

**MANAGER'S REPORT ON SUBMISSIONS OR OBSERVATIONS RECEIVED
ON THE DRAFT GREYSTONES-DELGANY AND KILCOOLE
LOCAL AREA PLAN (LAP) 2013-2019**

March 2013

**Forward Planning Section
Wicklow County Council
County Buildings
Wicklow**



MANAGER’S REPORT ON SUBMISSIONS OR OBSERVATIONS RECEIVED ON THE DRAFT GREYSTONES-DELGANY AND KILCOOLE LOCAL AREA PLAN (LAP) 2013-2019

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PART I: INTRODUCTION

1.1 Introduction

The Manager's Report is submitted under Section 20(3)(c) of the Planning and Development Act 2000 (as amended). It is part of the formal statutory process of the preparation of a Local Area Plan. This Report contains the following:

- i. a list of the persons or bodies that made submissions,
- ii. a summary of the issues raised by them,
- iii. the opinion of the Manager in relation to the issues raised, and his recommendations in relation to the Draft LAP, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

The report summarises the issues raised and the recommendations made by the NTA and outlines the recommendations of the Manager in relation to the manner in which these issues and recommendations should be addressed in the proposed local area plan.

The members of the planning authority are required to consider the proposal to make the local area plan and this report of the Manager.

Following consideration of this Manager's Report, the local area plan shall be deemed to be made in accordance with the recommendations of the Manager as set out in this Report, unless the planning authority, by resolution, decides to either (i) make or amend the plan otherwise than as recommended in this report, or (ii) not make the plan.

1.2 Next steps

This matter is to be on the agenda for consideration at the Special County Council meeting on the 15th April 2013.

Where, following consideration of the Manager's Report, it appears to the members of the authority that the Draft LAP should be altered, and if the proposed alteration is a material alteration, the planning authority shall within a certain period following the passing of a resolution, publish notice of the proposed material alteration.

In the event that material amendments to the draft plan are proposed, the planning authority shall determine if a Strategic Environmental Assessment or Appropriate Assessment, as the case may be, is or are required to be carried out as respects one or more than one proposed material amendments to the Draft LAP.

The Manager shall, not later than 2 weeks after a determination that SEA/AA of a material amendment is required, specify such period as he or she considers necessary following the passing of the resolution, as being required to facilitate an assessment. The planning authority shall carry out an assessment required of the proposed material amendment of the draft local area plan within the period specified by the Manager.

The planning authority shall publish notice of the proposed material amendment, and where appropriate in the circumstances, the making of a determination that a SEA/AA is required. The planning authority shall carry out the assessment within the period specified by the Manager.

The notice relating to material amendments shall state –

- i. that a copy of the proposed material amendment and of any determination by the authority that a SEA/AA is required may be inspected during a stated period of not less than 4 weeks, and
- ii. that written submissions or observations with respect to the proposed material amendment and of any determination by the authority that a SEA/AA is required, may be made to the planning authority and shall be taken into consideration before the making of any material amendment.

1.3 Strategic Environmental Assessment and Appropriate Assessment

In accordance with the relevant legislative requirements, this Manager's Report is accompanied by an Addendum to the Environmental Report of the Draft Greystones-Delgany and Kilcoole LAP 2013-2009 and Addendum to the Appropriate Assessment Screening Report. The Manager's Report should be considered in conjunction with these addendums.

1.4 Draft Consultation Process

The Draft Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 was on public display during the period 19th December 2012 to 8th February 2013. During this period, the following additional documents, relating to the Draft LAP were on display: Proposed Variation No.3 to Wicklow County Development Plan, 2010-2016 and Proposed Additions to and Deletions from the Record of Protected Structures.

During this period, a total of 171 submissions were received on the public consultation documentation.

1.5 List of Submissions

Note: The following list of submissions includes submissions received with respect to the following:

- Draft Greystones-Delgany and Kilcoole LAP 2013-2019
- Proposed Variation No.3 to Wicklow County Development Plan, 2010-2016
- Proposed additions to and deletions from the Record of Protected Structures

No.	Observer	Submitted by	Zoning Submission	Includes submission on La Touche Hotel
Elected Representatives				
1	Nessa Childers MEP			√
2	Cllr. Tom Fortune			√
3	Simon Harris TD			√
4	Cllr. Kathleen Kelleher			√
5	Cllr. Grainne McLoughlin			
6	Cllr. Derek Mitchell			
7	Cllr. James O'Sullivan			√
Prescribed Bodies				
8	An Taisce	Ian Lumley		√
9	Department of Arts, Heritage and Gaeltacht	Yvonne Nolan		
10	Department of Education and Skills	Lorraine Brennan		
11	Dublin Airport Authority (DAA)	Yvonne Dalton		
12	Environmental Protection Agency (EPA)	Cian O'Mahony		
13	Health and Safety Authority (HSA)	Alice Doherty		

14	Inland Fisheries Ireland	William Walsh		
15	National Roads Authority (NRA)	Michael McCormack		
16	National Transport Authority (NTA)	Hugh Creegan		
17	Office of Public Works (OPW)	Shirley Crosbie		
Public Submission				
	A			
	B			
18	Dermott Barrett	Simon Harris TD		
19	Simon Bates			√
20	John Bell			
21	Borrah Ltd	BBA Architecture	√	
22	Stephanie Bouyer			√
23	Davida Bradshaw			√
24	John Brady, Ballynerrin Farm Kilcoole	Pat O'Connor & Associates	√	
25	Paul Brady, Ballynerrin Farm Kilcoole	Pat O'Connor & Associates	√	
26	Susan Brambell			√
27	Brambleglen Ltd., Sean Mulryan and William O'Riordan of PricewaterhouseCoopers (receiver)	Kieran Rush Consult Ltd.	√	
28	Ciara Brassington			√
29	Susanna Braswell			√
30	Annemarie Breen			√
31	Elaine Breslin			√
32	Robert and Eileen Broderick			
33	Philippe Brodeur			√
34	Michael Browne (bba Architecture) (RO9 objective)			
35	Michael Browne (bba Architecture)			
36	Michael Browne (bba Architecture)			
37	Michael Browne (bba Architecture)			
38	Michael Browne (bba Architecture)			
39	Bernadette Bultman			√
40	Bernard Burke	BBA Architecture	√	
41	Burnaby Heights Residents Association	Rosa Murray		
42	Greg Butler			√
43	Brendan Byrne			
44	Kevin Byrne			√
45	Paul Byrne			√
	C			
46	Elaine Cahill			√
47	Capital Securities Corporation Ltd.	Cunnane Stratton Reynolds	√	
48	Joanne Carey			√
49	John Carroll			√
50	Joseph Carty			√
51	Eleanor Charles			√
52	Cherry family	Buck Planning Services	√	
53	Carole Ann Clarke			√
54	Cornerpark Estates Ltd	Stephen Little & Associates	√	
55	Dan Cullen		√	
56	Anne Curran			√
	D			
57	Clive and Eithne Dalby		√	

58	Denis and Catriona Daly			
59	Sunniva Darcy			√
60	Trish Darcy			√
61	Anne de Lacy Staunton			√
62	Maurice de Lacy Staunton			√
63	Catherine & Niall Delaney	Frank O'Gallachoir & Assoc	√	
64	Anne-Marie Derham & John Smyth			
65	John Desmond			
66	Una Dillon			√
67	Ann Donohoe			√
68	Georgia Doyle			√
69	Martin Doyle			√
70	Sarah Doyle			√
71	Triona Driscoll			√
72	Dromont Residents Association	Gibbons & Associates	√	
	E			
73	Pamela Echlin			
74	Eden Gate Management Ltd	Ruth Dean Sheridan		
75	David Emerson			√
76	Fiachra Etchingham			√
77	Tom Evans and Gabrielle Lindsay-Evans		√	
78	Wilson Evans, Clive Evans & Lance Evans			
	F			
79	Adrienne Fagan			√
80	Patrick Fahey	BBA Architecture	√	
81	Ramona Farrelly			√
82	Adelaide Fenlon			√
83	Joyce Ferns			√
84	E. Finnegan	Pat O'Connor & Associates	√	
85	Emma Finucane			√
86	Gillian Fox			√
87	Richard Fox		√	
	G			
88	Mo Gahan			√
89	Louise Gaynor			√
90	Will Gilbert			√
91	Jacqui Gleeson			
92	Glenbrook Park Residents Association Ltd.	Wolfgang Schnittger		
93	Tanya Gould			√
94	Greystones Family Resource Centre	Caoimhe Kerins		
95	Greystones Rugby Football Club RFC	Donall Gannon	√	
96	Katie Gunn			√
	H			
97	Emma Hamilton			√
98	Leo Harmon	PD Lane Associates	√	
99	Sylvia Harmon			√
100	Kathy Hazell			√
101	Sarah Henderson			√
102	Evelyn Hughes			√
	I			
	J			

103	Sebastien Jegat			√
	K			
104	Kiva Kaneswaran			√
105	Aidan Kelly			
106	Ciara Kelly			√
107	Dara Kelly			√
108	James Kenny & Aisling Venables			√
109	Lorraine Kiernan			√
110	Emer Kilbride			√
111	Killincarrig Community Association	John Desmond		
112	Knockree Properties Ltd.	Auveen Byrne and Assoc	√	
113	Walter de Kretser			√
	L			
114	Gervaise Landy			
115	Laneree Ltd.	John Spain Associates	√	
116	leannekeane85@gmail.com			√
117	lennonsharon@yahoo.co.uk			√
118	Michelle Liddle			√
119	Michelle Lincoln			
120	Russell Lincoln			
121	Stephanie Lindsay			√
	M			
122	Jennifer Malone			√
123	Breda Mathews			√
124	Patrick McCusker		√	
125	Alan McGonnell			
126	Mary McGrane			√
127	Michael McGuire			
128	Dearbhla Mescal			√
129	Anne Morris			√
130	A. & C. Morrissey			
	N			
131	Patrick Neary			√
132	Julie Noonan			√
	O			
133	Emer O'Brien	BBA architecture	√	
134	Sam O'Brien			√
135	R. O'Caoimh (Kindlestown House)	Eoin J. Carroll Architects		
136	R. O'Caoimh (Convent Road lands)	Eoin J. Carroll Architects	√	
137	Siobhan & Jerry O'Donnell			√
138	Roisin O'Grady			√
139	Louis O'Meara			√
140	Karen and Doris O'Neill			
141	Paul O'Toole on behalf of landowners AP9: Bullford Action Plan	PCOT Architects	√	
142	Christine O'Rourke			√
	P			
143	Jack Phelan			√
144	Sandra Purcell			√
	Q			
145	Michael Quilty			

	R			
146	Reach for The Beach	Anne Stanley et al.		
147	Carol Redmond			√
148	Alan Richardson			
149	Grainne Roddy			√
150	Jackie Ryan			√
151	Maire Ryle			√
	S			
152	Paddy Shanahan	Anne O'Kane	√	
153	Sisters of the Holy Faith	IMG Planning	√	
	T			
154	David Tempany	Conroy Crowe Kelly	√	
155	Tesco Ireland Ltd.	GVA Planning		
156	Gretchen and Robin Thornton			
157	Veronica Tindal			√
158	Grace Toland			√
159	Ali Toolan			√
160	Townpark Estates Ltd.	PD Lane Associates	√	
161	Sarah Tracey (Fox's Farm)	BBA Architecture	√	
	U			
	V			
162	vrkelly@yahoo.ie			√
	W			
163	Sinead Wall			√
164	David J Walsh			√
165	Jason Walsh			
166	Richard Webb			√
167	Wilson family	Pat O'Connor & Associates	√	
168	Matthew Wilson			√
169	Rob Wood			
	X, Y, Z			
170	Andrea Young			√
171	Ian Young			√

PART II: MANAGER'S RECOMMENDED AMENDMENTS TO DRAFT GREYSTONES-DELGANY AND KILCOOLE LOCAL AREA PLAN (LAP) 2013-209

Manager's recommended amendments to the draft LAP are indicated as follows: new text in **red**,
deleted text in ~~blue~~

SECTION 1: Statutory and Contextual background

No amendments recommended

SECTION 2: Overall vision and development strategy

No amendments recommended

SECTION 3: Population and Housing

PROPOSED AMENDMENT 1

Section 3: Population and Housing

Sub-section 3.4: Objectives

Amend the plan as follows:

Density

RES5 *On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in 'Table 11.1: Zoning Matrix'.*

*In existing residential areas, infill development shall **generally** be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. **However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.***

PROPOSED AMENDMENT 2

Section 3: Population and Housing

Sub-section 3.4: Objectives

Amend the plan as follows:

Density

RES7

Notwithstanding the zoning objectives set out within this plan, lower density residential developments may be required at certain locations; where by virtue of environmental, topographical and service constraints, including lack of public mains infrastructure, poor road access, steep gradients, flooding issues and significant coverage of natural biodiversity; a lower density of development is preferable. *This objective applies to all land zonings within the plan area.*

~~Having regard to these type of constraints,~~ *In particular,* the planning authority will limit growth in the amount of housing, on lands zoned 'R2.5: Residential (2.5/ha)' and 'R5: Residential (5/ha)' along Blackberry Lane, Delgany and lands zoned RE: Existing Residential at Kindlestown Upper and Bellevue Demesne. In these areas housing shall generally be restricted to the development of low density single housing, subject to all matters being addressed to the satisfaction of the planning authority.

On land zoned R17/R5/R22 in the Kindlestown Upper/Coolagad vicinity, the design and layout of developments shall be appropriate to the topography of sites and the necessity to ensure that there is a visual transition between these developed lands and the unzoned agricultural lands/Kindlestown Hill to the rear of the site. Regard shall be paid to the protection of the visual amenity of the area, including views of Kindlestown Hill and to the objectives of the Blacklion ACA.

SECTION 4: Retail

PROPOSED AMENDMENT 3

Section 4: Retail

Sub-section 4.1: Retail Strategy

Amend **Section 4.1 Retail Strategy** as follows:

A number of centres within the settlement of Greystones-Delgany are designated Level 4 Neighbourhood Centres. Neighbourhood centres usually contain one supermarket ranging in size from 1,000-2,500m² with a limited range of supporting shops and retail services and possibly other services such as post offices or community facilities, grouped together to create a focus for the local population. These centres meet the local day-to-day needs of the surrounding residents. *The Wicklow County Retail Strategy indicates that there are some sites that are larger than the normal size standards, where larger footstones will be permitted, based on their historic use and the need to service considerable tranches of housing. At these locations, the scale of convenience outlet will be dictated by the overall size of the town, the catchment of the neighbourhood centre and its distance to the town core. It is considered that the Bellevue Road site falls into this category.*

In undertaking the review of the current LAP, regard has been paid to the role and function that that small local centres provide to local communities and to ensuring that the viability of the town centre is safeguarded. As such, the following centres are considered capable of fulfilling the role of **Neighbourhood Centres**: Blacklion (Lidl), Bellevue Road (Tesco/Donnybrook Fair), Mill Road (spread over 2 sites) and Charlesland (Superquinn). In addition, Delgany village is to provide the role of a Level 4 Neighbourhood Centre, however in recognition of its village identity, the centre is to be called a **Village Centre**.

PROPOSED AMENDMENT 4

Section 4: Retail

Sub-section 4.2: Objectives

Amend RT3 as follows:

Greystones Town Centre

RT3 *To promote the development of retailing in the Core Retail Area of Greystones town centre (as indicated on Map A). A broad range of retail formats shall be promoted in Greystones town centre, including higher, middle and lower order comparison, super-store and super-market retail format. The planning authority shall not permit **large scale** retail development in other locations, unless it is satisfied that there will be no adverse effect on the vitality and viability of the retail core.*

Development proposals not according with the objective to support the vitality and viability of the Core Retail Area must demonstrate compliance with the sequential approach. The order of priority for large scale retail developments shall be:*

- 1. Core Retail Area*
- 2. Other TC zoned sites*
- 3. Zone 1 of the Greystones Harbour and North Beach Action Plan and neighbourhood/village centres*
- 4. Edge of town centre sites*
- 5. Out of centre sites*

Large scale retail development shall not be permitted on lands zoned 'Small Local Centre'.

** footnote: The sequential approach to the location of retail development shall be in accordance with the principles set out in 'Retail Planning Guidelines for Planning Authorities' (DoECLG, 2012).*

PROPOSED AMENDMENT 5

Section 4: Retail

Sub-section 4.2: Objectives

Amend RT9 as follows:

Neighbourhood Centres

RT9 *To provide for the development of a mix of uses within the neighbourhood centres of Blacklion, Bellevue Road, Mill Road (spread over two sites) and Charlesland., which provide for the day-to-day needs of the local community, to a degree that is akin to their designation as a Level 4 Centre.*

The planning authority may allow for the development of the Bellevue Road neighbourhood centre to a size that exceeds the normal standards as set out in the Wicklow County Retail Strategy (Wicklow CDP 2010-2016), subject to the proper planning and sustainable development of the area. All applications will be considered on a case by case basis, having regard to the Wicklow County Retail Strategy and Retail Strategy for the Greater Dublin Area. Particular attention shall be paid to ensuring that the scale of convenience offer is appropriate to the size of the town, the catchment of the

neighbourhood centre and the impact on the viability and vibrancy of the town centre and other neighbourhood centres in the locality.

PROPOSED AMENDMENT 6

Section 4: Retail

Sub-section 4.2: Objectives

Amend Objective RT12 as follows:

Retail Warehousing

RT12 *It is the objective of the Council to generally not permit the development of retail warehousing in the plan area, except where evidence in the form of a Retail Impact Study is provided to demonstrate that there is a proven need for retail warehousing within this area and subject to compliance with the Wicklow County Development Plan 2010-2016, Retail Strategy for the Greater Dublin Area 2008-2016 and the Retail Planning Guidelines for Planning Authorities (DoECLG, 2012). Subject to this objective, retail warehousing shall be not normally permitted but open for consideration within E, E1 and TC zones. It shall not be permitted at any other location.*

PROPOSED AMENDMENT 7

Section 4: Retail

Sub-section 4.2: Objectives

Amend RT15 as follows:

Environmental Amenity of the Public Realm

RT15 *To preserve and enhance the amenity of the public realm.*

Development proposals shall be sustainable and contribute to the improvement of the environmental amenity of all public areas in the plan area through the following ways:

- The creation of quality space and an enhanced public realm, through improvements to public spaces including improved paving, signage, lighting, street furnishings, tree planting and landscaping of car parking areas. The palette of paving material, lighting, signage and furniture fittings for use should be chosen with regard to the particular identity of each centre, so that enhancements can, as a whole, be visually coherent.*
- Improve connectivity between residential areas, the harbour, seafront and town centre areas, as appropriate.*
- Priority of movement for pedestrians, cyclists and public transport should be ensured, so that the impact of the private car is moderated. In particular, the Council will promote the development of wide footpaths throughout the plan area.*
- Promote the development of quality shopfronts, and in particular promote the development of traditional shopfronts which contribute to the distinctive character of the centres.*
- Placing underground of overhead power lines where possible.*
- The protection of natural and built heritage.*

- The development of public toilets and public information boards at appropriate locations, particularly in the vicinity of the Harbour.
- Appropriate controlling of advertising and signage in the interests of protecting the visual amenity of the area and ensuring the safety of the public.
- The promotion of high quality urban and architectural design.

PROPOSED AMENDMENT 8

Section 4: Retail

Sub-section 4.3: Opportunity sites

Amend **OP3: La Touche Hotel, Trafalgar Road** as follows:

OP3: La Touche Hotel, Trafalgar Road

- To facilitate the redevelopment of the site for a mix of uses, including commercial, tourist, leisure, office and residential uses, in accordance with the TC zoning objective.
- Any development on the site shall be in accordance with the objective to preserve the character of the Harbour ACA.
- ~~Subject to enabling development that meets modern requirements, it is an objective to retain external facades and internal features of interest, where this is possible.~~
- Protect the amenity of existing residential properties in the area.

SECTION 5: Employment and economic development

No amendments recommended

SECTION 6: Tourism

PROPOSED AMENDMENT 9

Section 6: Tourism

Sub-section 6.2: Objectives

Amend **TOUR1** as follows:

TOUR1 To promote and facilitate the **sustainable** development of tourism and recreational related development within the overall plan area, **at appropriate locations**. Tourism and recreational related development shall be located on suitably zoned land within the settlement boundaries of Greystones/Delgany and Kilcoole. Applications for tourism and recreational related developments on zoned land (e.g. Greenbelt lands), outside the settlement boundaries shall be determined on the basis of policies that apply to the rural area, as set out in the Wicklow County Development Plan, 2010-2016, and in particular, TR4 of the CDP.

PROPOSED AMENDMENT 10

Section 6: Tourism

Sub-section 6.2: Objectives

Amend TOUR3 as follows:

TOUR3 *To support and facilitate, in co-operation **and consultation** with the relevant bodies **such as NPWS**, the formalisation of **an appropriate** coastal walkway between Greystones-Delgany and Kilcoole and the development of **an appropriate** coastal cycle route. Any such proposal would be subject to appropriate assessment requirements in accordance with the Habitats Directive. No development shall be permitted that would have adverse impacts (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites.*

PROPOSED AMENDMENT 11

Section 6: Tourism

Sub-section 6.2: Objectives

Amend TOUR6 as follows:

TOUR6 *To provide for the development of an Integrated Tourism/Leisure/Recreational Complex at Druids Glen Golf Course, Woodstock Demesne, in accordance with the objectives set out for ITLRCs in the Wicklow County Development Plan, 2010-2016, and to promote the development of linkages between the settlement of Kilcoole and this tourist facility **in an environmentally sustainable manner**.*

SECTION 7: Social Infrastructure

No amendments recommended

SECTION 8: Transport and service infrastructure

PROPOSED AMENDMENT 12

Section 8: Transport and service infrastructure

Sub-section 8.1: Infrastructure Strategy

Amend **Section 8.1 Infrastructure Strategy** as follows:

The strategy for the development of transport and service infrastructure within the plan area shall be as follows:

- **Maximise advantages associated with the area's strategically important location on a key transportation spine along the N/M11 and Dublin-Rosslare train route, and to provide for the development of transport services having regard to relevant higher order strategies including the 'Spatial Planning and National Roads Guidelines' (DoECLG, 2012).***
- **Support the development of transportation infrastructure and services in line with the NTA policies and strategies including the 'GDA Draft Transport Strategy 2011-2013' and NTA investment projects for the area.***

- *Provide transportation and service infrastructure to provide for the needs of existing and future populations and to provide for the development of zoned lands.*
- *Improve the accessibility and safety of roads in the plan area.*
- *Promote the development of public transport facilities.*
- *Promote walking and cycling throughout the plan area.*
- *Address flood risk”*

PROPOSED AMENDMENT 13

Section 8: Transport and service infrastructure

Sub-section 8.2: Objectives – Roads & Transportation

Amend RO1 as follows:

RO1 ~~Provide~~ *Reserve a land corridor to provide for* a new road from the R761 at Sea View to lands within AP1:Coolagad Action Plan. The new road shall provide local access to zoned lands within the lifetime of the plan and shall, *subject to feasibility, need and design*, in the long term provide a northern access route from Greystones to the N11.

PROPOSED AMENDMENT 14

Section 8: Transport and service infrastructure

Sub-section 8.2: Objectives – Roads & Transportation

Objective R07 (Table 7.1)

(a) Omit RO7 as proposed under the Draft LAP and replace with new RO7 objective for the improvement of the R761 from Burnaby Heights to Kilcoole, as appropriate, i.e.

From:

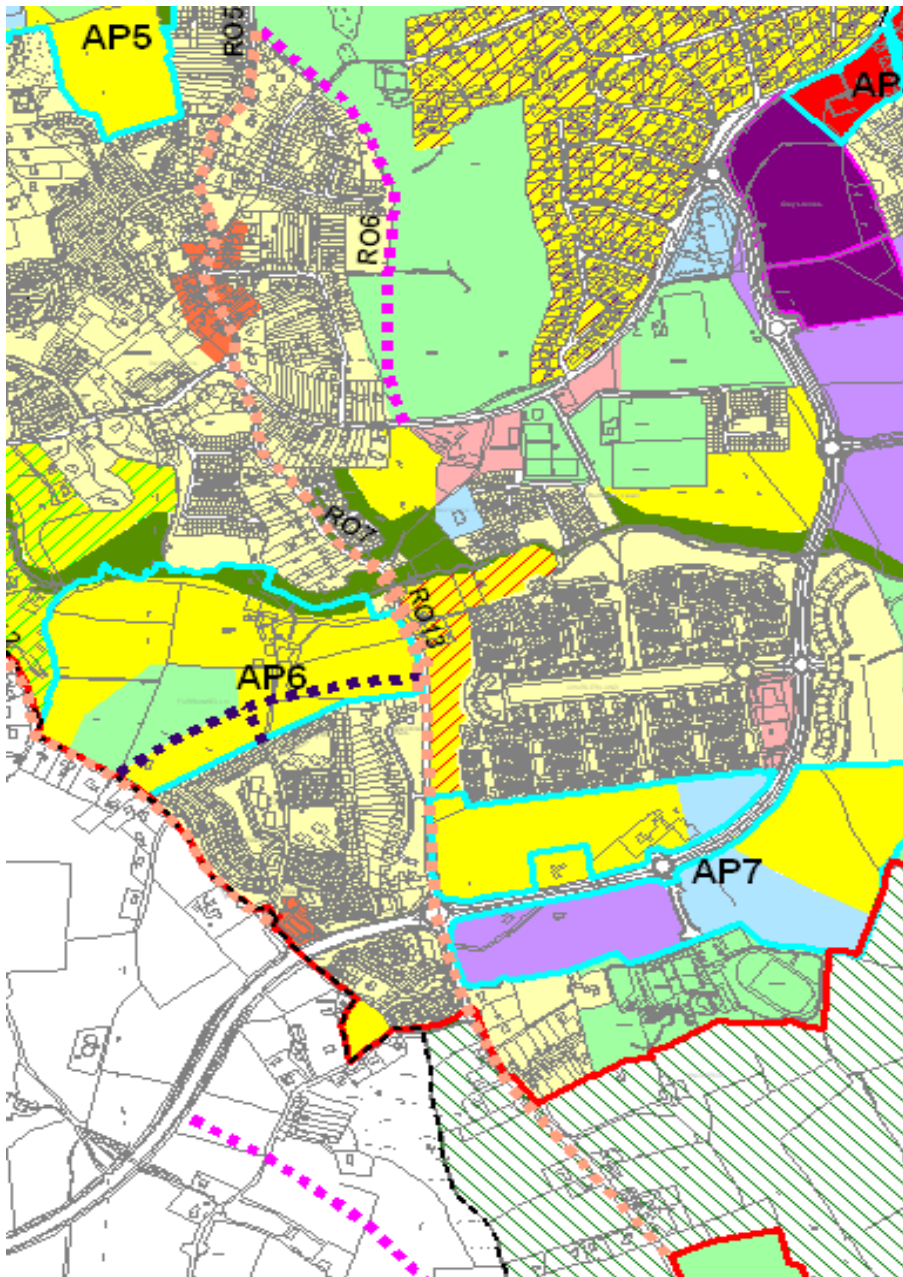
~~RO7: Provide for a local access road to facilitate the development of zoned lands, incorporating the possibility of a future bridge over the Three Trouts Stream to allow for linkage from Mill Road to the R761.~~

To:

RO7: Improvement of the R761 from Burnaby Heights to Kilcoole, as appropriate.

From:

14



(Wider view)

PROPOSED AMENDMENT 15

Section 8: Transport and service infrastructure

Sub-section 8.2: Objectives – Roads & Transportation

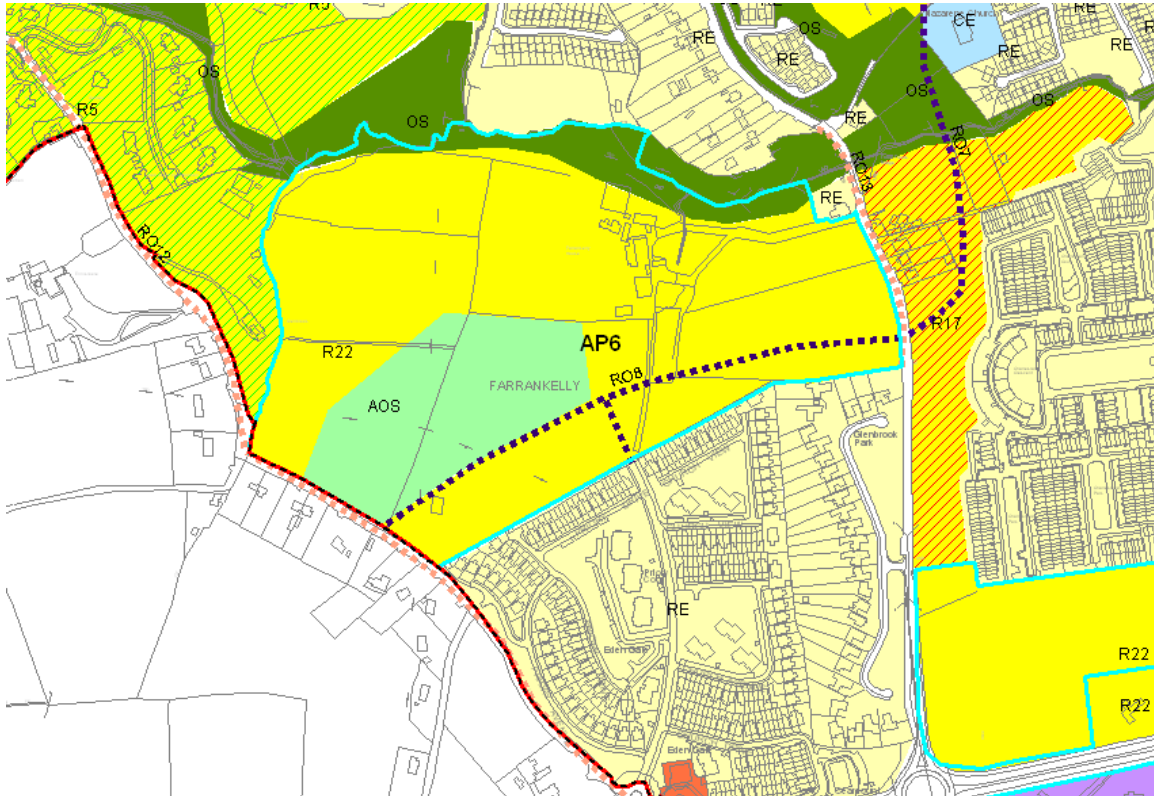
Objective R08 (Table 7.1)

(a) Amend R08 as follows:

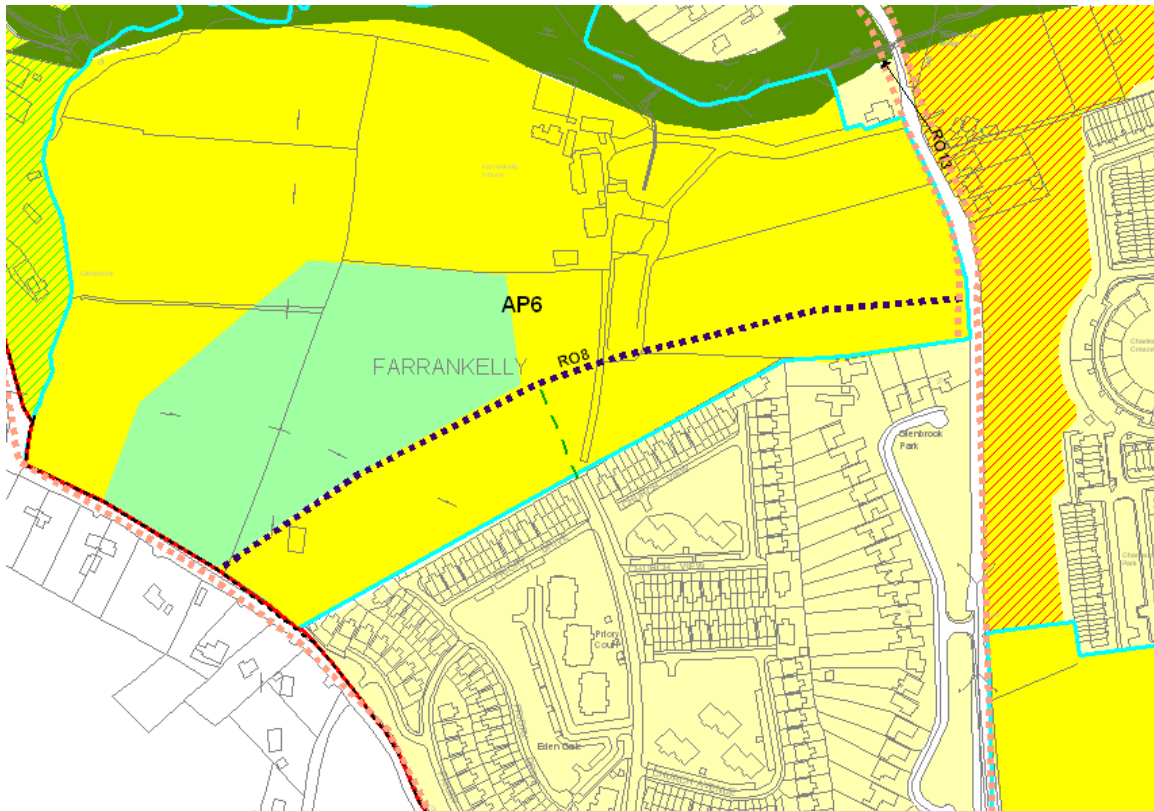
R08 Provide for a local access road to facilitate the development of zoned lands and to provide for the development of a through road from Priory Road to R761 and linkage to Mill Road (R07) ~~and Eden Gate~~.

