

ELEANOR MAYES



WICKLOW COUNTY COUNCIL
30 AUG 2021
PLANNING DEPT.

30 August 2021

Forward Planning
Planning, Development and Environment Department
Wicklow County Council

Submission

Re: Draft Wicklow County Development Plan, 2021-2027

Draft Wicklow County Development Plan, 2021-2027, submissions on Volume 1

1. Firstly, I would like to acknowledge the comprehensive documentation and objectives provided by Wicklow County Council in the Draft Wicklow County Development Plan 2022-2027.
2. It is not always clear how it is intended that the objectives of the Draft Wicklow County Development Plan 2021-2027 will be delivered. In this regard, it could be useful if Chapter 20 of the Plan, dealing with Implementation and Monitoring, were to include a summary tabulation of development standards and other criteria, with cross-referencing to the relevant Chapters of the Wicklow County Development Plan. This could help to ensure that development occurs in an orderly and efficient manner, having regard to the objectives of Wicklow County Development Plan.

Chapter 12 of Fingal Development Plan 2017-2023, dealing with Development Management Standards, provides an example of how consideration of proposals can be progressed in a range of different identified development types. This Chapter summarises the Fingal Development Plan rationale and objectives, and provides a useful starting point and check-list for prospective developers, and may also facilitate pre-planning consultations. This template may be useful to Wicklow County Council in finalising Wicklow County Development Plan 2021-2027.

3. There is some duplication of issues and objectives that are relevant to a number of different Chapters of the Draft Wicklow County Development Plan 2022-2027; cross-referencing could be checked again before the Plan is finalised, to ensure consistency.
4. With regard to Chapter 17 of the Draft Wicklow County Development Plan 2022-2027, dealing with Natural Heritage and Biodiversity, CPO 17.5, 17.6, 17.7, 17.8 and 17.12, it should be noted that Screening for Appropriate Assessment and Ecological Impact Assessment ecological baseline desk and field studies are generally required in the first instance, to determine whether there is a potential for likely significant impacts or effects on protected sites, habitats, species, and biodiversity to arise. It is submitted that Ecological baseline studies should be carried out by suitably qualified personnel and submitted with all development proposals, and that these studies should identify biodiversity features to be

protected and enhanced in the context of the proposed development, to assist in the implementation of Natural Heritage and Biodiversity CPOs 17.13 to 17.23 inclusive.

5. With regard to CPO 17.26, the protection of rivers, streams and other water courses would usefully be extended to include estuarine and coastal waters. It is submitted that protection of rivers, streams and watercourses should apply in urban, suburban, villages, and in rural areas. It is suggested that all development proposals should include Construction Environmental Management Plans (CEMP) that identify watercourses within and/or adjoining and/or downslope of the proposed development site boundary. It should be noted that prolonged rainfall and/or extreme rainfall events have a potential to mobilise significant volumes of soils resulting in overland flow and adverse siltation effects on watercourses. The CEMP should identify silt control measures as appropriate to individual development proposals.

Draft Wicklow County Development Plan, 2021-2027, submissions on Volume 2 Part 2

Small Towns Plans (Type 1): Ashford

1. It is submitted that the Draft Ashford Town Plan Specific Objectives Section 2.1 Context, paragraph 3 statement with regard to flooding in the Vartry catchment "the Vartry river...rarely experiences serious flood events" is not consistent with the current Flood Risk Management Plan (OPW, 2018).

The Ashford Town Plan Area as mapped in the Draft Wicklow County Development Plan 2021-2027 lies entirely within the flood risk Ashford and Rathnew Area for Further Assessment (AFA), as mapped in Appendix G8 of the Flood Risk Management Plan (OPW, 2018). Flood Protection measures have been identified within Ashford and currently relate to the Killiskey Stream, with the objective to "Progress the development of a Flood Relief Scheme for Wicklow AFA and Ashford & Rathnew AFA (Code IE10-IE-AFA-100124-0910-M33)". In accordance with the requirements of the EU 'Floods' Directive, the PFRA, flood maps and Plans will be reviewed on a six-yearly cycle.

Issues for note during AFA 10 project-level assessment in Ashford include: A small stream (Ballycurry watercourse) which was not modelled in CFRAM but has been identified as giving rise to a risk that needs to be addressed. This is the stream that arises in Ballycurry, crosses under the R764 road and flows along the eastern side of the R764 before crossing under the R764 / former R763 junction in a stone built culvert and flowing south to enter the River Vartry.

With regard to Climate Change Adaptability, the current Flood Risk Management Plan (OPW, 2018) states 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.

