



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	Kyran and Maeve O'Grady
Reference:	DWTRLAP-131316
Submission Made	November 20, 2024 1:14 PM

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**Planning Section
Wicklow County Council,
Wicklow County Building,
Wicklow,
Co. Wicklow.**

November 20, 2024.

RE: LOCAL AREA PLAN FOR WICKLOW TOWN – RATHNEW 2025 – PROPOSED REZONING OF FARMLAND IN
KNOCKROBIN ADJACENT TO BROADLOUGH SAC

A Chara,

On behalf of our clients, **Kyran and Maeve O'Grady, Knockrobin, Co. Wicklow**, we wish to make the following submission on the above mentioned Local Area Plan, and in particular to raise our serious and significant concerns regarding the proposed zoning of lands next to Broadlough SAC. We are writing to oppose the proposed rezoning of farmland in the townland of Knockrobin, located west of Broadlough, for housing development. This area's proximity to Broadlough Special Area of Conservation (SAC), combined with the presence of protected wildlife, makes it a totally unsuitable site for dense housing. The following are our specific concerns regarding the proposed rezoning:-

1. ENVIRONMENTAL AND ECOLOGICAL RISKS

The farmland west of Broadlough forms part of a sensitive ecological corridor. Key risks include:

a. Pollution Threats to Broadlough SAC

- Broadlough SAC is a protected wetland and lagoon, home to diverse species of flora and fauna. Housing development would increase surface runoff, introducing pollutants such as sediment, oils, and chemicals into the water system, leading to potential eutrophication and habitat loss.

b. Disruption to Protected Bat Colony

- The site is home to a bat colony located in trees directly adjacent to the proposed development area. Bats are protected under both Irish and EU legislation, including the Habitats Directive. Construction activities, habitat removal, and increased light pollution would disrupt the bats' roosting and foraging areas, contravening legal obligations for their protection.

c. Impact on Habitat Connectivity

- The farmland currently serves as a natural buffer and a corridor linking Broadlough with surrounding habitats. Development would fragment this greenbelt, cutting off wildlife movement and further threatening species dependent on the SAC.

d. Increased Disturbance

- Housing developments bring significant noise, light, and human activity, all of which disturb wildlife in and around the SAC. The area is home to migratory birds and other species that are sensitive to these disruptions.

2. CONTRADICTION OF SUSTAINABLE DEVELOPMENT PRINCIPLES

Rezoning farmland in Knockrobin for housing undermines principles of responsible planning:

- **Loss of Agricultural Land:** The farmland represents a vital resource for the local economy and contributes to Wicklow's rural character. Its conversion to housing is irreversible.
- **Greenbelt Preservation:** The site serves as an essential buffer zone for Broadlough, protecting it from urban



encroachment. Removing this buffer risks long-term damage to the SAC and its surroundings.

- Flood Risks: Given the area's low-lying nature, developing farmland near Broadlough would increase surface water retention issues, elevating flood risks for nearby properties.

3. PLANNING AND LEGAL CONCERNS

- Non-Compliance with the Habitats Directive: The proximity of the proposed development to the SAC and the presence of a protected bat colony necessitate strict adherence to Article 6 of the EU Habitats Directive, which mandates that projects must not adversely impact the integrity of an SAC.
- National Planning Framework (NPF): Rezoning greenfield sites for housing contradicts the NPF's goals of compact growth and urban regeneration, which prioritize sustainable use of land within existing urban areas.

4. INFRASTRUCTURE AND COMMUNITY IMPACTS

- Traffic and Safety Issues: The proposed access route from the Port Road would significantly increase traffic along this already busy thoroughfare, compromising road safety and creating congestion.
- Strain on Local Services: Existing infrastructure, including water, sewage, and waste management systems, may not be able to support significant population growth in this location.

5. BROADER COMMUNITY AND HERITAGE CONCERNS

- Threat to Recreational and Eco-Tourism Appeal: Broadlough is a cherished local amenity, offering natural beauty, birdwatching, and walking opportunities for residents and visitors. Housing development would diminish the area's value as a recreational and eco-tourism site.
- Loss of Local Identity: Rezoning this farmland risks eroding the rural and environmental character that defines the Wicklow area, affecting community well-being and quality of life.

6. ALTERNATIVE HOUSING SOLUTIONS

The need for housing in the area can be addressed through more sustainable approaches:

- Urban Infill Development: Maximize underutilized spaces within Wicklow town to accommodate population growth.
- Brownfield Redevelopment: Redeveloping existing derelict sites aligns with compact growth policies and avoids encroachment on sensitive greenfield areas.

CONCLUSION

Rezoning farmland west of Broadlough in Knockrobin for housing would irreparably harm local biodiversity, disrupt protected species, and contravene national and international planning policies. I urge Wicklow County Council to reject this proposal and focus on sustainable alternatives that prioritize environmental conservation and community interests.

Thank you for considering this submission. I trust that the Council will act in the best interest of both the local environment and the community. We respectfully request that all correspondence related to the above be sent to this address.

Yours Sincerely,



Michael A. O'Neill MIP