and now Irish Law).

Dr. Meehan also makes compelling reasoning against the design and the process of maintaining the proposed SuDs systems to be located across 76 soakaways :-

" 76 individual, back garden soakaways and three large scale soakaways, both for the individual houses and the collective catchment areas proposed for the subject site. These will all allow infiltration of recharging groundwater at highly varying rates and with markedly different volumetric amounts than the existing, in situ soils and subsoils on the site. Thus, I would genuinely question the assertion that "The hydrogeological regime supporting the existing springs will not be altered by the proposed development" as outlined a number of times in Section 6.5.1 of the Hydrological and Hydrogeological Assessment Report."

What the above shows is that any development of the AA2 site above Knocksink cannot comply with the requirements necessary to protect the SAC.

2. And secondly to protect the fabric of Enniskerry Village.

Enniskerry is a planned estate village dating from the 1840s, with the original buildings designed in a neo-Tudor style. The village has many protected buildings including the central clock tower, parochial hall, and Powerscourt Arms Hotel. The increasing volumes of traffic due to development and growing urban areas including south Dublin, are eroding the fabric of the village.

These concerns are supported by evidence noted in Wicklow County Council's (WCC), proposed amendments to the County Development Plan 2022-2028. This illustrates the over-development issue for Enniskerry. The former CEO of WCC summarised it in submissions to the draft CDP 2022-2028:-

'Having regard to level of growth already experienced / in train and the current deficiencies in the following infrastructure and facilities, Enniskerry is not determined to be well positioned to accommodate significant additional housing growth during the plan period, and focus should be on consolidation and investment in employment, and transport infrastructure/accessibility, in particular:- "

1. The very low jobs ratio in Enniskerry, with very few employment opportunities in the locality, which results significant commuting outflows from the town.

2. The inadequacies in public transport services, as well as lack of opportunities to use active modes of transport within the town and to surrounding larger towns (such as Bray) having regard to inadequacies in footpaths and no designated cycleways.

The significant environmental sensitivities in the area, particularly the Knocksink Wood SAC within the town centre, which is particularly susceptible to changes to the ground and surface water regime in the wider area." The CEO further stated in relation to housing:-

"As set out in the appended 'Chapter 3 – Proposed Amendments', the housing target for Enniskerry up to 2031, less units already completed, is 91. "

"However, the development capacity of existing zoned land is in the order of 520 units. Therefore, there is significant over provision, and this will require to be addressed in the review of the Bray MD LAP in due course. Therefore, it is not considered that there is scope to increase the population target for Enniskerry as part of this Plan. With respect to zoning requirements in Enniskerry, and AA2 in particular, these will be dealt with in the next review of the LAP for the settlement."

(Reference:-CEO, Wicklow County Council, response re submission to CDP. (p. 334/ SECTION 3 ASSESSMENT OF SUBMISSIONS)

Other material observations made by experts within Wicklow County Council specifically in relation to the development of the AA2 lands that support our concern to rezone are:-

WCC Senior Executive Engineer notes in his submission to the latest planning application (22-789, Kilgarron), August 2022:-

• "The local primary road L1011 providing access to the site provides a very poor link to the village. It has a very severe gradient, a deficient footpath that does not extend the full distance to the site, no cycle facilities and inadequate drainage and public lighting. Without proper safe pedestrian and cycle linkage to the village, there will be poor integration and an adverse impact on the village due to a big dependence on motor transport. The traffic impact assessment has included generic assumptions and does not take full account of existing traffic

conditions and planned future changes in the village centre.”

What the above shows is that at a very senior level in the planning authority, Wicklow County Council, there is concern that any development of size in the AA2 on Kilgarron Hill will constitute overdevelopment of Enniskerry while being a health and safety risk due to the lack of the possibility to install footpaths and bicycle lanes, as well as the steep incline from the village to the site involved. Therefore, the zoning for this land should be changed from AA2 to CZ.

> Are there any local open spaces or 'green corridors' you would like to see enhanced?

3. So, what can the AA2 lands be better used for when rezoned as CZ? Answer: Expand the Knocksink Nature Reserve from Knocksink up Kilgarron Hill.

A better use of the lands in question sloping to Knocksink Woods can be an imaginative and exciting project that will expand the SAC nature reserve, increase the amenity space for people, and therefore protect Knocksink Woods. Zoning for Nature is the right choice for Knocksink Woods which future generations will agree. And this expansion of the SAC should be put under the management of the NPWS. This measure will also have the benefit of taking the existing pressure from Knocksink Woods which is currently too small to support the increasing footfall from visitors.

[File](#)