



Draft Wicklow Town – Rathnew LAP Submission - Report

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RE: (a) Concerns about residential zoning in SLO4 in the Wicklow Town - Rathnew Local Area Plan 2025 and (b) Alternative Proposal to zone for Parkland/Recreation

Dear Decision-makers,

I welcome the commendable vision that is set out in the LAP 2025 and its aspirations should be kept to the forefront of minds when informing the council's decision-making.

For Wicklow Town – Rathnew to be a prosperous and growing community in the Garden County of Wicklow, offering a unique and high quality of life by providing for a sustainable and local work/life balance within a healthy environment for all who live, work and visit the settlement.

To strengthen and consolidate Wicklow Town as the County Town. To protect the identity of Rathnew village.

To recognise and protect, the unique character, built heritage, seaside location, maritime history and natural environment of the area.

I hope the public consultation submissions are genuinely considered and I hope you have a mug of strong coffee to hand. Please excuse the lack of legal jargon and formatting skills, and forgive me my tendency to ramble. I understand that public consultation should be socially inclusive and not just accessible to legal practitioners and their well-heeled clientele? Now let me begin, as a person that grew up in the area and has since had to relocate to another county to live despite being luckily employed in Wicklow, I am acutely aware of the need to provide a large supply of housing. So, I don't take objecting to zoning for residential units near where I am from lightly, but I will now outline below a number of reasons why the proposed zoning at Specific Local Objective Zone 4 (SLO4) is a poor plan, with the principal reason being the non-negotiability of the laws of physics.

I will then propose a different vision for the zone which I believe will really enhance the communities of Rathnew and Wicklow Town.

Concerns

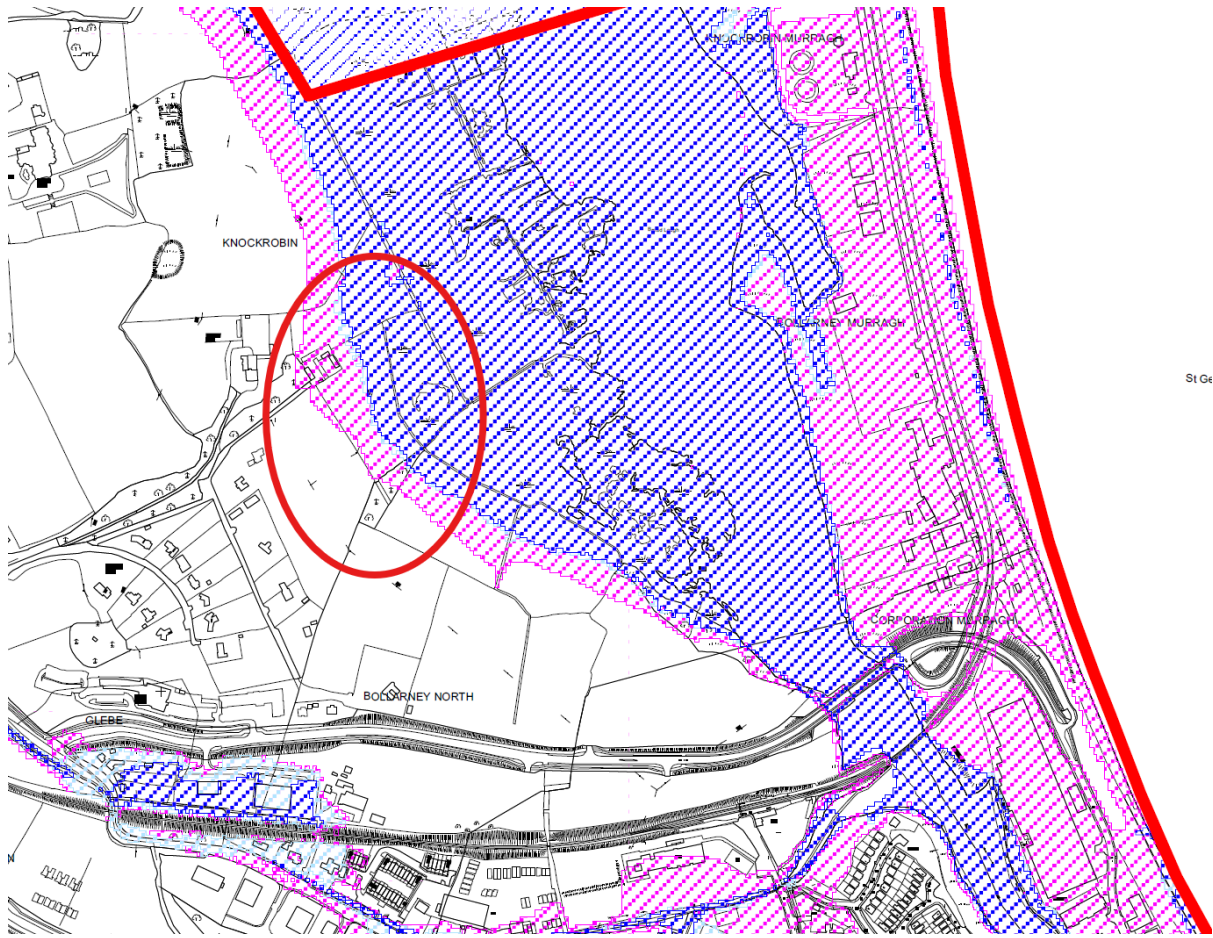
(i) Flooding

Unfortunately, one of the temperature limits of the 2015 Paris Climate Agreement of keeping temperature increases to below 1.5 degrees Celsius of warming has already been passed in the past 12 months and emissions are still increasing - we are therefore on course for significant disruption in the middle of the century, and alarming sea-level rise according to the UN's IPCC. As a consequence, Climate Adaptation and Mitigation should be thoughtfully considered when planning is occurring. We need to mitigate future

