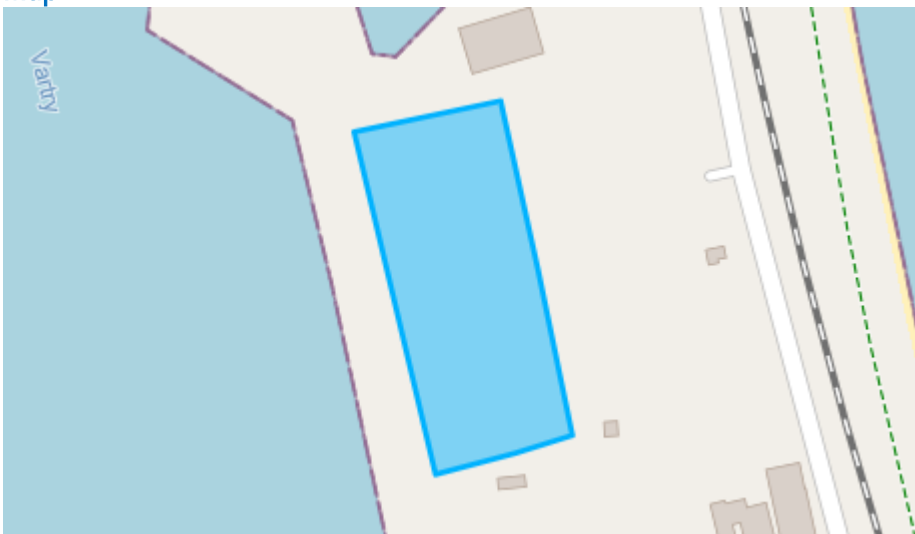




# Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Agent
Name:	R.F. Conway & Company Ltd.
Reference:	DWTRLAP-142720
Submission Made	November 19, 2024 2:33 PM

## Map



## Site Description:

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**File**

PACC R.F Conway Submission 19-11-24.pdf, 1.75MB

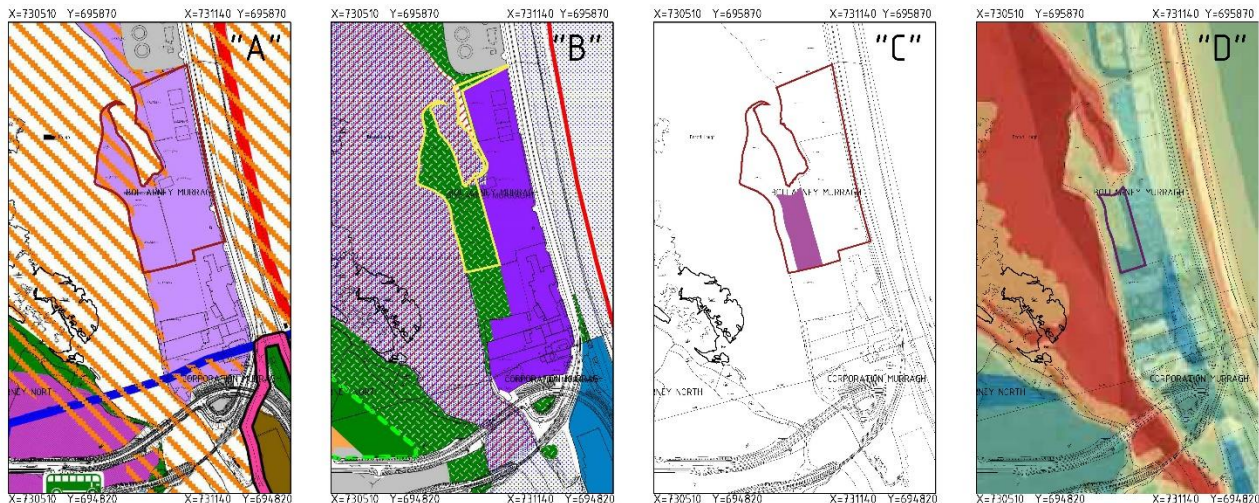
Forward Planning Section  
Planning and Development  
Wicklow County Council  
County Buildings  
Wicklow

**SUBMISSION DRAFT STAGE**  
Strategy of LAP-Land Use Zoning Map-Economic Development-Infrastructure  
WICKLOW TOWN - RATHNEW LOCAL AREA PLAN 2025

November 2024

Client: R.F. Conway & Company Ltd.  
Location: Murrough North - Lands - North of Port Road Bridge Wicklow Town

Current zoning proposed and submission zoning proposal:  
**Lands North of the Port Access Road Bridge**



A. EXTRACT EXISTING ZONING

Wicklow Town - Rathnew Local Area Plan 2013-2019

R.F. Conway & Company Ltd. Lands  
Circa 7.4 HA (E1 - Enterprise & Employment)

B. EXTRACT PROPOSED REZONING

Draft Wicklow Town - Rathnew Local Area Plan 2025

Lands Subject to DRAFT Rezoning  
Circa 2.8 HA (OS2 - Natural Area)

C. PROPOSAL SUBMISSION

Retain Employment Zoning

Submission to RETAIN E1 Zoning  
Circa 1.0 HA (E - Employment)

D. PROPOSAL SUBMISSION

Retain Employment Zoning

Risk Level  
Low Environmental Sensitivity  
(Draft 2025 LAP - Appendix 5 - Figure 1.1 Environmental Sensitivities)

## R.F. Conway & Company Ltd.

R.F. Conway & Company is a multi-generational, highly reputable shipping and logistics enterprise based in Wicklow Town. The company manages approximately 100 commercial cargo ships annually through Wicklow Port, facilitating both the import and export trade. It operates from Wicklow Port and from its cargo storage and distribution facilities situated at Bollarney Murrough, directly north of the Port Access Road Bridge. This land is owned by Waterbrand Holdings Limited, a company directly affiliated with R.F. Conway & Company.