(b) Amend map as follows:

From



To



PROPOSED AMENDMENT 16

Section 8: Transport and service infrastructure

Sub-section 8.2: Objectives – Roads & Transportation

Objective R09 (Table 7.1)

(a) Amend Objective RO9 as follows:

R09 *To provide for the development of a Western Distributor Road to bypass Kilcoole. The southern section of the route shall be developed according to one of the following two options: (i) southern junction of the new road shall be provided at the intersection with Kilcoole Industrial Estate, Creowen and route to extend northwards, or (ii) southern junction of the new road to be provided at the current entrance of Bullford Business Campus and road to extend northwards through the Business Park, including necessary upgrades and widening of the current estate road. As option (ii) poses constraints regarding road alignment and standards of design, option (i) is the preferred option. The development of the road according to option (ii) is subject to the agreement of the planning authority, in conjunction with the Roads Section, pending the preparation of a traffic analysis and design study.*

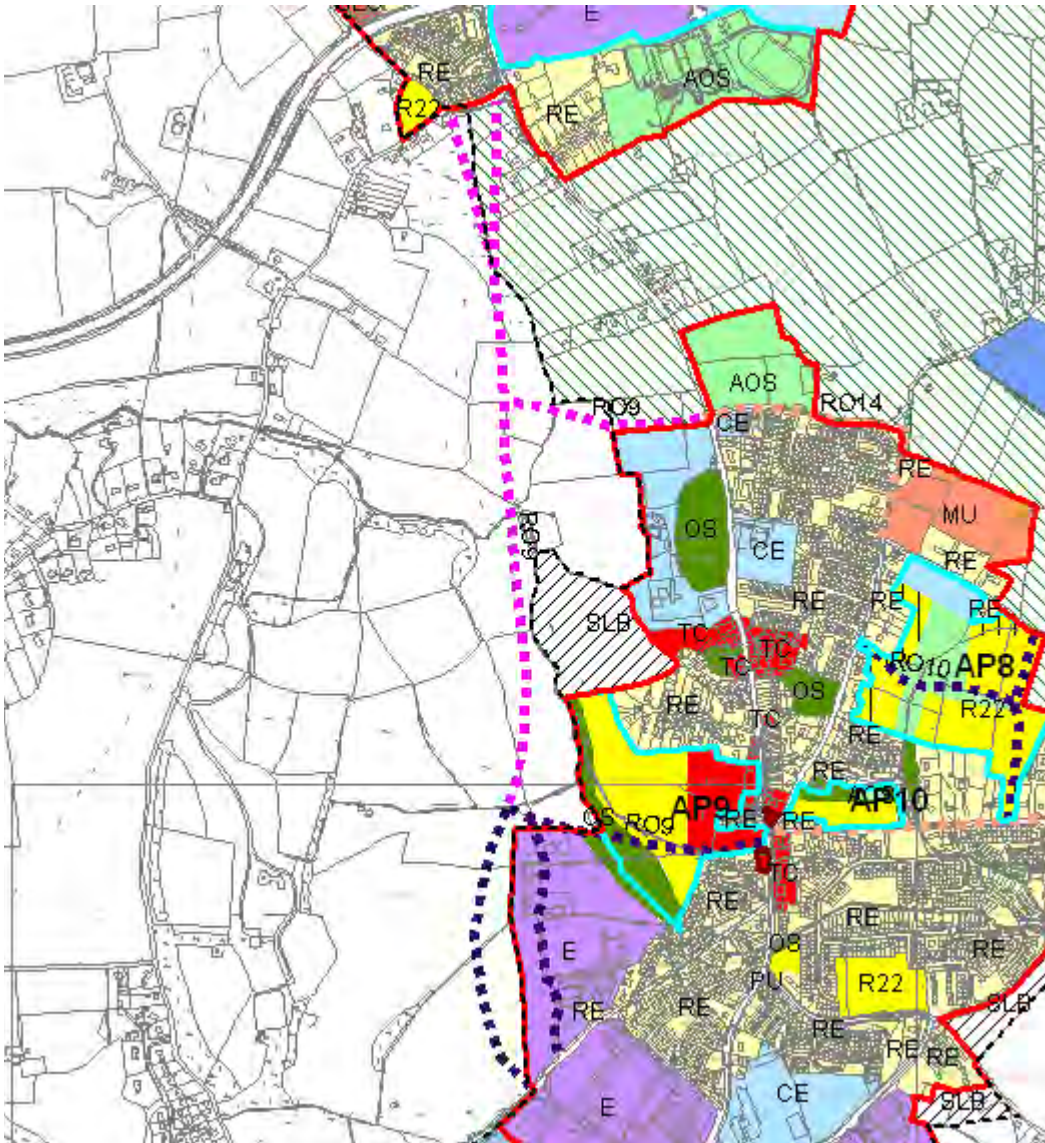
~~*The northern section of the route shall be developed, in the long term, according to one of the following two options: (i) linkage to the R761 at Farrankelly, or (ii) linkage to Priory Road to the west of Eden Wood/ Farrankelly Close.*~~ *The northern section of the route shall be developed in the long term, with linkage to the R774.*

It is a long term objective to develop an additional link between R761 intersection with Lott Lane and the Western Distributor Road.

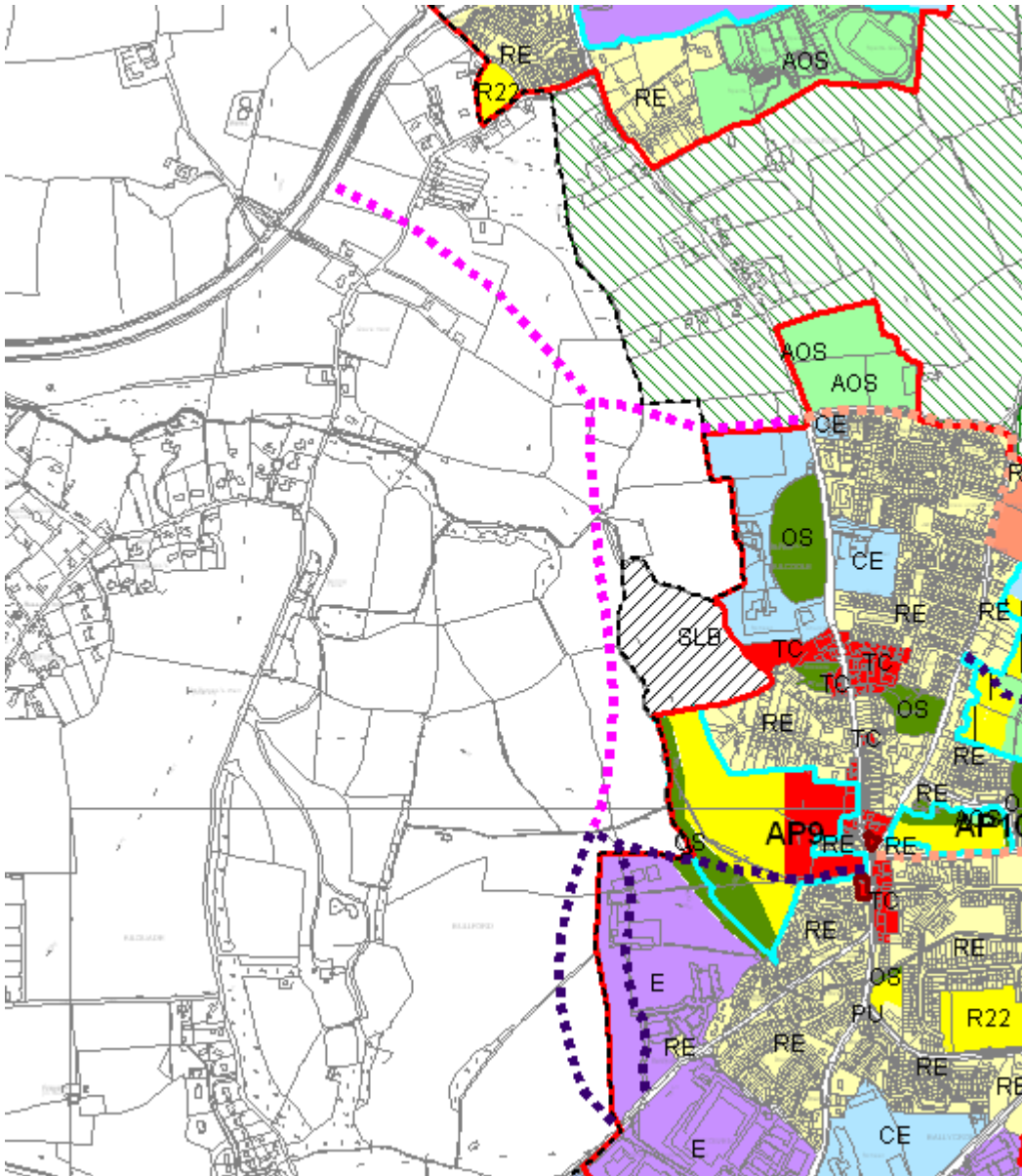
To provide for the development of a local access road in conjunction with the development of zoned lands at AP9: Bullford Action Plan and to provide for the development of a through link road from Main Street to the Western Distributor Road. This section of the route is necessary for the opening up of zoned lands (AP9 and E lands at Bullford Farm). Only 50% of development on these lands shall be permitted before the southern part of this road is completed.

(b) Amend Map A as follows:

From:



To:



PROPOSED AMENDMENT 17

Section 8: Transport and Service Infrastructure

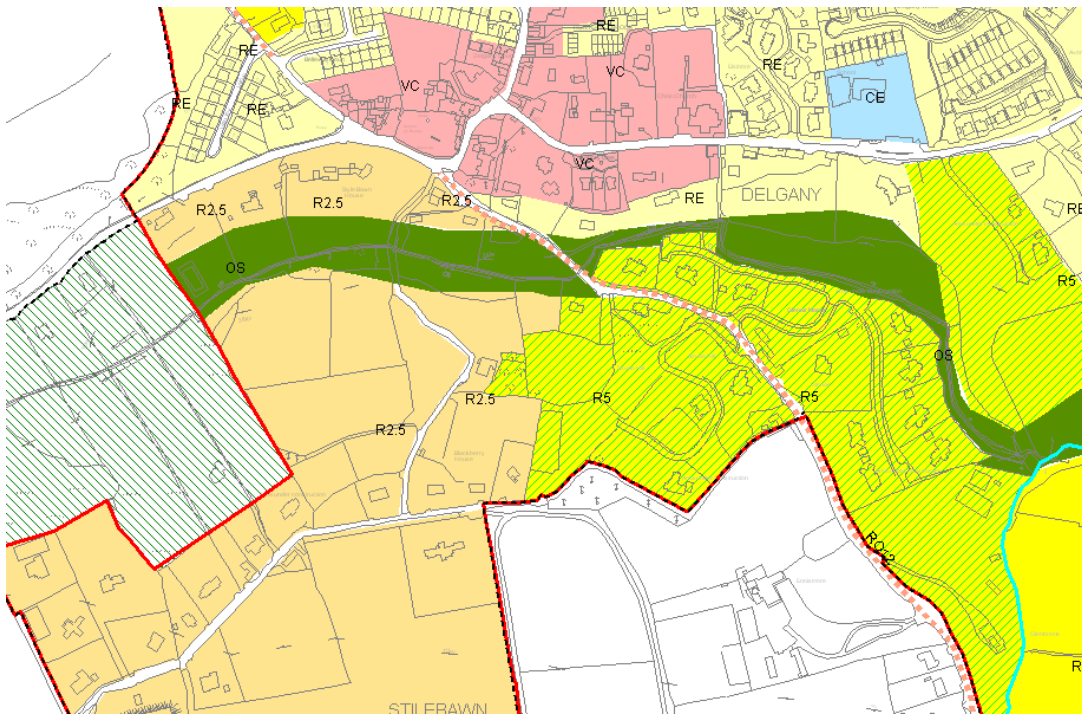
Sub-section 8.2: Objectives – Roads & Transportation

(a) Table 7.1: Roads Objectives - include a new road objective in the plan

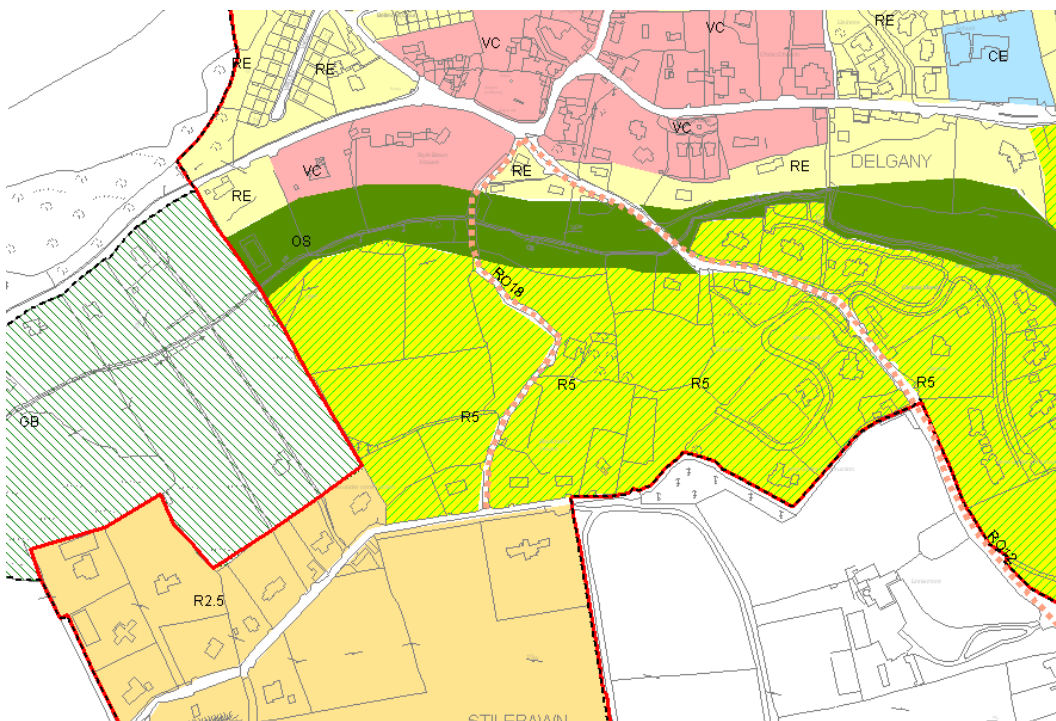
RO18 *To provide for improvements to width, alignment, public lighting and pedestrian facilities along Blackberry Lane and provide for improvements to the junction of Blackberry Lane with the R762 at Delgany village.*

(b) Amend Map A as follows:

From



To



PROPOSED AMENDMENT 18

Section 8: Transport and service infrastructure

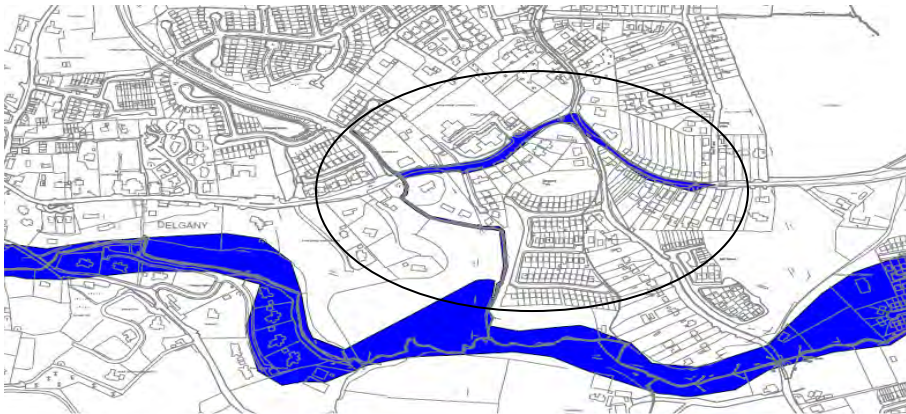
Sub-section 8.2: Objectives - Flooding

Flood Map C

Amend the flood maps as follows

(a) R762 at Delgany Wood

From:

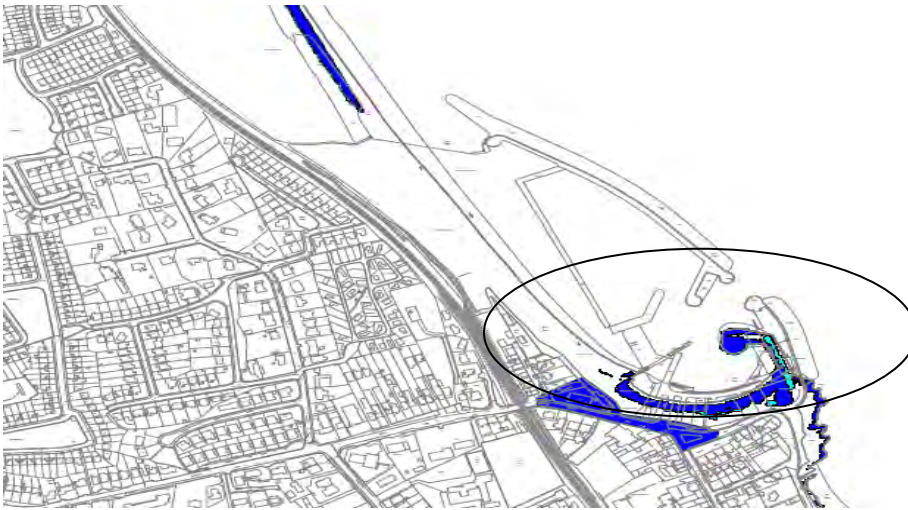


To:



(b) Greystones Harbour

From:

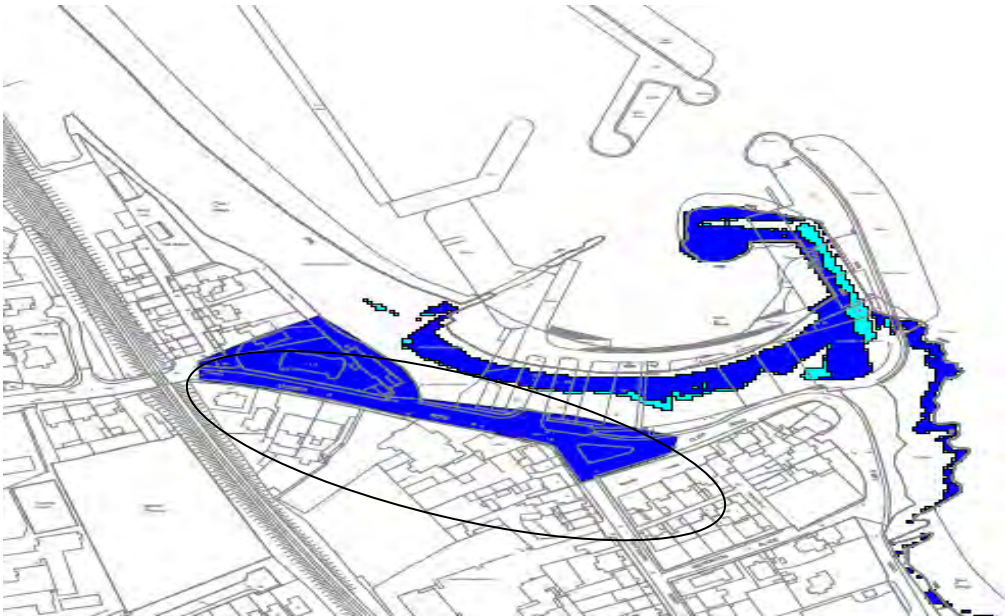


To:

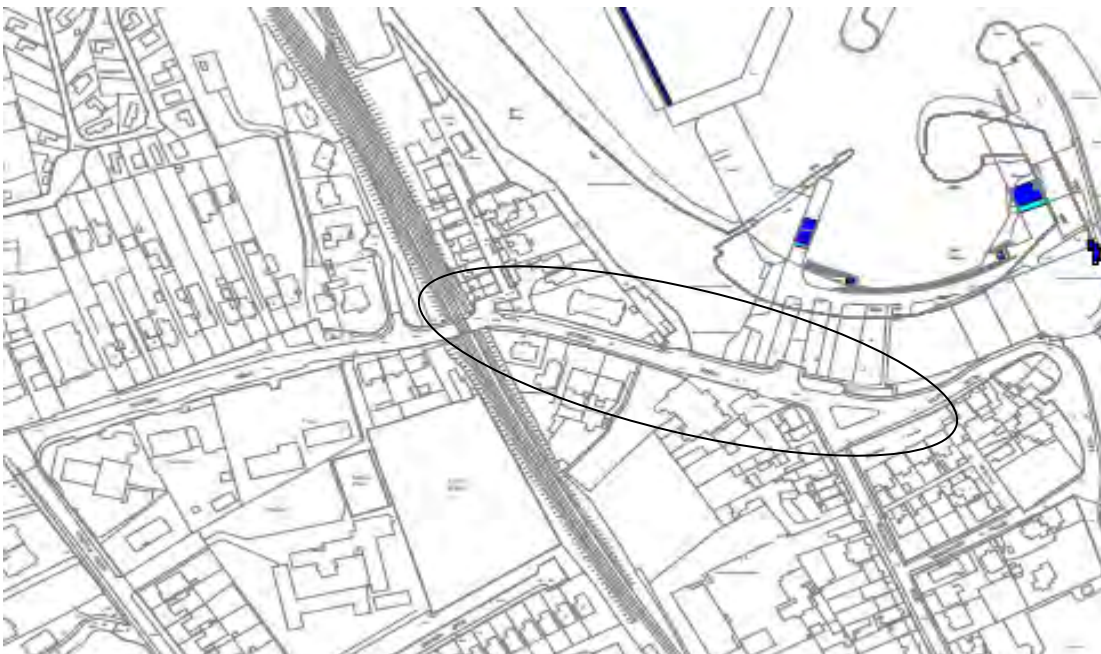


(c) Victoria Road

From:



To:



SECTION 9: Natural and Built Heritage

PROPOSED AMENDMENT 19

Section 9: Natural and Built Heritage

Sub-section 9.2: Objectives

Amend Objective HER 12 as follows:

HER12 To preserve the character of Architectural Conservation Area's (ACAs), in accordance with Appendix B. The following objectives shall apply to ACAs:

- Development will be controlled in order to protect, safeguard and enhance the special character and environmental quality of ACAs.
- The buildings, spaces, archaeological sites, trees, views and other aspects of the environment that form an essential part of the character of an ACA will be protected.
- **Proposals involving the demolition of buildings and other structures that contribute to the special interest of ACAs will not be permitted**
- The design of any development in an ACA, including any changes of use of an existing building, shall preserve and/or enhance the character and appearance of the ACA as a whole.
- Schemes for the conservation and enhancement of the character and appearance of an ACA will be promoted.
- The character and appearance of the urban public domain within an ACA shall be protected and enhanced. The Council will seek to work in partnership with local community and business groups to implement environmental improvements within ACAs.
- Within the Church Road ACA, alterations to the front boundaries to accommodate off-street car parking, will not normally be permitted.
- Historic items of street furniture and paving within ACAs shall be retained, restored and repaired.
- All electricity, telephone and television cables within ACAs shall be placed underground where possible.
- The placing of satellite dishes, television aerials, solar panels, telecommunications antennae and alarm boxes on front elevations or above the ridge lines of buildings or structures will generally be discouraged within Architectural Conservation Areas, except where the character of the ACA is not compromised.

It should be noted that the designation of an Architectural Conservation Area does not prejudice innovative and contemporary design. The principle of a contemporary and minimalist design style will be encouraged within ACAs, provided it does not detract from the character of the area. It is considered that new buildings should be of their own time in appearance and should not replicate the style and detailing of heritage buildings. The replication of historic architectural styles is considered to be counter productive to heritage conservation in principle as it blurs the distinction between what is historic and what is contemporary and can lead to the emergence of poorly considered and inauthentic buildings.

SECTION 10: Action Plans

PROPOSED AMENDMENT 20

Section 10: Action Plans

Sub-section 10.2: Coolagad Action Plan

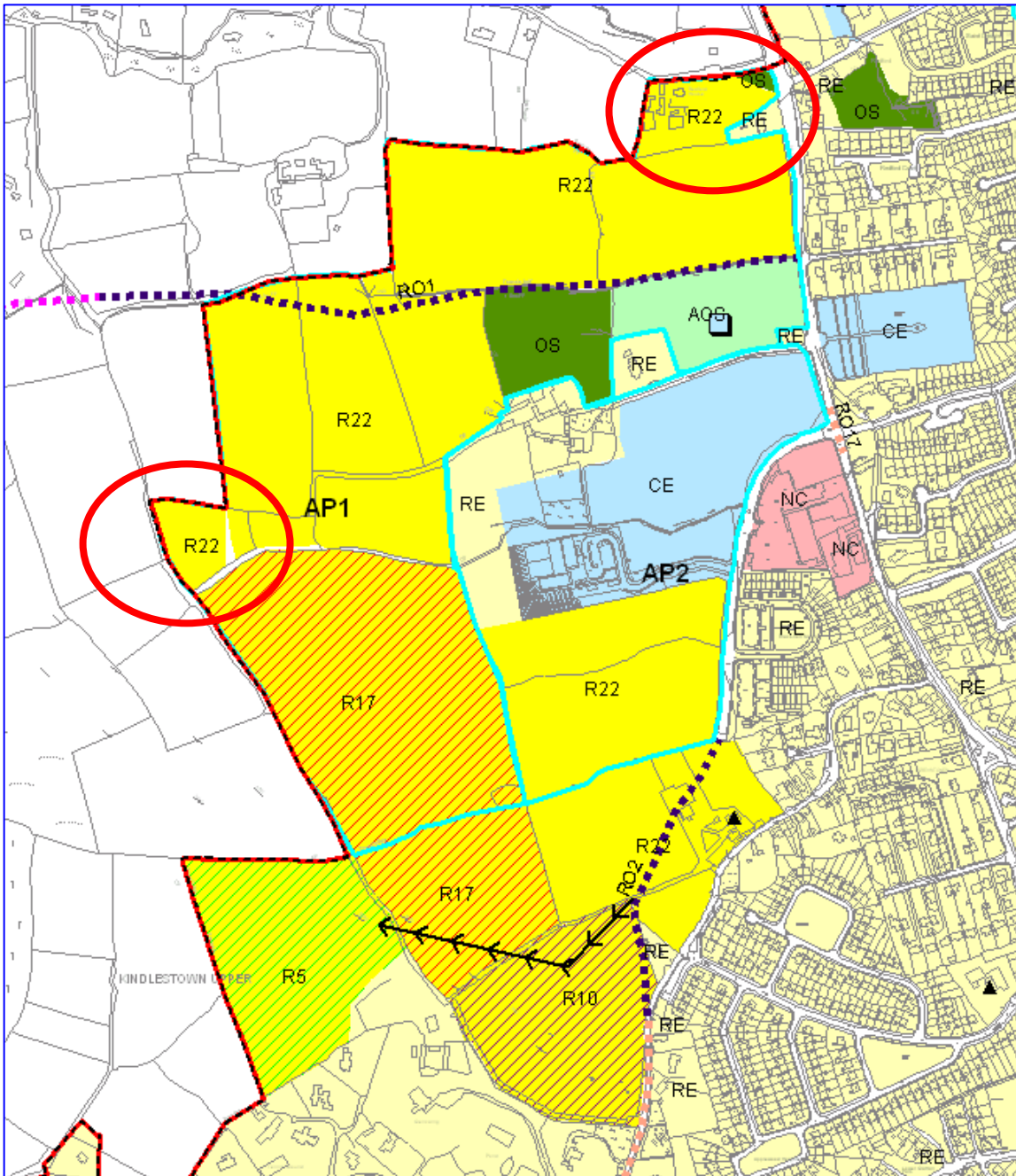
(a) Amend text as follows:

This Action Area is located at Templecarrig Lower, Coolagad and Kindlestown Upper, on a site approximately 36ha in size. This area shall be developed for a mix of uses including residential, community and open space, in accordance with the following:

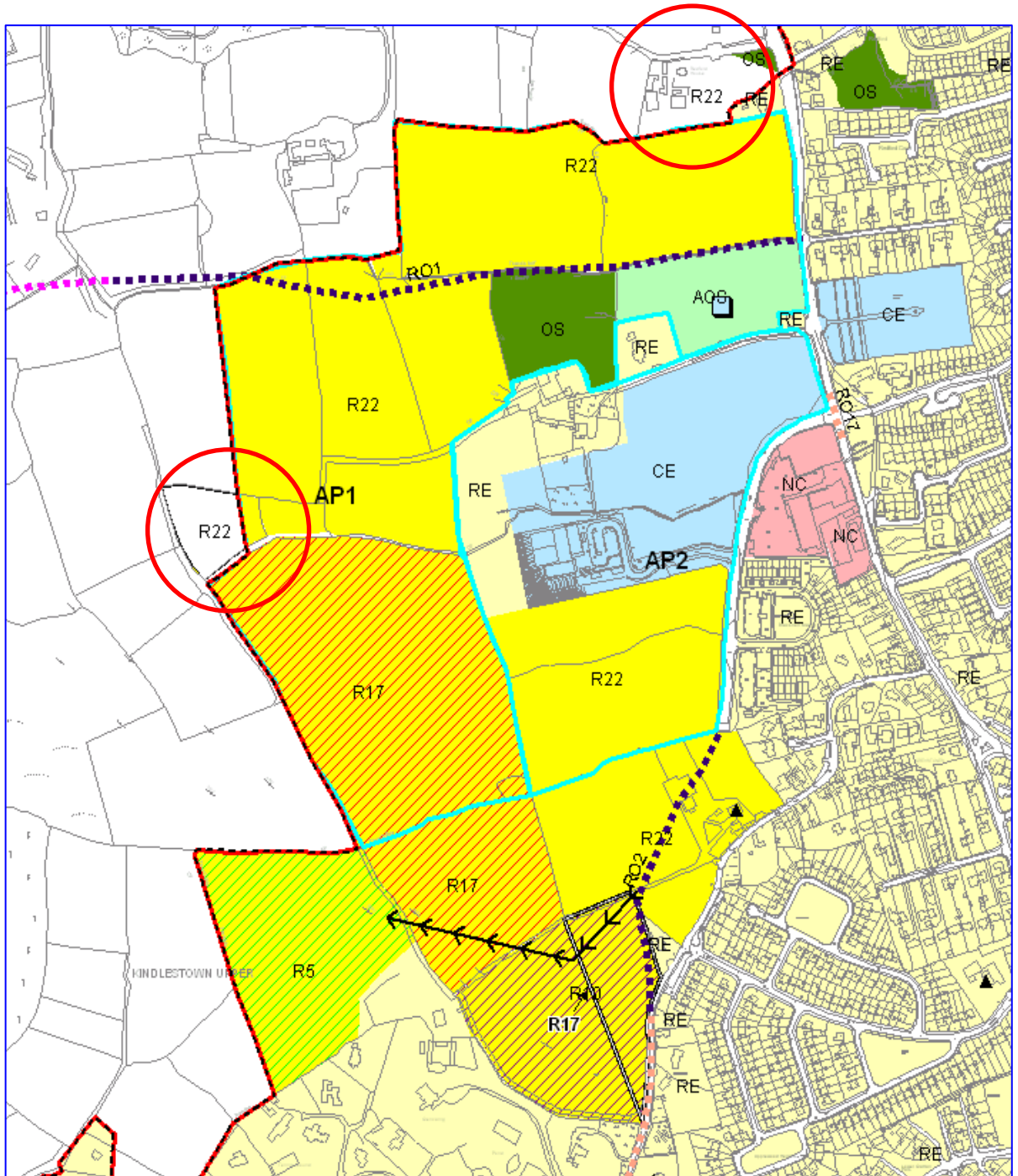
- ~~e. 31ha~~ **c. 29ha** for the development of residential units.
- A minimum of 4ha of land shall be provided for active open space including public park, MUGA and playground, in accordance with the requirements of the Community and Enterprise Section of the Council.
- A community centre and/or other community facility/facilities shall be provided to serve the communities of this area. In determining requirements for community facilities, a community services audit shall be carried out and consultation shall be undertaken with the Community and Enterprise Section of the Council.
- A new road shall be provided for local access to zoned lands and shall be designed to facilitate the achievement of the long term objective to provide a northern access route from Greystones to the N11, in accordance with roads objective RO1, 'Section 7: Transport and Service Infrastructure' of this plan.
- Greenroutes shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre.
- The residential amenity of existing and future adjoining properties shall be protected.
- Protection of natural and built heritage, including rivers and trees.
- In designing the development of this area attention shall be paid to reducing the visual impact of the development on views towards Kindlestown Hill, from the R761. In particular, development on lands to the west of the Blacklion Action Plan shall be of a design and layout that is appropriate to the typography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site.
- Regard shall be paid to ensuring appropriate links and transition of scale, design and layout of housing, with lands adjoining the boundary of the Action Plan, including lands within AP2: Blacklion Action Plan and lands zoned for housing to the south at Kindlestown Upper.
- Phasing shall be as follows:
 - Phase 1: 200 units and completion of road
 - Phase 2: 150 units and provision of open space (AOS and OS)
 - Phase 3: 150 units and community centre/facility
 - Phase 4: remainder of units.

