



Variation No.6

Who are you:	Private Individual
Name:	Lorna Kelly
Reference:	VAR6-121527
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Lorna Kelly,

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Re; Stakeholder Submission to Variation No. 6 of the Wicklow County Development Plan 2022–2028

Dear Sir / Madam,

I make this submission as a long-term resident of Enniskerry and as a parent of five young adults who in the near future will have housing need, importantly with a strong interest in ensuring that planning decisions taken now protect the long-term social, environmental and economic wellbeing of the area.

I am acutely aware of the privilege of living in a village with immediate access to the mountains, proximity to the sea, and connectivity to the capital. These qualities do not exist solely for residents; they represent a regional and national asset that supports recreation, tourism, physical and mental health, climate resilience, and landscape protection for Wicklow, Dublin and beyond.

Enniskerry functions as a gateway to the uplands of Wicklow and to high-value natural and cultural landscapes. Its scale, character and environmental sensitivity are central to that role. If these are undermined through inappropriate density or poorly aligned development, the loss will be public, permanent and irrecoverable.

For that reason, while I support sustainable housing in principle, I do not support development that outpaces infrastructure, compromises protected environments, or erodes the qualities that make the village and its setting valuable in the first place.

The attached comments set out in detail why Proposed Variation No. 6, as currently drafted, risks doing exactly that — and why amendment is both necessary and justified.

You're faithfully,



LORNA KELLY

COMMENTS

I believe the Enniskerry residential community supports sustainable housing development.

Although it seems like continuous push back, as a resident of the 'gate way to the garden of Ireland' I recognise the importance of ensuring that the character of the village remains, that infrastructure is put in place, village economy strengthened and social and natural environment health is given priority for future generations and landscape resilience - before further housing development of any sort is undertaken.

Over the last number of years Enniskerry Village and its environs has experienced significant growth. any further development will be overdevelopment, risking damaging the natural, social and built character and heritage of the area. The infrastructure capacity, and community fabric of the village are under threat and once lost are not retrievable. Turning an elephant is hard to do.

The proposal to reclassify Enniskerry as a *Key Town / Large Town* and apply density increases of over 100% is of serious concern. Concerns regarding the Proposed Variation No.6 include

- The basis for the very large proposed density increases for Enniskerry is not clearly explained in the documentation.
- Enniskerry is being classified as a Large Town, while Roundwood — which has more services and facilities — is classified as a Small/Medium Town Edge with lower densities. This inconsistency requires justification.

Impacts on Enniskerry Village

(its existing residential community, local, regional, national and international visitors, and its landscape character as an upland rural village with high nature value)

- The proposed densities assume access to high-capacity public transport; however, Enniskerry is served only by low-frequency bus routes and has no rail connectivity. This infrastructure deficit should be addressed before any increase in housing density is considered.
- Higher densities will significantly worsen congestion on the R117 and R760, already heavily constrained routes, creating risks for emergency access and village safety. These routes also

serve multiple Coillte forestry sites, with heavy goods vehicles required to pass through the village.

- Increasing density by two to five times in the absence of a funded, deliverable and sustainable transport strategy will increase car dependency and transport emissions, directly contradicting the objectives of Wicklow County Council's Climate Action Plan 2024.
- Increased car dependence will have a negative impact on those that use the region for recreational pleasure including vast numbers of road biker users and hill walkers.

Impacts on Knocksink Woods SAC and wider nature value of the landscape

The environmental assessments accompanying the Proposed Variation fail to adequately address the risks posed by increased development density to the Tufa Springs and hydrological regime of Knocksink Woods SAC, which is protected under the EU Habitats Directive, the Nature Restoration Law and Irish law.

Independent expert evidence and the National Parks and Wildlife Service have already raised serious concerns that higher densities would adversely affect this sensitive ecosystem.

Conclusion

- Proposed Variation No. 6 is ambiguous and lacks sufficient justification for its zoning and density changes.
- Enniskerry has already experienced development pressures that are negatively affecting village life and infrastructure.
- Increased density near Knocksink Woods SAC risks environmental harm, legal non-compliance, and potential EU infringement.

Request

I respectfully request that Proposed Variation No. 6 be amended as follows:

- Reclassify Enniskerry as no greater than a *Small/Medium Town* in Table 6.1.
- Apply a maximum residential density of 20–25 units per hectare or lower
- Revisit and strengthen the Appropriate Assessment for Knocksink Woods SAC, fully reflecting the concerns raised by the National Parks and Wildlife Service, including its submission dated 10 March 2022 to An Bord Pleanála regarding AA2 lands at Parknasillogue.

end