The Conway family has been deeply rooted in port operations for at least five generations, exemplifying a steadfast and enduring commitment to Wicklow over the decades. They are tireless advocates for Wicklow Port, promoting its capabilities and significance on an international stage. Additionally, the company's operations generate substantial port revenues, commercial rates, and rents for the Local Authority.

Providing direct employment to over 20 individuals, R.F. Conway & Company plays a pivotal role in the vitality of port activities and the broader supply chain, particularly within the construction industry. The company's operations at Wicklow Port facilitate the import of essential materials that support hundreds of additional jobs across the nation. These jobs span manufacturing facilities, timber merchants' yards, construction sites, and beyond, creating a substantial socio-economic impact.

By ensuring a steady supply of key construction materials, R.F. Conway & Company contributes directly to Ireland's national objectives for addressing housing needs. Its logistics and shipping expertise enable the efficient delivery of resources critical to construction projects, underpinning efforts to deliver housing and infrastructure projects throughout the country.

Wicklow Port was designated as a Port of Regional Significance under the 2013 National Ports Policy and serves as a vital hub for Ireland's bulk and break-bulk international trade. This designation highlights its strategic importance in supporting regional economic development, facilitating the import and export of essential goods and materials.

The Wicklow County Development Plan 2022-2028 has acknowledged this and recognised Wicklow Port as a Port of Regional Significance, underscoring its essential role in driving regional economic growth. The plan outlines strategic objectives aimed at supporting and expanding commercial activities, bolstering the fishing industry, and enhancing the port's status as a significant hub for leisure and tourism. These initiatives are designed to also leverage the port's commercial potential.

Management of Wicklow Port transitioned from Wicklow Port Company to Wicklow County Council in 2016, marking a pivotal moment for the region. Upon signing the transfer order, Minister Shane Ross, T.D., highlighted the significance of this event, stating:

***“Today marks an important milestone as Wicklow Port becomes the first Port of Regional Significance to be transferred to a local authority. Wicklow Port is a thriving hub of regional commerce, and this transition opens up exciting opportunities for the development of marine-related industries, regional freight, and enhanced marine leisure and tourism. It also paves the way for cultural and recreational amenities, fostering significant potential for local job creation and economic growth.”***

This transfer underscored the port's strategic importance to the region, positioning it as a cornerstone for both commercial and community-focused initiatives.

The strategic importance of the port has been recognised by many Government officials, particularly over recent years when the port required urgent dredging works. Taoiseach Simon Harris, former Taoiseach Leo Varadkar, multiple Ministers, TDs, and local politicians actively supported the efforts to dredge the port over recent years. Such is the importance of Wicklow Port to the national economy that Minister Darragh O'Brien (as Minister for Housing, Local Government and Heritage) and Minister Jack Chambers (now Minister for Finance) both visited the port facilities along with local representatives in the past 12 months and spoke to my client about the pivotal role the port plays.

## **Engagement with the Local Business Community**

My client was deeply disappointed by the complete lack of a consultation process before the publication of the draft Local Area Plan: Land Use Zoning Map. The absence of any engagement or dialogue with key stakeholders has been particularly disheartening, as it bypassed an essential opportunity for collaborative input and constructive feedback.

They strongly believe that engaging local businesses and stakeholders should be a priority in the LAP process, alongside and in tandem with all other considerations. Supporting existing industries and local employers is essential for ensuring that planning objectives are realistic and achievable. This engagement helps address relevant concerns while providing valuable insights into the challenges and pressures faced by the local business community.

As a business which is heavily reliant on the land north of the Port Access Road Bridge, my client is extremely concerned about the proposed redesignation of a portion of its land to an OS2 - Natural Area for several reasons:

### **1. Port Access Road:**

Delivered by Wicklow County Council, the Port Access Road is a vital infrastructural project designed to enhance connectivity and support port operations. This road and bridge development underscores the strategic importance of Wicklow Port and demonstrates the local authority's commitment to investing in the port and improving its viability at both regional and national levels, ensuring its continued growth and future contribution to the national economy.

Since the Port Access Road opened in 2010, my client's business is uniquely positioned to support and enhance the port's operations, leveraging the infrastructure provided by the Port Access Road and bridge. R.F. Conway & Company Ltd. has successfully used its strategically located lands north of the bridge, ideally positioned to capitalize on the direct access to both the quayside at Wicklow Port and the new road infrastructure access to national road corridors.

It seems entirely counterintuitive that the objectives outlined in the Draft LAP propose reversing previous commitments by attempting to rezone my client's lands, thereby hindering their business operation and growth in Wicklow Town. The 'Wicklow Town - Rathnew Development Plan 2013 – 2019' emphasises the importance of the Murrough area and the opportunities presented by the Port Access Road. In relation to the Murrough North specifically (areas north of the Port Access Road), one clear objective of the Council is to:

"Facilitate the continued operation of established / permitted existing business / commercial activities and the development of new employment facilities in this area"

***\*We strongly urge Wicklow County Council to reconsider the proposed zoning objective, as its implementation would unnecessarily undermine the delivery of previous objectives aimed at fostering growth through Wicklow Port.\****

## 2. Logistics & Port Viability:

The storage facility at the Murrough is essential for handling a range of timber products critical to both domestic and international markets. The facility is used directly in conjunction with Wicklow Port, and the future prosperity of the port is closely tied to it.

Over the decades, Wicklow Port has established an outstanding reputation across Europe, earning its status as Ireland's leading facility for the handling and distribution of timber products. However, the port operates within a compact footprint, requiring meticulous management of space to mitigate congestion, optimise cargo flow, and ensure maximum efficiency in storage and transportation operations. This careful balance is critical to maintaining the port's premier position in the industry while supporting its ongoing growth and development.