(b) Amend Map A as follows:

From



To:



PROPOSED AMENDMENT 21

Section 10: Action Plans

Sub-section 10.4: AP3: Greystones Harbour and North Beach Action Plan

Amend as follows:

Zone 2 – Public Park

Creation of an attractive linear coastal public park to include:

- *Provision of new landscaped public park for passive recreation and some appropriate sporting uses, incorporating Wicklow Coastal Walk and access to any future Heritage Park at the site of medieval Rathdown*
- *Appropriate planting (using native plants suited to the local environment and using seed of local provenance where possible), walkways, signage and seating to form a pleasant and successful outdoor public open space*
- *Capping and landscaping of the old landfill dump, with appropriate planting (using native plants suited to the local environment and using seed of local provenance where possible), to form an integral part of the park*
- *Creation of a sandy cove at the north end of the proposed development with good beach access from adjacent public car parking*
- *Provision of road access and public car parking with suitably located toilet and washroom facilities*
- *Provision of coastal protection in the area of the old landfill, together with beach nourishment and management from the harbour/marina to at least 250m past the Gap Bridge. ~~Cliffs to be re-graded and high level and low level walks with occasional access to the beach provided with appropriate planting on the slopes~~*

PROPOSED AMENDMENT 22

Section 10: Action Plans

Sub-section 10.7: Farrankelly Action Plan

(a) Amend text as follows:

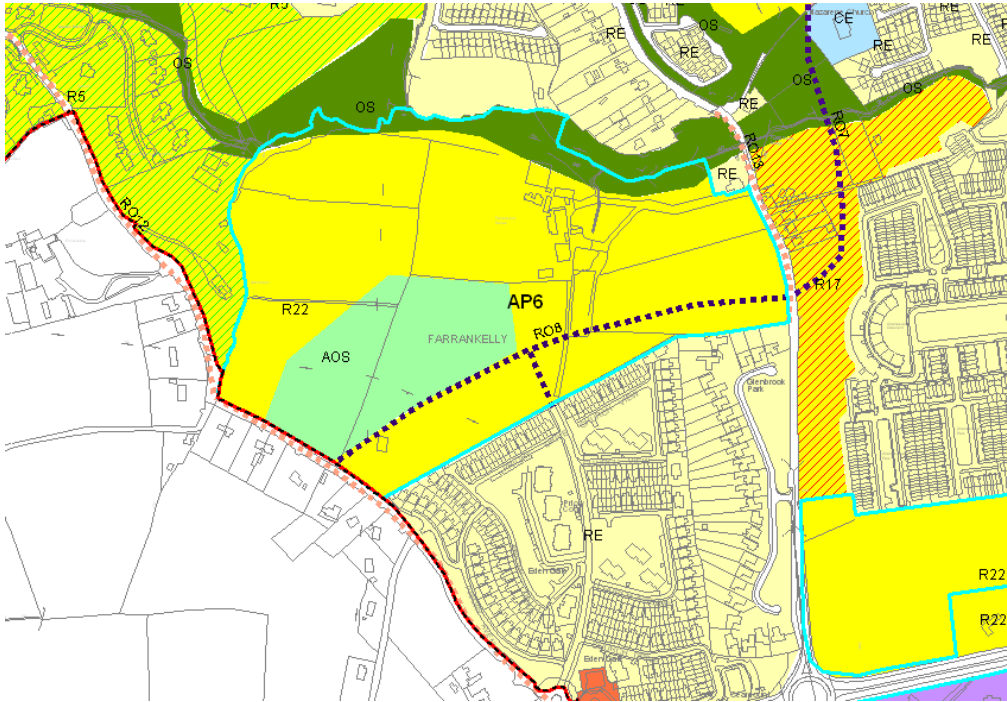
10.7 AP6: FARRANKELLY ACTION PLAN

This action plan is located at Farrankelly, on a site approximately 24ha in size. This are shall be developed for a mix of uses including residential and active open space, in accordance with the following:

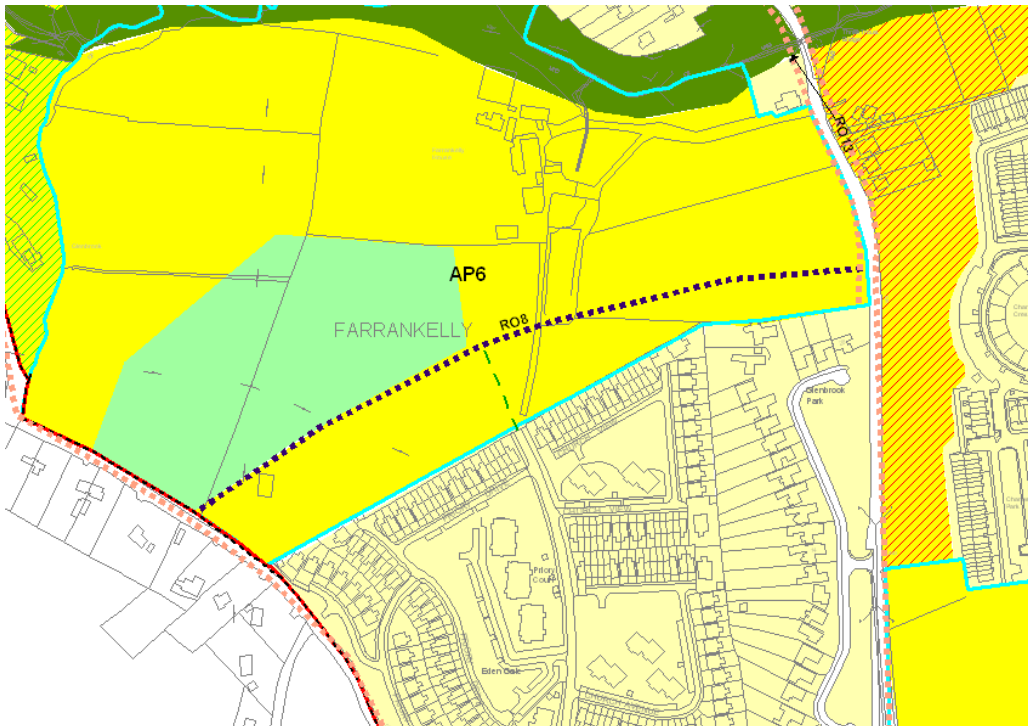
- *Approximately 17ha to be developed for residential use.*
- *Approximately 4.5ha of land shall be provided for active open space.*
- *Lands identified at risk of flooding (under the FRA) shall be reserved as open space.*
- *Roads shall be provided in accordance with RO8, Section 7 of this plan.*
- *Provide for the development of a 'greenroute' for the provision of pedestrian and cycling facilities linking the RO8 road objective to Eden Gate. This route shall be a minimum width of 10m, in order to facilitate the development of a possible traffic route, should the need arise in the future.*
- *The residential amenity of existing adjoining properties shall be protected.*
- *Protection of natural and built heritage, including rivers and trees.*
- *No more than 50% of houses shall be delivered prior to the provision of the active open space.*

(b) Amend map as follows:

From



To



SECTION 11: Zoning

PROPOSED AMENDMENT 23

Section 11: Zoning

(a) Below Table 11.1 Zoning Matrix (paragraph 3)

Amend the plan as follows:

*Uses generally appropriate for **centres** include retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing/care homes, parking, residential development, commercial, office, ~~some~~ tourism and recreational uses **including sports uses**, community, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the CDP.*

(b) Below Table 11.1 Zoning Matrix (paragraph 5)

Amend the plan as follows:

*Uses generally appropriate for **community and educational** zoned land include community, educational and institutional uses include burial grounds, places of worship, schools, training facilities, community hall, sports and recreational facilities, **residential institutions**, utility installations and ancillary developments for community, educational and institutional uses in accordance with the CDP.*

Appendix A: Background analysis

PROPOSED AMENDMENT 24

Appendix A: Background analysis and calculation of land required for particular purposes

Section 1: Residential Zoning

Table 1.3: Make any changes necessary consequent to adopted zoning changes

Appendix B: LAP Heritage Features

PROPOSED AMENDMENT 25

Appendix B: LAP Heritage Features

Section 3: Architectural Conservation Areas

(a) Sub-section 3.6: Greystones Harbour Area ACA (proposed)

Amend as follows:

Character

The ACA is characterised by its seaside location and a predominance of well preserved 19th century buildings which includes houses, public buildings and a small number of commercial premises. There are fine semi-detached Victorian houses and terraces at Bayswater Terrace,

Simonton Place and Marine Terrace. The former Coastguard station, now a Garda Station, is a significant public building occupying a terrace of eight houses, part two-storey and part three-storeys. The La Touche Hotel, although no longer in use, remains a significant local landmark and a reminder of the area's late Victorian / Early Edwardian seaside resort popularity. The original building occupies a prominent elevated position and an extensive associated site and contributes significantly to the special interest of the area. There are two churches; the Greystones Presbyterian Church on Trafalgar Road and the Church of the Holy Rosary on La Touche Road, the latter occupying a large site which includes a car park to the rear. The two schools; St. Bridget's National School and St. David's Secondary school are both modern buildings with flat roofs. Evidence of Greystones' earlier pre Victorian origins as a small fishing settlement can be found in the single storey vernacular style buildings along the west side of Trafalgar road, while Bethel terrace contains a fine example of Georgian architecture.

Proximity to the coast and the views of the sea to the east and north are key characteristics of this area. There is an extensive and accessible coastal open space along the length of Marine Road and Cliff Road. This area is of high amenity value and is an integral backdrop to the harbour area ACA. Other important open spaces include the hard landscaped triangular area with ship's anchor in front of Bayswater Terrace which contributes greatly to the local seaside character, and the car park on Trafalgar road which is pleasantly screened by trees and vegetation. Many of the houses have small front gardens, with planting and boundary hedging that softens the overall visual appearance of the built environment.

The area is characterised by:

- Predominance of two storey semi detached and terraced house with rendered finishes, moulded quoins and slate roofs.
- The building facades are characterised vertically orientated sash windows, timber panelled doorways and fanlights, many chimneys are rendered with corbelled caps and clay pots.
- Houses generally set back from street and surrounded by low roughcast rendered walls and square rendered gate pillars, with small front gardens.
- Pebble encrusted coping where used on boundary walls adds a local distinctiveness and seaside character.
- There are some well preserved traditional style shopfronts
- The views of the sea and coast with an extensive green open space running along Marine Road and Cliff road and associated hard landscaping, paths and benches
- The Victorian seaside resort character as represented by the original building of the La Touche Hotel

(b) Sub-section 3.8: Architectural Conservation Areas and Development

Amend as follows:

3.8 ARCHITECTURAL CONSERVATION AREAS AND DEVELOPMENT

When submitting a planning application for works to a non-protected structure located in an Architectural Conservation Area, additional information may be requested by the Planning Authority, depending on the extent and likely impacts of the development proposed.

In principle, applications for development which are not consistent with the character, policies and objectives for Architectural Conservation Areas will not be granted planning permission.

In consideration of applications for new buildings, alterations and extensions affecting Architectural Conservation Areas, the following principles apply:

- Proposals will only be considered where they positively enhance the character of the Conservation Area.
- **Proposals to demolish buildings and other features which contribute to the special interest of the ACA will not be permitted**
- New buildings should, where appropriate retain the existing street building line.
- The mass of the new buildings should be in scale and harmony with the adjoining buildings and the area as a whole, and the proportions of its parts relate to each other and to the adjoining buildings
- The Council shall actively encourage the reinstatement of historically accurate architectural detailing on buildings of heritage interest in accordance with good conservation practice.
- The introduction of roof-lights to buildings of heritage or historical value should in principle be limited to the rear of the building.
- A high standard of shop front design relating sympathetically to the character of the building and the surrounding area will be required.
- The materials used should be appropriate to the character of the area. Proposals to repair rather than replace original features will be encouraged, and where replacement does occur similar materials and compatible design will be required.
- Planning applications in Architectural Conservation Areas should be in the form of detailed proposals, incorporating drawings of full elevation treatment, colours and materials to be used.

MISCELLANEOUS

PROPOSED AMENDMENT 26

Amend text to correct minor typographical errors, as appropriate throughout the plan.

MAP CHANGES

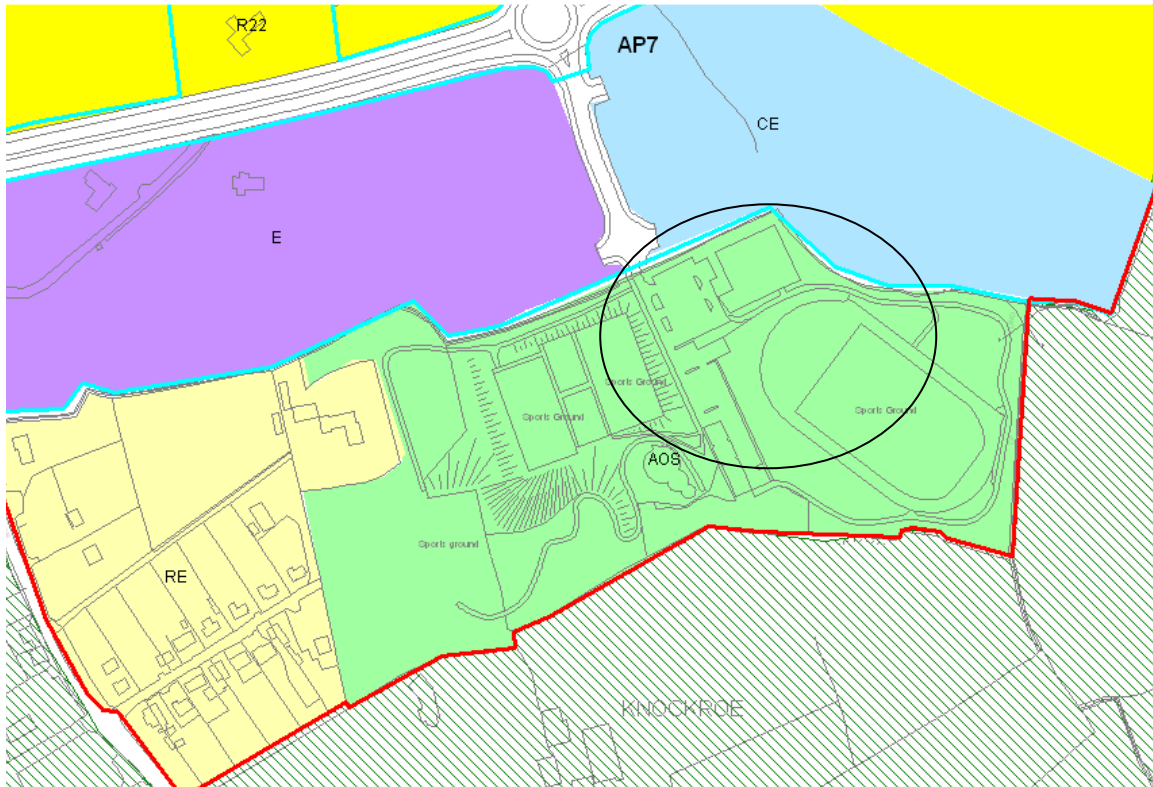
PROPOSED AMENDMENT 27

Map A: Land Use Zoning Objectives

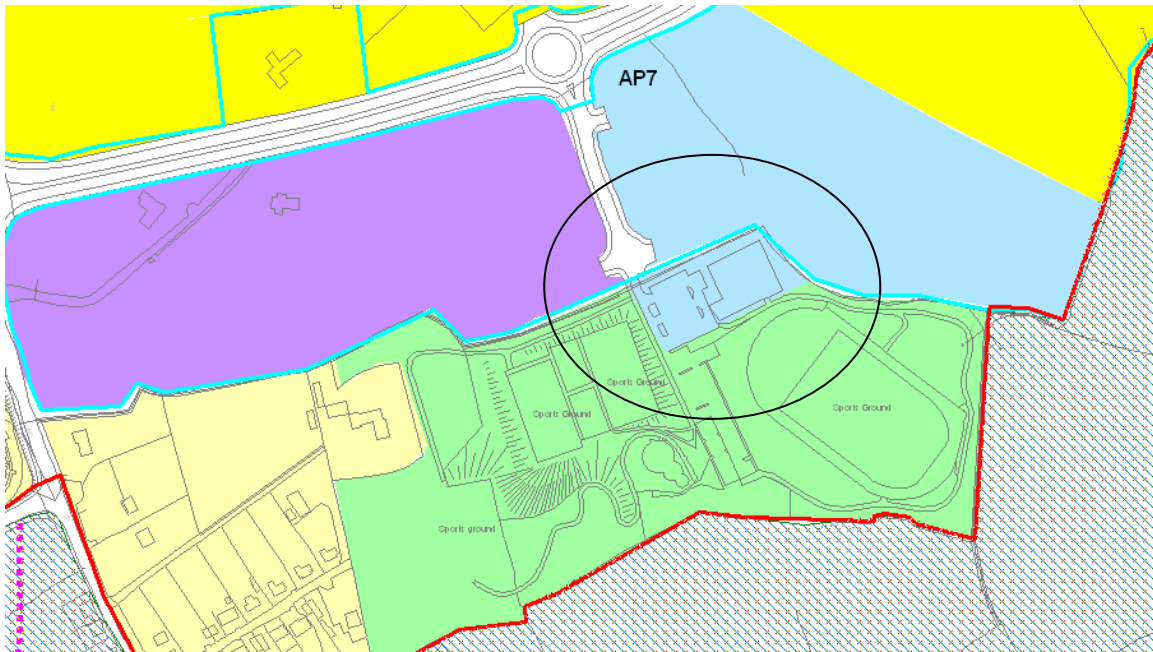
Amend Map A as follows:

Change c. 0.6ha at Charlesland from AOS to CE

From



To

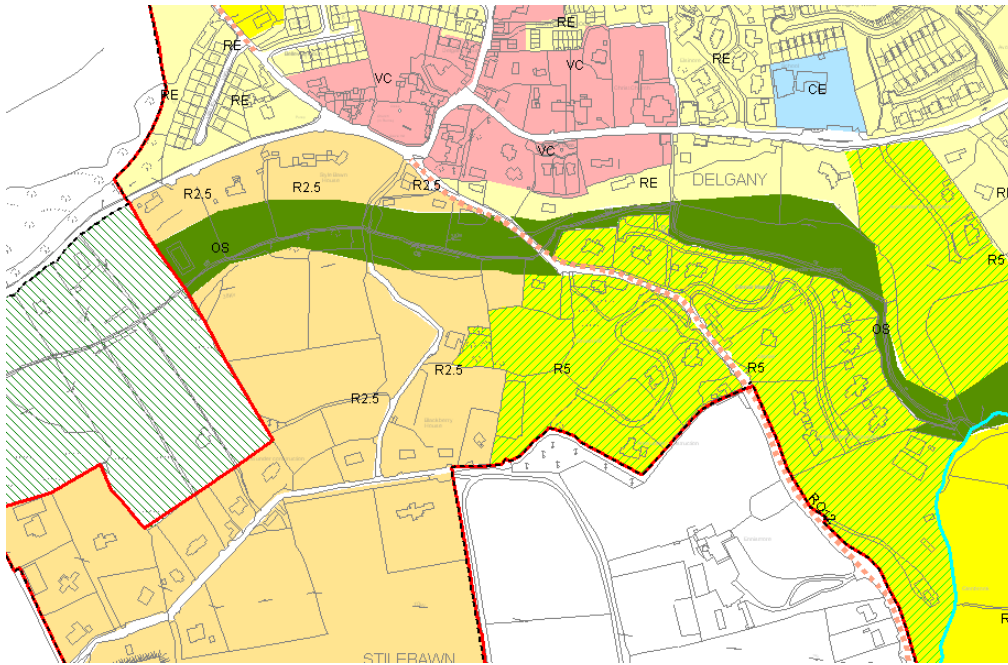


PROPOSED AMENDMENT 28

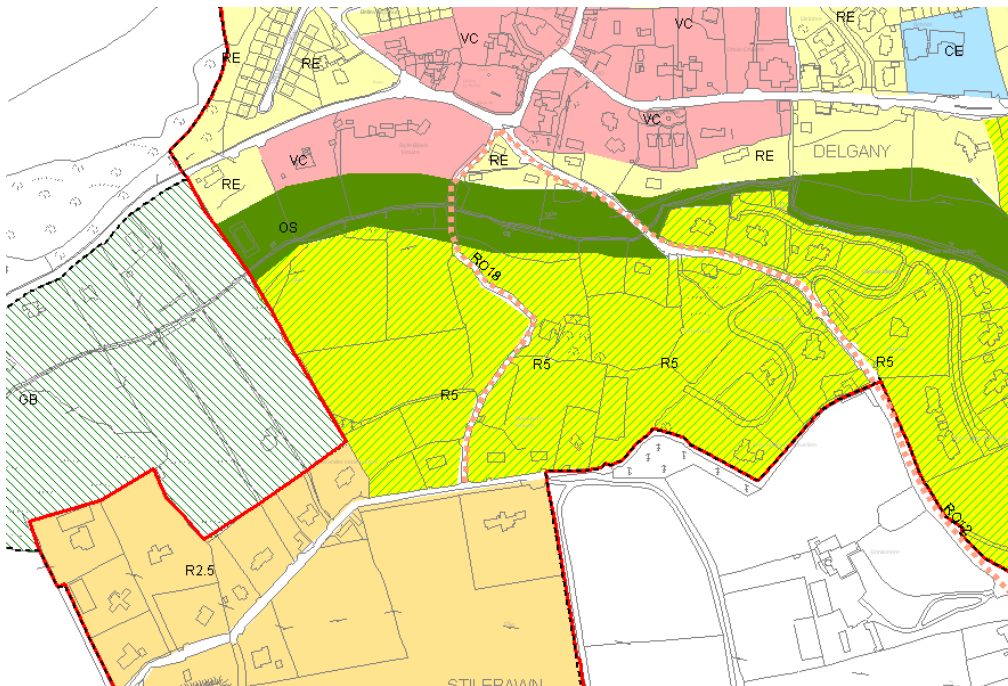
Map A: Land Use Zoning Objectives

- (a) Amend the RE zoning to the north of the Three Trout's Stream and zone these lands VC Village Centre as set out below.
- (b) Increase density on the remainder to 5/ha
- (c) Rezone existing residential properties to east and west of new VC zoning from R2.5 to RE: Existing Residential (i.e. 'Glenowen', Glen Road and properties at Priory Road/Blackberry Lane intersection)

From



To

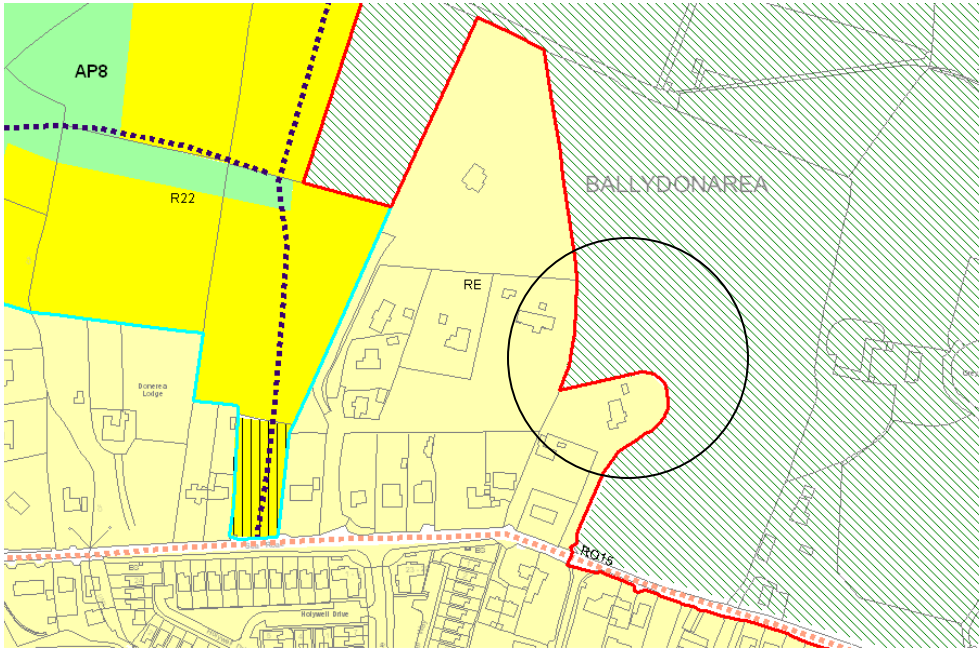


PROPOSED AMENDMENT 29

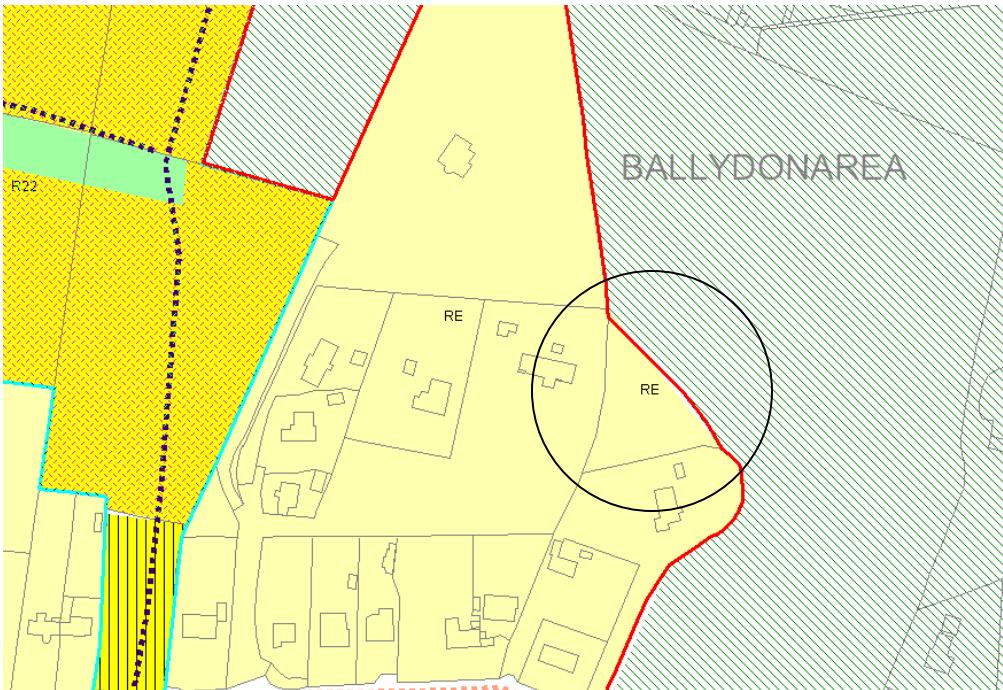
Map A: Land Use Zoning Objectives

Amend as follows:

From:



To:

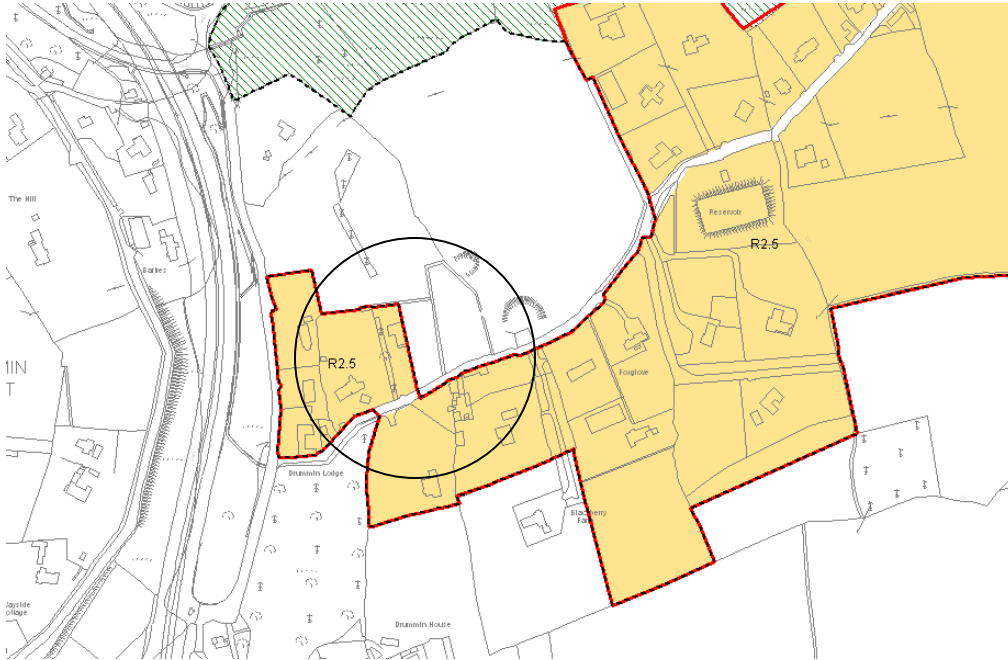


PROPOSED AMENDMENT 30

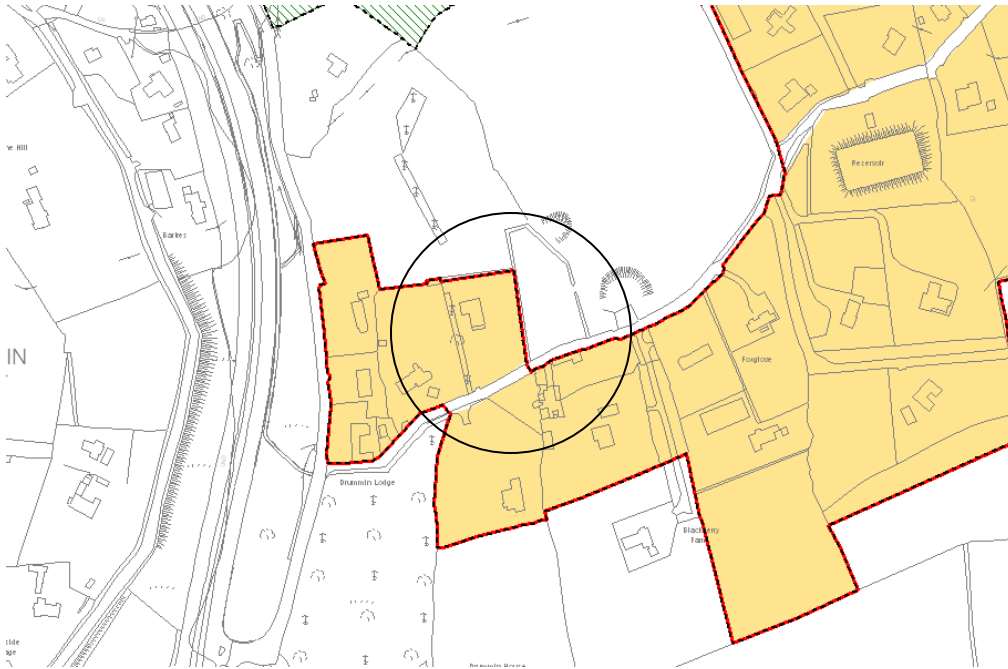
Map A: Land Use Zoning Objectives

Amend as follows:

