# ENNISKERRY FORUM SUBMISSION TO WICKLOW COUNTY COUNCIL

### **WICKLOW COUNTY DRAFT DEVELOPMENT PLAN**

**PERIOD 2016 - 2022** 

## **FINAL DRAFT**

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#### **INTRODUCTION**

Enniskerry Forum are a voluntary community group that exists to support and work with the wider Enniskerry community including sports, social groups, clubs and individual residents. The Forum is making a submission in relation to the draft County Development Plan. This submission takes into account the following –

- The Forum is not anti development and would not normally take a position on individual planning applications other than to reiterate or emphasize specific points in relation to preserving the character and ambience of the village.
- The Forum understands that there will be some development in the village environs to meet the requirements and population growth objectives of the plan.
- The Forum have reviewed the draft plan in detail and have taken external advice to ensure that we are conversant with the content and the implications of the implementation of the plan.
- The Forum have engaged with local public representatives to help us understand how the plan might be implemented.
- The members of the Forum have had extensive discussions on many aspects of the plan and we have also received comments and observations from the wider community all of which have been included in this submission.
- The Forum is community based and will try and represent the community views in the best possible way. Individual Forum members may have personal views that will be communicated to WCC in the member's personal capacity.
- The Development Plan states "Landscape plays a large part in town's character and development" It also states "The County Development Plan also categorizes the landscape surrounding Enniskerry in all directions as an Area of Outstanding Natural Beauty" In the plan the vision for Enniskerry confirms the necessity to "protect the built and natural heritage of the area along with the its identity"
- In the Development Plan 2016 2022 WCC CEO states as an objective **"to** strengthen and enhance as appropriate all objectives of the existing town plan particularly those relating to heritage including views, traffic and transportation and community development" This will be a recurring theme in this submission as the community wants these objectives to be met in any future decisions in relation to land use.
- There have been a large number of comments made to the Forum in relation to the number of housing units referenced in the plan 470. There would appear to be a major inconsistency with this number when considered in conjunction with the planned population growth. According to the plan the population in 2011 was 1,940. This has probably not changed in any material way since. The projected population in 2028 is shown as 2,500; an increase of 560. We don't understand how you would need 470 housing units to service this increase which with current infrastructure deficits in Enniskerry would be difficult anyway. This would suggest that many of the housing units would be only single occupancy which is highly unlikely.

The Forum support these objectives and the spirit and content of this submission reflects this. This means that the Enniskerry Community will be judging and assessing any proposed development based on these critical criteria. This was the overwhelming view from a widely attended public meeting held in Enniskerry on Monday February 15<sup>th</sup> 2016. Many of the comments and observations in this submission have been provided by the attendees at this public meeting and via direct contact with the Forum. WCC can therefore assume that this submission is broadly representative of the Enniskerry community.

#### **Submission Details**

The following are the matters and issues that The Forum wish to bring to the attention of WCC and which we request are recognized and taken into consideration in the final plan once issued –

#### **Unique Character of the Village**

Enniskerry is unique in being a "village" in an urban sprawl that will increase as development proceeds in Kiltiernan, Cherrywood and Fassaroe. This unique character is one of the prime attractions for visitors to the village which in turn supports local jobs and economic activity. Any material change in this character will have a negative impact on Enniskerry. An interesting media commentary (link below) encapsulates the importance of maintaining the unique character and ambience of Enniskerry village.

http://lovindublin.com/sponsored/11-reasons-you-need-to-visit-wicklow-right-now

A second media contribution that should be viewed and acknowledged is below. This underpins the attraction of Enniskerry in its current format and this has to be preserved and enhanced in any future development plans.

http://enniskerry.ie/blog/641-terry-wogans-ireland-enniskerry

http://theculturetrip.com/europe/ireland/articles/the-10-most-beautiful-towns-in-ireland/

One of the comments made in this video is "Enniskerry relies on Powerscourt and its tourism to this day". This emphasizes the need to preserve and enhance the village character and ambience.

Any development that expects to have wide community support will have to ensure that this is protected for the good of all stakeholders including current and future residents, business owners and visitors.

