

# **GAP (Greystones Area Planning) Community**

Greystones Area Planning Community  
30.08.21

Re: GAP Community Submission on Chapter 17 Natural Heritage and Biodiversity into Draft County Wicklow Development Plan 2021 – 2027.

We are a group of residents from Greystones and Delgany who have come together following the recent, significant developments that have taken place over the past number of years. We believe that these developments are unsustainable due to lack of investment in all other aspects associated with granting planning permission such as public services (schooling, medical, dental) transport infrastructure (traffic congestion), recreational facilities (lack of), residential issues resulting in an adverse impact into the biodiversity of the area.

Several these developments (Glenheron) have been approved under the Strategic Housing Development (SHD) process. We are also aware of the Carmelite development in Delgany which is under a Judicial Review and an upcoming SHD at Coolagad. We believe strongly that the SHD process is completely undemocratic as they bypass residents' rights to object to planning proposals in the normal manner – making representations to elected councillors and the county council. It has been reported by architect and surveyor bodies that SHD's have led to high density badly designed residential developments that tend to override democratically devised Local Area Plans (LAP) especially on density levels.

Greystones Area Planning Community welcomes this opportunity to input into the Wicklow County Development Plan 2021 – 2027 to try and ensure that planning of developments going forward is sustainable.

Our input is as follows;

## **CHAPTER 17 Natural Heritage and Biodiversity**

We believe that Draft County Development Plan does not adequately address the value of Biodiverse ecosystems. Our current Planning & Development strategy to date (with housing zoning & regulation focus) has not worked to preserve our Biodiversity or protect our Climate. We have declared a Climate & Biodiversity Emergency but not significantly changed our Planning approach to suit. We cannot expect to succeed if we do not change our ways and would recommend that a Biodiversity Planning and Development function is established.

Additionally, Wicklow County Council should as a matter of priority be identifying "Local Nature Reserves and wildlife corridors". While there are Special Areas of Conservation (SAC) in Greystones/Delgany, there are also valuable wildlife corridors which should be identified, named and protected.

Trees: A better system for preserving trees is required. Trees also need to be protected from harm during the construction process - numerous beautiful mature eucalyptus, birch, elm and other deciduous trees have been removed. Virtually no mature trees have been retained on the Eastmount and Melwood development sites in Delgany. Mature Trees should not be cut down as a standard without impact assessment made.

If the biodiversity value of a site is damaged by development, it cannot be compensated for by a requirement for the developer to allocate or retain a percentage of the site after development as new open space. New planting takes many years to mature. The emphasis should be on retaining and conserving biodiversity where possible even if this means a reconfiguration of plans and lower density.

As already above, we believe strongly that the significant development in Greystones and Delgany over the last few years has had an adverse impact to local agriculture and unbalanced the local biodiversity in the area. We are seeing a Gradual DISAPPEARANCE of habitats for PROTECTED SPECIES including frogs, newts, owls, bats, red squirrels and other native species as illustrated so clearly in the Greystones Biodiversity action plan 2021 commissioned by Greystones Tidy Towns.

The 2021 Greystones Biodiversity Action Plan (BAP) identifies several areas of important natural biodiversity which are examples of Local Biodiversity Areas in the Greystones area.

- The Three Trouts Stream riparian corridor and other watercourses\*
- St. Crispins Graveyard, Kilruddery Deerpark Stream and D'Arcy's Field
- Greystones Coastal Cliffs
- Greystones Rocky Shoreline
- Greystones South Beach

We support the recommendations that above areas should be classified as "Biodiversity zones" in both this Draft County Development plan and the next Greystones-Delgany and Kilcoole Local Area Plan. These biodiversity zones should have a specific focus of sustainable land management with biodiversity and habitat restoration, regeneration, or preservation as its core.

\*In conjunction with Delgany Tidy Towns and several other local interest groups, we support the proposed creation of a Community Nature Reserve to protect the course of the Tree Trouts Stream, which was identified as "the most important area of natural habitat remaining in the Delgany - Greystones area" in the recent Greystones BAP.

We also support the objective to protect watercourses – CPO 17.26 "Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban location) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible."

We ask that the following is added:

"- All applicants for planning permission (including housing, roads, greenways) will be required to prove how they have complied with this condition, both at Application stage and again at notification of Site Plan before construction commences".

The feedback and input in this submission is designed to improve / strengthen the Draft Wicklow County Development Plan 2021 – 2027 even further.

Yours Sincerely,  
Greystones Area Planning Committee.