From:



To:

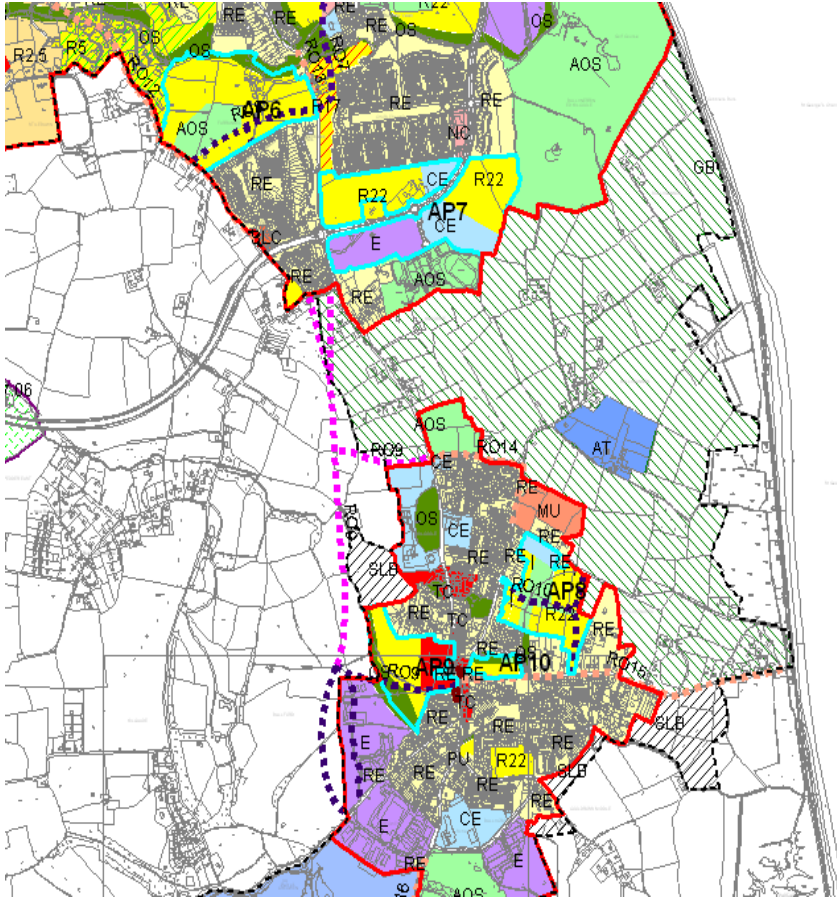


PROPOSED AMENDMENT 31

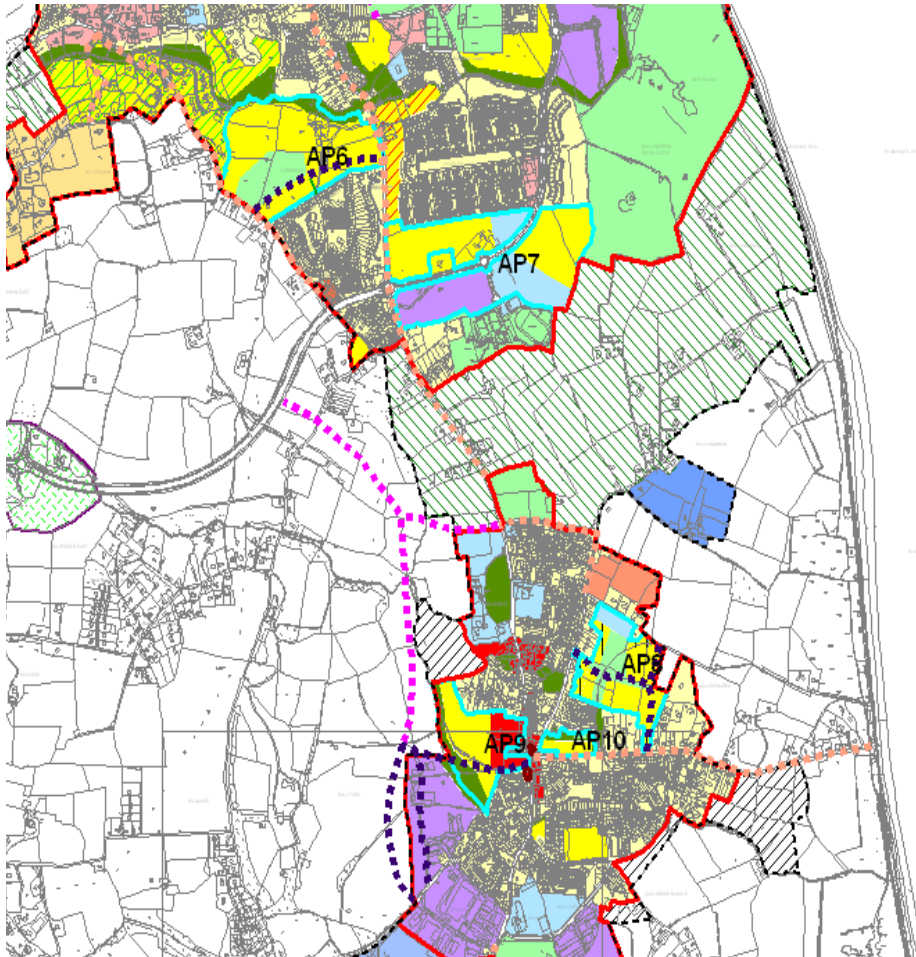
Map A: Land Use Zoning Objectives

Remove GB zoning on lands zoned to the south of the AT zoning within the Kilcoole Settlement boundary and amend the plan boundary as demonstrated below:

From:



To:

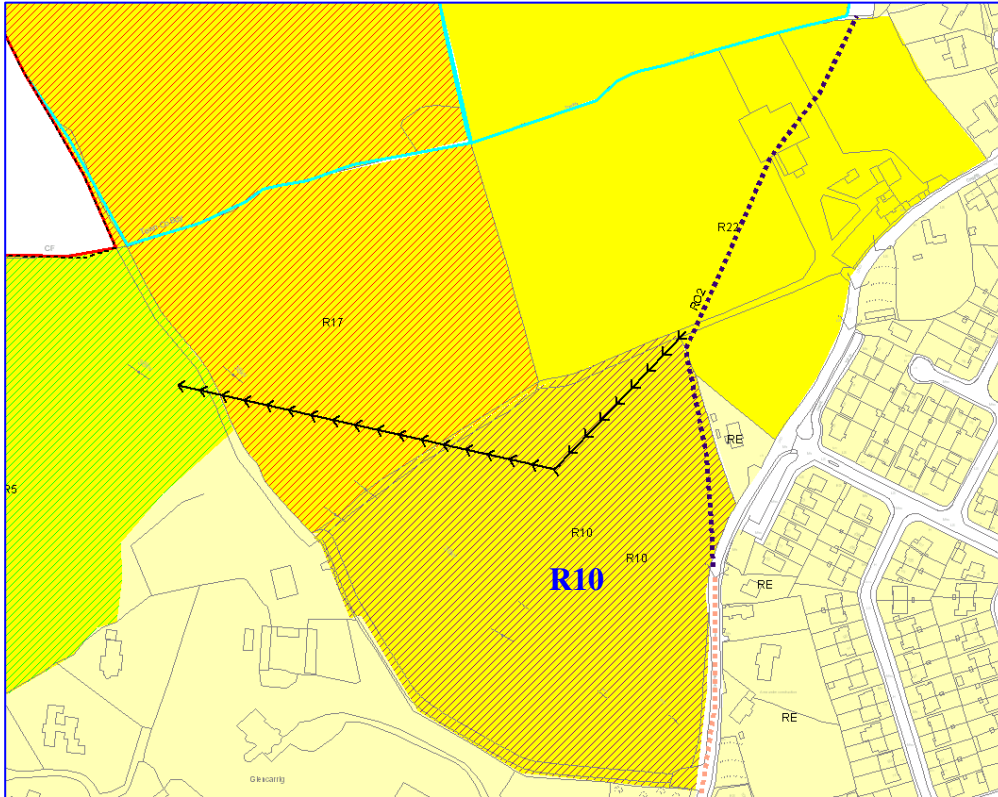


PROPOSED AMENDMENT 32

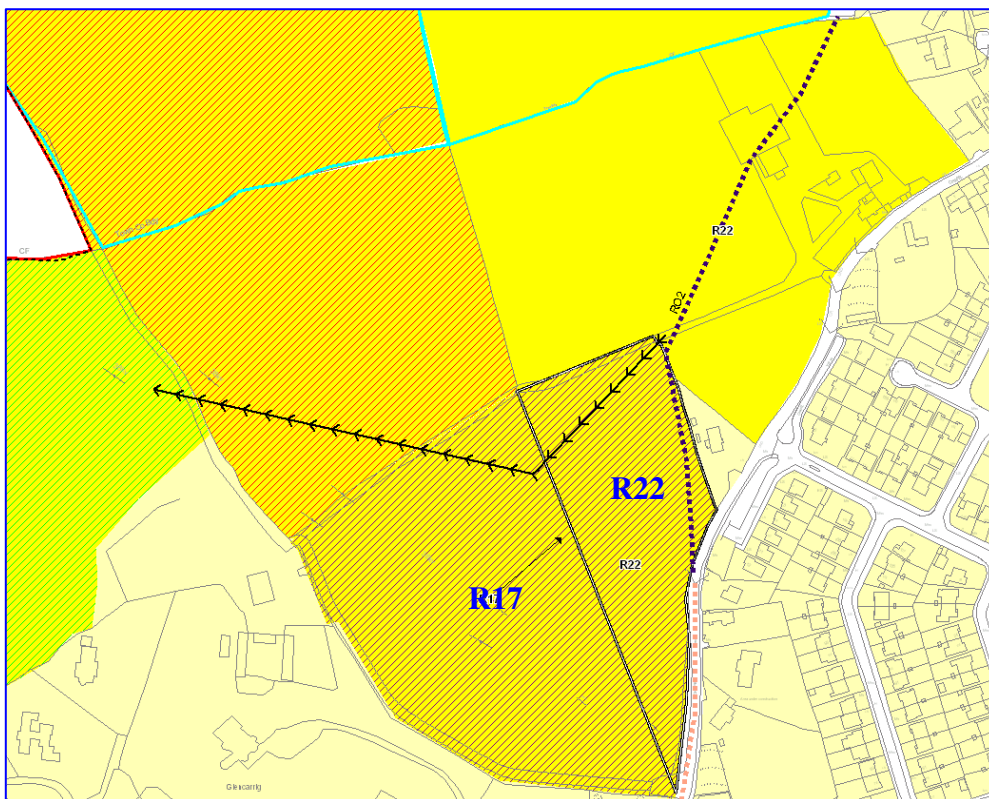
Map A: Land Use Zoning Objectives

Amend map as follows:

From:



To:



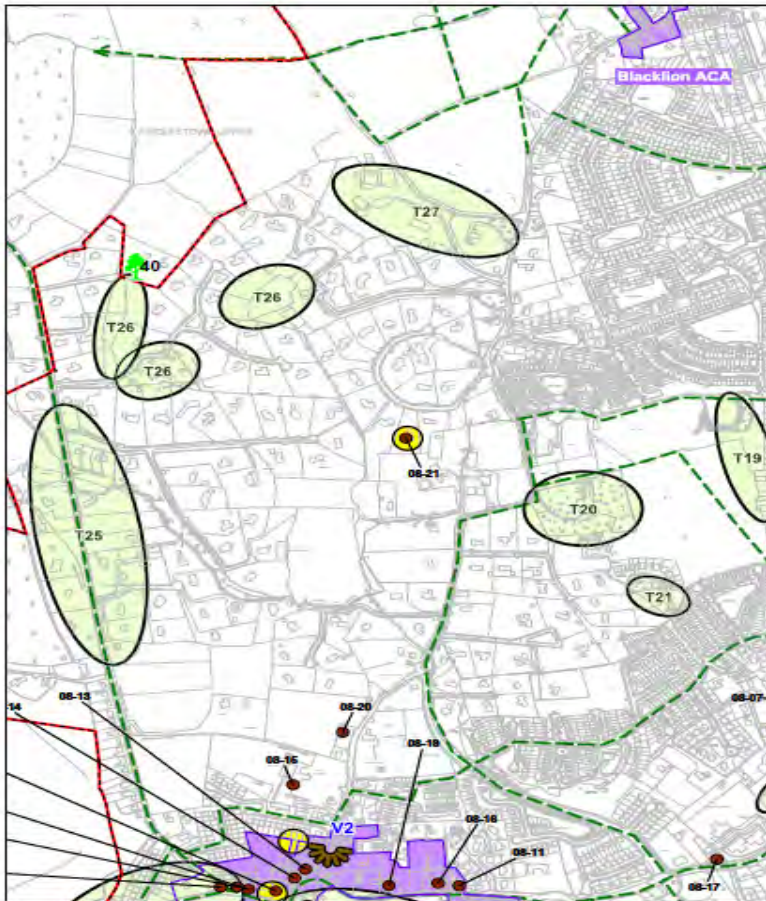
PROPOSED AMENDMENT 33

Map A: Make any changes necessary consequent to adopted zoning changes

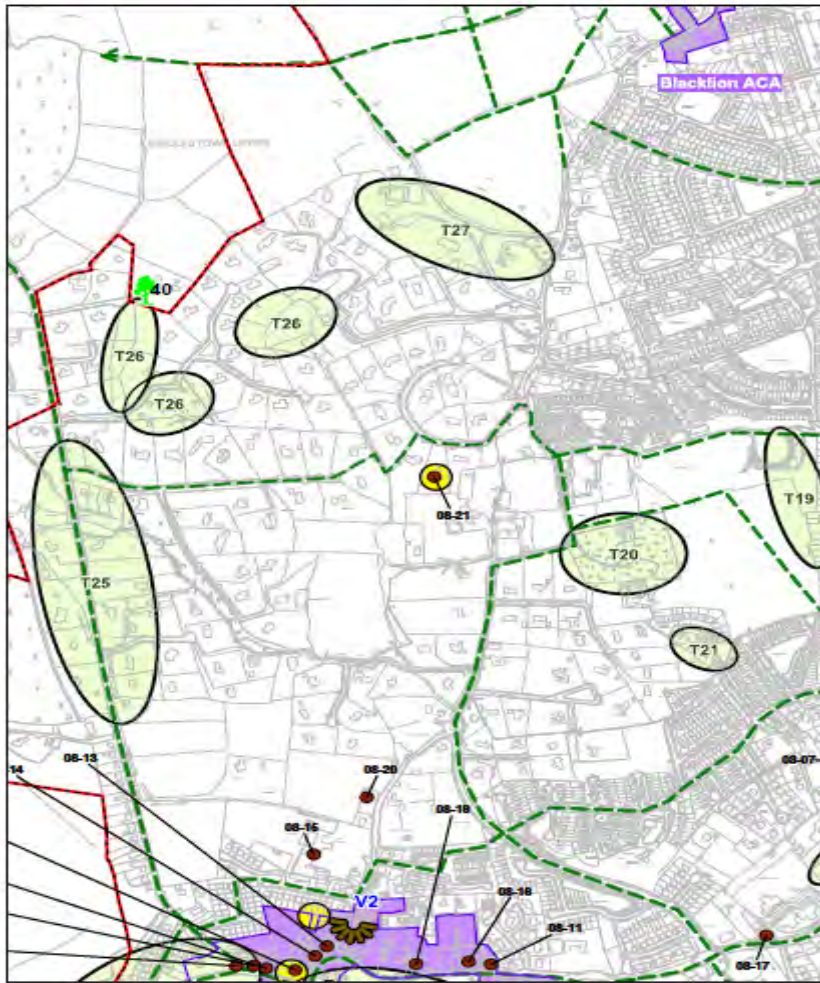
PROPOSED AMENDMENT 34

Amend 'Map B: Heritage Map' as follows:

From



To



PART III: SUMMARY OF ISSUES RAISED AND MANAGER'S OPINION AND RECOMMENDATION ON THESE ISSUES RAISED

Manager's recommended amendments to the Draft LAP are indicated as follows: new text in **red**, deleted text in ~~blue strikethrough~~

Section 3.1 **PRESCRIBED BODIES**

Prescribed Body
An Taisce
Submission Number
8
Summary of Issues Raised
La Touche Hotel is identified in the NIAH as being of regional significance (Ref 16304004). NAMA which holds a loan on the property has released funds for maintenance. Accordingly, there are no grounds to warrant descheduling.
Opinion of Manager
Noted. This matter is considered in the Manager's Report on the Proposed Additions to and Deletions from the Record of Protected Structures (RPS) and in 'Topic 8: Natural and Built Heritage' of this report.
Manager's Recommendation
Refer to Manager's Report on the Proposed Additions to and Deletions from the Record of Protected Structures (RPS) and 'Topic 8: Natural and Built Heritage' of this report.

Prescribed Body
Department of Arts, Heritage and Gaeltacht
Submission Number
9
Summary of Issues Raised
<p>Re: Draft Greystones-Delgany and Kilcoole LAP, SEA and AA</p> <ul style="list-style-type: none"> Erosion protection, the provision of a groyne to create a sandy beach and proposed harbour/marina development have potential to impact on patterns of erosion and deposition and in turn impact on coastal sites such as Bray Head cSAC, Murrough Wetlands cSAC and The Murrough SPA. As outlined in Appendix C of the Draft LAP, this needs to be adequately addressed. AA screening refers to issue of coastal protection in relation to The Murrough Wetlands cSAC, but not for Bray Head SCA. Need for AA screening to provide more detail on this matter and for additional factors to be assessed. If impact cannot be ruled out, full AA of Draft LAP is required. AA needs to address issue of planting on cliffs, slopes and sides of walkways along Bray Head cSAC. SEA needs to address issue of impact of coastal erosion protection works on cliffs and resident sand martins. It is not easy to mitigate for loss of their nesting habitats. SEA needs to review SEOs, targets and indicators, to ensure that protected species under the Wildlife Acts are adequately assessed in the SEA.
Opinion of Manager
These matters are also considered in the Addendum to the Environmental Report and Appropriate Assessment Screening Report of the Draft Greystones-Delgany and Kilcoole LAP 2013-2019.

Regarding the potential threat to Natura sites from inappropriate planting of alien/ invasive species along walkways it is considered that the use of the wording “appropriate planting” in the plan mitigates against this, however, in the interests of clarifying this point it is proposed that the wording in the Plan be amended in ‘ Zone 2 – Public Park’.

It is proposed that the scope of coastal protection works should be limited in accordance with the recommendations as set out in the EIS on the Greystones Harbour development (2011). This is also addressed in the addendum to the Appropriate Assessment Screening report.

Manager’s Recommendation

The following change is recommended to ‘AP3: Greystones Harbour and North Beach Action Plan’:

Section 10: Action Plans

Sub-section 10.4: AP3: Greystones Harbour and North Beach Action Plan

Amend as follows:

Zone 2 – Public Park

Creation of an attractive linear coastal public park to include:

- *Provision of new landscaped public park for passive recreation and some appropriate sporting uses, incorporating Wicklow Coastal Walk and access to any future Heritage Park at the site of medieval Rathdown*
- *Appropriate planting (using native plants suited to the local environment and using seed of local provenance where possible), walkways, signage and seating to form a pleasant and successful outdoor public open space*
- *Capping and landscaping of the old landfill dump, with appropriate planting (using native plants suited to the local environment and using seed of local provenance where possible), to form an integral part of the park*
- *Creation of a sandy cove at the north end of the proposed development with good beach access from adjacent public car parking*
- *Provision of road access and public car parking with suitably located toilet and washroom facilities*
- *Provision of coastal protection in the area of the old landfill, together with beach nourishment and management from the harbour/marina to at least 250m past the Gap Bridge. ~~Cliffs to be re-graded and high level and low level walks with occasional access to the beach provided with appropriate planting on the slopes~~*

Prescribed Body

Department of Education and Skills

Submission Number

10

Summary of Issues Raised

The Department of Education and Skills submit the following:

- Information provided to outline how Department calculates educational infrastructural requirements.
- Department analysis of future schools needs is provided.
- Greystones area – currently 89 classrooms available. To rise to 106 by September 2013. Departments notes and welcomes the site reservations in the Charlesland area for a primary and post-primary school.
- Kilcoole – currently 16 classrooms available. To rise to 24 upon completion of planned

<p>developments. Department notes and welcome the reservation of lands adjacent to post-primary school for future development.</p> <ul style="list-style-type: none"> • School sites should be in close proximity to community facilities. Multi-campus school arrangements encouraged. Both of these approaches can reduce land take for school development. • Following documents provide guidance in relation to site suitability for educational provision: <ul style="list-style-type: none"> ○ 'Technical Guidance Document 025 – Identification and Suitability Assessment of Sites for Primary Schools' ○ 'Technical Guidance Document 027 – Identification and Suitability Assessment of Sites for Post Primary Schools' ○ DoEHLG planning guidelines –Sustainable Residential Development in Urban Areas' (2009) ○ 'Code of Practice for Planning Authorities and provision of schools' (Department of Education and Skills, 2008) • Memorandum of Understanding between the Department of Education and Skills and the City and County Managers' Association on the acquisition of sites for school planning purposes, is in place. In relation to additional educational needs identified for this plan, subject to availability of resources and on foot of a formal request to the Manager of your local authority, it would be the Department's intention to request, at an appropriate time, that WCC would take the lead on behalf of the Department in relation to the identification/acquisition of suitable school sites as required. <p>Lands adjacent to existing schools should be, where possible, protected for possible future educational use to allow for school expansion.</p>
Opinion of Manager
Noted. It is considered that the plan adequately provides for the future primary and post primary requirements of the plan area, having regard to guidance received from the Department of Education and Skills. The Council is committed to the process of the acquisition of appropriate lands for future school sites, in conjunction with the Department.
Manager's Recommendation
No change

Prescribed Body
Dublin Airport Authority (DAA)
Submission Number
11
Summary of Issues Raised
DAA have no comment on the Draft Greystones-Delgany and Kilcoole LAP 2013-2019
Opinion of Manager
noted
Manager's Recommendation
No change

Prescribed Body
Environmental Protection Agency (EPA)
Submission Number
12
Summary of Issues Raised
The submission from the EPA primarily includes comments on the objectives of the Draft Greystones-Delgany and Kilcoole LAP 2013-2019 and includes comments on the Environmental Report of the Draft LAP. The following includes a summary and response to all issues raised pertaining to the objectives set out in the Draft LAP. All matters raised in connection with the Environmental Report are addressed in the Addendum to the Environmental Report. All matters

raised in connection with the Appropriate Assessment Screening Report are addressed in the Addendum to the Appropriate Assessment Screening Report.

1. Map A - Zoning Land Use Objectives

- i. Land zoned SRU – amount and extent of these lands should be described. These lands to be developed on phased basis subject to environmental constraints and outcome of SEA/AA/SFRA.

2. Action Plans

- i. APs to be consistent with higher order planning strategies. Requirements of SEA/AA/SFRA to apply to these lands.
- ii. Need to clarify how the development of APs is reflected in the assessment of environmental effects, including cumulative effects. Particular attention is required with regard to assessing the likely environmental effects of Greystones harbour and associated mitigation measures (with particular focus on effects on Natura 2000 sites).

3. Section 3: Population and Housing

- i. RES2 and RES3 – it is unclear how many phases of development are proposed and the extent of land likely to be developed within the lifetime of the plan.
- ii. RT15 suggested re-wording: “...*Development proposals shall **be sustainable and contribute to the environmental amenity of all public areas in the plan area...***”
- iii. There would be merits in the inclusion of a commitment to develop a green infrastructure strategy, to protect existing ecological corridors/linkages of importance in the plan area along with the intention to facilitate and develop pedestrian and cycle lands.

4. Section 6: Tourism

Suggested amendments to objectives:

- i. TOUR1: “To promote and facilitate the **sustainable** development of tourism and recreational development within the overall plan area, **at appropriate locations...**”
- ii. TOUR3: “To support and facilitate, in co-operation with the relevant bodies, the formalisation of an **appropriate** coastal walkway between Greystones-Delgany and Kilcoole... **The alignment of this walkway should also be selected and developed** in consultation with the NPWS and other **key** stakeholders to minimise any potential disturbance to coastal fauna and flora.
- iii. TOUR6: “To provide for the development of an Integrated Tourism/Leisure/Recreational Complex at Druids Glen Golf Course...and to promote the development of linkages between the settlement of Kilcoole and this tourist facility **in an environmentally sustainable manner**”

5. Section 8: Transport and Service Infrastructure

- i. Subsection 8.1 – Infrastructure Strategy – suggested re-wording: “Provide transportation and service infrastructure to provide for the needs of existing and future populations for the **environmentally sustainable** development of zoned lands”
- ii. TS4 is noted and welcomed.
- iii. Objective TS9 – consideration should be given to establishing an integrated traffic management plan to ensure issues such as noise, congestion and drainage are taken into account in a coordinated manner.
- iv. TS12 should also take into account the protection of existing ecological corridors and networks which may exist within the plan area.

6. Section 9: National Heritage

- i. HER5 – include reference to National Biodiversity Plan 2011-2016

7. Section 11: Zoning

- i. Table 11.1 Zoning Matrix – unclear how APs relate to zoning references. Give consideration to describing zoning constraints applicable to APs. The extent of land zoned in APs should

be clarified and whether these APs will be in phased manner.

8. Appendices

- i. Appendix C, subheading 'Recommendations in relation to the coastal zone area' – noted that "the potential impacts of the proposed marina on the coastal zone need to be adequately assessed". Should clarify the extent to which the Greystones Harbour and North Beach AP has been assessed to meet this recommendation.
- ii. Ensure that measures are in place to protect local biodiversity as per recommendations in Appendix C.

9. Future Amendments to the Draft Plan

Requirement to assess the likely significant environmental effect of amendments

10. SEA Statement

Required following adoption of the plan.

Appendix included with additional comments on the integration of environmental considerations for the plan.

Opinion of Manager

1. Map A - Zoning Land Use Objectives

- i. Map A identifies three sites zoned for 'Special R: Special Residential' use. The estimated development potential of these lands is described in Tables 1.3 and 1.4 of Appendix A. In addition, objectives RES9, RES10 and RES11 set out particular objectives relating to the future development of these three sites. Objectives RES2-RES4 of the Draft LAP ensures the phased development of lands in the plan area. All environmental constraints have been considered in the preparation of the plan and in the identification of lands for development, in accordance with SEA/AA/SFRA requirements. It is considered that the issues raised by the EPA are adequately dealt with in the proposed plan.

2. Action Plans

- i. The objectives of the Draft LAP including Action Plan area objectives have been prepared having regard to higher order planning strategies including the Core Strategy of the Wicklow CDP 2010-2016 and SEA/AA/SFRA requirements.
- ii. Clarification regarding the assessment of the likely environmental effects of the development of Action Plan areas is considered in the 'Addendum to the Environmental Report and Appropriate Assessment Screening Report of the Draft Greystones-Delgany and Kilcoole LAP 2013-2019.

3. Section 3: Population and Housing

- i. RES2 and RES3 are objectives for the phased development of lands within the plan area. While RES2 ensures the phasing of lands so that the population targets set out in the Core Strategy are not exceeded, RES3 phases the development of lands in accordance with the 'sequential approach', in accordance with 'Development Plan Guidelines for Planning Authorities' (DoEHLG, 2007). Apart from these objectives, the Draft LAP does not include objectives for the phased development of specific land banks during the lifetime of the plan. Having regard to the obligation of the Council to aim to achieve the growth targets set out in the Core Strategy of the CDP and the need to ensure that the plan provides sufficient flexibility in order to respond to market demands, it is not considered appropriate or necessary to unduly restrict the development of lands through excessively restrictive phasing impositions. It is considered that the regulation of the phased development of lands can be most appropriately managed by the development management section. It should be noted that the majority of lands identified for future development are included within Action Plan areas, which generally include phasing requirements regarding the amount of units to be

- developed in conjunction with the provision of infrastructure.
- ii. The proposed re-wording of Objective RT15 is reasonable and the plan should be amended accordingly.
- iii. It is considered that the objectives set out in 'Section 9: Natural and Built Heritage' of the Draft LAP appropriately ensure the protection of the natural heritage of the plan area. In particular, HER1, HER2 and HER3 ensure the protection of designated and non-designated biodiversity sites including ecological corridors, throughout the plan area. TS12 of the Draft LAP includes an objective for the development of a 'greenroute' network for pedestrian and/or cycling facilities in the plan area. It is considered that the issues raised by the EPA are adequately dealt with in the proposed plan.

4. Section 6: Tourism

- i. The proposed re-wording of objective TOUR1 is reasonable and the plan should be amended accordingly.
- ii. TOUR3 is considered generally appropriate. The wording includes a mitigation objective in accordance with Appropriate Assessment requirements. Minor amendments to the wording can be introduced in order to reflect the EPA suggestions which aim to further safeguard the integrity of the environment.
- iii. The proposed re-wording of objective TOUR6 is reasonable and the plan should be amended accordingly.

5. Section 8: Transport and Service Infrastructure

- i. It is considered that the plan appropriately provides for future development of the plan area, including the development of infrastructure projects, in an environmentally friendly and sustainable manner and it is not considered necessary to amend the plan as suggested by the EPA.
- ii. Noted.
- iii. The Roads Section of the Council is responsible for the preparation and implementation of integrated traffic management plans, subject to need analysis and resource allocations. It is outside the remit of this land use plan to include objectives for the preparation of integrated traffic management plans.
- iv. HER1-HER5 include objectives for the protection of designated and non-designated biodiversity throughout the plan area. The wording of TS12 includes a mitigation objective in accordance with Appropriate Assessment requirements. It is considered that the plan adequately provides for the protection of ecological corridors throughout the plan area.

6. Section 9: National Heritage

- i. Chapter 17 of the Wicklow CDP 2010-2016 includes objectives relating to the implementation of the National Biodiversity Plan. Objective HER3 requires that regard shall be paid to the recommendations set out in the local biodiversity plan for the Greystones-Delgany area. It is considered that these provisions ensure that appropriate regard is paid to the National Biodiversity Plan in protecting the biodiversity for the area. As the LAP is a local based plan, which does not generally include specific reference to higher order national strategies, is not considered necessary to include reference to the National Biodiversity Plan within the Draft LAP.

7. Section 11: Zoning

All lands within Action Plan areas are zoned with zoning objectives as set out in Table 11.1. The objectives included within the plan for the development of action plan areas make reference to any specific environmental or infrastructure constraints that are relevant to the action plan areas. The extent of land zoned in AP areas is set out in Tables 1.3 and 1.4 of Appendix A. Section 10 of the plan includes objectives for the phasing of housing and infrastructure within Action Plan areas, as appropriate. In addition, RES 2-RES4 include phasing objectives that apply to the entire plan area, including action plan areas. It is considered that the issues raised by the EPA are adequately dealt with in the proposed plan.