We would expect that WCC will liaise with the other adjoining local authorities in relation to wider regional development. The WCC plan acknowledges the unique nature and features of Enniskerry village and the importance of maintaining the character of the village. This would be seriously compromised by disconnected development in Fassaroe and areas under the control of Dun Laoire Rathdown.

The preservation of a green belt around Enniskerry is essential to the ongoing existence of Enniskerry as a Victorian village that is a major tourist destination in conjunction with Powerscourt. The economic value that this brings is acknowledged in the plan but is dependent on Enniskerry continuing to be a "village" albeit surrounded by an urban sprawl.

#### **Preserving the Economic Benefits of a Unique Victorian Village**

Enniskerry has an interesting history and its role as a Victorian Estate village is something that the community values and wants to preserve. This includes a notable heritage, more details of which are in 4 below. Powerscourt Estate is one of the major tourist attractions on the East Coast and many of their visitor's transit through Enniskerry. Many are taken by its old-style village layout and the architecture of many of the buildings. This is a major attraction for Enniskerry as is evidenced by the media report above. Development that would compromise this must not be allowed under any circumstances. There will be opportunity for appropriate development that is undertaken in a sensible manner that should not undermine the future of Enniskerry as a traditional Victorian village that people want to visit.

#### **Maintaining the Physical Structure of the Village**

The village must maintain its character and ambience preserving its physical structure and layout, particularly the centre and approx. 1km in all directions from the village centre. Whilst this may, at one level, go against an objective of developing from the centre out, any development within this area would compromise the overall character of the village. There are buildings and structures that are essential to maintain and which would be compromised in the event of such development. It is not in the interests of current residents, future residents, visitors and WCC that Enniskerry adds to what will be a surrounding urban sprawl. There are opportunities for sensible and considered development in various places outside of the village centre that could enhance the village and its environs not detract from it.

#### Heritage

Enniskerry village has some unique heritage features that must be preserved for the longterm benefit of the village, its residents and visitors.

As part of the overall vision and development strategy set out in the plan reference is made to "protect the built and natural heritage of the area with the town's identity"

The major focal point of Enniskerry is its Town Clock, which was built in 1843 and is the core of the village built heritage. There is a committee that are putting significant time and effort into the restoration of the Town Clock. The long-term value of this restoration project is dependent on the surrounding character and layout of the village being preserved.

#### **Traffic / Parking**

Traffic is a major issue in the village and is impacting on both business and resident activities. As a major tourist attraction Powerscourt Estate brings large numbers of visitors most of which pass through Enniskerry to get there. Most of these visitors arrive by either car or bus. In addition, the village is also the starting point for many hill walkers who park their cars in and around the village for extended periods particularly at the weekend. The residents and businesses in the village welcome these visitors as they bring important economic activity. Any additional development in Enniskerry will have to take into account the parking and traffic situation in the village so as not to compromise the experience that visitors should have.

Residents in and around Enniskerry have to rely on the car for their transport needs as the public transport facilities are inadequate. Most residents do not work in or near Enniskerry and therefore are largely reliant on a car to go to and from work and for other recreational purposes. It is unrealistic to impose additional development in the village centre that would result in more cars having to be accommodated. Residents in the village centre, Kilgarron Hill and Church Hill currently have to use street parking to a considerable degree.

#### **Flooding**

There has been a history of flooding in Enniskerry in recent times. One area of particular concern is in and around the new school on the Cookstown Road. This has been investigated and reviewed by WCC on a number of occasions. The area is also one that is earmarked for future development. When flooding arises it creates an unsafe environment adjacent to a school with significant traffic flow. WCC are aware of the dangerous environment that this causes. In advance of any development in this locality a permanent and effective resolution will have to be identified and implemented. Whilst this may be costly it would have to be undertaken before introducing additional traffic and pedestrian movement in this area.

There is an issue on the road from the Texaco Garage to Knocksink that has been recently resurfaced. The shores for water runoff are blocked and this is causing flooding on the road and pooling on the bridge. Whilst this is not directly related to a land use plan it does illustrate that additional development will require upgraded infrastructure.

A wider flood impact study should be implemented in any area of potential development. This should include the excessive flow of water down Kilgarron Hill and in and around the Texaco garage on the Kiltiernan road. We acknowledge that the Development Plan is primarily dealing with current and future land use but issues such as flooding cannot be ignored if the correct decisions are to be made.