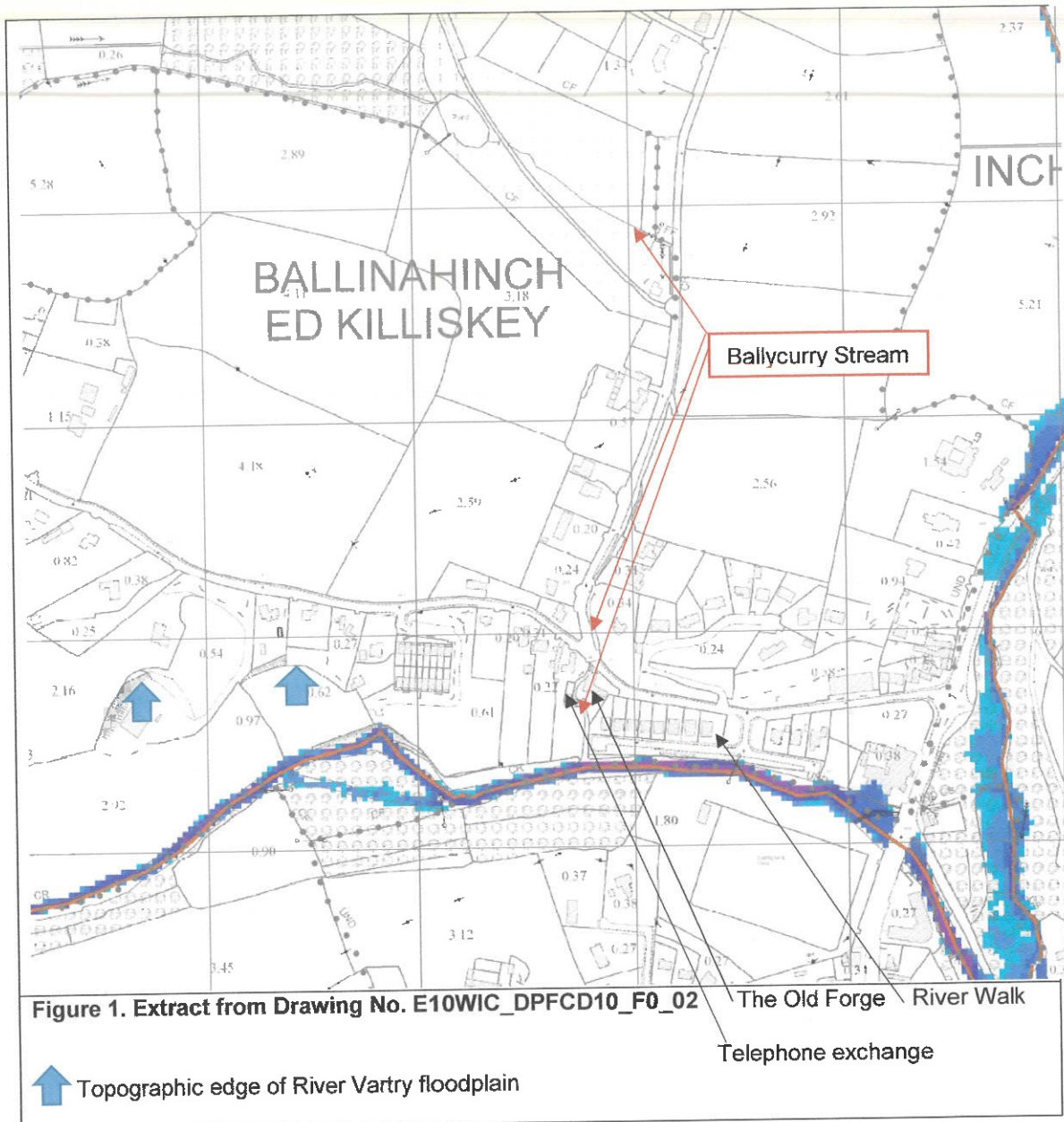
The Vartry River catchment is unusual in having a major water abstraction via the Vartry Reservoir, combined with an absence of recent hydrometric information that could have informed the current Flood Risk Management Plan (OPW, 2018). Two new gauging stations are now in place on the River Vartry, and hydrometric data should be available to inform the next cycle of flood risk mapping. The final 2018 flood risk mapping was based on modelling and shows a somewhat reduced flood risk area in the Ashford area, as compared with the draft mapping (see Figure 1 below). The draft mapping would, I assume, have been largely based on anecdotal and other records of flooding that occurred during Hurricane Charlie on 25th and 26th August 1986, on 16 August 2008, and during more recent flood events. The draft OPW mapping seems to have been used in the 2016 – 2022 indicative flood zone mapping

(Map 3, Ashford LAP). It is submitted that, following the precautionary principle, the draft mapping should continue to be considered to represent more likely flood risk scenario – at least until the next cycle of flood risk mapping is available for consideration.