- **Sawn Packaged Timber:** The storage facility primarily stores sawn, packaged timber imported from Scandinavia, which is indispensable for constructing houses and other buildings throughout Ireland. High volumes of this timber are dispatched nationwide daily. Ireland relies on these imports because the quality and composition of homegrown timber alone cannot meet the diverse needs of the construction sector.
- **Irish Round Timber Logs (Pulpwood):** The facility also serves as a staging ground for pulpwood logs sourced from County Wicklow and surrounding areas. While this pulpwood holds limited value domestically, the storage facility near Wicklow Port enables the aggregation of logs from multiple forests into larger export consignments. This process allows local forestry owners to access international markets, particularly in the UK and mainland Europe, where the pulpwood commands a premium price. This aggregation not only supports the local forestry industry but also enhances the economic value of their produce on a global scale.

To illustrate the scale of operations, a single shipment of imported timber—approximately 4,000 to 5,000 cubic metres—nearly fills the port to capacity. To prevent congestion, my client ensures that cargo is swiftly transported out of the port before the next vessel arrives. Without this efficient turnover and the support of dedicated storage facilities, the port's commercial viability would be severely compromised, jeopardising the Irish market's access to timber.

What sets Wicklow Port apart is its specialised infrastructure, advanced handling expertise, substantial investment in IT systems, and ideal location to serve the Irish market, which collectively enable seamless and efficient operations. These capabilities are not easily replicated at other ports, reinforcing Wicklow Port's critical role in supporting Ireland's timber supply chain.

Wicklow Port's status as an industry leader must be a key consideration in any zoning decisions. The Murrough storage facility is indispensable to the port's ongoing operations and its commercial viability, both nationally and internationally. This facility serves as a cornerstone in supporting the Irish construction sector, enabling the delivery of homes and accommodation across the entire island of Ireland. Therefore, it is essential to ensure that the land on which the port depends is strategically managed to enhance its commercial potential, rather than impose restrictions that could hinder its critical role in the economy.

As an established business that has made and will make significant commercial investments in Wicklow, R.F. Conway & Company Ltd is completely reliant on maintaining and enhancing operations north of the Port Access Road Bridge.

My client is deeply concerned that Wicklow County Council's Local Area Plan (LAP) objective to redesignate their lands as an OS2 - Natural Area has not adequately considered the significant impacts on the viability of their business operations. This decision could have far-reaching consequences, not only disrupting their activities in Wicklow but also jeopardizing the future operations and overall viability of Wicklow Port, which plays a critical role in the regional economy.

***\*We strongly urge Wicklow County Council to reconsider the proposed zoning objective and re-evaluate based on Wicklow Port's regional and strategic importance in sustaining the local economy and achieving national objectives.\****

### **3. Impact on National Housing Strategy:**

The national housing strategy, 'Housing for All' aims to address the housing crisis by delivering over 300,000 new homes between 2025-2030, rising to approximately 60,000 homes per year thereafter. The core objective of the national housing strategy, Housing for All, is to ensure that everyone in Ireland has access to affordable, quality housing to meet their needs and support sustainable communities.

Modern Methods of Construction (MMCs) refer to innovative building techniques and materials that improve the efficiency, sustainability, and quality of construction projects. These methods are designed to address challenges such as labour shortages, environmental concerns, and the increasing demand for affordable housing.

The government is actively promoting the adoption of Modern Methods of Construction (MMC) to enhance efficiency, sustainability, and productivity in the construction sector, particularly in residential housing.

My client's business specializes in storing sawn, packaged timber, a key component of modern methods of construction (MMC). This timber supports prefabrication and advanced engineering techniques, including timber frame housing, engineered laminated beams, roof trusses, and pozi floor systems. Imported timber is a vital component for the Irish housing market as it provides a grade quality that the Irish producers cannot offer and is required, in conjunction with the Irish material, to deliver high quality housing stock.

Commercial manufacturers, timber merchants, and builders' providers face constant challenges associated with procuring the timber they need, at the right time. Packaged timber products require a lot of space to store, and typically require a long lead time between order placement and receipt of the goods. The provision of a large storage facility solves many corresponding problems, by allowing a 'just-in-time' model to be adopted into the business model of these companies nationwide.

The timber imported through Wicklow Port is used heavily in 'offsite manufacture' and is widely recognised that offsite manufacture will play an increasingly major role in delivering houses in Ireland. It is not an exaggeration to say that virtually every large housing construction project in Ireland will contain timber which has been imported through Wicklow Port.

Efforts are underway to secure approval for greater use of timber frame construction in the high-rise sector. If successful, these initiatives could drive a further substantial increase in demand for timber products, significantly expanding the market to unprecedented levels.

Retaining employment zoning on the 1.0-hectare site will ensure an optimal use of these lands. This will in turn facilitate increased volumes of packaged timber products imported through

Wicklow Port. The additional capacity directly enhances Ireland's access to critical materials for new-home construction, making a significant contribution to addressing the national housing crisis and achieving the Government's ambitious housing targets.

***\*We urge Wicklow County council to therefore refocus their LAP objectives to support operations at Wicklow Port and its growth potential to enable further investment and allow an expansion of logistics operations such as that provided by R.F. Conway & Company Ltd are essential to supply chain business operations that play a vital role in ensuring national housing targets are met effectively.\****

#### **4. Historic and Existing Use of Storage Facilities:**

To date all lands in my client's ownership (circa 7.4 hectares) at Murrough North have remained designated as Enterprise & Employment (E1) under the 2013-2019 and previous local area plans.