problems by moving away from and not building on areas vulnerable to flooding. We need to adapt where a built environment already exists such as along the docks of the town. Sadly, as witnessed by the recent flooding in Spain, evermore extreme weather events are already happening, and their ferocity and frequency will increase. With this in mind, the council should strive not to compound the problems that future residents in the area will face. We need to begin planning a managed retreat from vulnerable coastal areas, we won't be alone in adopting this approach - The Indonesian government for example has decided to move its capital due in part to its vulnerability to flooding.

And now to the specific location, the proposed zoning of SLO4 fails to prudently consider the topography and geology of the site – there is no bedrock above sea level across much of the site and the soil is a mix of clay and loam. Locals can tell of wells that were drilled which were almost a 100 metres deep – this is well below sea level. So, any potential large development would be particularly vulnerable to the rising seas which we can now expect as a result of Climate Change. Indeed, the adjacent fields and parts of the lower areas of the site are already experiencing seasonal flooding as well as being heavily saturated. In the adjacent fields to zone SLO4, one can observe where the soil is already eroding and crumbling into the wetlands. There is no bedrock which can protect the soil. The estuary is tidal and as the soil becomes saturated with increased heavy downpours in the future it will be susceptible to subsidence and slippages. We have already witnessed a large slippage in recent years on the river closer to the town.

The Murrough is extremely prone to erosion as it is essentially a shingle ridge, it acts as a delicate barrier between the Sea and the largest wetlands on the east coast of Ireland, if it were to flood and fail in the future, the sea will be on a direct collision course with SLO4, this would have devastating impacts on any large scale residential area. This prospect is not beyond the realms of possibility, the map below which is the indicative flooding zone map from LAP 2025 shows the possibility of future flooding. It shows the Murrough being completely inundated.



Worryingly, a small area of SLO4 (inside the red oval) is even at risk from flooding. If this flooding event were to coincide with a storm bringing easterly winds and waves, a massive loss of property and even life could unfold. The fact that this area isn't addressed specifically in the LAP 2025 Strategic Flood Risk Assessment is a significant omission and needs to be rectified before considering zoning this area for highly vulnerable residential development. Conducting a desk-based assessment to categorise Flood Zones A and B and then ignoring other potential flooding areas is deeply flawed and also highlights why such a comprehensive disclaimer needs to be included at the beginning of the flood risk assessment - I trust the disclaimer will be flagged to all future property owners in the town and village? A field survey of SLO4 would almost certainly result in different recommendations and should be conducted.

The flood risk assessment does however include many valuable points, and comments that: "An assessment of climate and catchment changes shows **Wicklow, Ashford and Rathnew to be highly vulnerable** to the increases as modelled in the mid-range and high end future scenarios." It notes that the first guideline from the 'Planning System and Flood Risk Management – Guidelines for Planning Authorities' is to "avoid inappropriate development in areas at risk of flooding."

It would also be wise to employ the Sequential Approach and Justification Test to this area SLO4. The flood assessment highlights that “where the **planning authority** considers that land should be zoned for ‘inappropriate development’ that does not meet the criteria of the Justification Test, the flooding risk should be mitigated, so that the flood risk is reduced to an acceptable level by means of **land use strategies** or by means of **detailed proposals for the management of flood risk**, as addressed in a Flood Risk Assessment.” The area is without question strategically important but given the risk of flooding it would be advisable to substitute it for a different development type.

I would also urge the local authority to reflect on the mitigation objectives of the flood risk assessment, chiefly CPO14.04 and CPO14.16.

CPO 14.04 - To ensure the County’s natural coastal defences (beaches, sand dunes, salt marshes and estuary lands) are protected and to ensure that their flood defence/management function is not put at risk by inappropriate works or development.

CPO 14.16 - For developments adjacent to all watercourses or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse in accordance with the guidelines in ‘Planning for Watercourses in the Urban Environment’ by Inland Fisheries Ireland.

While acknowledging the desperate need for affordable and quality housing within the area and county. Our planning must be extremely careful so as to not leave people exposed in the future – the corridors that are already extending inland might provide better options for future developments, but they would need to be assessed on their own merits as some are quite low-lying too.