The Ballycurry watercourse is a permanently watered stream that arises in the Ballycurry area, and is a tributary of the River Vartry. Stream water levels rise rapidly in response to local heavy rainfall events, and the stream is liable to overflow its banks at the R763/R764 junction, causing flooding along the R764 down towards the R764 Roundabout Junction with the R772, and into River Walk, Ashford. These sudden flash floods on the Ballycurry stream occurred on at least two occasions during the winter of 2015/16, and the stream came close to overflowing its banks at the R763/R764 junction in early 2021.

The Ballycurry stream is also liable to be backed up by high water levels in the River Vartry during more generalised heavy rainfall events in the Vartry catchment. The most recent of these combined flood events was in July 2012, during which the grounds of The Old Forge were flooded and sandbags to protect the house were provided by Wicklow County Council. During Hurricane Charlie, there was extensive flooding in Ashford, including the dwelling at The Old Forge which was flooded, and presumably also the Ashford telephone exchange (located within the grounds of my property at The Old Post Office, and located at a similar level to The Old Forge; see Figure 1, reproduced from observations submitted by me to the Draft Flood Plans Consultation, OPW, in December 2016).

The Killiskey stream is also liable to flood (see Figure 1), and OP1 zoned lands (see Map No. 1, Ashford Town Draft Plan 2022-2027) are at flood risk as well as being located with the 25m buffer zone adjoining the River Vartry and the Killiskey Stream. It is submitted that any Town Centre development on these lands should continue to be restricted to 'Less Vulnerable' or 'Water Compatible' development as defined in the 'Planning System and Flood Risk Management: Guidelines for Planning Authorities', as indicated in the 2016 – 2022 Ashford LAP.



2. With regard to Ashford Town Centre zoned lands OP2 as shown in Map No. 1 of the Draft Ashford Town Plan 2022-2027 (The Mart Site), the provision of supported housing would be appropriate for inclusion in any development proposals for these lands, in order to contribute to implementation of the objectives of CPO 6.32 of Part 1 of the Draft Wicklow County Development Plan and to meet local needs.

3. With regard to Draft Ashford Town Plan 2022-2027 Service Infrastructure Objective ASH8, to provide for a new through road linking the R764 to the R772 through and serving employment lands designated as Action Area 1, it is noted that this objective has been in place since 2008, but remains to be implemented. Existing road infrastructure capacity, safety and sightline issues, and pedestrian safety issues and concerns have been brought to the attention of Wicklow County Council repeatedly since 2008, as traffic volumes have increased, and the

number of residents wishing to walk safely to the village has increased substantially arising from recently completed housing, and the current housing construction totalling c. 300 new dwellings in Ballinahinch and in SLO1 lands. Since no indicative mapping of the new through road linking the R764 and R772 is included in the Draft Plan 2022 - 2027, it is requested that Wicklow County Council takes responsibility for the identification of a route, and subject to public consultation, provides a plan and seeks/provides funding for the implementation of Service Infrastructure Objective ASH8. Planned implementation of Service Infrastructure Objective ASH8 will provide this essential transport infrastructure, to facilitate the proper development of the AA1 zoned lands, and to facilitate the proper development of the adjoining Community & Education and Active Open Space zoned lands, and to improve the safety and sustainability of pedestrian, cyclist, and vehicular traffic within and through Ashford. In this regard, the Sustainable Transportation Objectives of Chapter 12 of the Draft Wicklow County Development Plan 2021-2027, including CPO 12.11, CPO 12.33 and CPO 12.44 are noted, together with Draft Map 12.01, and the Core Strategy Map 3.1 included in Chapter 3 of the Draft Wicklow County Development Plan 2021-2027.

4. With regard to the identification of Passive Open Space OS2, and to Draft Ashford Town Plan Heritage Objective ASH11, it is submitted that to assist in the implementation of the Natural Heritage and Biodiversity Objectives of the Draft Ashford Town Plan and of the Draft Wicklow County Development Plan:

- the woodland area on steeply sloping ground to the south of the River Vartry, the woodland and treelines along the River Vartry including the wooded island in the River Vartry,
- woodland and treelines along and adjoining the Killiskey Stream, and
- treelines in Ballymacahara,

are included in the Schedule 17.05 A & B and Maps 17.05 of trees hedgerows and woodlands referred to in CPO 17.18 (Chapter 17, Draft Wicklow County Development Plan), and included as a natural heritage objective in the Draft Ashford Town Plan, and shown on Ashford Map No. 2, which could then be re-named "Draft Ashford Town Plan Cultural and Natural Heritage and Biodiversity Objectives".

As noted in the Draft Natural Heritage and Biodiversity Objectives, protection of trees, hedgerows and woodland refers in particular to native tree species.

It should also be noted that the woodland area on steeply sloping ground to the south of the River Vartry referred to, together with treelines along the River Vartry, are an important part of the protected View looking westwards from Ashford Town Centre as shown in Draft Ashford Town Plan Map No. 2.

Eleanor Mayes