Currently a large portion 4.6 hectares actively engaged in E&E activities. The Draft LAP 2025 now proposes to rezone approximately 2.8 hectares of my client's land from Enterprise & Employment (E1) to OS2 - Natural Areas. In response to this proposal

- All my client's lands are located south of the existing sewage treatment plant and wastewater facility that serves Wicklow Town and its surrounding areas. This facility and its operations establish a clear and definitive boundary to the Special Area of Conservation (SAC), effectively delineating the extent of development to the north of the Port Access Road Bridge.
- My client fully acknowledges the importance of protecting areas associated with the SAC. In this proposal, we are not advocating for the retention of all lands under consideration for rezoning but rather a balanced approach that aligns environmental protection with sustainable business operations.
- As an ISO 9001-certified business, my client upholds the highest performance standards and operates with a strong sense of responsibility. The Murrough facilities are managed with meticulous care to minimize environmental impact, a commitment that would equally apply to the proposed additional storage area.

Therefore, my client seeks to focus on the retention of approximately 1.0 hectares of land directly adjacent to the existing yard as E1 Employment zoning. The existing landscape area is best characterized as scrub vegetation, resembling what would be typically defined as a brownfield site.

The Ordnance Survey Ireland, 6-inch Map Series (revision date: 31-Dec-1908), shows the presence of a chemical works on the site indicating that portion of my client's land has been in commercial use for over 115 years. Additionally, the National Library of Ireland's Morgan Aerial Photographic Collection provides images from 1955 depicting the Dublin and Wicklow Manure Company factory occupying the land and surrounding areas. The land has not formed part of the natural landscape associated with the Murrough SAC for multiple decades.

This historic use and generational pattern of commercial activity on lands south of the treatment system is well-established, demonstrating a longstanding integration with the surrounding area.



The commercial operations have coexisted alongside the adjacent protected areas for decades. Retaining the current employment zoning, allowing my client to use the land for timber storage, will not result in any direct loss or alteration of the existing SAC habitat, nor will it cause habitat or species fragmentation.

This rationale is reinforced by the environmental sensitivities mapping detailed in Appendix 5 of the draft 2025 LAP documentation (SEA Environmental Report), which clearly marks all lands north of the wastewater facility and within the estuary in red, indicating higher environmental sensitivity.

In contrast, my client's lands are shown in light green/blue, indicating the **lowest level of sensitivity**.

**Under this proposal:**

- a. My client is proposing that, in parallel to 1.0 hectares retaining its current employment zoning, 1.8 hectares would change to OS2 - Natural Area zoning. My client believes that this is a very reasonable position to adopt, particularly when they have always maintained a legitimate expectation of utilising the entire property for enterprise and employment purposes.
- b. Along the Broadlough perimeter a 20-meter buffer zone would be designated as an OS2 - Natural Area.
- c. They are recognising that the entire peninsula area would be zoned OS2 - Natural Area.
- d. Additional Mitigation & Protective Measures:

My client appreciates the importance of maintaining a continuous buffer along the Broadlough side of the property and recognizes that a 20-meter width is appropriate for both ecological and aesthetic purposes and is committed to enhancing the buffer through strategic landscaping and berming, if required. This approach is intended to create a visually appealing screen and effective environmental barrier which enhances the natural beauty of the area and supports sustainable land use practices.

Given that the primary use of the land is timber storage, the associated environmental impact is inherently minimal. Nonetheless, my client is committed to enhancing ecological sensitivity and aligning with best practices. To that end, the client is willing to install perimeter fencing around the buffer zone to delineate and protect the area effectively, if required. The fencing will be designed with non-invasive materials and structured to minimize visual disruption to the natural landscape.

My client's commitment extends to collaborating with local environmental organizations or relevant authorities to ensure that the development of the buffer zone aligns with conservation objectives. This proactive approach underscores their dedication to protecting the Broadlough area while balancing the operational needs of their business and the wider markets it serves.

In addition, to mitigate potential light pollution and its effects on the Special Area of Conservation (SAC) wildlife, my client is prepared to implement advanced lighting solutions. This includes cowed lighting fixtures and automated light control measures that direct illumination away from sensitive habitats, reduce glare, and limit nighttime brightness. Such measures will ensure that the lighting is only activated when necessary

and at appropriate intensities, thereby preserving the nocturnal environment and reducing disruption to local fauna. These improvements are part of a broader commitment to maintaining the ecological balance and integrating sustainable practices into site management.

***\*We strongly urge Wicklow County Council to then reconsider the scope of the OS2 - Natural Area LAP objectives. Considering the historic use context outlined above, we request that the 1.0 hectares of my client's lands be recognized as a brownfield site not natural area and that the employment zoning be retained to support both ongoing and future commercial activities.\****

## Summary of Pro & Cons

### Potential Risks / Unintended Consequences

#### Impact on Commercial Viability

Jeopardise the commercial viability of Wicklow Port, significantly affecting both direct and indirect employment. My client estimates that up to 1,000 jobs in Ireland are indirectly connected to their operations at the port.

#### Impact on Growth

Restricting growth on the importation of timber and forestry products essential to the Irish construction industry, thereby risking a detrimental impact on Ireland's ability to deliver on the objectives of the Housing for All initiative.

#### Impact on Future Investment

Implementing a policy objective that entirely undermines my client's longstanding commitment to investing in and supporting the planned road and bridge infrastructure, which was specifically developed to serve Wicklow Town's local employment, port operations, and surrounding activities.

#### Impact on Job Losses

Seeking to implement a policy that stifles growth and deters future commercial prospects for Wicklow Port. This could have far-reaching consequences. International sawmills and other cargo stakeholders, who currently view Wicklow as the optimal gateway to the Irish market, may be discouraged by a compromised or unavailable storage facility. This could lead to their complete withdrawal from the Irish market, particularly as demand for their products remains strong in other regions.