(ii) Biodiversity

The impact on the local Murrough Wetlands SPA, which is protected by the Habitats Directive, needs to be fully appraised. It may be necessary to conduct an Environmental Impact Assessment before zoning the land as this could potentially preclude any development in the area in such close proximity to the wetlands. One impact for example would be that a large increase in residential units in the area would lead to a significant increase in the population of domestic cats - they will hunt the birds that forage in the area from the nearby wetlands, thereby reducing the numbers of these vulnerable birds. This in turn has a socio-economic impact, as bird watchers who visit and stay from around the country will be dissuaded from coming to Wicklow.

One example of at risk birds is the Curlew. The Curlew is a Red-listed bird species, it has been observed by locals to visit the proposed location to be zoned at SLO4. The Curlew with its distinctive and piercing call was once ubiquitous in Ireland, however there are currently a small and threatened number remaining due to land use change and other

environmental factors. It has significant cultural and ecological value. A small but dwindling number thankfully persist in the Murrough wetlands but they need to be pro-actively protected. A development of this scale in such close proximity to the wetlands would further encroach on their habitat and reduce their chances of long-term survival in the wetlands.

(iii) Traffic Management – Disruption to Ambulance Service

With more residential development in the SLO4 zone and access via the port road, the traffic congestion will significantly increase at the junction with the main Wicklow road at Knockrobin Primary Healthcare Centre (R999 and R750). In turn, this would disrupt and delay the response time of our ambulance service which is a critical issue in a life-or-death emergency. The extra backup of traffic at the junction traffic-lights will force the ambulances which turn towards the junction to potentially drive on the wrong side of the road into the oncoming traffic – risking an accident.

Proposal – The Greenway Gateway Parkland

Why not zone the area for parkland and allow it to become the Gateway to the Greystones to Wicklow Greenway? With the strategic importance of the location in mind, I would like to suggest that the area could be zoned for parkland, with a mix of biodiversity rich native meadows and woodlands. This would be a worthy substitution of the development type and the pathways and features of the parkland would not be at such a risk from flooding. The parkland could link with the field at the back of Tinakilly Hotel and would provide an expansive recreational space.

The proposed zoned area is also ideally located to provide a great local amenity which could be a jewel in the region's crown - with links to the two urban centers of Wicklow Town (via the port road (R999) close to the bridge) and Rathnew (through Tinakilly by a possible route east of Knockrobin House and Tinakilly House). The parkland could then link up with the proposed greenway. In mainland Europe, it is commonplace to find impressive urban woodlands and parklands next to busy built-up urban areas and it really enhances the built environment – not only that, it would create a significant new community focal point, and we would in effect be building a piece of cultural heritage for the future. Too often we rely on the culture and heritage of the past while failing to have the ambition to create something in our time for those that come after. Isn't it time we try to enhance the character of the town without falling into the trap of more estates sprawling in every direction and hollowing out the sense of community and leaving a soulless commuter town? Unfortunately, the recreational walking area along the Murrough looks destined to succumb to the sea in the not-too-distant future, as the sea relentlessly gnaws away towards the trainline. A parkland in the vicinity would provide a

replacement recreational and walking amenity – It would be of huge value to the growing populations of Wicklow and Rathnew. It would also have the added benefit of reducing carbon emissions as rather than needing to drive to woodlands or scenic areas farther afield in the county, a large park would be on our doorstep. Residents of the town and willing community groups could also play a part in helping nurture this inclusive parkland with fantastic views of Broadlough and the sea. It would also provide a more serene and relaxing way to walk between Wicklow and Rathnew - a welcome alternative to the main road which is very busy and often clogged with traffic.

The existing mature woodland copse to the east of SLO4 could be enhanced by reforesting around it with native trees. There are already existing areas next to the wetlands where Goat Willow is providing a nature-based solution and mitigating the erosion caused by the tidal encroachment and this could be actively expanded to protect other areas along the wetland margin. I am sure organisations such as Rewild Wicklow would be ecstatic to work in a large urban area. The parkland could function as a buffering area between the estuary and the recent large development at Tinakilly which sits atop of the hill which as mentioned above is devoid of any significant bedrock. Without the protective bedrock underneath this large development, as the water levels rise in the decades ahead, hard engineering may be necessary to protect it in the future, or alternatively afforestation of the land between the development and the wetlands could reinforce the hill and provide natural protection.

A parkland on zone SLO4 could become an educational destination to showcase the forward thinking of the local community. It was this forward thinking, which encouraged Wicklow County Council to be the first Irish local government to declare a Climate and Biodiversity Emergency in 2019 as voted on by the then elected local representatives. This was an example of what is positive about representative democracy. One would therefore expect the governance and policies of the Local Authority to reflect this democratic will. A once in a lifetime opportunity now presents itself to choose an ecologically sound solution when rezoning the proposed site. The decision must not compound the burden that the next generation will have to shoulder. Building homes in an area that is vulnerable doesn't alleviate the housing crisis - it will amplify it down the line. It could potentially leave families tied to homes that could become uninsurable and may ultimately need to be abandoned. The alternative is to create a magnificent and ambitious parkland that would become the heart of our community.

“Great people plant trees whose shade they know they shall never sit in.”

Thank you for your time and diligent reflection. I trust you are still awake and will carefully reflect on the points raised.

Warm regards,

S.B.

