

	<h1>Variation No.6</h1>
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Who are you:	Group
Name:	Friends of Knocksink Woods (Save Enniskerry and Protect Knocksink Woods)sep
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Submission to Variation No.6 of the Wicklow CDP 2022-2028

The Friends of Knocksink Woods SAC (Save Enniskerry and Protect Knocksink) Group would like to make the following observations to proposed Variation, No.6 of the Wicklow County Development Plan.

Knocksink Woods SAC.

Knocksink Woods SAC is a protected Nature Reserve adjacent to zoned lands at Parknasilloge, Enniskerry, Co. Wicklow. It holds three qualifying interests protected under Annex I Habitat under the EU Habitats Directive (Council Directive 92/43/EEC). Two are 'priority status' including '7220 Petrifying springs with tufa formation (Cratoneurion)'. meaning they are especially vulnerable in a fragile ecosystem.

The management of the Petrifying springs with tufa formation to ensure favourable status condition is paramount in the objectives of the National Parks and Wildlife Service. And indeed, the State, as we are obliged to achieve this status under the EU Habitats Directive.

The proposed Variation (No.6) to the CDP states in relation to the SEA Screening, concludes: -
'In making the determination, the information contained in the Screening for SEA Report (including information provided by environmental authorities and an examination of the need to undertake SEA against relevant criteria set out in Schedule 2A 'Criteria for determining whether a plan is likely to have significant effects on the environment' of the above Regulations) is being taken into account. That information has been carefully considered and its reasoning and conclusion agreed with and adopted – allowing a determination to be made that Proposed Variation No. 6 would not be likely to result in significant environmental effects''.

And the Appropriate Assessment (AA) in relation to Knocksink Woods SAC, comes to the conclusion:

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"It is considered that the Proposed Variation No. 6 will not cause any significant direct, indirect, or cumulative impacts on this site in terms of reduction in habitat area, disturbance to key species, habitat or species fragmentation, reduction in species density, or changes in key indicators of Conservation Value (water quality, etc.)."

We strongly disagree with Wicklow County Councils Screening and particularly the Appropriate Assessment. We point to the latest evidence produced for submissions to various planning applications to lands at Parknasilloge, Kilgarron, Enniskerry (AA2 lands), which slope down to Knocksink Woods, SAC. These lands with their particular hydrological regimes and the geometry of the subsoils have been proven to be particularly complex.

Independent Hydrologist expert, Dr. Robert Meehan (EurGeol, B.A. Ph D., Pgeo) continually noted in all submissions to the competent authorities:

"I still consider that the Zone of Contribution to the tufa springs, which in part form the basis for designation of the down-gradient Knocksink Woods SAC, is potentially at risk by the proposed development". The conceptual model of the site does not consider existing topsoils, or variable subsoils, as contributors to the emergent groundwater hydrochemistry".

The National Parks and Wildlife Service have also come to this conclusion in their latest submission (Department Submission dated 10 March, 2022 to An Bord Pleanála):

"The Hydrological & Hydrogeological Assessment 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). (Department Submission dated 10 March, 2022 to An Bord Pleanála), (Underline inserted).

Therefore, it is inconceivable that higher densities may be considered under the proposed variation and that no impacts significant or otherwise will occur when the evidence is clearly contrary.

Enniskerry Village

Introduction

The published Proposal for Variation No.6

- 1) The explanation and rationale for the 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, is classified as ‘Small Medium Town edge’ with density per hectare of 25 to 40. It would be useful for our community to understand why this is.

Our community has supported 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 proposed variation No.6 will cause is to further damage the fabric of the village including the community life using the village.

Designation Status

We disagree to the proposed reclassification of Enniskerry from a "Small Growth Town" to a "Key Town/Large Town" This change does not reflect the real status of this estate village. Roundwood Village is classified as Small Medium Town but is substantially larger village. Enniskerry must be classified at most a Small Medium Town with a density cap of 20 units per hectare. The proposed variation represents a fundamental shift in the settlement hierarchy that is inconsistent with the physical and infrastructural reality of the village).

Planning .

Increasing density by 200% to 500% per the proposed variation proposal is not sustainable. The village has already reached capacity and packing in more units into a village with poor infrastructure and difficult surrounding topography is not proper or sustainable planning. No costing or traffic growth analysis has been conducted to assert the proposed density increases.

Enniskerry is not well located with respect to the Metropolitan Area to absorb housing demands arising from the north of the County. And there is no infrastructure data studies published to support the assertion that is it.

The communities' concerns are supported by evidence noted by Wicklow County Council (WCC), proposed amendments to County Development Plan 2022-2028 along with the data it has published, this illustrates the over-development issue for Enniskerry. The CEO (previous) 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.***
- 3. 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."***

(Wicklow CoCo CEO response re submission to CDP. (p. 334/ SECTION 3 ASSESSMENT OF SUBMISSIONS))

The CEO further noted:

"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."

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

AA2 Lands at Parknasilloge.

The AA2 lands at Parknasilloge in particular are currently inappropriately zoned and do not suit residential or commercial development. Indeed, the WCC Senior Executive Engineer notes in his submission to the 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 exiting traffic conditions and planned future changes in the village centre."

Moreover, planning inspectors have noted in their reports to planning applications:

“Given, the location of the site (Parknasilloogue /AA2 lands) and the rural location of Enniskerry it is inevitable that most journeys will be car borne.’ (ABP Inspector Report 30403A7 SHD, 2019).”

In conclusion.

- Enniskerry has experienced material development growth that is having adverse effects on the fabric of the village. The location of the village and lack of infrastructure support, especially transport, makes increased densities unsustainable and for poor planning.
- We ask that the Appropriate Assessment for Knocksink Woods SAC, accompanying the Proposed Variation be amended to reflect the current expertise opinion. Knocksink Woods SAC, as a protected nature reserve under the EU Habitats directive cannot be undermined by not adhering to the evidence stated here in our observation. Allowing increased density levels to the AA2 lands at Parknasilloogue will only further increase the risk of damage to its qualifying interests and incur penalties from the EU.
- We ask that the proposed Variation No. 6 be amended to align Enniskerry to no greater than Small Medium Town Edge with a density cap of 20 units per hectare.

End.