#### Impact on Revenue

Restricting port efficiency by reducing storage space close to Wicklow port will lead to a significant reduction in revenue for Wicklow Port. When considering the combined income generated by all County Wicklow ports, including Arklow, Bray, and Greystones, it is a fact that Wicklow Port accounts for 84% of the total revenue. *Source: 2019 GDG 'Maritime Strategic Review for County Wicklow'.*

## Advantages and Opportunities

### Proven Results

R.F. Conway & Company's timber terminal is, by a significant margin, the largest imported timber distribution facility in the Republic of Ireland, underscoring its critical importance to the nation's construction and logistics sectors. Roughly 85-90% of timber leaving the terminal makes its way into housing projects.

### Future Rail Opportunities

My client's lands are at the same topographical level to and run parallel to the rail network servicing the East Coast from Belfast through Dublin to Rosslare. With minimal investment and initiative, a commercial loading platform could be developed alongside the existing line, capitalizing on this strategic location.

Such an initiative would align seamlessly with Irish Rail's focus on expanding freight transport nationwide. In the future, this site has the potential to evolve into a critical hub for integrating Ireland's road, rail, and sea networks, significantly enhancing connectivity and promoting sustainable logistics solutions.

### Irish Forestry Interests

Additional storage space would enable larger volumes of homegrown pulpwood logs to be aggregated for export through Wicklow Port. This would create new opportunities for local foresters and farmers to access broader markets with larger consignments, thereby maximizing the value of their yields and enhancing the economic benefits for these stakeholders.

### Growth

Despite the inevitable pressures on businesses during the economic downturn in the construction industry and the global pandemic, R.F. Conway & Company has remained a strong and viable operation in Wicklow. They are embracing new clientele and products, with a clear vision for the future of Wicklow Port. Their Murrough storage facilities require additional space in order to meet the demands of the market and safeguard a bright outlook for the port's future. Every effort should be made to support this business's acumen, entrepreneurial ambition, and drive to ensure sustained growth and success.

## 5. Conclusion

*The main objective of this submission is to emphasize that a change to zoning would disproportionately and unjustly constrain the R.F. Conway & Company's ability to support the construction industry, jeopardize the growth and strategic importance of Wicklow Port, and diminish its regional role as an economic driver. The subject lands are critical for maintaining the operational flexibility necessary for the core business to thrive and expand. This flexibility underpins not only the company's economic resilience but also contributes significantly to the broader economic development and sustainability of the port area, reinforcing its status as a vital regional asset.*

*My client's operations at the Murrough are already operating at full capacity. The adoption of the proposed rezoning would significantly impede R.F. Conway & Company's ability to meet current commercial obligations and would severely restrict the potential for future growth and expansion. Recognizing the critical nature of this situation, my client has proactively applied to Wicklow County Council seeking an extension of the storage yard. The proposed retention of approximately 1.0 hectares of employment zoning aligns with the lands subject of the planning application submission. This expansion is essential not only to sustain ongoing operations and uphold existing contracts but also to ensure the continued viability and strategic development of the business in the years ahead.*

*My client wishes to assure Wicklow County Council of their unwavering commitment to environmental responsibility. They emphasize their dedication to preserving the SAC conservation area, recognizing their shared vested interest in safeguarding the sustainable future of this critical environmental asset.*

*However, in tandem they would also like to remind Wicklow County Council of its responsibility to promote, protect, and support both emerging and established viable businesses, while encouraging and fostering local growth and employment as interdependent objectives of the Local Area Plan review.*

*My client firmly believes that retaining employment zoning on this 1.0 hectare and allowing the continuation of commercial activities on all suitable lands can coexist harmoniously with the SAC, ensuring both economic development and environmental preservation.*

I trust the enclosed information meets with your requirements however should you have any queries, please do not hesitate to contact me at 086 0794813.

Yours sincerely

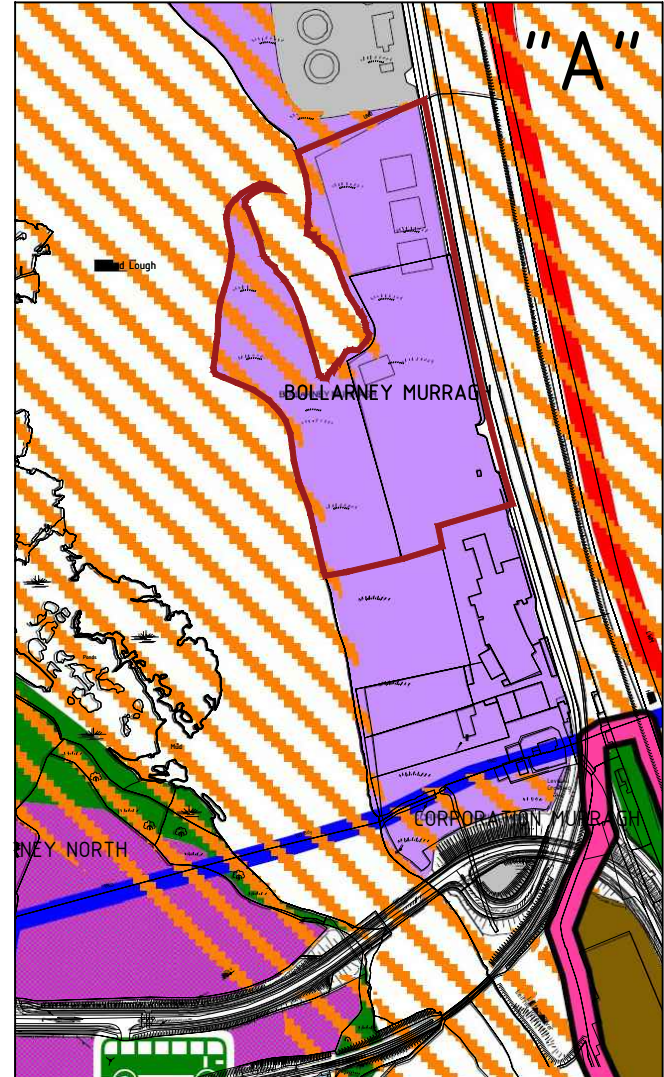
A handwritten signature in blue ink, appearing to read 'Nicky Sullivan' followed by the letters 'URIAI'.

