

# Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	Private Individual
Name:	Mia Merrigan
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#### **Topic**

**Residential Development** 

**Submission** 

Please see attached document

#### **Topic**

**Economic Development** 

**Submission** 

Please see attached document

## Topic

Rathnew Village Centre Strategy

**Submission** 

Please see attached document

## **Topic**

Tourism

**Submission** 

Please see attached document

#### Topic

Infrastructure (inc. Infrastructure Delivery Schedule)

**Submission** 

Please see attached document

## Topic

Transport Assessment / Transportation Strategy Map

**Submission** 

Please see attached document

# Topic

Heritage / Biodiversity / Heritage Maps

**Submission** 

Please see attached document

# Topic

Green Infrastructure / GI map

**Submission** 

Please see attached document

## **Topic**

Strategic Flood Risk Assessment & SFRA Map **Submission** 

Please see attached document

## File

WCC Submission Points.docx, 0.02MB

#### **WCC Submission Points:**

**Flooding Risk** – areas below Tinakilly / lower Rathnew are all under flood Zone A&B which classifies them as areas of high risk of flooding.

- 1. Tinakilly lane Flood Zone B
- 2. Tinakilly Park Flood Zone A & B
- 3. Rathnew Village
- 4. South Rathnew inner relief road Flood Zone A & B
- 5. Wicklow county Campus Rathnew Flood Zone A&B
- 6. Merrymeeting former corn company site Flood Zone A &B
- 7. Rathnew Graveyard & adjacent lands- Flood Zone A &B

The existing and proposed developments with increased density housing, apartment blocks, car parking and roads situated above or directly within the flood prone zones increase the chance and extent of flooding and associated damages to these areas from increased with run off and reduced capacity for water infiltration caused by expansion of impermeable surfaces in these areas.

Currently these green areas and mature trees are a major contribution to water absorption to alleviate pressure from the Flood zones which are already under pressure from river flow and high water table and current built areas.

Strategic Flood Risk Assessment is based on Guidelines from 2009 which you could argue are out of date when looking at the significant changes in climate, sea level, housing. It also states it uses best available information – do we know how current this is?

The council also have an uncertainty and disclaimer removing their liability if the facts they use are inaccurate, and removes their responsibility and accountability for any future flooding. This raises questions on the long term sustainability and safety in the area if construction proceeds. This not very reassuring for the current and new residents in the flood zone areas, who will have to deal with the consequences.

There is no Existing -Flood Risk Management Measures and no current Pump house built to in address the current flooding risks, not taking into account the increased risks from the proposed planning changes. Also the type proposed is controversial as capacity decreases with silt buil up in the tanks and becomes less affective. What is the maintenance plan for this? No confirmed site has been chosen but the 2 options proposed are themselves both located in the flood zone which would further undermine its effectiveness.

#### Housing development - Tinakilly Rathnew

Planners have chosen not to specify the type of building in Rathnew/Tinakilly area, however this does not mean they can't. Removal of apartments with car parking and little or no green areas being replaced by residential houses with gardens would reduce run off and contribution to the flooding risks.

Rathnew has been lumped in with Wicklow town as a growth area, however Bord Pleanala has stated Rathnew has been overzoned for housing and that was stated even knowing the designation of being in a growth area. Also WTR6 is clearly not being adhered to – community infrastructure.

#### **Relief Road Plans**

Plan indicates there are no other routes for the Relief road SL02 and should go ahead as it has started. Also it is the only via route outside the flood zone, however part of the road will be in the Flood zone A & B which they term an acceptable risk even though SL03 states buffers and bridges would need to be integrated into its construction and its better to avoid building in these areas.

However there are more viable and current routes available that can be expanded and make more sense. The Rocky road could be expanded and utilised, the current structure is not in a flood zone and circumvents the whole of Rathnew and accesses the N11 at a different point thereby reducing the pressure to the current exit to the N11, which the current plan acerbates. Another option is the Marlton road to Beehive again this has a current road structure in place and direct access to N11 by different exit point. Both utilise the current built road structure which has already been built as part of relief road, it would also reduce pressure on port road and Main Wicklow -Rathnew route. Financial constraints and deals with contractors should not override what is best for a community for the long term, just because the relief road plan was set a number of years ago does not mean it cannot change for what makes better sense.