8. Appendices

- i. It is considered that the objectives as set out for the protection of heritage in the Wicklow CDP 2010-2016 and the Draft LAP ensure the appropriate protection of biodiversity in the area including the coastal zone and Harbour area. In addition, it should be noted that any proposed development of the harbour area is required to comply with normal EIA and AA requirements as set out in the legislation. It should be noted that the SEA Environmental Report includes an assessment of the likely environmental effects of the implementation of the plan. The Environmental Report and Appropriate Assessment Screening Report and Addendums, indicate that appropriate mitigation objectives are included in the draft plan to address any likely adverse environmental effects of the proposed development of AP3 lands. Accordingly, it is considered that the plan includes appropriate provisions for the environmental protection of the harbour and north beach area. It is considered that the issues raised by the EPA are adequately dealt with in the proposed plan.
- ii. HER5 of the draft plan ensures that regard shall be paid to the recommendations set out in the Greystones-Delgany Local Biodiversity Area Study (Appendix C). This ensures the adequate protection of local biodiversity. It is considered that the issues raised by the EPA are adequately dealt with in the proposed plan.

9. Future Amendments to the Draft Plan

Noted.

10. SEA Statement

Noted.

It is considered that environmental considerations have been appropriately integrated during the preparation of the plan.

Manager's Recommendation

1. Map A - Zoning Land Use Objectives

No change

2. Action Plans

No change

3. Section 3: Population and Housing

- i. No change
- ii. Amend RT15 (Environmental Amenity of the Public Realm) as follows: "...Development proposals shall **be sustainable and** contribute to the environmental amenity of all public areas in the plan area..."
- iii. No change

4. Section 6: Tourism

- i. Amend TOUR1 as follows: "To promote and facilitate the **sustainable** development of tourism and recreational related development within the overall plan area, **at appropriate locations**. Tourism and recreational related development shall be located on suitably zoned land within the settlement boundaries of Greystones/Delgany and Kilcoole. Applications for tourism and recreational related developments on zoned land (e.g. Greenbelt lands), outside the settlement boundaries shall be determined on the basis of policies that apply to the rural area, as set out in the Wicklow County Development Plan, 2010-2016, and in particular, TR4 of the CDP."
- ii. Amend TOUR3 as follows: "To support and facilitate, in co-operation **and consultation** with the relevant bodies **such as NPWS**, the formalisation of an **appropriate** coastal walkway between Greystones-Delgany and Kilcoole and the development of an **appropriate** coastal cycle route. Any such proposal would be subject to appropriate assessment requirements in accordance with the Habitats Directive. No development shall be permitted that would have

	<i>adverse impacts (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites.”</i>
iii.	<i>Amend TOUR6 as follows: “To provide for the development of an Integrated Tourism/Leisure/Recreational Complex at Druids Glen Golf Course, Woodstock Demesne, in accordance with the objectives set out for ITLRCs in the Wicklow County Development Plan, 2010-2016, and to promote the development of linkages between the settlement of Kilcoole and this tourist facility in an environmentally sustainable manner.”</i>
5. Section 8: Transport and Service Infrastructure	
i.	No change
ii.	No change
iii.	No change
iv.	No change
6. Section 9: National Heritage	
i.	No change
7. Section 11: Zoning	
No change	
8. Appendices	
No change	
9. Future Amendments to the Draft Plan	
No change	
10. SEA Statement	
No change	

Prescribed Body
Health and Safety Authority (HAS)
Submission Number
13
Summary of Issues Raised
Health and Safety Authority note the publication of the Draft LAP
Opinion of Manager
Noted
Manager’s Recommendation
No change

Prescribed Body
Inland Fisheries Ireland
Submission Number
14
Summary of Issues Raised
<ul style="list-style-type: none"> • Three Trouts Stream and Kilcoole Stream represent local salmonid systems warranting protection within the LAP. River systems also include many other fish species. • Ensure that sufficient treatment capacity is available within receiving sewerage systems and waste water treatment plans in order to provide for projected growth. Infrastructural development shall precede actual development. • HER3 welcomed. Undisturbed buffer zoned between development area and river bank should be maximised (10m minimum). Riparian vegetation to be retained in natural state –

<p>this is crucial to flood prevention. IFI opposed to development on floodplains.</p> <ul style="list-style-type: none"> IFI would welcome the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation.
Opinion of Manager
<ul style="list-style-type: none"> It is considered that the ecological integrity of the Three Trouts Stream and Kilcoole Stream is adequately protected through the objectives of the LAP, including the rezoning of lands adjoining these river systems for open space purposes where appropriate and the objectives of the LAP (including HER1-HER5) and CDP 2010-2016 (WT1-WT6, Section 17.5 of Chapter 17) relating to the protection of water systems. As set out in 'Section 1.6 Water Services: Wastewater', it is considered that there is sufficient capacity in the wastewater treatment systems in the area to provide for the needs of the targeted population of the area up to 2022. Objectives of the Draft LAP ensure that infrastructural development shall precede actual development, e.g. TS1-TS3. In addition, 'Section 8.2 Objectives' states that <i>"In all cases, new development shall not be permitted ahead of appropriate provision of infrastructure"</i>. The objectives of the Wicklow CDP 2010-2016 apply to the plan area. Objectives FL9¹ and WT4² of the CDP ensure the protection of a 10m minimum undisturbed buffer along river systems, in accordance with the IFI recommended advise. In addition, a Strategic Flood Risk Assessment (SFRA) has been prepared in accordance with 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities - Technical Appendices (Nov 09)'. This assessment identifies flood risk lands. Where appropriate, undeveloped lands along river systems has been rezoned Open Space. In addition, objectives TS4-TS6 ensures that developments that are considered to be an 'inappropriate' use for a flood zone area, as set out in the Guidelines, will not be permitted, except where the proposal complies with Justification Test for Development Management. These objectives ensure that development is restricted on floodplains, in accordance with IFI recommended advise. Sites adjoining surface waters are referred as a matter of course to IFI, as per the Planning and Development Regulations 2001 (as amended). <p>Having regard to the above, it is considered that the issues raised by Inland Fisheries Ireland are adequately dealt with in the proposed plan.</p>
Manager's Recommendation
No change

Prescribed Body
National Roads Authority (NRA)
Submission Number
15
Summary of Issues Raised
<ul style="list-style-type: none"> i. N/M11 is identified in the NSS as a strategic radial corridor. NRA notes objective set out in 'Section 5.1: Employment and Economic Development Strategy' to maximise advantages associated with the LAPs strategic location on the N/M11. Suggest similar objective to be included within 'Section 8.1: Infrastructure Strategy' with reference included to DoECLG Spatial Planning and National Roads Guidelines (2012) ii. It is premature to include long term roads objective to provide a northern access route from

¹ FL9 of Chapter 12: "For developments adjacent to all watercourses of significant conveyance capacity or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse to allow access for channel clearing/ maintenance/vegetation. A minimum setback of up to 10-15m will be required either side depending on the width of the watercourse."

² WT4 of Chapter 17: "To minimise alterations or interference with river/stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of 10m along watercourses should be provided free of built development, with riparian vegetation generally being retained in as natural a state as possible. In all cases where works are being carried out, to have regard to Regional Fisheries Board "Requirements for the protection of fisheries habitat during the construction and development works at river sites".

<p>iii.</p> <p>iv.</p>	<p>Greystones to N11 (R01 and 'Section 10.2 AP1: Coolagad Action Plan') – the criteria outlined in Section 2.7 of Guidelines to demonstrate the case for additional connectivity to the national road junction has not been progressed by the Council. This objective, in its current form, is premature pending resolution of requirement of the Guidelines.</p> <p>Council to be aware of the priority to ensure maintenance of national road network in order to protect the value of previous investments.</p> <p>NRA notes map includes zoning objective associated with Map 7.06 of the CDP. Observations submitted by NRA during adoption of the CDP still apply.</p>
<p>Opinion of Manager</p>	
<p>i.</p> <p>ii.</p> <p>iii.</p> <p>iv.</p>	<p>It is agreed that 'Section 8.1: Infrastructure Strategy' should be amended to include an objective relating to the LAPs strategic location on the N/M11 and include reference to DoECLG Spatial Planning and National Roads Guidelines (2012).</p> <p>The RO1 road objective is to provide local access to zoned land within the lifetime of the plan and shall, in the long term provide a northern access route from Greystones to the N11. The planning authority considers that it is prudent to retain the proposed long term road reservation as it is prudent to reserve land at this early stage in order to ensure the realisation of a future road link, should this be deemed feasible at some stage in the future. The objective should be amended to more fully reflect this intention.</p> <p>Noted</p> <p>Noted</p>
<p>Manager's Recommendation</p>	
<p>i.</p> <p>ii.</p> <p>iii.</p> <p>iv.</p>	<p>Amend '8.1 Infrastructure Strategy' as follows:</p> <p><i>The strategy for the development of transport and service infrastructure within the plan area shall be as follows:</i></p> <ul style="list-style-type: none"> <i>Maximise advantages associated with the area's strategically important location on a key transportation spine along the N/M11 and Dublin-Rosslare train route, and to provide for the development of transport services having regard to relevant higher order strategies including the 'Spatial Planning and National Roads Guidelines' (DoECLG, 2012).</i> <i>Provide transportation and service infrastructure to provide for the needs of existing and future populations and to provide for the development of zoned lands.</i> <i>Improve the accessibility and safety of roads in the plan area.</i> <i>Promote the development of public transport facilities.</i> <i>Promote walking and cycling throughout the plan area.</i> <i>Address flood risk"</i> <p>Amend RO1 as follows: Provide <i>Reserve a land corridor to provide for</i> a new road from the R761 at Sea View to lands within AP1:Coolagad Action Plan. The new road shall provide local access to zoned lands within the lifetime of the plan and shall, <i>subject to feasibility, need and design</i>, in the long term provide a northern access route from Greystones to the N11.</p> <p>(Note: Refer also to Manager's recommended amendment to 'Section 8.1: Infrastructure Strategy' in response to submission from NTA)</p> <p>No change</p> <p>No change</p>

Prescribed Body
National Transport Authority (NTA)
Submission Number
16
Summary of Issues Raised
<p><i>Population and Housing</i></p> <ul style="list-style-type: none"> • Zoning of sufficient land to meet 2022 population targets is supported in principle. • NTA concerned with residential densities proposed and associated extent of land zoned. <ul style="list-style-type: none"> - Development lands are classified as 'outer suburban/greenfield' according to DoECLG Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas. These Guidelines state an appropriate density of 35-50 units per hectare on these lands. Densities less than 30 units per hectare should be discouraged. - Draft LAP densities of 2.5-22 units/ha is outside government policy and inconsistent with Draft Transport Strategy for GDA for increasing densities to support public transport, walking and cycling. There is potential for higher densities through objective that bases density on unit size of 125m² allows for higher densities. This approach does not guarantee delivery of government policy. - A minimum density of 28 units/ha would be acceptable, taking account of need to offer choice in housing market while also providing choice in transportation modes to local services. Surplus lands should be zoned 'Strategic Land Bank'. • Welcomes commitment to phasing under RES2 and RES3. Need to identify action plan lands to be developed in each phase of growth. <p><i>Retail</i></p> <ul style="list-style-type: none"> • NTA support retail policies of the Draft LAP. • Recommend that retail warehousing use is only open for consideration on lands zoned TC and E1, and not on lands zoned E. <p><i>Employment and Economic Development Strategy</i></p> <p>NTA support broad thrust of Draft LAP objectives to provide jobs in order to reduce commuting. Concern expressed regarding E zoned land south of Charlesland, due to remoteness from DART station and proximity to N11 interchange. Recommended that future planning permission on site be contingent on commitment to (i) no negative impact on operation of N11 interchange, (ii) subject to mobility management plan that equates to a target of up to 45- 60% trips by single-occupancy car, and car parking to be reflective, (iii) heavy goods vehicle access from N11 only, (iv) retail development not included.</p> <p><i>Tourism</i></p> <p>NTA supports tourism objectives</p> <p><i>Social Infrastructure</i></p> <ul style="list-style-type: none"> • NTA supports objectives for phased provision of schools with population growth. • Encourage policy approach whereby primary schools are located at the centre of neighbourhoods and post-primary schools at centre of town or district, in order to maximise walking/cycling. • NTA strongly recommend that consideration is given to building both primary and post-primary schools to the north of Charlesland Road/R774, in order that neither are severed from their catchment by the dual-carriageway. Objectives to be included requiring site to be connected by walking/cycling routes to adjoining residential areas, to enable access without use of R774. If LAP cannot be amended accordingly, significant works to R774 may be

required, e.g. traffic calming, variable speed limits, pedestrian and cycle crossings and signalisation.

- Need for inclusion of new objective requiring drop-off facilities, footpaths, walkways and cycle infrastructure between school sites and residential areas.

Transport and Service Infrastructure

- Recommend insertion of new objective: "To provide for public transport, walking and cycling infrastructure in collaboration with the NTA under the NTS's funding programmes".
- Recommend that reference should be included to support potential outline schemes for the area as set out in the Authority's 5 year Investment Framework for Wicklow.
- Recommend that policy requiring the application of 'Achieving Effective Workplace Travel Plans – Guidance for Local Authorities' (NTA, 2012) be inserted into LAP.
- Suite of roads schemes presented in plan is not consistent with principles set out in Measure ROAD1 of the NTA Draft Transport Strategy. Some roads schemes essentially comprise bypasses of existing areas and are designed in order to cater for through movement of increased car flows, rather than for the opening up of development lands. Such an approach compounds car use within the settlement. Recommended that roads objectives be revisited with the objective of giving advantage to walking, cycling and public transport as central.

Opinion of Manager

Population and Housing

Re: Densities

It is noted that the NTA supports the principle of land zonings as set out in the plan which meet the 2022 population target.

The NTA suggests that the densities as set out in the Draft LAP are not consistent with DoECLG 'Guidelines for Planning Authorities on Sustainable Residential Development In Urban Areas' which require a density of 35-50 units per hectare on lands classified as 'outer suburban/greenfield'. In addition, it is indicated that the low densities compromise the NTA strategy for increasing densities to support public transport, walking and cycling.

Having considered the issues raised by the NTA, it is considered that the densities as set out in the Draft LAP are acceptable, for the following reasons:

- i. The DoECLG guidelines do not consider the characteristics and local context of settlements. Notwithstanding the population targets for Greystones-Delgany, it is considered that a lot of the settlement's characteristics are more akin to a 'small town', which promotes lower maximum density targets, including for example:
 - Commuter town surrounded by unserviced rural area,
 - 45min-1hr commute distance, located at the very periphery of the metropolitan area,
 - Coastal settlement with significant natural and built heritage
 - High demand for low density single house type to accommodate families
 - Existing settlement pattern of predominantly low to moderate density housing.
- ii. Greystones-Delgany is served by a relatively infrequent public transport services compared to other settlements within the metropolitan area, e.g. DART frequency approximately every 30 minutes and relatively limited and infrequent bus service. For the most part, lands that are available for new housing are located at a distance that is not within walking distance of the DART station.
- iii. There is no extra demand in this area for apartments or duplex accommodation. By contrast, there is a marked shortage of lower density family homes.
- iv. The topography of a large number of sites available for new housing do not lend themselves

to high density housing.

Having regard to the above, it is considered that an average density of c.22/ha on new development lands is reasonable and appropriate the local context.

It is noted that the NTA acknowledge that a density of 28/ha is appropriate to Greystones-Delgany. As acknowledged by the NTA, RES5 can in fact result in a settlement form that is akin to the requirements of the NTA, i.e. the actual density that can potentially be built over a site with a 22/ha density is a factor of $22 \times 125\text{m}^2 = 2750\text{m}^2$ floor area spread over a 1 ha site – assuming units of 90m² each are built, the actual resulting density of a development once built is 30/ha. While the NTA argue that this approach does not guarantee delivery of government policy, it is considered that this policy approach provides sufficient flexibility to enable the development of sites at a high density, in line with NTA and government policy, should this be acceptable in terms of the local characteristics and context within which a site is to be developed and having regard to all matters relating to the proper planning and sustainable development of the area.

In addition, the plan does promote the development of high density developments at appropriate locations within centre, edge of centre sites and sites within 10 minute walking distance of the DART (RES5).

It should also be noted, that the Draft LAP sets out a settlement pattern that promotes 'walkable neighbourhoods', whereby significant new housing areas at Blacklion and Charlesland are located within a c. 5 minute walk of a neighbourhood centre and school.

Overall, it is considered that the approach taken within regard to densities in the proposed plan is appropriate to the local context, provides flexibility in its application, allows for higher densities at appropriate locations and promotes the use of sustainable transportation modes. It is therefore considered that the densities should not be amended and the density approach set out in the Draft LAP should be retained.

Re: Phasing

It is noted that the NTA welcomes the commitment to phasing as set out in RES2 and RES3. The NTA suggest that the plan should identify which action plan lands are to be developed in each phase of growth.

RES2 and RES3 are objectives for the phased development of lands within the plan area. While RES2 ensures the phasing of lands so that the population targets set out in the Core Strategy are not exceeded, RES3 phases the development of lands in accordance with the 'sequential approach', in accordance with 'Development Plan Guidelines for Planning Authorities' (DoEHLG, 2007). Apart from these objectives, the Draft LAP does not include objectives for the phased development of specific land banks during the lifetime of the plan. Having regard to the obligation of the Council to aim to achieve the growth targets set out in the Core Strategy of the CDP and the need to ensure that the plan provides sufficient flexibility in order to respond to market demands, it is not considered appropriate or necessary to unduly restrict the development of lands through excessively restrictive phasing impositions. It is considered that the regulation of the phased development of lands can be most appropriately managed by the development management section. It should be noted that the majority of lands identified for future development are included within Action Plan areas, which generally include phasing requirements regarding the amount of units to be developed in conjunction with the provision of infrastructure.

Retail

It is noted that the NTA supports the retail policies set out in the Draft LAP.

RT12 of the Draft LAP states that *".....retail warehousing shall be not normally permitted but open for*

consideration within E, E1 and TC zones. It shall not be permitted at any other location." The NTA recommend that retail warehousing is only open for consideration on lands zoned TC and E1 and not on lands zoned E. It is agreed that the plan should be amended in accordance with the NTA recommendation.

Employment and Economic Development Strategy

It is noted that the NTA broadly supports the Draft LAP objectives to provide jobs in order to reduce commuting.

The NTA expresses concern regarding the E zoning within the Charlesland Action Plan, due to remoteness from the DART station and proximity to the N11 interchange. In this regard, it should be noted that employment strategy in the plan has been prepared in accordance with the Wicklow CDP 2010-2016, whereby the plan aims to attract investment from foreign and local sources in a mixture of 'people' and 'product' intensive industries. As such, the plan generally promotes high density 'people' based employment in close proximity to the DART and allows for the development of 'product' based employment at locations with good access to the strategic roads infrastructure. This approach is considered appropriate and is consistent with the proper planning and sustainable development of the area.

The NTA recommends that future planning permissions on the site shall be subject to various conditions including an assessment on the N11 interchange and traffic and mobility plans. All planning applications on the site shall be subject to the requirements as set out in the CDP 2010-2016. Section 7.5 of Chapter 7 of the CDP 2010-2016 sets out specific requirements for the adjudication of planning applications, including for example the preparation of mobility management plans. In addition, all planning applications shall be considered having regard to the 'Spatial Planning and National Roads: Guidelines for Planning Authorities' (DoECLG, 2012). Taking account of the requirements as set out in the CDP and National Roads guidelines, it is considered that the concerns of the NTA in this regard are adequately dealt with.

The NTA recommends that retail development should not be allowed on these lands. This matter is considered above.

Tourism

It is noted that the NTA supports the tourism objectives of the Draft LAP.

Social Infrastructure

It is noted that the NTA generally supports the schools objectives as set out in the Draft LAP.

Detailed consideration has been given to the NTA's suggestion that both school sites be located on the north side of the dual carriageway and it has some merit in terms of accessibility from the Charlesland estate. However, the result of carrying out of 'swap' of CE and R lands in the action area would mean there would be a much larger block of residential land on the south side of the dual carriageway and a larger number of younger children crossing the road to reach the primary school site. It is considered the children of secondary school going age can safely negotiate a dual carriageway crossing, with appropriate crossing points / lights put in place. Furthermore, the site identified for a secondary school is immediately adjoining the existing Charlesland sport and recreation area and therefore high usage of this area by the secondary school would be feasible. The reservation of a site for a secondary school is clearly a long term objective given that St. David's hope to expand their school shortly and a new secondary school is to be built in the next 2 years in Blacklion. To identify and reserve the land on the north side of the dual carriageway for a secondary school will result in a large area of land being left in a somewhat dilapidated, neglected condition for a long period, which is not desirable given its location adjacent to a major housing area and on a prominent site at the gateway to the settlement.

Having regard to the above, no change is recommended to the Draft LAP.

Transport and Service Infrastructure

The NTA suggests that the plan includes a large number of objectives for the development of new roads in the area and that these objectives promote the development of a settlement pattern that is dependent on car use rather than a pattern that promotes walking, cycling and the use of public transport.

In light of the above comments, all roads objectives have been reviewed in conjunction with the Roads Section of the Council. A number of roads objectives have been omitted or amended including RO7, RO8 and RO9 (refer to Topic 7: Transport and Service Infrastructure). It should be noted that 'Section 8.1: Infrastructure Strategy' sets out the overall transport strategy for the plan area. As indicated, it is the objective of the Council to improve all forms of transport infrastructure within the plan area, including public transport, walking and cycling facilities and roads. In order to ensure that the plan provides for the development of a sustainable land use and transportation pattern to meet existing and future populations, it is necessary to provide for all forms of transportation. It should be noted that there are a large number of objectives within the plan that promote walking, cycling and the development of public transport, e.g. TS8 (a number roads objectives relate to the development of new footpaths), TS11 and TS12. In addition, the plan promotes a settlement pattern that promotes the concept of 'walkable neighbourhoods', whereby new housing areas are located within walking distance of neighbourhood centres, public transport routes and schools.

Having regard to the above, it is considered that the matters raised by the NTA have been addressed and that the plan adequately provides for the needs of all types of transportation, with particular emphasis on promoting sustainable transportation modes.

In order to support works relating to the investment strategies of the NTA in the plan area, it is considered that the plan should include an objective to support NTA strategies in the area – refer to Manager's Recommendations.

Manager's Recommendation

1.

Amend Objective RT12 as follows:

Retail Warehousing

RT12: It is the objective of the Council to generally not permit the development of retail warehousing in the plan area, except where evidence in the form of a Retail Impact Study is provided to demonstrate that there is a proven need for retail warehousing within this area and subject to compliance with the Wicklow County Development Plan 2010-2016, Retail Strategy for the Greater Dublin Area 2008-2016 and the Retail Planning Guidelines for Planning Authorities (DoECLG, 2012). Subject to this objective, retail warehousing shall be not normally permitted but open for consideration within E, E1 and TC zones. It shall not be permitted at any other location.

2.

Amend 'Section 8.1: Infrastructure Strategy' as follows:

The strategy for the development of transport and service infrastructure within the plan area shall be as follows:

- *Support the development of transportation infrastructure and services in line with the NTA policies and strategies including the 'GDA Draft Transport Strategy 2011-2013' and NTA investment projects for the area.*

- *Provide transportation and service infrastructure to provide for the needs of existing and future populations and to provide for the development of zoned lands.*
- *Improve the accessibility and safety of roads in the plan area.*
- *Promote the development of public transport facilities.*
- *Promote walking and cycling throughout the plan area.*
- *Address flood risk*

(Note – refer also to Manager’s Recommended amendment to ‘Section 8.1: Infrastructure Strategy’, in response to submission from NRA)

Prescribed Body
Office of Public Works
Submission Number
17
Summary of Issues Raised
<p>Strategic Flood Risk Assessment</p> <p>OPW indicate that it is acceptable to retain the proposed zonings set out in the draft LAP and that flood risk has been examined comprehensively in the making of the plan.</p> <ol style="list-style-type: none"> The OPW welcomes the carrying out of a comprehensive Strategic Flood Risk Assessment (SFRA) as part of the draft plan, and the commitment to adhere to ‘The Planning System and Flood Risk Management- Guidelines for Planning Authorities’ Welcomes the inclusion of the mitigation objectives which address flood risk, as set out in Draft LAP and Wicklow CDP 2010-2016. OPW comments emphasise the importance of the application of a site specific flood risk assessment in the relevant areas.
Opinion of Manager
<p>The OPW has indicated that the planning authority has appropriately addressed flood risk within the plan area, in accordance with ‘The Planning System and Flood Risk Management- Guidelines for Planning Authorities’.</p> <p>In accordance with TS5 of the draft plan, developments that are an ‘inappropriate’ use for a flood zone area, as set out in Table 3.2 of the Guidelines, will not be permitted, except where a proposal complies with the Justification Test for Development Managements, as set out in Box 5.1 of the Guidelines. As per this objective, site specific flood risk assessments are required to be carried out in accordance with the requirements set out in the Guidelines.</p> <p>Having regard to the above, it is considered that no change is required to the proposed plan.</p>
Manager’s Recommendation
No change

Section 3.2 PUBLIC SUBMISSIONS

Public submissions are generally dealt with by topic, rather than individually, due to the high level of overlap between submissions.

TOPIC 1: GENERAL

Topic
General
Submission Number
13, 148
Summary of Issues Raised
<ol style="list-style-type: none">1. Difficult to identify where the draft varies with the original plan.2. Lack of costing of implementing the plan.3. No alternatives proposed.
Opinion of Manager
<ol style="list-style-type: none">1. The current 'Greystones-Delgany LAP 2006-2012' and 'Kilcoole LAP 2008-2014' are available to all members of the public. The opportunity is available to all members of the public and interested groups to consider the current plans and proposed Draft LAP in order to review the specific differences between the current and proposed plans for the area.2. The LAP is a policy document that sets out the vision for the sustainable management of land uses within a plan area. The plan is not a capital 'spending plan', but rather sets the framework within which development can be undertaken, in the event that the public or private sector is in a position to develop. The Council will continue the maintenance and upgrade of water services and roads infrastructure in accordance with the Council's infrastructure programmes³. In addition, the 'Wicklow County Council Development Contribution Scheme 2008', prepared under Section 48 of the Planning and Development Act 2000 (as amended) is a capital contribution scheme for the provision of public infrastructure and facilities including roads, water services and community infrastructure. The list of projects identified in the Scheme can be progressed subject to funding from development projects. In addition, Section 49 of the Act of the Planning and Development Act 2000 (as amended) allows for the imposition of supplementary development contributions in respect of specific infrastructural schemes.3. Alternatives for the preparation of the Draft LAP were considered in the preparation of the LAP. Information regarding these alternatives is set out in the SEA Environmental Report.
Manager's Recommendation
No change

³ E.g. 'Water Services Investment Programme 2010-2016', yearly roads maintenance programmes including the 'Restoration Maintenance Grant' and 'Restoration Improvement Schemes', NRA national roads maintenance fund, NTA funding and developer led projects.

TOPIC 2: POPULATION AND HOUSING

Topic
Settlement Strategy – Population and Housing Growth
Submission Number
20, 32, 145, 92, 148, 164, 7, 50, 61, 62, 4
Summary of Issues Raised
<p>A number of submissions express concern regarding the high level of population and housing growth planned for under the LAP:</p> <ul style="list-style-type: none"> • The level of growth is excessive. • A period of significant growth has been experienced – need period of less growth while settlements accustom to change. • Infrastructure is not in place to provide for growth – no growth should be permitted unless there is an increase in the provision of services and facilities, e.g. DART service is inadequate (trains only once every half hour). • There is sufficient undeveloped land available under the current LAP to provide for future growth. • Development should be phased and concentrated on most suitable lands – prioritisation should be given to existing undeveloped infill sites prior to new greenfield sites, e.g. landbank at Charlesland should be developed prior to zoning of lands further south. • Need to ensure the protection of existing residential amenity. • Growth predictions are unrealistic. To what extent have planning applications been made at this time? • Unfinished building sites should be developed prior to new development. <p>A number of submissions raise issues in relation to the overall settlement strategy, as set out in the plan:</p> <ul style="list-style-type: none"> • Support for the preparation of a single plan for Greystones-Delgany and Kilcoole, however also submission indicating lack of support for link with Kilcoole. • Preferable to enhance distinctions between Delgany and Greystones. Greystones, Delgany and Kilcoole should all have distinct identities. • Support for the development of separate settlements and support for GB zoning between Greystones and Kilcoole - need to ensure this is not eroded in future years. • Welcome the action plans. • Support the retention of the greenbelt that currently exists between Greystones and Bray. • Section 3.3 criteria for selection of new residential lands – no mention of necessity to restrict creep up Bray Head and The Little Sugar Loaf. No zoning is provided to protect these heritage areas. • Rural character of road/area between Delgany and Blacklion should be maintained. • Greystones-Delgany is designated a 'settlement', Coastal Area of Outstanding Natural Beauty, landscape is of high vulnerability – development of large estates in Charlesland, Blacklion and above Kindlestown is contrary to this landscape categorisation. • Coolagad/Blacklion Zonings: <ul style="list-style-type: none"> - Zoned lands extend significantly up Kindlestown Hill, notwithstanding objectives to safeguard against encroachment to the upper reaches. Need for assessment of visual impact of zonings in this area and extent of zoning/densities should be reviewed. - Mass zoning at Coolagad and Blacklion should be removed – significant growth can be provided for without need to extend. In addition, these land zonings should be removed considering distance from TC and need for increased use in private transport. Alternative infill areas are more suitable and all should be exhausted before development to north is attempted. Contribute to reduced opportunity for 'leap frogging'.

Opinion of Manager

It is noted that there is a relatively high level of concern expressed regarding the high level of population and housing growth planned under the LAP. In response, it should be noted that as per the Planning and Development Act, 2000 (as amended), the LAP is required to be consistent with the Core Strategy as set out in the Wicklow County Development Plan. Under the core strategy, 'Greystones-Delgany' is designated a 'Large Growth Town 2' with a target population of 24000 by 2022. Under the strategy, Kilcoole is designated a 'Small Growth Town' with a target population of 5000 by 2022. These growth targets cannot be altered under the LAP preparation process and the plan is required to be prepared in accordance with these targets.

The plan is required to provide for the growth targets in a sustainable manner and to ensure that a sufficient amount of land is zoned for residential, employment, retail and community purposes to provide for the targeted growth and to ensure that transportation and services infrastructure is provided apace with growth. Appendix A of this plan sets out the background analysis relating to the various land use zonings provided in the plan. The objectives of the plan ensure that growth is provided in a phased manner so that social and service infrastructure is provided in line with housing. In addition, various objectives are included that aim to ensure the protection of existing residential amenity and the protection of environmental quality. It is considered that the plan has been prepared in a manner that accords with best planning practice as set out in higher order planning strategies and legislation, and provides for the proper planning and sustainable development of the area.

It is noted that a number of submissions raise concern with regard to the overall settlement strategy and land use pattern promoted in the plan. In this regard, attention should be paid to the following:

- In the preparation of the settlement strategy, consideration was given first and foremost to targeting all new housing into suitable infill sites within the existing settlement boundaries. Upon the exhaustion of all options on these sites, greenfield sites at the edges of the current settlement boundary were considered. In addition, all new housing areas are required to provide a mix of land uses to promote quality 'walkable' neighbourhoods with access to public transport, services and facilities.
- The new settlement boundary respects the need to provide a greenbelt between Greystones-Delgany and Kilcoole.
- The new settlement boundary respects the need to provide a greenbelt between the north of Greystones and the lower slopes of Bray Head.
- The new settlement boundary in the Blacklion/ Coolagad area respects the need to provide a suitable transition between the rural and urban demarcation, and accordingly applies lower transitional densities along the area bordering Kindlestown Hill. In addition, objectives within the plan ensure that design and layout of developments in this area shall have regard to the need to provide a visual transition between the urban and rural area.
- Regard has been paid to the Landscape Categories and Coastal Zone Management Plans, as set out in the Wicklow CDP 2010-2016. The settlements of Greystones-Delgany and Kilcoole are within an 'urban' landscape category' and all areas outside the existing settlement boundaries are located within the Coastal Area of Outstanding Natural Beauty. Having regard to the need to accommodate increased growth, variation no. 3 of the CDP proposes the necessary amendments to the landscape categories of the proposed plan.
- Future development shall be phased in a 'sequential' manner (refer to RES3).

Having regard to the above, it is considered that the settlement strategy and land use pattern adopted within the proposed plan is acceptable and promotes the proper planning and sustainable development of the area. In addition, it should be noted that the SEA and AA assessments indicate that environmental considerations have been appropriately addressed in the preparation of the plan and that any likely adverse environmental effects can be appropriately mitigated.