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Phone 0404 64078 – 086 0794813  
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Appendix:

PACC Support Drawing RFC LAP2025  
Environmental Efficiency  
Environmental Report prepared by Rebecca Stokes, Environmental Consultant,

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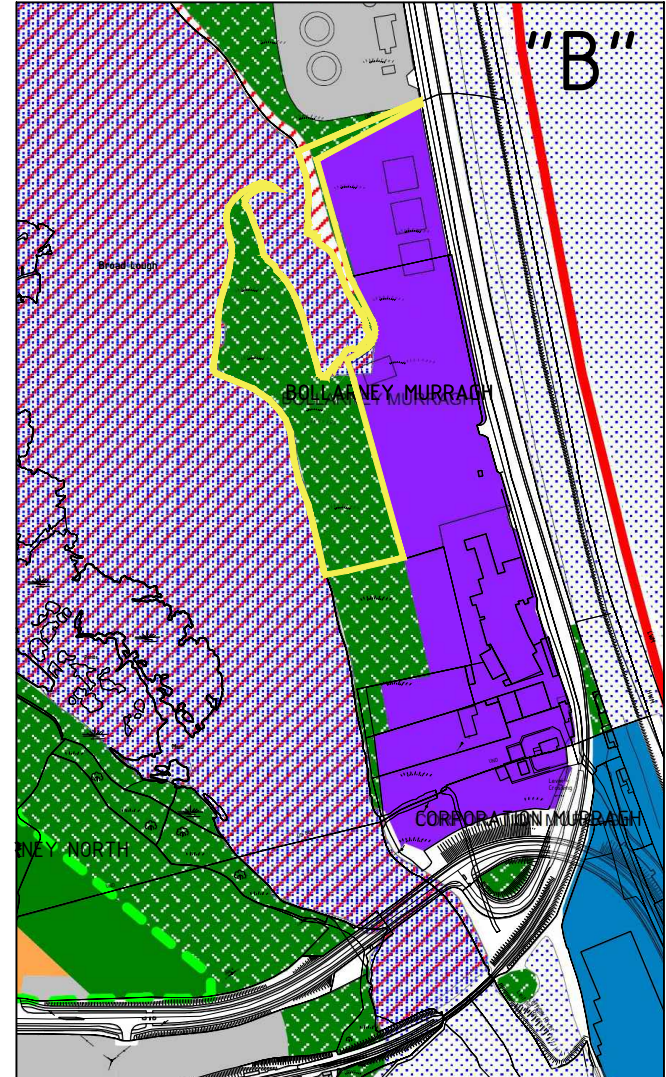


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EXTRACT EXISTING ZONING  
Wicklow Town - Rathnew  
Local Area Plan 2013-2019

R.F. Conway &  
Company Ltd.  
Lands Circa 7.4 HA

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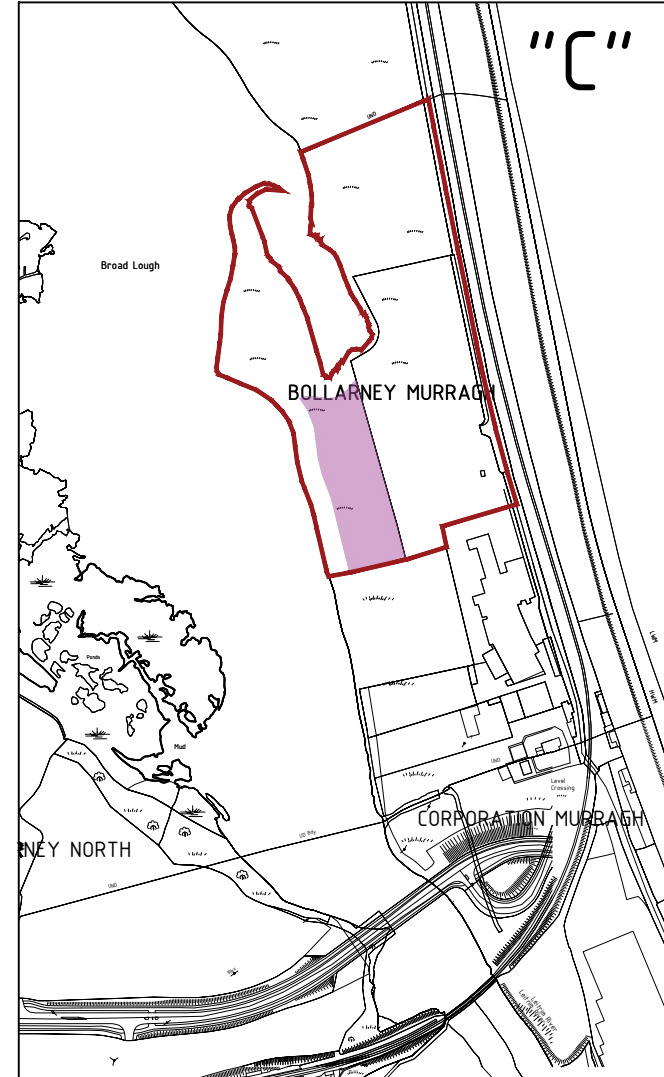