Plan states it is facilitating the improvement of the existing road network, to enhance safety for all users, and to remove bottlenecks and hazards. However, the current proposed network only increases a bottle neck at the Rathnew- Ashford roundabout exit to N11. Vehicles will bottle neck at traffic lights in front of aldi's whether traffic comes via village or new processed exit on the Clermont road. This will encourage cars to take back roads to Ashford/kilcoole which will increase traffic there, it will also have a bottle neck at this exit as cars are already queuing. It would be better and more useful if cars bypassed Rathnew using a completely different exit to N11.

Current proposed Rocky road update is only increasing road from 5.5m to 6m and add or doing up paths, in accordance to improving Wicklow for walking and cycling. This is inadequate and will not encourage use or help elevate current bottlenecks and increased traffic volume.

#### **Integrity of Tinakilly Avenue/ Access:**

Plan to run a road through this avenue goes against the natural environment access, biodiversity and keeping/protecting amenities for public utility, tourism, educational/community, recreational use which Tinakilly avenue and Broadlough lake provides for the community. It is sited as a green quarter used for passive and active recreation which has come under pressure from development but rather than protecting it they have previously given permission to remove it from community use. There are no parks, play areas, walks in the area that provide a walk into nature for both young [prams/buggy accessible) and old where they are not beside a main busy road or in or by a private housing estate. This avenue has been enjoyed for generations by the current community for walks, cycling, running, exercise, school nature walks, wild life and bird watching. Its Tourism potential has not been exploited to its full as it is part of the Tinakilly house entrance – Robert Halpins final residence which was built/financed as a thank from the crown to him for captaining the ship that helped lay the Trans-Atlantic line between Ireland and America, the precursor to the telephone line.

It also acts as a sponge to absorb run off water, precipitation to help remove pressure from the flood zones located directly below. Current plans removes mature trees replaced by saplings which would not have the same absorption capacity or shelter for wildlife or on the carbon footprint.

They propose to destroy an historic tree line avenue, which could be used also in relation to the WTR92 point where the plan provides connecting links as a potential walkway could be designed to link Tinakilly, Broadlough lake and the Murrough.

## N11 – Commuter Road or Car park?:

N11 is not fit for the increased volume being introduced by new housing. Planning department have not taken into account the growth increase is due to the fact we are in commuter belt and people who can afford housing in our communities are from Dublin/Bray or further afield with jobs in those areas and not locally.

Suggested Bus lane and park and ride area conceptually is fine, but in practice will not benefit the area or decrease vehicular traffic.

Introduction of DART is far away and considering that the murrough is approximately 2-3 storms away from washing said tracks into the sea, it is not viable unless something is done immediately rather than in next 5 years. Where did the extra lane disappear to?

#### Murrough:

Murrough has been designated as a tourism area with part for conservation, however there is no plans to actually try to protect or converse what is there. There are provisions made for public toilets or facilities to be introduced. Poor investment and lack of imagination and no action for the last 20 years have resulted in Irish rail introducing unsightly stone barriers which apart for being ugly and making it more difficult to walk as acerbated erosion in the areas where it stops. Inappropriate unsightly businesses given permission to be located in same area like the metal transfer station and the remains of a waste transfer station which along with premises in the old corn company in Rathnew were owner was allowed to dump and leave waste behind by the councils effectiveness to enforce the license. Clearly no clear thought has been given for the plan for this area in relation to development and sustainability. Needs to be revisited.

#### **Economical Development / Strategy - Rathnew**

Economical development is very aspirational, when council don't look after roads etc to these areas to make them attractive.

Rathnew Village Centre Strategy is relying on private property to be the focus or green link for the village even though access can be removed at any given time e.g. Ashford playground. Part of strategy to not be absorbed as suburb of Wicklow town is not being maintained. WTR39 to 47 is again aspirational but no substance to how this would be created by affective planning.