Manager's Recommendation

No change

Topic
Housing
Submission Number
4
Summary of Issues Raised
<ul style="list-style-type: none"> • Welcome recognition of need for various types of housing. • Entrances to housing estates to be well defined – entrance road to be slightly wider than other roads. • Need for small flat green areas interspersed throughout estates. • Pedestrian accesses to be open etc. • Max 200 houses in estates. • Need for sufficient parking space.
Opinion of Manager
As set out in 'Section 1.2 Purpose and Status of Plan', the objectives of the Wicklow CDP 2010-2016 apply to the plan area. It is not proposed to include a repetition of the policies, objectives or strategies as set out in the county plan, within the LAP. In this regard, Chapter 5: Urban Development of the CDP includes objectives for the development of housing estates in urban areas, including objectives pertaining to the layout of roads, entrances, open spaces, parking, number of units etc. All proposals for housing estate developments in the plan area are required to be in accordance with these objectives.
Manager's Recommendation
No change

Topic
Densities
Submission Number
36, 148, 32
Summary of Issues Raised
<p><u>Densities – General</u></p> <p>Michael Browne suggests that densities be revised to 30 units/ha.</p> <ul style="list-style-type: none"> • Greystones is in Metropolitan Area of RPGs, designated Large Growth Town II, good transport links and public infrastructure. • This would be in accordance with guidelines for planning authorities – Sustainable Residential Development in Urban Areas <p>DoE Guidance Note on Core Strategies (November 2010) and CDP suggest market/headroom factors of up to 1.5 be utilised. This does not appear to be applied in table 2.3.</p> <p><u>Apartments</u></p> <ul style="list-style-type: none"> • Alan Richardson supports restrictions on apartment development. Need for strict rules on nature and quality of developments permitted. • Robert and Eileen Broderick submit the following: Apartments should not be permitted within Greystones Town Centre, Kilcoole Town Centre, Delgany Village Centre, Neighbourhood Centres, Small Local Centres, Greystones Harbour and North Beach, as exceptions to normal housing. There is no need or requirement to build apartments in rural seaside town.
Opinion of Manager
The matter of densities has been considered in the response to the NTA submission. In summary, it is considered that the density approach adopted in the Draft LAP is appropriate to the local context of the area. This approach allows for the development of higher densities including apartments at

suitable locations that are in proximity to services and facilities in central areas and to the DART station, in line with established planning practice.

The design of all apartment schemes shall comply with the development management standards as set out in the Wicklow CDP 2010-2016.

A 'headroom' has been applied in accordance with government guidelines including the 'Development Plan Guidelines for Planning Authorities' (DoE, 2007) and 'Guidance Note on Core Strategies' (DoE, 2010). The 2007 guidelines indicate that 'headroom' is to be provided through providing sufficient zoned land for the equivalent of three years demand beyond the date on which the current plan ceases to have effect. The 2010 guidance indicates that the population targets set out in the RPGs are maximum allocations. 'Headroom' has been provided in the Draft LAP through ensuring that enough land has been zoned in the plan to meet the target for 2019 (the lifetime of the plan) plus an additional 3 years beyond the life of the plan up to 2022. This is in accordance with government guidelines and no further changes are required.

Manager's Recommendation

No change

Topic

Development of lands opposite Glenbrook Park (R17/R22 Zoned Lands between R761 and Charlesland)

Submission Number

32, 140, 91, 92

Summary of Issues Raised

Residents of Glenbrook Park object to the proposed development of lands opposite the estate. The following issues are raised:

- Object to possible development of site facing Glenbrook Park from Charlesland site.
- Presently zoned land at western boundary of Charlesland site (R17) should be rezoned to lower density for single story buildings near road and max 2 storey deeper into the site.
- Too many houses being constructed in area of Glenbrook Park, Delgany – greenbelt should be included between Glenbrook Park and Delgany/Greystones.
- Preservation of the prospect on the R761, designated P2 on Map B Heritage must be maintained – landscape category Coastal Area of Outstanding Natural Beauty.

Opinion of Manager

The lands east of Glenbrook Park have been zoned for housing and / or employment development since 1999. Revisions to the road layout and zoning provisions for this area since this time has resulted in the access road serving these lands being located south of Glenbrook Park, and employment zoning restricted to the southern side of this road. These are both positive changes in terms of protecting the residential amenity of Glenbrook Park. It is correct that there has been considerable residential development in the last 10 years in this area and further development is envisaged – this has been deemed the most appropriate development strategy for this area and the settlement as a whole, given the physical growth constraints faced by Greystones – Delgany (sea to the east, Bray head to the north) and considerable investment has been made in infrastructure (roads, water, community services, retail) to facilitate the development of this area. It is considered sustainable development to maximise the use of this infrastructure and in this regard, it is considered appropriate that further development be allowed in this area. The plan provides for the protection of the prospect mentioned and any new development would have to be designed and sited with this in mind.

Manager's Recommendation

No change

TOPIC 3: RETAIL & CENTRES

Topic
Retail
Submission Number
38, 148, 164, 4, 6, 62
Summary of Issues Raised
<p>(i) Retail Strategy: Not logical to zone for more retail space when so much existing stock at present. No demand for 12,000m² comparison shopping.</p> <p>(ii) Neighbourhood Centres: No demand for 2 centres along Mill Road - too many pieces of land zoned village centre in the plan area, especially as Aldi is building near here. Shopping is too scattered. Lands next to rugby club should be zoned for sporting, with requirement that views from road are maintained, e.g. via low fencing.</p> <p>(iii) While Cllr. Kathleen Kelleher welcomes the intention to retain the retail core and supports the possible future retail development on Council lands to the south, David J. Walsh is concerned that retail development at South Beach Action Plan would undermine the viability of Church Street town centre. Need for proven need for 'outside of town' retail development. Retail development at Harbour is more likely to take precedence.</p> <p>(iv) Re Opportunity sites – Maurice de Lacy Staunton submits the following: high quality design and innovative architectural design solutions required at these locations.</p> <p>(v) Michael Browne suggests the following re-wording of objectives (suggested additions in blue, suggested deletions in red strikethrough):</p> <p><u>Re: RT3: Greystones Town Centre (Sequential Test)</u> <i>Development proposals not according with the objective to support the vitality and viability of the Core Retail Area must demonstrate compliance with the sequential approach. The order of priority for large scale retail development shall be:</i></p> <ol style="list-style-type: none"> 1. Core Retail Area 2. <i>Edge of town centre sites, including E1 zoned lands</i> 2. Other TC zoned sites 3. Zone 1 of the Greystones Harbour and North Beach Action Plan and neighbourhood/village centres 4. Out of centre sites <p>Reason: These lands are within 500m of the town centre, are fully serviced, easily accessible and adjacent to the retail core area.</p> <p>vi) Michael Browne suggests the following re-wording of objectives (suggested additions in blue, suggested deletions in red strikethrough):</p> <p><u>Re: RT12: Retail Warehousing</u> <i>RT12: It is the Council to generally not permit the development of retail warehousing in the plan area, except where evidence in the form of a Retail Impact Study is provided to demonstrate that there is a proven need for retail warehousing within this area and subject to compliance with the Wicklow County Development Plan 2010-2016, Retail Strategy for the Greater Dublin Area 2008-2016 and the Retail Planning Guidelines for Planning Authorities (DoECLG, 2012). Subject to this objective, retail warehousing shall be not normally permitted but open for consideration within E, E1 and TC zones. It shall not be permitted at any other location.</i></p> <p>Reason: Retail warehousing is not suitably located within TC zoned lands.</p>

Opinion of Manager

(i) The retail allocations as set out in the retail strategy of the Draft LAP are considered appropriate having regard to the designation of Greystones-Delgany as a 'growth town' under the Core Strategy of the Wicklow CDP 2010-2016. The background analysis relating to the figures is set out in 'Section 4.1: Retail Strategy' of the Draft LAP and Chapter 10: Retail of the Wicklow CDP 2010-2016.

(ii) This matter is considered in the Manager's response to the rezoning submission on behalf of Greystones Rugby Football Club (see No. 95)

(iii) Objective RT3 of the Draft LAP aims to protect the vitality and viability of the retail core of Greystones town centre. In summary, the objective indicates that development proposals not according with the fundamental objective to support the vitality and viability of this retail core must demonstrate compliance with the sequential approach before they can be approved. The sequential approach indicates that the order of priority is as follows: 1. Core Retail Area, 2. Other TC zoned sites, 3. Zone 1 of the Greystones Harbour and North Beach Action Plan and neighbourhood/ village centres, 4. Edge of town centre sites and 5. Out of centre sites. Large scale retail development shall not be permitted on lands zoned 'Small Local Centre'. This approach is considered acceptable and is in accordance with the 'Retail Planning Guidelines for Planning Authorities' (DoECLG, 2012).

The wording of RT3 has been reviewed and it is considered that this wording could be improved to have regard to the 'Retail Planning Guidelines for Planning Authorities' (DoECLG, 2012). Refer to Manager's Recommendation.

(iv) Section '4.3 Opportunity Sites' of the Draft LAP requires that opportunity sites be developed with high quality design and innovative architectural design solutions.

(v) The suggested revision to the sequential test is not considered to be appropriate. The proposed revision does not accord with the principles set down for 'sequential tests' as set out in 'Retail Planning Guidelines for Planning Authorities' (DoECLG, 2012).

(vi) The 'Retail Planning Guidelines for Planning Authorities' (DoECLG, 2012) indicates that smaller retail warehousing units are capable of being accommodated in urban centres. Objective RT12 as set out in the Draft LAP is in accordance with this.

Manager's Recommendation

Amend RT3 as follows:

*RT3: To promote the development of retailing in the Core Retail Area of Greystones town centre (as indicated on Map A). A broad range of retail formats shall be promoted in Greystones town centre, including higher, middle and lower order comparison, super-store and super-market retail format. The planning authority shall not permit **large scale** retail development in other locations, unless it is satisfied that there will be no adverse effect on the vitality and viability of the retail core.*

Development proposals not according with the objective to support the vitality and viability of the Core Retail Area must demonstrate compliance with the sequential approach. The order of priority for large scale retail developments shall be:*

- 6. Core Retail Area*
- 7. Other TC zoned sites*
- 8. Zone 1 of the Greystones Harbour and North Beach Action Plan and neighbourhood/ village centres*
- 9. Edge of town centre sites*
- 10. Out of centre sites*

Large scale retail development shall not be permitted on lands zoned 'Small Local Centre'.

** footnote: The sequential approach to the location of retail development shall be in accordance with the principles set out in 'Retail Planning Guidelines for Planning Authorities' (DoECLG, 2012).*

Topic
Bellevue Road (Tesco/Donnybrook Fair) Neighbourhood Centre
Submission Number
155 (Tesco Ireland Ltd)
Summary of Issues Raised
<p>Re: Tesco Supermarket and Shopping Centre, Bellevue Road, Greystones</p> <p>Site designated Level 4 Neighbourhood Centre under Draft LAP.</p> <ul style="list-style-type: none">• Policies relating to Neighbourhood Centres should be reviewed so that they are consistent with the CDP.○ Draft LAP states that one supermarket will be permitted at Level 4 Centres ranging in size from 1000m²-2500m². These policy statements are not consistent with those provided within the Wicklow CDP 2010, which distinguishes between smaller Level 4 Centres (some of which less than 500m²) and more established ones (with floor areas in excess of 2500m²). Bellevue Road lands provide for a foodstore and ancillary units measuring 5205m² gross (Tesco store net retail area of 2580m²). Permission granted in 2010 to extend store to 4000m² net. As such, this site should not be subjected to the same retail designation as the smaller Neighbourhood Centres (e.g. Killincarrig and Victoria Road). Wicklow CDP provides specific policy statements to recognise that a large foodstore is permissible at this site.○ Recommended that the following text is incorporated into the adopted plan: <i>"the Neighbourhood Centre at Bellevue Road is an established location for convenience goods shopping and cannot be categorised as a Level 4 Neighbourhood Centre as defined by the Retail Planning Strategy for the Greater Dublin Area, 2008. Therefore, the planning authority will encourage the provision of a larger foodstore at the site and will assess proposals on a case-by-case basis"</i>.○ Recommended that planning authority introduces additional designations to distinguish between the smaller and larger Neighbourhood Centres within Greystones.• A specific local objective should be included to encourage the future redevelopment of the Bellevue Road/Kilcoole Road Neighbourhood Centre.○ Recommended to include a map based local objective relating to this site. Objective to state: <i>"the planning authority will encourage the upgrading and expansion of retail uses at the site within the lifetime of the LAP"</i>• The review of the LAP should progress in conjunction with a review of the Development Contribution Scheme.○ Recommended to review and amend the existing Development Contribution Scheme to promote improvements to the existing retail environment within the town.
Opinion of Manager
<p>The Bellevue Road level 4 neighbourhood centre includes a Tesco foodstore, ancillary units and the Donnybrook Fair outlet.</p> <p>RT9 of the Draft Plan sets out an objective for the development of neighbourhood centres: <i>"To provide for the development of a mix of uses within the neighbourhood centres of Blacklion, Bellevue Road, Mill Road (spread over two sites) and Charlesland, which provide for the day-to-day needs of the local community, to a degree that is akin to their designation as a Level 4 Centre"</i>.</p>

In accordance with the Wicklow CDP 2010-2016, 'Section 4.1: Retail Strategy' of the Draft LAP states the following: *"A number of centres within the settlement of Greystones-Delgany are designated Level 4 Neighbourhood Centres. Neighbourhood centres usually contain one supermarket ranging in size from 1,000-2,500m² with a limited range of supporting shops and retail services and possibly other services such as post offices or community facilities, grouped together to create a focus for the local population. These centres meet the local day-to-day needs of the surrounding residents."*

It is noted that the strategy for Level 4 centres, as set out in the CDP, allows for a degree of flexibility in the scale and size of convenience outlets allowed in these centres, having regard to historic use and the need to service considerable tranches of new housing.

It is submitted that the Tesco Store has a net retail area of 2580m² with planning permitted to extend the store to 4,000m² net. The scale of permitted use on the site exceeds the normal supermarket size standards for level 4 centres. Having regard to the fact that this centre exceeds the normal scale of a level 4 centre, it is agreed that the Draft LAP should be amended to reflect the exceptional nature of this centre. The site should remain a Level 4 centre, however additional text should be included to reflect its specific nature.

It is not considered necessary to include an additional objective relating to the above on Map A.

The Development Contribution Scheme is reviewed periodically, in line with the requirements of the Planning and Development Act 2000 (as amended).

Manager's Recommendation

Amend Objective RT9 as follows:

RT9: *To provide for the development of a mix of uses within the neighbourhood centres of Blacklion, Bellevue Road, Mill Road (spread over two sites) and Charlesland., which provide for the day-to-day needs of the local community, to a degree that is akin to their designation as a Level 4 Centre.*

The planning authority may allow for the development of the Bellevue Road neighbourhood centre to a size that exceeds the normal standards as set out in the Wicklow County Retail Strategy (Wicklow CDP 2010-2016), subject to the proper planning and sustainable development of the area. All applications will be considered on a case by case basis, having regard to the Wicklow County Retail Strategy and Retail Strategy for the Greater Dublin Area. Particular attention shall be paid to ensuring that the scale of convenience offer is appropriate to the size of the town, the catchment of the neighbourhood centre and the impact on the viability and vibrancy of the town centre and other neighbourhood centres in the locality.

Amend Section 4.1 Retail Strategy as follows:

A number of centres within the settlement of Greystones-Delgany are designated Level 4 Neighbourhood Centres. Neighbourhood centres usually contain one supermarket ranging in size from 1,000-2,500m² with a limited range of supporting shops and retail services and possibly other services such as post offices or community facilities, grouped together to create a focus for the local population. These centres meet the local day-to-day needs of the surrounding residents. The Wicklow County Retail Strategy indicates that there are some sites that are larger than the normal size standards, where larger footstones will be permitted, based on their historic use and the need to service considerable tranches of housing. At these locations, the scale of convenience outlet will be dictated by the overall size of the town, the catchment of the neighbourhood centre and its distance to the town core. It is considered that the Bellevue Road site falls into this category.

In undertaking the review of the current LAP, regard has been paid to the role and function that that small local centres provide to local communities and to ensuring that the viability of the town centre is

safeguarded. As such, the following centres are considered capable of fulfilling the role of **Neighbourhood Centres**: Blacklion (Lidl), Bellevue Road (Tesco/Donnybrook Fair), Mill Road (spread over 2 sites) and Charlesland (Superquinn). In addition, Delgany village is to provide the role of a Level 4 Neighbourhood Centre, however in recognition of its village identity, the centre is to be called a **Village Centre**.

Topic
Public Realm
Submission Number
18, 20, 105
Summary of Issues Raised
<ul style="list-style-type: none"> • Support for RT15 (environmental amenity and public realm). • Greystones neglected in terms of certain local services, while money is being spent unwisely in other areas. Need for professional urban designers, in undertaking public works/improvements. Art, signage, landscaping and other civic improvements are inappropriate and bad value for money. • Burnaby Park – Lights from main street should be transferred to Burnaby Park. • Public demand for paved path from Whitshed Road to the gap in the wall opposite the Hot Spot. • There is a need for a cultural focal point in Greystones – defined by an appropriate piece of public art. • Include additional objective to improve connectivity with the Seafront. Include objective to improve access between Redford/Rathdown Estates and Seafront/Harbour, and from Main Street, between Bow Lane and Train Station and lands in vicinity of AP4 lands. • Greystones Public Realm Scheme should be extended to wider area. • Need to place power lines underground. • Town centre should be pedestrian dominated area. • Request that the Dark Sky Policy (as set out in Section 8.3.7 Heritage and Landscape of Greystones-Delgany LAP 2006-2012) be re-instated in the current plan. The policy is not within the CDP 2010-2016. This objective can mitigate light pollution and can contribute to enhancing the amenity of urban areas.
Opinion of Manager
<ul style="list-style-type: none"> • It is agreed that the public realm in all urban areas, including the plan area, can in many cases benefit from improvements. Public realm improvements are undertaken on an on-going basis, subject to a need being identified and funding and resource allocations. • A community based public realm plan has been prepared for the upgrade of Burnaby Park, including proposals for lighting, landscaping, paving etc. The Council is in support of any appropriate improvements to the public realm, including Burnaby Park. There are no other public realm improvement schemes currently in place. • RT15 includes an objective to place overhead power lines underground where possible. • It is agreed that an additional objective should be included in the plan to promote the improvement of connectivity between the harbour and seafront areas and other parts of the town. • There are no immediate plans to pedestrianise Greystones town centre, which could not be immediately achieved without diverting traffic through predominantly residential areas. • Chapter 13 of the Wicklow CDP 2010-2016 includes objectives that aim to mitigate light pollution (refer 'Section 13.7: Light Pollution, LP1 and 13.8.8 Light'). These objectives apply to the plan area. These objectives appropriately mitigate light pollution and contribute to the amenity of urban areas. As these objectives appropriately address the matter of light pollution in the plan area, it is not considered necessary to re-instate the Dark Sky Policy as set out in the current plan.

Manager's Recommendation

Amend RT15 as follows:

RT15: To preserve and enhance the amenity of the public realm.

Development proposals shall contribute to the improvement of the environmental amenity of all public areas in the plan area through the following ways:

- *The creation of quality space and an enhanced public realm, through improvements to public spaces including improved paving, signage, lighting, street furnishings, tree planting and landscaping of car parking areas. The palette of paving material, lighting, signage and furniture fittings for use should be chosen with regard to the particular identity of each centre, so that enhancements can, as a whole, be visually coherent.*
- *Improve connectivity between residential areas, the harbour, seafront and town centre areas, as appropriate.*
- *Priority of movement for pedestrians, cyclists and public transport should be ensured, so that the impact of the private car is moderated. In particular, the Council will promote the development of wide footpaths throughout the plan area.*
- *Promote the development of quality shopfronts, and in particular promote the development of traditional shopfronts which contribute to the distinctive character of the centres.*
- *Placing underground of overhead power lines where possible.*
- *The protection of natural and built heritage.*
- *The development of public toilets and public information boards at appropriate locations, particularly in the vicinity of the Harbour.*
- *Appropriate controlling of advertising and signage in the interests of protecting the visual amenity of the area and ensuring the safety of the public.*
- *The promotion of high quality urban and architectural design.*

TOPIC 4: EMPLOYMENT AND ECONOMIC DEVELOPMENT

Topic
Employment
Submission Number
7, 148, 62
Summary of Issues Raised
<ul style="list-style-type: none"> • Current employment zones in Greystones area must cater for labour intensive employment rather than warehousing or storage based services. • LAP will not attract industrial development without incentives – rates reduction, training grants etc. • Greystones categorised as a ‘growth’ town. Unable to see how objective to provide high order economic and social function etc. can be achieved. Local businesses have not been able to sustain themselves in town.
Opinion of Manager
<p>The purpose of the plan is to put in place a framework for the planned, co-ordinated and sustainable development of the area. The employment strategy set out in Section 5.1 of the plan endeavours to achieve employment and economic growth within the area. However, it should be noted that the plan is not a ‘spending’, training or marketing plan, but rather is a land use plan, that enables appropriate development so that the settlement can reach its growth targets, in the event that the public or private sector is in a position to develop.</p> <p>The economic strategy as set out in the plan allows for the development of a mixture of employment types. The strategy particularly encourages the development of ‘people’ based employment types, including labour intensive employment, within Greystones.</p>
Manager’s Recommendation
No change

Topic
E1 Zone – Mill/Charlesland Road
Submission Number
5, 6, 38, 58
Summary of Issues Raised
<p>Cllr. Derek Mitchell submits the following: No shopping area to be allowed on IDA lands, as will impact negatively on Main Street. Retail warehousing, further into the development, would not take away from the Main Street. Allow higher shop density in Meridian to encourage a reasonable scale clothing shop here.</p> <p>Cllr. Grainne McLoughlin submits the following:</p> <ul style="list-style-type: none"> • Whilst Zone 2 could be used for product based employment, it is not appropriate for Zone 2 to develop with potential retail development. Object to any retail being developed on this land until such time that other lands allocated for retail have been fully used. • Zone 1 should not allow any retail element except such convenience retail that would be necessary to complement office based development in the zone. Object to ‘integrated element’ with the TC to the immediate east of the site being included. • Rationale: It is imperative that a concerted effort is put in place to develop the zoned lands for high end employment. This area is of optimum level for development of new companies, e.g. Procap – from infrastructure, services and location point of view. There is shortage of high quality office space in south Dublin. Need for all interest groups to ensure land is used for employment type jobs as opposed to retail jobs, and thus allow highly educated local population to secure appropriate employment in the town.

Denis and Catriona Daly object to retail element contained in E1 'employment' use zoning objective. EMP4 provides for the creep of uses to occur from the adjoining TC zoned land into the subject lands. Adequate lands east of subject lands can sufficiently provide for extension of retail uses of the town. Request these lands be changed to zoning objective E 'to provide for economic development, enterprise, industry, distribution, warehousing and employment'.

Michael Browne suggests the following re-wording of objectives (suggested additions in blue, suggested deletions in red strikethrough):

Re: EMP4: E1 Zone, Mill / Charlesland Road

EMP4: To promote and facilitate the development of lands zoned for employment development ('E1' zone) adjoining Mill Road / Charlesland Road in accordance with the following requirements:

- Zone 1 shall be developed as an extremely high quality, ~~primarily office~~ *employment* based employment zone. In this area, a reasonably high intensity of development will be required, and in particular, development should attain a plot ratio of not less than 0.75 and may be up to 3-storeys in height. Given the proximity of the lands to high quality transport links and the town centre, flexibility shall be afforded to the application of car parking standards and the majority of undeveloped lands shall be given over to high quality hard and soft landscaping. The design and format of this area shall address AP4: South Beach Action Plan, such that there is an easy transition between the two areas, with strong pedestrian links. The height, massing and finishes of the development shall be appropriate to the nature and scale of existing and proposed developments in the vicinity, including the Burnaby ACA and the South Beach Action Area. Buildings shall generally be designed around civic spaces / public squares.
- Zone 2 shall be developed for a mix of employment facilities, and may be more appropriate for product based employment facilities.
- The following uses shall not normally be considered but shall be open for consideration, subject first and foremost to compliance with objective RT3 (sequential test) and RT12 (retail warehousing), and to the following
 - (a) Retail warehousing (*non high street uses*) may be considered in Zone 2 in conjunction only with the substantial development of Zone 1 (which is taken to mean a minimum of ~~10,000sqm~~ *1,000sqm* high employment density floorspace) and in particular, the development of the roadside frontage of Zone 1 along Mill Road and Charlesland Road
 - (b) 'Town centre' type retailing i.e. individual shops offering both convenience and comparisons goods and retail services may be considered in Zone ~~1 strictly only where it forms part of a integrated development proposal with lands~~ *and shall take cognisance of the land* zoned TC to the immediate east of the site. In no circumstances will any such retail use be permitted in advance of the commencement of similar development on the adjacent TC lands in order to ensure that development occurs in an orderly and sequential fashion.
- Mature trees along the eastern boundary of the site shall be retained, to provide a buffer to the residential area of Woodlands.
- This site is appropriate for the development of hotel.

Development on this land shall be subject to the agreement of a Master Plan.

Reason: The above changes are in order to encourage early development of the site and provide much needed employment.

Re: Section 11: Zonings

*Uses generally appropriate for employment zoned land include general and light industry, office uses, civic amenity, enterprise units, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, community facilities, utility installations, *cinema, car sales, night club* and ancillary developments for employment and industry uses. *In addition to the above uses, the lands zoned E1 shall include the following uses: hotel, discount foodstore,**

supermarket, superstores, hypermarket, restaurant (including drive through), outlet stores in accordance with the CDP.

Reason: In accordance with the sustainable and proper development of the area.

Opinion of Manager

It is considered that the objective for the E1 lands should remain as set out in the Draft LAP. The E1 zoning objective first and foremost promotes the development of the site for employment uses and allows for the appropriate development of certain types of retail development subject to certain strict limitations.

While the submissions generally support the development of employment uses on the site, objections relate to the proposed retail use of the site. In summary, the plan allows for the development of (i) convenience and comparison use in Zone 1 in conjunction with TC lands to the north, and (ii) retail warehousing in Zone 2, in conjunction with employment development in Zone 1. Importantly, the objective states that retail development of any kind across the E1 zone, will only be permitted subject to strict limitations, including compliance with the sequential test (RT3) and limitations relating to retail warehousing (RT12).

Importantly, RT3 aims to protect the vitality and viability of the existing retail core . The RT3 objective is set out below:

RT3: To promote the development of retailing in the Core Retail Area of Greystones town centre (as indicated on Map A). A broad range of retail formats shall be promoted in Greystones town centre, including higher, middle and lower order comparison, super-store and super-market retail format. The planning authority shall not permit retail development in other locations, unless it is satisfied that there will be no adverse effect on the vitality and viability of the retail core.

Development proposals not according with the objective to support the vitality and viability of the Core Retail Area must demonstrate compliance with the sequential approach. The order of priority for large scale retail developments shall be:

- 11. Core Retail Area*
- 12. Other TC zoned sites*
- 13. Zone 1 of the Greystones Harbour and North Beach Action Plan and neighbourhood/ village centres*
- 14. Edge of town centre sites*
- 15. Out of centre sites*

Large scale retail development shall not be permitted on lands zoned 'Small Local Centre'.

This indicates that all other site options must be exhausted prior to edge and out of centre sites, such as the IDA lands, being considered for development. This approach is consistent with 'Retail Planning Guidelines for Planning Authorities' (DoECLG, 2012).

RT12 states that it is the objective of the Council "to generally not permit the development of retail warehousing in the plan area, except where evidence in the form of a Retail Impact Study is provided to demonstrate that there is a proven need for retail warehousing within this area and subject to compliance with the Wicklow County Development Plan 2010-2016, Retail Strategy for the Greater Dublin Area 2008-2016 and the Retail Planning Guidelines for Planning Authorities (DoECLG, 2012). Subject to this objective, retail warehousing shall be not normally permitted but open for consideration within E, E1 and TC zones. It shall not be permitted at any other location." It is considered that this objective sets out a general presumption that retail warehousing will not be permitted in the plan area, however could be considered, subject to compliance with higher order strategies and demonstration of there being a proven need in the area.

Having regard to the significant growth targets for this settlement and the need to provide space for the expansion of retail services into the future extending beyond the lifetime of the current plan, it is

considered prudent to set in place a strategy at this early stage, to allow for the future development of retail uses in this area, subject to the strict limitations set out in the plan. These objectives are aimed to promote the economic development and vibrancy of the settlement, having regard to its designation as a Large Growth Town within the metropolitan area of the Greater Dublin Area.

The suggested amendments to 'Section 11: Zonings' are not considered to be appropriate or warranted. As stated in the plan, no zoning use table is included in the plan. The plan includes a list of uses generally appropriate to the employment zone, however the plan states that the development management section of the planning authority shall determine each proposal on its merits, having regard to the zoning objective for the area. As such, each proposed use can be considered on its individual merits, having regard to the proper planning and sustainable development of the area.

(Note: Amendments to RT3 and RT12 are recommended – refer to Topic: Retail under 'Topic 3: Retail and Centres' and Manager's response to NTA (Prescribed Bodies).

Manager's Recommendation

No change

TOPIC 5: TOURISM

Topic
Tourism and Recreational Amenity
Submission Number
4, 20
Summary of Issues Raised
<ul style="list-style-type: none">• Welcome support attributed to Cliff Walk in plan.• Greystones still undeveloped as a Heritage and Tourism destination.• Tourism Objectives: promote Greystones as a walking and cycling hub.
Opinion of Manager
Noted. 'Section 6: Tourism' of the Draft LAP sets out a strategy and objectives for the promotion of tourism in the plan area and promotes the appropriate development of tourism products including the cliff walk and walking and cycling.
Manager's Recommendation
No change

TOPIC 6: SOCIAL INFRASTRUCTURE

Topic
Schools
Submission Number
35, 32, 4, 156
Summary of Issues Raised
<p>Robert and Eileen Broderick submit that there is currently there is an extreme schools deficit in the area.</p> <p>Cllr. Kathleen Kelleher welcomes planning for future schools provision and welcomes the provision of future schools in Charlesland.</p> <p>Michael Browne suggests that CE zoned lands for secondary school at Blacklion be swapped with R22 lands at Charlesland. Schools at Blacklion will result in traffic hazard in absence of RO2. Charlesland closer to population, served by Charlesland Dual Carriageway, closer to town centre, adjacent to sports facilities.</p> <p>Gretchen and Robin Thornton submit the following: Request that sufficient land reserved at new school sites in Blacklion for school sports facilities/playing fields.</p>
Opinion of Manager
<ul style="list-style-type: none"> The plan ensures that sufficient lands are reserved for the development of schools in the area to provide for the needs of existing and future populations and acknowledges the current deficit in schools provision, particularly with regard to post-primary provision in the Greystones-Delgany area. The CE lands at Blacklion have been purchased by the Minister of Education for the purpose of constructing a secondary school. A planning application has been lodged for this school and a decision is due before 17 April 2013. Therefore it is unclear what has stimulated this request. With regard to the development of schools in the Charlesland area, the draft plan makes provision for the zoning of two sites for a primary and a secondary school site already. The land zoned CE at Blacklion meet Department of Education and Skills site size guidelines, which have been arrived at making allowance for school buildings, car parking, various sports including hard courts and pitches and other ancillary facilities. The nature of type of sports facilities provided will be a matter for the Department and the school patron body.
Manager's Recommendation
No change

Topic
Community Facilities
Submission Number
94, 7
Summary of Issues Raised
<p>The following issues are raised by Greystones Family Resource Centre:</p> <ul style="list-style-type: none"> There is lack of community facilities, in particular affordable and inclusive facilities in the Greystones-Delgany area. There is a complete absence of community development buildings and amenities in the area. It is essential that a purpose built community centre is provided by WCC in an accessible location in Greystones, in line with the Council's Social Inclusion remit to house the work of

<p>Greystones FRC. The FRC is the only professional community development organisation in the Greystones area. The absence of any other professional services is highly unusual for such a highly populated area and there is strong demand for services, which are used by all sectors of the community.</p> <ul style="list-style-type: none"> • Current building (very small local authority cottage on Burnaby Court) significantly reduces capacity to meet the needs of the community. • Purpose built community centre to be accessible – have large hall space, staff offices, counselling rooms, childcare facilities, kitchen facilities and youth room. <p>Cllr. James O'Sullivan indicates that there is a lack of social services in Greystones and has indicated that recognition be given in the plan to 'Greystones Peoples Project Ltd'.</p>
Opinion of Manager
<p>These submissions make the following observations in relation to the Draft LAP:</p> <p>1) There is a lack of affordable, inclusive and centrally located facilities. A lack of affordable and accessible community facilities is acknowledged in the Draft Plan. Section 7.1 Social Infrastructure Strategy states that the development of social infrastructure within the plan area includes ensuring community facilities which are financially and geographically accessible to all sectors of the community. Appendix A Community Buildings section specifically notes that while there are a number of community space options in Greystones-Delgany, it is noted that there is a shortfall of non-commercial facilities that are financially and geographically accessible to all sectors of the community.</p> <p>2) There are no community development premises in the areas currently zoned as community spaces and that it is important these gaps in community infrastructure are addressed. The Coolagad Action Plan (See p.29/30) located at Templecarrig Lower, Coolagad and Kindlestown Upper states that a community centre and/or other community facility/facilities shall be provided (by the developer) to serve the communities of this area. This to be provided in Phase 3 of the development. The development of this facility is therefore dependent on development occurring in this area. Due to financial and resource constraints Wicklow County Council is not in a position to be the provider and operator of a local community centre.</p> <p>It is not considered appropriate to give special recognition in the plan to any individual community group.</p>
Manager's Recommendation
No change

Topic
Open Space and Recreational Facilities
Submission Number
32, 156, 7
Summary of Issues Raised
<ul style="list-style-type: none"> • Lack of free common public open space. • Any open space areas provided for housing areas should provide sufficiently for the play needs of young children and young adults. • Give consideration to the provision of additional recreational facilities in the area.
Opinion of Manager
<p>The Draft LAP includes land zoned Active Open Space (AOS) for public open space and recreational facilities at a rate of 2.4ha per 1000 population. Appendix A of the plan sets out a detailed analysis and breakdown of AOS zonings throughout the plan area. It is considered that the proposed plan</p>

provides sufficient AOS land for the needs of the existing and future population and provides for the phased provision of this land apace with new housing. Objectives SOC8-SOC12 provide for the development of AOS lands in addition to objectives set out in the Action Plans for the area.