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EXTRACT PROPOSED REZONING  
Draft Wicklow Town -  
Rathnew Local Area Plan 2025

Lands Subject to  
DRAFT Rezoning  
Circa 2.8 HA

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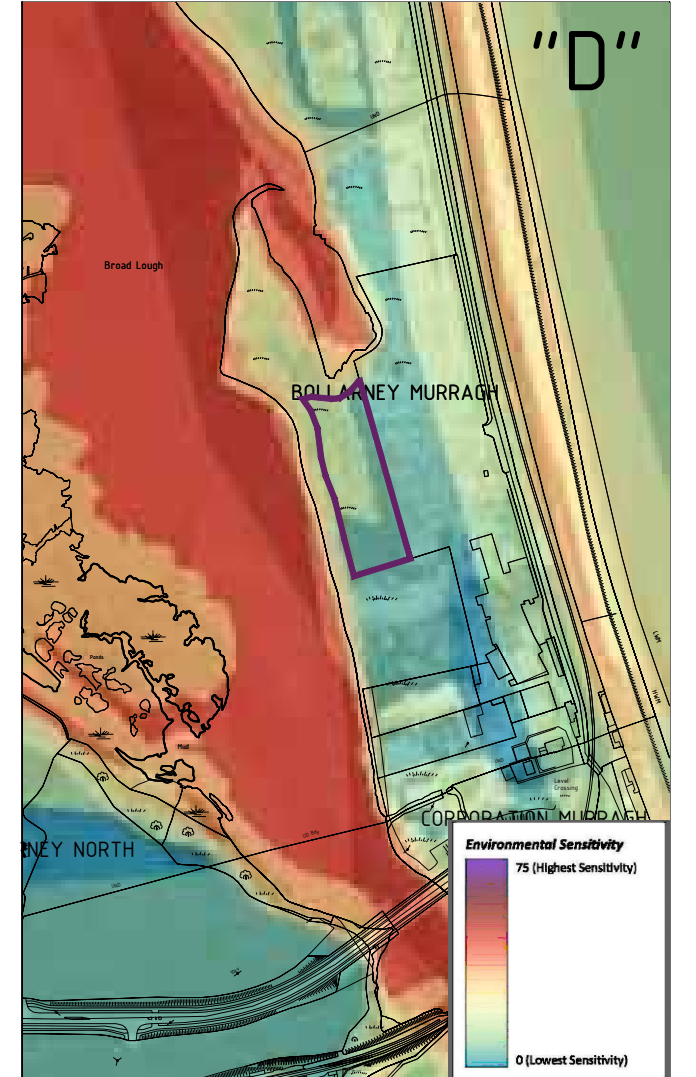


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PROPOSAL SUBMISSION  
Retain Employment Zoning

Submission to  
RETAIN E1 Zoning  
Circa 1.0 HA

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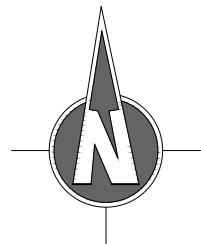
X=730510 Y=694820 X=731140 Y=694820

PROPOSAL SUBMISSION  
Retain Employment Zoning

Risk Level- Low  
Environmental  
Sensitivity

LAP SUBMISSION (DRAFT STAGE)

Retain 1.0 HA E - Employment



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CLIENT:  
R.F. Conway & Company Ltd.  
PROPOSAL SUBMISSION

PROJECT TITLE:  
DRAFT MAP  
LAP SUBMISSION  
DRAWING TITLE:

DATE: 19-11-24

SCALE: na

M:086 0794813 E: info@pacc.ie

PROJECT NUMBER:  
SAZ4 -018

DRAWING NUMBER:  
RFC LAP2025

**Client:** R.F. Conway & Company Ltd.  
**Location:** Murrough North - Lands - North of Port Road Bridge Wicklow Town.  
**Title:** Ecological Report: Rezoning Proposal for Murrough North, Wicklow.

This statement has been prepared in response to the draft Wicklow Town–Rathnew Local Area Plan (LAP) 2025, specifically addressing the proposed redesignation of our client, R.F. Conway & Conway Ltd.’s lands, from ‘E1 – Enterprise and Employment’ to ‘OS2 – Natural Areas.’

Our client plays a vital role in the local, regional, and national economy by importing sawn, packaged timber products, which are essential to the construction industry and the delivery of housing across Ireland.

We respectfully urge Wicklow County Council to reconsider the proposed zoning change, which seeks to rezone approximately 2.8 hectares of our client’s land to ‘OS2 – Natural Areas.’ In response, we propose retaining approximately 1.0 hectares of this land under the ‘E1 – Enterprise and Employment’ zoning for the following reasoning;

The Strategic Environmental Assessment (SEA) was conducted to evaluate the potential significant environmental impacts of implementing the Wicklow Town – Rathnew LAP Plan 2025. Figure 1.1 of this report highlights areas of environmental sensitivity that the Plan aims to steer incompatible developments away from. According to Section 4.14 of the SEA, environmental sensitivities within the Plan area were analysed, weighted, and mapped to identify locations with overlapping sensitivities. Areas with a high concentration of these sensitivities present a greater risk of environmental conflict and degradation if developed. However, the presence of environmental sensitivities does not inherently prohibit development. Instead, it signals the need for strict adherence to the mitigation measures

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***Environmental Services for Industry***

- ▶ Building Performance Verification
- ▶ Secondary Containment Assessments
- ▶ EAS & ESOS Energy Audits
- ▶ Environmental Monitoring & Modeling
- ▶ Carbon Footprint
- ▶ IPC/IED/Waste Licence Compliance
- ▶ EIS & Planning
- ▶ Workplace Monitoring



embedded within the Plan to ensure its implementation supports environmental protection. The 1.0-hectare site in question is classified as having the lowest environmental sensitivity, indicating that development on this land is unlikely to adversely affect environmental objectives. The most sensitive areas identified in the Plan include The Murrough Wetlands SAC and The Murrough SPA which fall outside of the area our client is seeking to retain as E1-Employment.