#### **Additional Civil Amenities**

There is a deficit of amenities in and around the village at the moment. Any additional development must be accompanied by appropriate amenities. This is a fundamental requirement of the community in Enniskerry. It should also be noted that such amenities should be part of the initial development and not something that would be provided "after the event" Such amenities should include a playground located in an appropriate and safe location that would have broad community acceptance.

#### Water/Sewage

The water/sewage service in the village and its immediate environs has been under considerable pressure in recent years. Various situations have been reported to and dealt with by WCC. This has caused some environmental problems with the potential for health implications. Any development in Enniskerry will have to come with significant investment in water/sewage infrastructure. This must be a mandatory requirement for any development and must be in place prior to any development completion.

We acknowledge that Irish Water now have responsibility for investment etc. under this heading. Any development in or around the village should involve detailed discussion and agreement with Irish Water in relation to the infrastructure.

#### **Environmental**

We understand from our public representatives that there is no mandatory or statutory requirement for an EIS to be conducted in relation to all individual planning applications. Nevertheless due to the village location i.e. adjacent to the Dargle valley and its proximity to other areas of natural beauty the community request that an EIS is completed for all development involving multiple units. This is to ensure that trees, fauna, wildlife and other environmental aspects are fully catered for. Once any damage is done it is usually irreversible.

#### **Action Area 1**

This makes reference to catering for up to 156 housing units. We would remind WCC that An Bord Plenala made a ruling on a planning application relating to this land (ref PL 27.237190, Wicklow County Council ref 10/2230) as follows: "Having regard to the location of the site between the road and an area of outstanding natural beauty and with excessive scenic views to the north and east as far as Bray Head and the Irish Sea, and to the bulky two-storey design of the proposed extension, it is considered that the design approach would not represent the most appropriate method of extending the house on this extensive site at this visually sensitive location"

This ruling confirms and emphasizes the necessity to maintain and enhance the visual sensitivity of this and other locations in and around Enniskerry.

#### **Action Area 2**

This relates to the area behind the Fruit and Veg shop, the cottages and the stables on Kilgarron Hill. Apart from impacting and disturbing the natural structure and shape of the village any additional housing in this location will result in more traffic coming out onto Kilgarron Hill in what is already a dangerous environment. Kilgarron Hill has significant vehicle traffic up and down including heavy trucks. In addition recreational cyclists are major users of this access point into and out of the village. Any change of use of this location will impact negatively on the traffic and parking in the immediate area and will increase the risks in what is already a dangerous environment for pedestrians, cyclists and motorists. Cars are regularly parked a considerable distance up Kilgarron Hill and this forces pedestrians out on to the road and line of sight for residents exiting driveways is often impeded.

There is an assumption in the plan that any development will involve minimal vehicle traffic. This is unrealistic given the necessity for residents to have independent transport due to the absence of adequate public transport. Any development at this location should be preceded by a detailed and comprehensive safety analysis, vehicle movement study and assessment of pushing more traffic movement onto Kilgarron Hill. The current environment in this area is inherently unsafe. Most vehicles on Kilgarron Hill are parked illegally (opposite continuous white lines) resulting in traffic up and down the hill having to cross to the wrong side of the road.

#### **Underlying Geology of Enniskerry**

Enniskerry is located in a deep valley surrounded by water - rivers, springs, boggy land, sand and gravel and has a unique topography and geology having been formed by a glacier. The location is inherently not stable geologically and should be the subject of environmental studies to determine its suitability before any significant development is permitted. We note the area behind the RC church has been dezoned for housing due to its failure to pass new environmental standards.

#### **Conclusion**

The Forum have considered the Development Plan in detail and acknowledge the many positive features. We have many concerns, as set out above, that if not addressed would change the character of the village in a way that could not be reversed. That goes against many of the stated plan objectives. The Enniskerry community want to work with WCC to ensure that all our concerns are considered and dealt with. As stated at the beginning of this submission The Forum is not anti-development and understands that additional housing units will be required. However, as a community, we will do all we can to ensure that the unique character and ambience of the village and its surrounding areas is maintained for the benefit of all.