The design and layout of all new housing areas shall be in accordance with the requirements as set out in the Wicklow CDP 2010-2016. The CDP ensures that open space areas in housing estate are designed to provide for the needs of children's play.

Manager's Recommendation

No change

Topic

Lands adjacent to Greystones RFC

Submission Number

No. 95, 2, 6

Summary of Issues Raised

These submissions relate to lands on Mill Road, to the west of the existing Rugby Club grounds.

- Greystones Rugby Football Club requests that these lands be rezoned from 'NC' to sports/amenity usage.
- Cllr. Tom Fortune supports the submission from Greystones RFC
- Cllr. Derek Mitchell submits that too many pieces of land are zoned village centre in the plan area. Lands next to rugby club should be zoned for sporting, with requirement that views from road are maintained, e.g. via low fencing.

Manager's response

The subject lands are situated along Mill Road Greystones adjoining Active Open Space lands currently in use by Greystones Rugby Club and Greystones GAA. The subject lands form part of two sites designated Neighbourhood Centre in the draft Plan.

The NC zoning proposed, (which is similar to the existing 'T2' zoning of the lands as provided for in the 2006 LAP) would facilitate the development of these lands for sporting use, should the owner of the land desire to use the land for such a purpose. It should be noted that the rezoning of lands would not in any way ensure the development or use of the lands by sporting groups unless it is in their ownership.

In order to re-assure the public that this is the case, it recommended that the following change be made:

Section 11: Zoning

Uses generally appropriate for **centres** include retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing/care homes, parking, residential development, commercial, office, ~~some~~ tourism and recreational uses **including sports uses**, community, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the CDP.

Manager's recommendation
<p>Amend the plan as follows:</p> <p>Section 11: Zoning</p> <p>Uses generally appropriate for centres include retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing/care homes, parking, residential development, commercial, office, some tourism and recreational uses including sports uses, community, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the CDP.</p>

TOPIC 7: TRANSPORT AND SERVICE INFRASTRUCTURE

Topic
Transport – General Issues
Submission Number
156, 148, 32, 6, 20
Summary of Issues Raised
<ul style="list-style-type: none"> i. Traffic plan required for Greystones. ii. Roads should be prioritised over development of cycleways and footpaths – lack of demand for these facilities. iii. TS11 should include objective to maintain, improve and increase permeability throughout the area for pedestrians and cyclists. iv. Should be no increase in population until public transport facilities can be improved, e.g. DART service once every half hour is inadequate. v. Bellevue Hill – need for objective to have footpath up this road. vi. RO11 and RO12 should be brought forward as short term objective.
Opinion of Manager
<ul style="list-style-type: none"> i. The Roads Section of the Council is responsible for the preparation and implementation of integrated traffic management plans, subject to need analysis and resource allocations. It is outside the remit of this land use plan to include objectives for the preparation of integrated traffic management plans. ii. 'Section 8.1: Infrastructure Strategy' sets out the overall transport strategy for the plan area. As indicated, it is the objective of the Council to improve all forms of transport infrastructure within the plan area, including public transport, walking and cycling facilities and roads. In order to ensure that the plan provides for the development of a sustainable land use and transportation pattern to meet existing and future populations, it is necessary to provide for all forms of transportation. iii. TS11 and TS12 provide for the development of walking and cycling. The implementation of these objectives will increase permeability throughout the area. iv. It is agreed that the frequency of current DART service could be improved. Rail services north and south of Greystones currently operate on a single track, seriously impacting the service level that can be provided. TS11 of the Draft LAP includes an objective to facilitate works required to upgrade the frequency and capacity of existing DART services. v. The Draft LAP includes an objective for the improvement of Bellevue Hill Road, to include a footpath (refer to RO11 and Map A) vi. The implementation of all roads objectives is subject to the availability of funding and/ or, to delivery as part of proposals for the development of zoned lands. In many cases, the implementation of roads objectives is subject to further design and feasibility studies. Within these constraints, it is an objective of the Council to implement all short term roads objectives within the timeframe of the plan, and to implement long term roads objectives within a timeframe that extends beyond the lifetime of the plan.
Manager's Recommendation
No change

Topic
RO6 and RO5 Roads Objective
Submission Number
64, 65, 41, 148
Summary of Issues Raised
<p>RO6</p> <p>Residents from Burnaby Heights and Castlefield Terrace vicinity object to RO6 long term road objective between Mill Road and Kindlestown Road Lower, on the following grounds:</p> <ul style="list-style-type: none"> • Injurious to residential amenity of these existing residential areas, including noise, fumes, visual obtrusion. • Proposed road would facilitate the development of land currently zoned as ROS which are proposed to be rezoned RE. • Would compromise security of homes. • Require explanation of what justifies RO6. <p>Burnaby Heights Residents Association submit the following: RO6 cuts through existing 'Pigs Hollow' ROW between estate and top of Burnaby (Greystones Golf Club entrance). This ROW must be preserved and if RO6 proceeds, a 'safe' method of crossing to be provided. In addition, recommend sound and light pollution minimisation to be introduced with any road plan.</p> <p>RO5</p> <ul style="list-style-type: none"> • Burnaby Heights Residents Association submit the following: Any improvement to the safety of pedestrians, cyclists and motorists at the entrance to Burnaby Heights would be welcomed. Recommend Council should purchase the Greystones Golf Club land and a heavy grit dressing should be applied at the entrance to facilitate necessary accelerated exiting. • Alan Richardson submits the following: Unclear why RO5 requires more work – has been subject to recent works
Opinion of Manager
<p>RO6</p> <p>RO6 is an objective for the <i>"provision of a long term road objective to provide for an alternative road around Killincarrig Village through Greystones Golf Club, or improving the R761 for pedestrians, cars and cyclists"</i>.</p> <p>The RO6 roads objective should be retained in the plan. The capacity of the R761 through Killincarrig Village is currently constrained. The provision of an additional link between Mill Road and the R761 would increase roads capacity in this area and could facilitate the provision of cycling and pedestrian routes along the R761 in the Killincarrig area. It should be noted that RO6 is a long term road objective, for possible implementation beyond the lifetime of the plan. All roads objectives are subject to detailed feasibility and design, which would take into account the concerns raised by the residents of this area, including ensuring that the residential amenity of residents is safeguarded as much as possible and the retention of the ROW at 'Pigs Hollow'. It should be noted that public open space lands within residential housing estates is protected under objectives including SOC9 of the Draft LAP. As such, no development would be permitted that would compromise the integrity of these lands.</p>

RO5

RO5 is an objective to *“improve the pedestrian and traffic safety of the R761 junction and the entrance to Burnaby Heights”*.

The RO5 roads objective should be retained in the plan. The Burnaby Heights/R761 junction requires improvement works in the interests of improving traffic and pedestrian safety. It is an objective of the Council to implement all roads objectives subject to funding and detailed design.

Manager’s Recommendation

No change

Topic**RO7 and RO8 Roads Objectives****Submission Number**

74, 169, 125, 119, 120, 156, 148, 91, 92, 140, 145

Summary of Issues Raised

A number of submissions were received from the residents of Eden Gate, requesting that RO7 and RO8 be removed from the plan.

The objections focus on the following:

1. The combined RO7 and RO8 road objective for a link between Priory Road and Mill Road (R762). This objection is based on the following grounds:

- Priory Road is already overloaded with excessive car traffic from Eden Gate local residents. Cannot facilitate 2 way traffic and linking another road to Priory Road only exacerbates traffic problems.
- No reason to have another road crossing the Kilcoole Road and creating another roundabout and traffic congestion.
- Mill Road is already serviced by dual carriage way R774 and the Kilcoole Road R761. No reason why another road is required.
- Not clear what is meant by ‘short term’, what the purpose is and how long it will remain there.

2. The proposed linkage of RO8 to Eden Gate. The objection is based on the following grounds:

- Proposed road will introduce the potential for ‘rat-running’ through Eden Gate estate and result in potential traffic hazard
- Creates a through road between Priory Road and N11 access road and other local roads. ‘Short cut’ through estate increases traffic flow – safety considerations within residential estate. Linking private estate road with national roads is unacceptable. Current speed limit in estate is 10km/hr.
- Increase cost of maintenance for local residents
- Noise pollution
- Makes estate more accessible and potentially increase burglaries.
- Devaluing properties.
- Not necessary – existing roads can more than adequately support this. Would be better to provide better access for the residents of Eden Gate and Delgany village from the Farrankelly Road to Priory Road?

In addition, a number of submissions were received from the residents of Glenbrook Park objecting to RO7 and RO8 on the basis that Glenbrook Park would be surrounded by roads on three sides. The residents question the need for the amount of roads needed off the main regional roads within this area.

Other issues raised:

- Due to adverse impact on amenity and safety of residents along Priory Road, all access to the Farrankelly lands (AP6) should be from the R761 and not from Priory Road. (ABP Inspector Report for temporary construction entrance at Priory Road by Borg Developments, during construction of Eden Gate submitted).
- Not safe to add intersection into AP6 zoned lands on this already dangerous road (accident black spot).
- Before RO7/RO8 is considered, would be better idea to install proper bridge and footpaths at the Three Trout area?

Opinion of Manager

RO7

RO7 is an objective to *“provide for a local access road to facilitate the development of zoned lands, incorporating the possibility of a future bridge over the Three Trouts Stream to allow for linkage from Mill Road to the R761”*.

Having regard to the following, it is considered that it is reasonable to omit the RO7 road objective from the proposed plan:

- The RO7 road objective is a historic objective that has been carried forward in many plans. The objective was introduced prior to the realisation of the R774 Charlesland Road. The construction of the R774 introduced an alternative link from the R761 to Mill Road and Greystones town centre, to the previous link via the Killincarrig crossroads. The introduction of the R774 scheme negates the need for an additional option for a through route from the R761 to Mill Road.
- All undeveloped residential lands, including R17 (south of Three Trouts Stream) and R22 (off Mill Road) lands can be accessed from the existing road network.
- The proposed upgrade the existing bridge traversing the Three Trouts Stream (RO13) negates the requirement for a new bridge.

Having regard to the planned population growth of the plan area, objectives for the development of residential zoned land along the R761 and the proposed omission of the RO7 road objective, it is considered necessary to undertake general road improvements to the R761. These improvements are required in order to improve the safety and capacity of this existing road. It is therefore recommended that the existing RO7 objective be omitted and replaced with a new RO7 objective for the improvement of the R761 from Burnaby Heights to Kilcoole, as appropriate.

RO8

RO8 is an objective to *“provide for a local access road to facilitate the development of zoned lands and to provide for the development of a through road from Priory Road to R761 and linkage to Mill Road (RO7) and Eden Gate”*.

It is considered reasonable to include an objective within the plan to provide for the development of a local access road to facilitate the development of zoned lands at AP6: Farrankelly Action Plan and that this road provides an additional function of providing a link between the R761 and Priory Road. This is particularly necessary since Priory Road was effectively cut off from direct traffic entering it from the south east since the construction of the Farrankelly dual carriageway. This has resulted in residents of Priory Road and indeed Eden Gate having to detour to Kilpedder or Delgany to access their homes when travelling from Greystones. The road line shown on the map will not only service the lands it traverses, but will give increased connectivity and convenience to existing residents on Priory Road and Eden Gate. This road, contrary to what has been suggested in some submissions, will reduce traffic on the full length of Priory Road.

However, having regard to the following, it is considered that it is reasonable to omit the proposed short term road objective for a link road from RO8 to Eden Gate:

- AP6 lands can be adequately accessed from the R761 or Priory Road and as such this negates the requirement for an additional third option for access to these lands.
- Road objective RO12 provides for the *“upgrading of Priory Road, including the development of a footpath”*.
- The introduction of a new RO7 objective for the upgrade of the R761 from Burnaby Heights to Kilcoole (refer to opinion and recommendation regarding RO7 above).
- the potential adverse effect on the residential amenity of Eden Gate

Having regard to objectives for the promotion of cycling and pedestrian linkages between residential areas, it is considered appropriate to replace the road objective with a greenroute objective. It is considered prudent to ensure that the pedestrian/cycling route is a minimum 10m width, in order to facilitate the development of a possible traffic route, should the need arise in the future.

Manager's Recommendation

RO7

1. Omit RO7 as proposed under the Draft LAP and replace with new RO7 objective for the improvement of the R761 from Burnaby Heights to Kilcoole, as appropriate, i.e.

From

~~RO7: Provide for a local access road to facilitate the development of zoned lands, incorporating the possibility of a future bridge over the Three Trouts Stream to allow for linkage from Mill Road to the R761.~~

To

RO7: Improvement of the R761 from Burnaby Heights to Kilcoole, as appropriate.

2. Amend Map A as set out below.

RO8

1. Amend RO8 as follows:

RO8 is an objective to *“provide for a local access road to facilitate the development of zoned lands and to provide for the development of a through road from Priory Road to R761 and linkage to Mill Road (RO7) ~~and Eden Gate~~”*.

2. Amend ‘Section 10.7: AP6: Farrankelly Action Plan’ as follows:

10.7 AP6: FARRANKELLY ACTION PLAN

This action plan is located at Farrankelly, on a site approximately 24ha in size. This are shall be developed for a mix of uses including residential and active open space, in accordance with the following:

- *Approximately 17ha to be developed for residential use.*
- *Approximately 4.5ha of land shall be provided for active open space.*
- *Lands identified at risk of flooding (under the FRA) shall be reserved as open space.*
- *Roads shall be provided in accordance with RO8, Section 7 of this plan.*
- *Provide for the development of a ‘greenroute’ for the provision of pedestrian and cycling facilities linking the RO8 road objective to Eden Gate. This route shall be a minimum width of 10m, in order to facilitate the development of a possible traffic route, should the need arise in*

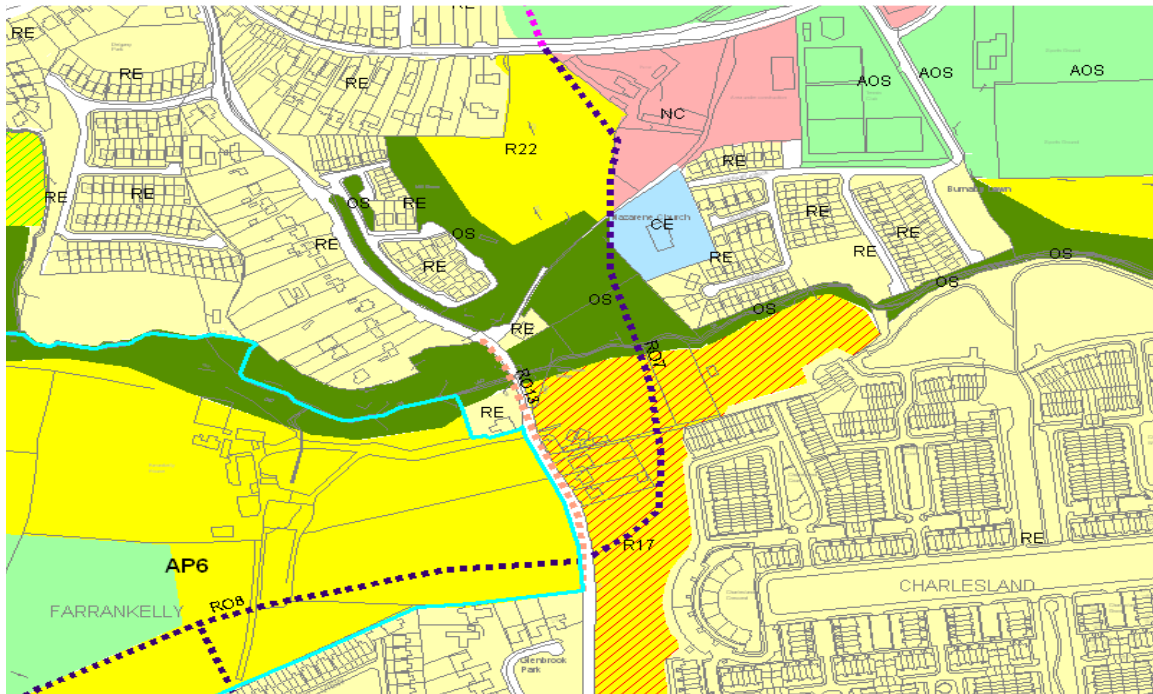
the future.

- *The residential amenity of existing adjoining properties shall be protected.*
- *Protection of natural and built heritage, including rivers and trees.*

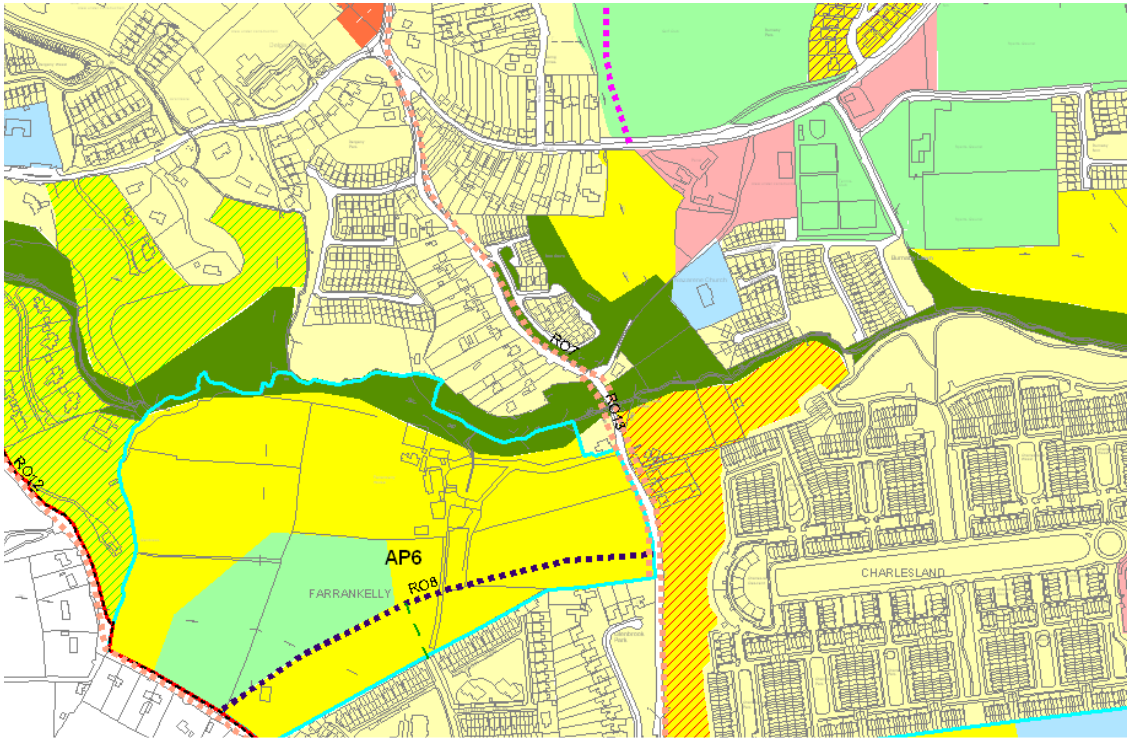
3. Amend Maps as set out below.