In addition to this, Table 7.3 in Section 7.3.1 of the SEA states that facilitating developments on land that has relatively low levels of environmental sensitivities and are served by infrastructure and services, will help avoid the need to establish developments in more sensitive, less well-serviced areas and the potential for significant adverse environmental effects occur where the development is unmitigated. In this instance the 1.0 HA of land our client seeks to retain as employment land will be used as a storage area for packaged timber products to facilitate the expansion and requirement for timber products for the construction area. As it is just a storage area, there will be no major developments of the land that would be likely to impact environmental objectives, and the land is already served by infrastructure and services. Despite the classification of this area as having low environmental sensitivity, our client remains fully committed to implementing measures that align with environmental protection objectives. They are prepared to adopt additional safeguards which have been previously mentioned, to ensure that their operations do not compromise the local environment, reinforcing their dedication to sustainable business practices.

In addition to falling outside of the bracket of an SAC or SPA area, the land our client is seeking to retain also falls outside the bracket of a proposed natural heritage area and is not an area likely to contain Annex I Habitats. Again, reinforcing the fact that this area our client is seeking to retain has no significant ecological value and has a long-term history of

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***Environmental Services for Industry***

- ▶ Building Performance Verification
- ▶ Secondary Containment Assessments
- ▶ EAS & ESOS Energy Audits
- ▶ Environmental Monitoring & Modeling
- ▶ Carbon Footprint
- ▶ IPC/IED/Waste Licence Compliance
- ▶ EIS & Planning
- ▶ Workplace Monitoring



industrial/commercial use. The subject lands are a brownfield site and are ideally suited for continued commercial activity and as stated in the SEA, the use of brownfield sites for development rather than greenfield areas will reduce any adverse environmental impacts that are associated with developments on greenfield sites.

Section 8.6.10 Chapter 11 of the SEA, point three states that where there is existing undeveloped lands, the lands have only been zoned for new development where it can be justified that such zoning and development arising therefrom is essential for the town to achieve its development vision and strategic objectives. Chapter 4 on the LAP 2025 deals with economic development of Wicklow Town-Rathnew including those relating to managing employment at Murrough North, facilitating employment along the Wicklow Port Access Road and Hawkstown Road, and supporting the maritime sector and Wicklow Port. By not retaining the 1.0 HA of land our client is seeking to retain as E1-Employment, this would be in conflict to the proposed economic development of the mentioned areas as the requirement of timber products is currently expanding nationally and is vital for local and national economic growth.

An EIA screening report was conducted in 2019 for a neighbouring waste facility. This report stated that the development would have no impact on biodiversity by reason of its nature, scale, location, and the fact the development is limited to an area of previously developed land of little ecological value. Regarding the issue of habitat/species fragmentation the proposed development would not result in any direct habitat loss or fragmentation. It also stated that the facility is in keeping with the buildings in the surrounding industrial area and would have no significant impact to the wider landscape and due to the immediate site setting, the development is of relatively low sensitivity and is in line with the zoning of the area. A planning inspector reviewed the EIA Screening assessment and the accompanying Natura Impact Statement. The conclusions of the planning inspectors report stated that the

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proposed development, individually or in combination with other plans and projects would not adversely affect the integrity of Murrough Wetlands SAC (Site Code 002249), the Wicklow Reef SAC (Site Code 002274), the Wicklow Mountains SAC (Site Code 002122) and the Murrough Wetlands SPA (Site Code 004186) or any other such designated European, in view of their Conservation Objectives when mitigation measures were implemented.

This situation is similar to that of our client; however, our client is merely seeking to store packaged timber products in an area which is adjacent to an area where timber products are currently already stored and does not involve any extensive development such as that of the neighbouring facility. As a result, there would be no disruption to ecological habitats and species and is simply expanding the timber storage area. A planning application for this has been submitted. Therefore, the storage of timber products on this 1.0 HA of land would be keeping in line with current business operations in the area on land that is of no ecological significance and has historically been used for business and commercial purposes.

As an ISO 9001-certified organisation, our client is dedicated to maintaining high standards of excellence and responsible business practices. The Murrough facilities are meticulously managed to minimize environmental impact, a commitment that will be upheld in the proposed additional storage area. The storage of packaged timber products on the 1.0-hectare site proposed for retention will not significantly affect the surrounding environment, consistent with the minimal impact of the existing storage area. The facility is subject to annual inspections by the EPA to ensure compliance with environmental regulations, which are integral to my client's operations. Regular environmental sampling is conducted on-site to confirm that the operations do not compromise the protection of critical ecological habitats.

It is important to note that, under this submission, my client does not wish to seek the retention of all the proposed rezoning land and wishes to retain the 1.0 HA previously

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described which is shown to have little ecological importance based on the SEA Environmental Report accompanying the draft LAP 2025 and would not be compromising the integrity of surrounding ecological habitats. This approach would ensure that the objectives to promote the safeguarding of critical habitats is also met with the need to continue vital economic growth and sustainable business productions. We respectfully urge Wicklow County Council to consider this request to ensure both ecological and economical needs are met.

Rebecca Stokes

BSc (Honours) in Applied Freshwater and Marine Biology

MSc. Conservation Behaviour

Environmental Consultant at Environmental Efficiency Consultants.

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