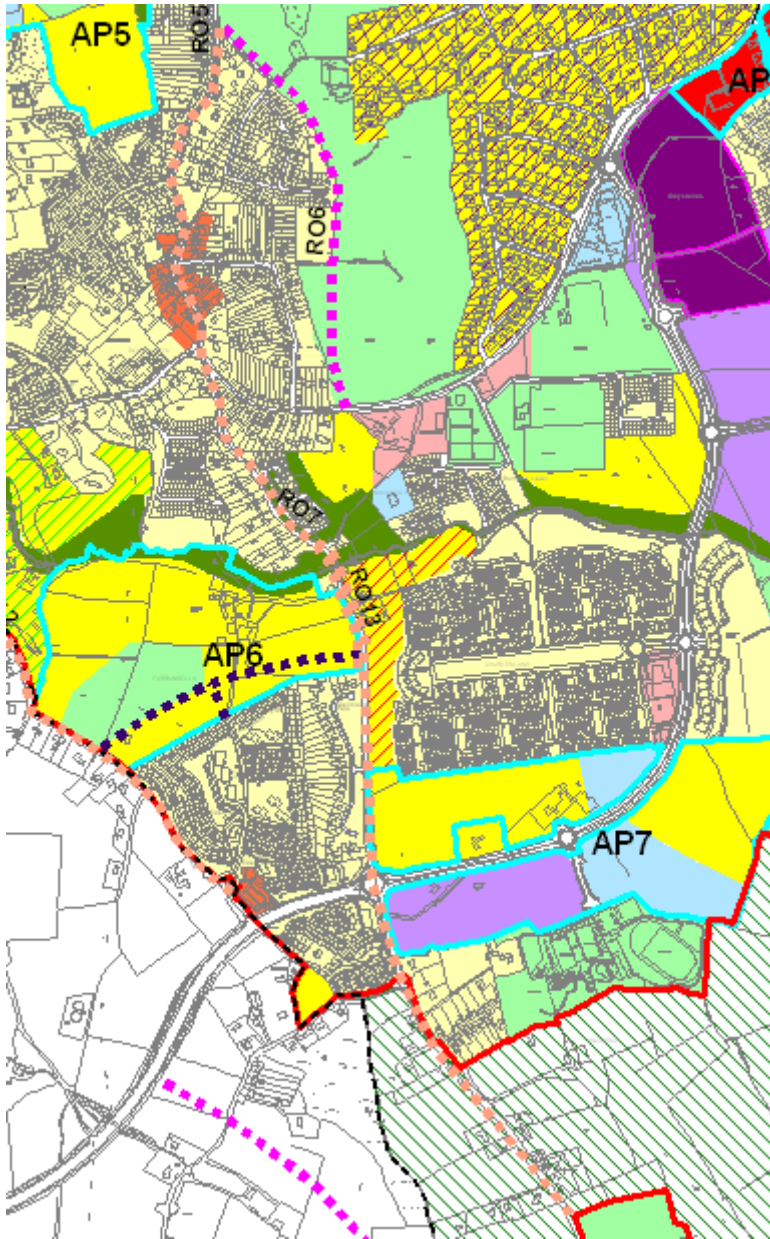
RO7: Recommended Amendment to Map A

From



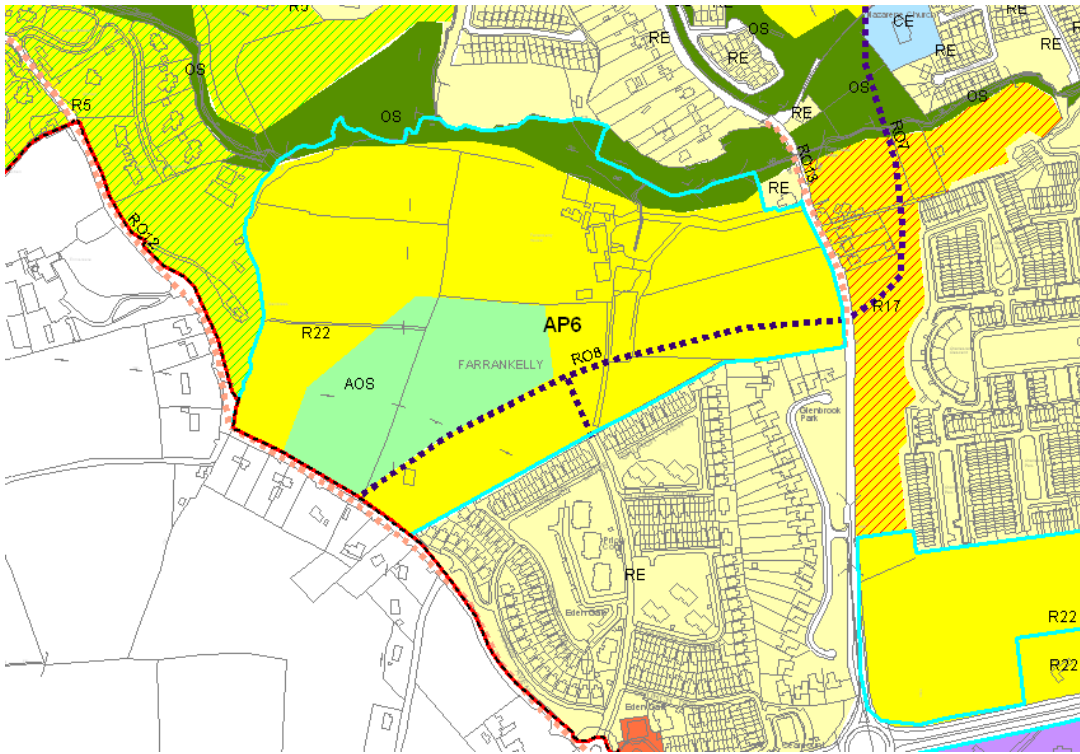
To



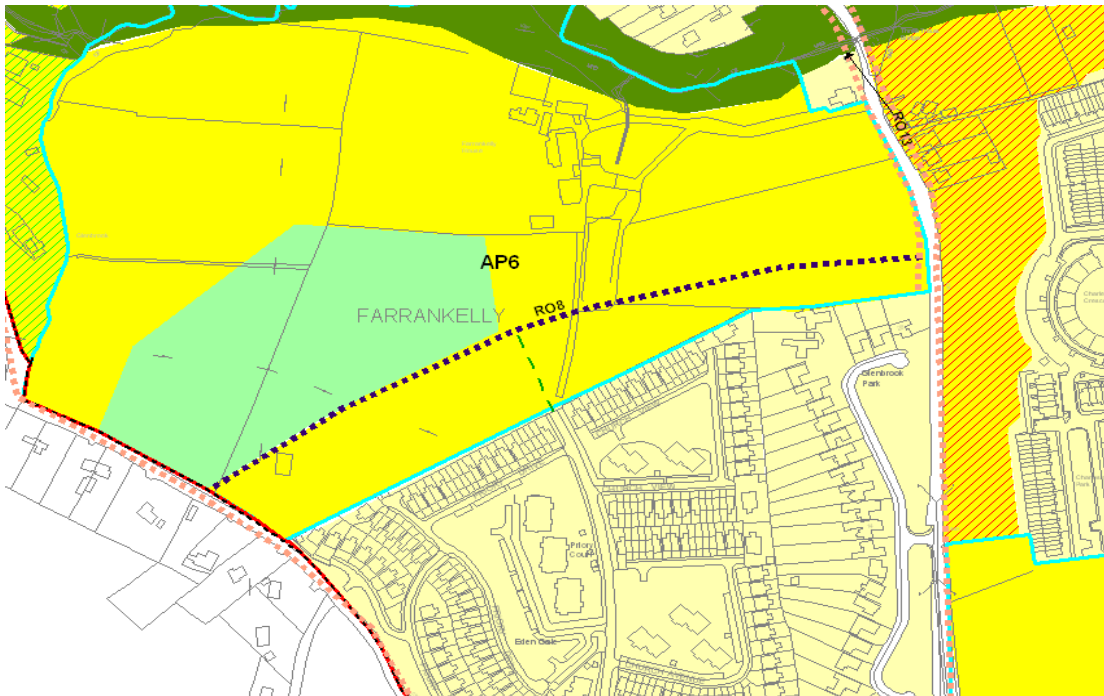


RO8: Recommended Amendment to Map A and B

From



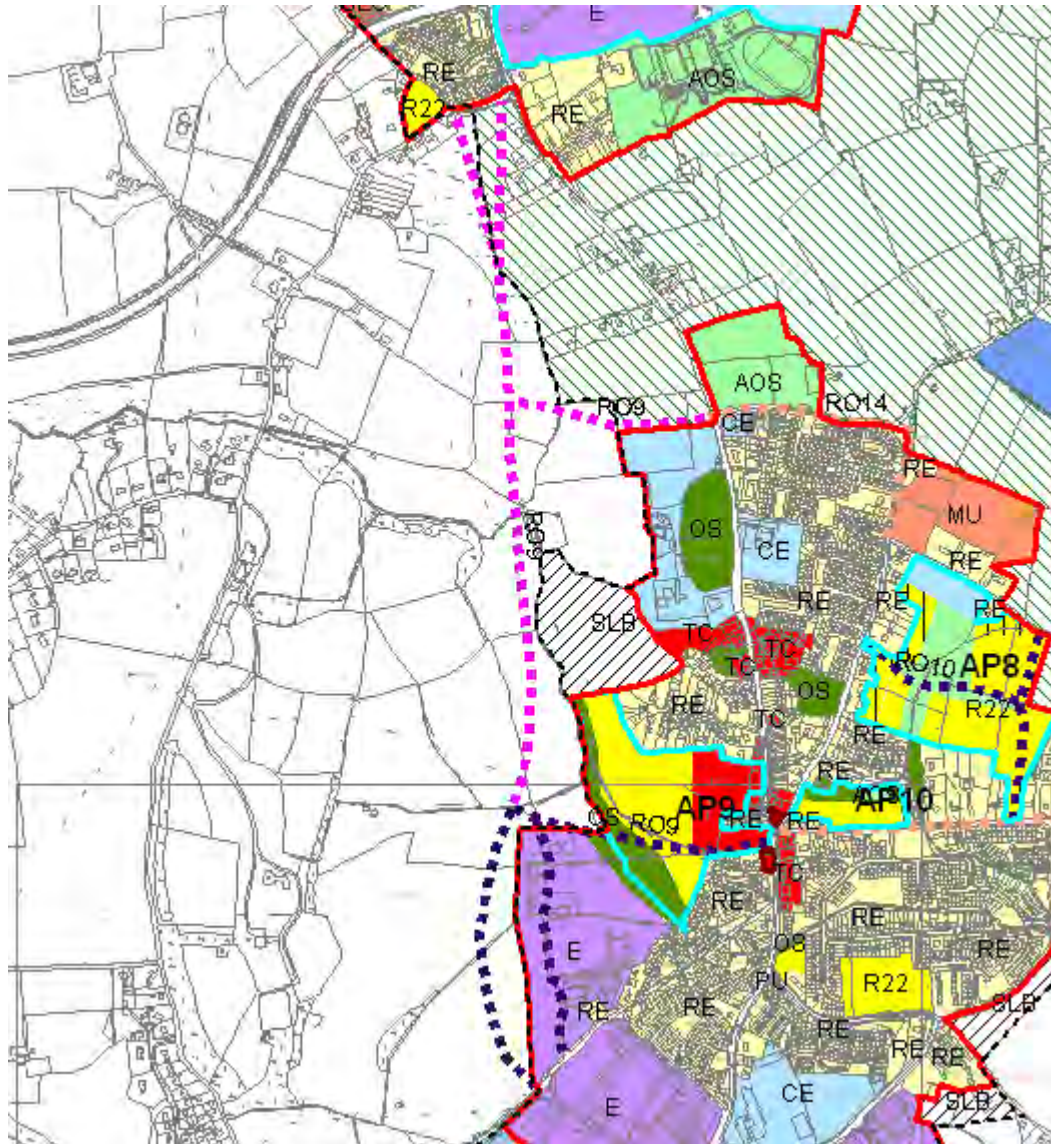
To



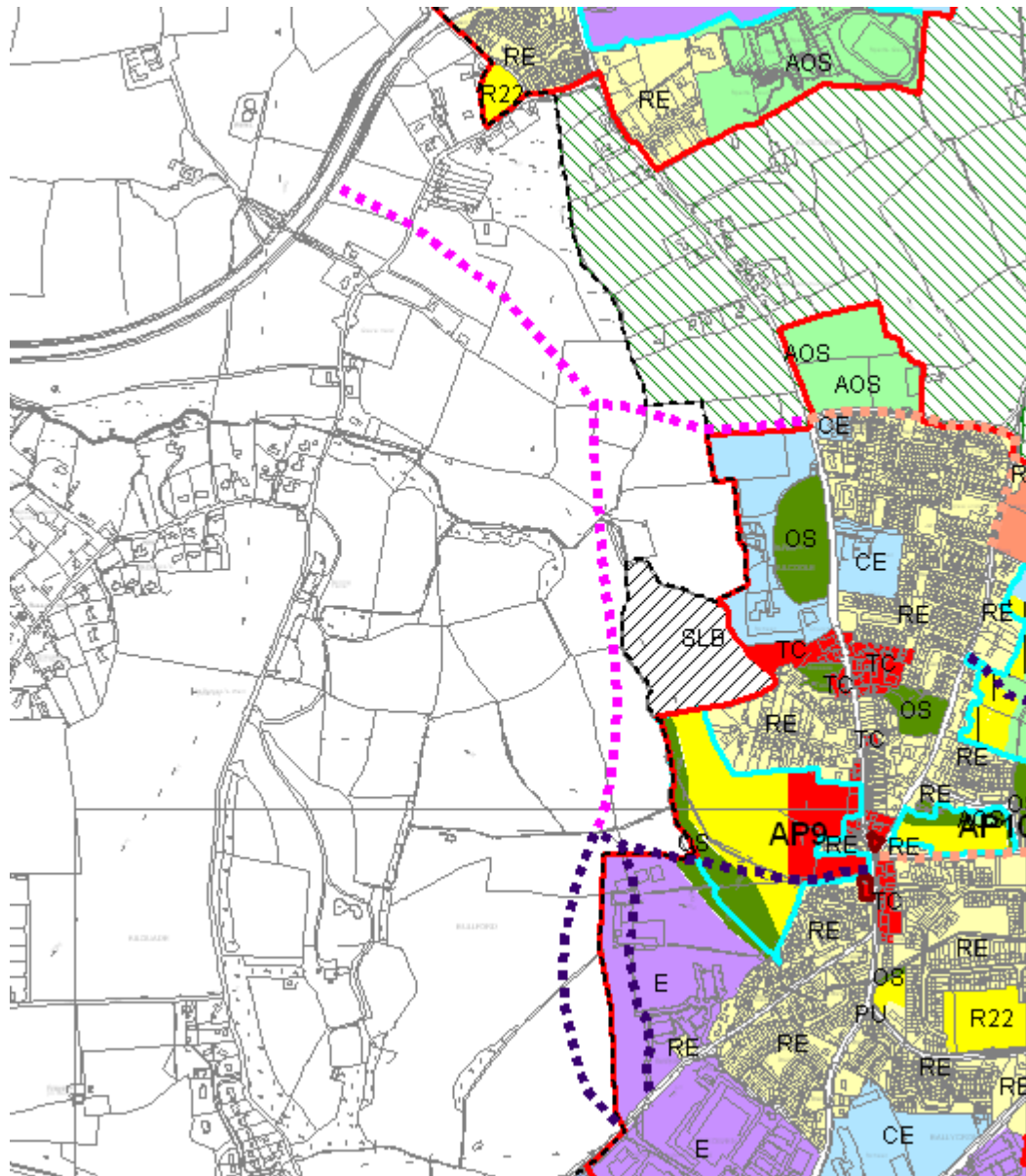
Topic
RO9 Roads Objective
Submission Number
34
Summary of Issues Raised
<p>Map submitted proposing possible alternative route for the Western Distributor Road (RO9) to Kilcoole. This will:</p> <ul style="list-style-type: none"> • Provide easier and more direct route to access the west and south of Kilcoole where employment zoning and existing Industrial Estates/Business Parks are located. • It avoids difficult junction at Pretty Bush corner • Provides access onto the Southern Access Route/Farrankelly Road • Reduce journey times • Roundabout on Farrankelly Road/SAR would provide easier access to lands to north.
Opinion of Manager
<p>It is agreed that the proposed possible alternative route would provide enhanced benefits to the area in terms of providing for the future proper planning and sustainable development of the area. In addition, it is considered that the proposed re-routing is feasible from a roads engineering and design point of view. The proposed route as indicated in this submission is likely to provide the greatest options for the long term future development of the roads network in the general area.</p> <p>It is not necessary to include three possible routes for the northern link of the proposed RO9 road to R774. As such, it is recommended that the current long term objective for the development of the northern part of RO9 be replaced with the proposed option as set out in this submission.</p>
Manager's Recommendation
<p>RO9 should be amended as follows:</p> <p>1. RO9 objective to be amended as follows:</p> <p><i>To provide for the development of a Western Distributor Road to bypass Kilcoole. The southern section of the route shall be developed according to one of the following two options: (i) southern junction of the new road shall be provided at the intersection with Kilcoole Industrial Estate, Creowen and route to extend northwards, or (ii) southern junction of the new road to be provided at the current entrance of Bullford Business Campus and road to extend northwards through the Business Park, including necessary upgrades and widening of the current estate road. As option (ii) poses constraints regarding road alignment and standards of design, option (i) is the preferred option. The development of the road according to option (ii) is subject to the agreement of the planning authority, in conjunction with the Roads Section, pending the preparation of a traffic analysis and design study.</i></p> <p><i>The northern section of the route shall be developed, in the long term, according to one of the following two options: (i) linkage to the R761 at Farrankelly, or (ii) linkage to Priory Road to the west of Eden Wood/ Farrankelly Close.</i> <i>The northern section of the route shall be developed in the long term, with linkage to the R774.</i></p> <p><i>It is a long term objective to develop an additional link between R761 intersection with Lott Lane and the Western Distributor Road.</i></p> <p><i>To provide for the development of a local access road in conjunction with the development of zoned lands at AP9: Bullford Action Plan and to provide for the development of a through link road from Main Street to the Western Distributor Road. This section of the route is necessary for the opening up of zoned lands (AP9 and E lands at Bullford Farm). Only 50% of development on these lands shall be permitted before the southern part of this road is completed.</i></p>

2. Map A to be amended as follows:

From



To

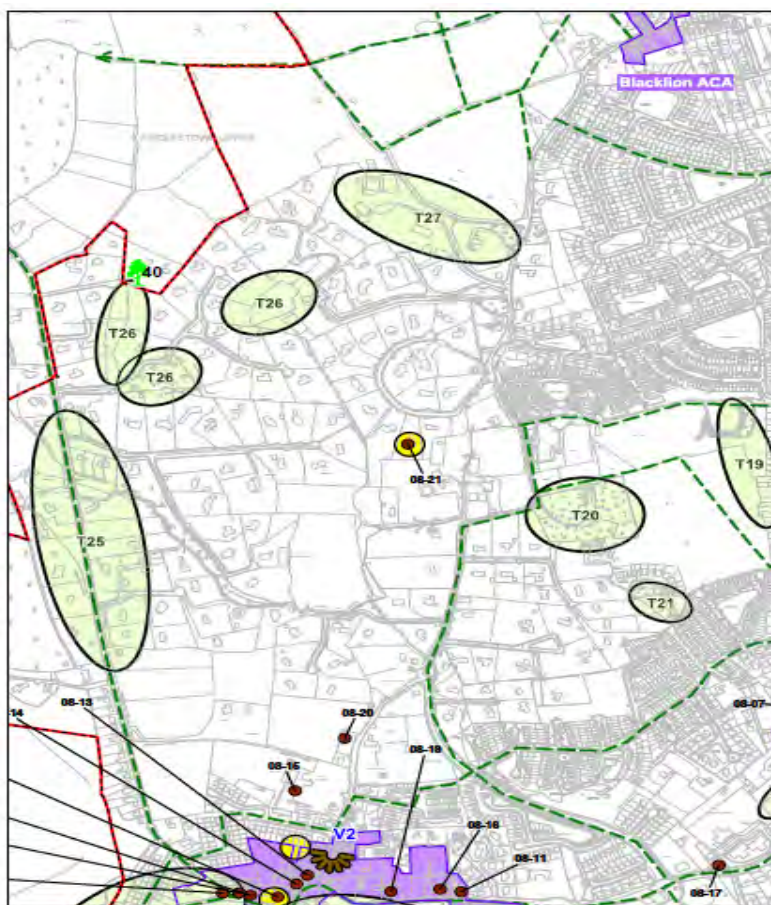


Topic
RO10 Roads Objective, AP8 Kilcoole
Submission Number
165
Summary of Issues Raised
Acknowledge need for the proposed road. Suggest alternative location to link proposed road to existing Sea Road. More appropriate to use existing road, located approximately 50m east of the proposed road.
Opinion of Manager
This proposal has been considered in conjunction with the Roads Section of the Council. It is considered that the proposed alternative link along the existing access laneway is deficient in terms of width and alignment. The current proposed route is a more acceptable alternative, in the interests of public safety, traffic management and protecting the amenity of existing residents.
Manager's Recommendation
No change

Topic
Indicative Greenroutes
Submission Number
164, 43, 20
Summary of Issues Raised
<ul style="list-style-type: none"> • TS12 should prioritise routes including green route parallel to Three Trouts River extending from Delgany-Kilcoole Road – Charlesland Road-Seafront. Improve greenway connectivity at Charlesland Estate to Kilcoole Road (bus stop), between Charlesland Estate and Burnaby Lawn, Charlesland Road to Burnaby, Mill Road to side of Rugby Club. • Development at Coolagad should include creation of a greenway connecting to Kindlestown Hill/Woods. • David J. Walsh recommends that the right-of-way between Upper Kindlestown and St. Lawrence's School be designated a greenroute. This is a school route and part of Delgany Heritage Trail. • Need to include objective to maintain and upgrade the coastal walkway that extends south from Greystones to Kilcoole and on to Wicklow Town. • Brendan Byrne submits the following with regard to a proposed coastal green route: Propose that land be designated for the purpose of linking this Coastal Green Route from Bray Head through Greystones Seafront, leading to Kilcoole. Maps of route should be included in LAP. Suggested route: Bray promenade to cliff walk, past Raheen Park Car Park, along upper side of Bray Head golf course, past Bray Head Lodge and passing over Bray Head west of the R761 Bray/Greystones Road and descending into Greystones. Bray plans support proposals for cycle routes.
Opinion of Manager
<p>All of the suggested additional indicative greenroutes have been considered in conjunction with the Roads Section of the Council. Map B of the Draft LAP includes all indicative greenroutes within the plan area. All suggested additions are already included in Map B, with the exception of the route between Upper Kindlestown and St. Lawrence's School. It is considered that Map B should be amended to include this route – refer to Manager's Recommendations.</p> <p>Objective TOUR3 of the Draft LAP provides for the development of a coastal walkway and cycle route between Greystones-Delgany and Kilcoole. In addition, this greenroute is shown on Map B, with an indicated possible extension further south of Kilcoole. Objective TS12 promotes the development of greenroutes for pedestrian and/or cycling facilities. HER8 aims to maintain and enhance the 'cliff walk' from Bray to Greystones. Having regard to these objectives, it is considered</p>

Manager's Recommendation

From



Topic
Access from R774 to Evans Land including Charlesland Golf Club
Submission Number
78
Summary of Issues Raised
<p>Wilson Evans, Clive Evans and Lance Evans submit the following:</p> <p>Request that plan include provision for the granting of access to submitter's property, including Charlesland Golf Club, from the R774 dual carriageway. Access could be provided at any one of several points, e.g. at roundabout. Would help fulfil some of the objectives of the plan. Would provide safe and easy access to businesses in IDA complex.</p>
Opinion of Manager
<p>It is unclear from the submission, which exact lands are being referred to by the submitters. It does however appear that the lands in question relate the Charlesland Golf Club. The planning authority is aware of the need to ensure that undeveloped lands do not become landlocked in the future. As</p>

such, the current Draft LAP includes an objective relating to 'through route corridors'. Objective TS13 states *"Lands being developed at the periphery of the developed part of zoned lands should provide for corridors, to ensure lands that could be required to facilitate future population increases in future LAPs are not landlocked and can be effectively and efficiently accessed."* It is considered that this objective adequately addresses the matters raised in this submission.

It should also be noted that it is not within the remit of a development plan or the Planning Authority to require the landowner / controllers of the Seabourne View development to provide access to third parties lands, if this was not a requirement of their planning permission; this would be a private matter between the landowners. However, having regard to the above objective, the design of any future development on lands zoned R22 to the south of Seabourne View will have to make provision for access to possible future development lands surrounding the site.

Manager's Recommendation

No change

TOPIC 8: NATURAL AND BUILT HERITAGE

Topic
Protected Structures
Submission Number
4
Summary of Issues Raised
Kindlestown Castle, Killincarrig Castle and the Old Mill should be protected.
Opinion of Manager
<ul style="list-style-type: none"> Kindlestown Castle is a recorded monument (RMP WI 8:17) protected under the provisions of the National Monuments Acts and is also a Protected Structure (RPS 08:21) as included in the Wicklow County Development Plan. Killincarrig Castle is a recorded monument (RMP WI 13:05) protected under the provisions of the National Monuments Acts and is also a Protected Structure (RPS 08:29) as included in the Wicklow County Development Plan. The Old Mill is a building of substance and historical interest, and should be considered as a potential future addition to the RPS following on from a more detailed assessment.
Manager's Recommendation
<p>No change to Draft LAP.</p> <p>Upon completion of the LAP process, the planning authority will carry out further investigation of the Old Mill building in order to determine whether the structure or specified part(s) of the structure warrant addition to the RPS. Pending the results of that investigation, the council will follow up with appropriate action as relevant.</p>

Topic
Architectural Conservation Areas
Submission Number
65, 164, 50, 61
Summary of Issues Raised
<ul style="list-style-type: none"> While Joseph Carty welcomes the introduction of the Harbour ACA, John Desmond queries the appropriateness of the ACA, in light of the predominance of modern post 1960s development of varying styles – a more limited extent should be considered. It is submitted that there is a need to recognise the burden that is place on homeowners of protected structures/ within ACA areas. Need to assist them and make them aware of implications of designations. Council should assist owners within ACA to make them aware of the development implications regarding exempted development, of designation. Suggest fee for Section 5 referrals be waived. Delgany Village ACA: Council to be pro-active in protecting heritage and LAP should include provisions for the taking of suitable action to protect heritage. Owners of Stylebawn should be required to remediate vandalism at site.
Opinion of Manager
<p>It is considered and that the various buildings, structures, open spaces and other elements within the Harbour area collectively contribute to the special interest and distinctive character of the area and warrant the additional planning control achieved by the ACA. Applications for alterations to the exterior of individual buildings will be dealt with on a case by case basis, and will be assessed based on their impact on the character of the ACA as a whole.</p> <p>The importance of communicating to the public on the implications of Protected Structures and ACAs is acknowledged and agreed. This awareness raising forms part of ongoing forward planning work, as does the co-ordination of schemes of grant aid to home owners, where available. It should be noted that the creation of an ACA places no additional burden on the homeowners of Protected Structures. The council provides planning advice and conservation guidance in the form of section 57</p>

Declarations free of charge to homeowners of Protected Structures; however it is not within the Council's power to waive fees for section 5 referrals.
Re: Delgany Village ACA - This point is acknowledged. The council takes a pro active approach to protecting heritage within the statutory framework and within available resources.
Manager's Recommendation
No change

Topic
La Touche Hotel
Submission Number
Issues Raised:
<p>A total of 94 submissions were received on the proposed deletion of the La Touche Hotel from the Record of Protected Structures (RPS), including from local residents, tourists, elected representatives and prescribed bodies (An Taisce). In addition to submissions received, a Facebook page 'Protect the La Touche' was set up by a local community group to protest against the removal of the La Touche Hotel from the RPS. This page has 1,054 'likes'⁴, generally from members of the local community, in support of the protest.</p> <p>Of the 94 submissions received, 93 submissions are generally against the proposal to delete the La Touche Hotel from the RPS. One submission (from Philippe Brodeur) was received in favour of the proposal to delete the structure from the RPS. Mr. Brodeur is in favour of the removal of the protected status in order to allow for the development of the site.</p> <p>In general, the submitters are protesting against the proposal to delete the structure from the RPS on the following grounds:</p> <ul style="list-style-type: none"> • Iconic Greystones landmark – important to the identity and character of the town. • Significant architectural value. • La Touche Hotel is identified in the NIAH as being of regional significance (Ref 16304004). • At heart of Greystones community for many years – community have sentimental association based on affectionate memories of the hotel. • Historical and cultural value – association with Irish historical figures, including Michael Collins, Kitty Kiernan, Samuel Beckett, Synge, Behan and DeValera. Inspiration for JG Farrell's novel 'Troubles'. Seminal to the development of the town, from fishing village to tourist destination. Place names in locality relate to the La Touche Hotel • Makes significant contribution to amenity of this area. Highly visible structure, e.g. visible from distance upon entering Greystones, structure and new harbour road are within same line of sight. • Protection of this heritage site can bring many benefits to the area, including economic, tourism and educational contribution. Potential for hotel development on site, which is much needed. • Bound to protect architectural heritage under Convention for the Protection of Architectural Heritage in Europe (Granada Convention).

⁴ As of 26th February 2013

- Under Article 1, it is of conspicuous historical, artistic, social and technical interest.
 - Removal from RPS would contravene Article 5 and 10.
 - Wicklow County Council has allowed building to fall into disrepair – contrary to Convention.
 - Need to take advantage of powers within the Convention for bringing building back to service.
 - May be other roles the building might play for the community – refer Article 11
 - Stripping of protection in order to remove any unnecessary financial burden from potential investors is contrary to EU law/ contrary to principle of preserving heritage.
- Fear that if preservation order is lifted, structure will be replaced with modern structure – comparisons made to harbour development and desire that heritage is not destroyed to pave way for modern, bland, unsympathetic development.
 - General disagreement regarding financial reasons for removal of preservation order:
 - Building only unused against backdrop of recession.
 - Removing status will not alter current state of idleness.
 - Protective order is not a prohibitive obstacle to development. Cost of complying with protection order is not preventing development but absence of credit for speculative development is. In time, interest in investment will resume after recession
 - Fall in value of site would compensate a prospective developer for the cost of making good the façade.
 - Not job of council to protect profit margins of developers.
 - To remove the protective status because site derelict, would be to reward the neglect of a protected building and to set a dangerous precedent.
 - A developer has expressed an interest in developing a commercially viable project, whilst preserving heritage features.
 - NAMA has released funds for maintenance.
 - Concern regarding the legacy for this and future generations.
 - For LAP to be a success, there needs to be 'buy-in' from key stakeholders, most important of which, is the local community – 'people power' should count.
 - Regarding objective OP3 (Section 4.3: Opportunity Sites), while some submissions note the intent of this objective, it is also argued that this is an unreliable and unacceptable form of protection, as a range of circumstances could enable the removal of the façade.

While submissions are against the proposed deletion of the structure from the RPS, it appears that the motivation for objections is generally primarily based on the concern that the deletion will result in the demolition of the structure. There is unanimously strong opposition against the demolition of the structure. In addition, the vast majority of submissions specifically request that protection be retained for the original four Victorian facades of the building. A number of submissions suggest that the protection of the external facades of the structure should not be removed, and if a decision is made to remove the structure from the RPS, then protection should be replaced by the imposition of an Architectural Conservation Area (ACA) which specifically refers to the preservation of the original four facades.

It should however be noted that a number of submissions express concerns regarding whether adequate protection can be provided for the external structure through an ACA designation. In this regard, the following issues are raised:

- If ACA provides adequate protection, then why the need for 'protected structures' in first place?
- If removed and replaced with ACA, then why not apply same logic to all protected structures within Harbour ACA and remove all other structures from RPS in this area?
- ACA designation disregards commitment in Convention to pursue restoration.

- ACA only to be considered as last resort.
- ACA should be in place before building is removed from RPS.
- Wording of ACA important - ACA should stipulate that the footprint of the building remains unaltered and the whole façade is restored unaltered.

A number of submissions include recommendations regarding the future use of the site. Recommended suggestions include:

- General support for the rejuvenation of site.
- Support for internal improvements. Allow for modern improvements.
- Potential to restore the gardens.
- Suggest site be zoned for 'hotel use only'
- Any works on original building should ensure re-use of the original construction material
- Against modern design on site.

Managers Opinion

Note: This matter is also considered in the Manager's Report on Proposed Additions to and Deletions from the Record of Protected Structures (RPS).

The protection of the La Touche Hotel is enshrined within the Local Area Plan through objectives HER 1, HER 12 and Opportunity Area Objective 'OP3: La Touche Hotel, Trafalgar Road'.

The proposal to remove the building from the RPS and offer it alternative protection through its inclusion in the proposed Harbour Area ACA is considered warranted, given that the building's internal features of special interest have been lost in recent years. This approach is in keeping with *Architectural Heritage Protection Guidelines for Planning Authorities* DOEHLG (2.7.1), which in turn is based on the Government's commitment to Architectural Heritage protection as enshrined in the Granada Convention (1987).

The Council is of the opinion that the ACA provisions as set out in the Planning and Development Act 2000 (Part IV Ch.2) are a more appropriate vehicle for ensuring that the La Touche Hotel, its character and setting and its wider contribution to the local built heritage is protected.

The concerns expressed that the proposed removal of protected structure status and replacement by ACA designation will facilitate the future demolition of the building are acknowledged but considered unfounded. However in the interests of clarity, and to emphasise that the demolition of this building will not be permitted, a wording amendment is recommended.

Manager's Recommendation

Amend the plan as follows:

(1) Objective HER 12, add the following text (shown in **red**)

HER12: To preserve the character of Architectural Conservation Area's (ACAs), in accordance with Appendix B. The following objectives shall apply to ACAs:

- Development will be controlled in order to protect, safeguard and enhance the special character and environmental quality of ACAs.
- The buildings, spaces, archaeological sites, trees, views and other aspects of the environment that form an essential part of the character of an ACA will be protected.
- **Proposals involving the demolition of buildings and other structures that contribute to the special interest of ACAs will not be permitted**
- The design of any development in an ACA, including any changes of use of an existing building, shall preserve and/or enhance the character and appearance of the ACA as a

whole.

- Schemes for the conservation and enhancement of the character and appearance of an ACA will be promoted.
- The character and appearance of the urban public domain within an ACA shall be protected and enhanced. The Council will seek to work in partnership with local community and business groups to implement environmental improvements within ACAs.
- Within the Church Road ACA, alterations to the front boundaries to accommodate off-street car parking, will not normally be permitted.
- Historic items of street furniture and paving within ACAs shall be retained, restored and repaired.
- All electricity, telephone and television cables within ACAs shall be placed underground where possible.
- The placing of satellite dishes, television aerials, solar panels, telecommunications antennae and alarm boxes on front elevations or above the ridge lines of buildings or structures will generally be discouraged within Architectural Conservation Areas, except where the character of the ACA is not compromised.

It should be noted that the designation of an Architectural Conservation Area does not prejudice innovative and contemporary design. The principle of a contemporary and minimalist design style will be encouraged within ACAs, provided it does not detract from the character of the area. It is considered that new buildings should be of their own time in appearance and should not replicate the style and detailing of heritage buildings. The replication of historic architectural styles is considered to be counter productive to heritage conservation in principle as it blurs the distinction between what is historic and what is contemporary and can lead to the emergence of poorly considered and inauthentic buildings.

(2) In **Appendix B: Section 3.8** 'Architectural conservation areas and development' add the following text:

3.8 ARCHITECTURAL CONSERVATION AREAS AND DEVELOPMENT

When submitting a planning application for works to a non-protected structure located in an Architectural Conservation Area, additional information may be requested by the Planning Authority, depending on the extent and likely impacts of the development proposed.

In principle, applications for development which are not consistent with the character, policies and objectives for Architectural Conservation Areas will not be granted planning permission.

In consideration of applications for new buildings, alterations and extensions affecting Architectural Conservation Areas, the following principles apply:

- Proposals will only be considered where they positively enhance the character of the Conservation Area.
- **Proposals to demolish buildings and other features which contribute to the special interest of the ACA will not be permitted**
- New buildings should, where appropriate retain the existing street building line.
- The mass of the new buildings should be in scale and harmony with the adjoining buildings and the area as a whole, and the proportions of its parts relate to each other and to the adjoining buildings
- The Council shall actively encourage the reinstatement of historically accurate architectural detailing on buildings of heritage interest in accordance with good conservation practice.
- The introduction of roof-lights to buildings of heritage or historical value should in principle be limited to the rear of the building.
- A high standard of shop front design relating sympathetically to the character of the building

and the surrounding area will be required.

- The materials used should be appropriate to the character of the area. Proposals to repair rather than replace original features will be encouraged, and where replacement does occur similar materials and compatible design will be required.
- Planning applications in Architectural Conservation Areas should be in the form of detailed proposals, incorporating drawings of full elevation treatment, colours and materials to be used.

(3) In **Appendix B Section 3.6** 'Greystones Harbour Area ACA (proposed)' add the following text:

Character

The ACA is characterised by its seaside location and a predominance of well preserved 19th century buildings which includes houses, public buildings and a small number of commercial premises. There are fine semi-detached Victorian houses and terraces at Bayswater Terrace, Simonton Place and Marine Terrace. The former Coastguard station, now a Garda Station, is a significant public building occupying a terrace of eight houses, part two-storey and part three-storeys. The La Touche Hotel, although no longer in use, remains a significant local landmark and a reminder of the area's late Victorian / Early Edwardian seaside resort popularity. The **original** building occupies a prominent elevated position and an extensive associated site **and contributes significantly to the special interest of the area**. There are two churches; the Greystones Presbyterian Church on Trafalgar Road and the Church of the Holy Rosary on La Touche Road, the latter occupying a large site which includes a car park to the rear. The two schools; St. Bridget's National School and St. David's Secondary school are both modern buildings with flat roofs. Evidence of Greystones' earlier pre Victorian origins as a small fishing settlement can be found in the single storey vernacular style buildings along the west side of Trafalgar road, while Bethel terrace contains a fine example of Georgian architecture.

Proximity to the coast and the views of the sea to the east and north are key characteristics of this area. There is an extensive and accessible coastal open space along the length of Marine Road and Cliff Road. This area is of high amenity value and is an integral backdrop to the harbour area ACA. Other important open spaces include the hard landscaped triangular area with ship's anchor in front of Bayswater Terrace which contributes greatly to the local seaside character, and the car park on Trafalgar road which is pleasantly screened by trees and vegetation. Many of the houses have small front gardens, with planting and boundary hedging that softens the overall visual appearance of the built environment.

The area is characterised by:

- Predominance of two storey semi detached and terraced house with rendered finishes, moulded quoins and slate roofs.
- The building facades are characterised vertically orientated sash windows, timber panelled doorways and fanlights, many chimneys are rendered with corbelled caps and clay pots.
- Houses generally set back from street and surrounded by low roughcast rendered walls and square rendered gate pillars, with small front gardens.
- Pebble encrusted coping where used on boundary walls adds a local distinctiveness and seaside character.
- There are some well preserved traditional style shopfronts
- The views of the sea and coast with an extensive green open space running along Marine Road and Cliff road and associated hard landscaping, paths and benches
- **The Victorian seaside resort character as represented by the original building of the La Touche Hotel**

(4) In **Section 4: Retail**

Amend '4.3 Opportunity sites', Greystones Harbour Area ACA (proposed)' as follows:

Amend **OP3: La Touche Hotel, Trafalgar Road** as follows:

OP3: La Touche Hotel, Trafalgar Road

- *To facilitate the redevelopment of the site for a mix of uses, including commercial, tourist, leisure, office and residential uses, in accordance with the TC zoning objective.*
- *Any development on the site shall be in accordance with the objective to preserve the character of the Harbour ACA.*
- ~~*Subject to enabling development that meets modern requirements, it is an objective to retain external facades and internal features of interest, where this is possible.*~~
- *Protect the amenity of existing residential properties in the area.*

TOPIC 9: ACTION PLANS

Topic
AP2: Blacklion
Submission No.
35, 156
Summary of issues raised:
<ol style="list-style-type: none"> 1. Suggest CE zoned lands for secondary school at Blacklion be swapped with R22 lands at Charlesland - schools at Blacklion will result in traffic hazard in absence of RO2. Charlesland closer to population, served by Charlesland dual carriageway, closer to town centre, adjacent to sports facilities. 2. Request that sufficient land reserved at new school sites in Blacklion for school sports facilities/playing fields.
Opinion of Manager
<ol style="list-style-type: none"> 1. The CE lands at Blacklion have been purchased by the Minister of Education for the purpose of constructing a secondary school. A planning application has been lodged for this school and a decision is due before 17 April 2013. Therefore it is unclear what has stimulated this request. With regard to the development of schools in the Charlesland area, the draft plan makes provision for the zoning of two sites for a primary and a secondary school site already. 2. The land zoned CE at Blacklion meet Department of Education and Skills site size guidelines, which have been arrived at making allowance for school buildings, car parking, various sports including hard courts and pitches and other ancillary facilities. The nature of type of sports facilities provided will be a matter for the Department and the school patron body.
Manager's recommendation
No change

Topic
AP3: Greystones Harbour and North Beach Action Plan
Submission Number
146
Summary of Issues Raised
<ol style="list-style-type: none"> 1. AP3: Greystones Harbour and North Beach Action Plan: <i>"Provision of coastal protection from the harbour/marina to at least 250m past the Gap Bridge. Cliffs to be re-graded and high level and low level walks with occasional access to the beach provided with appropriate planting on the slopes and sides of the walkways. The park is to be of contemporary design which will attract wide public use. It is intended to be an integral part of the development design concept to form a natural transition between the harbour development, the possible future heritage park, and the outstanding beauty of the natural coastal landscape up to Bray Head."</i> Request this to be maintained within LAP. Request objective to be implemented. 2. The lack of coastal protection has led to division of the beach at The Gap Bridge. Request Council to review and provide secondary access to North Beach, at the site of where the Historic Gap Bridge was removed. This access is missed by local residents at north of the town.
Opinion of Manager
<ol style="list-style-type: none"> 1. As per response set out to DAHG and EPA submissions, the current objective as set out in the Draft LAP has been amended (refer to proposed amendment no. 21). Objectives are implemented on an on going basis subject to available resources and other considerations as relevant.

2. Due to coastal erosion issues, there is no feasible option available at this stage, to provide secondary access to North Beach.
Manager's Recommendation
No change

Topic
AP5: Killincarrig
Submission No.
114, 160
Summary of issues raised:
<p>1. Submission No. 114 from Gervais Landy makes the following points:</p> <ul style="list-style-type: none"> (a) It is proposed that the wooded area to north-east of AP, be re-landscaped and re-contoured to promote use as an informal, low maintenance play space and running trail. (b) It is requested that the objectives be amended as follows: <p>From: "Suitably re-contour and landscape the lands at the north-east part of the site to render these lands open to maximum passive supervision from surrounding residential areas, or other alternatives that would achieve similar objectives"</p> <p>To: <i>"Suitably re-contour and landscape the lands at the north-east part of the site to render these lands suitable for walking, running and children's play by: cutting new trails through existing bramble and gorse hedges, retaining existing trails and footpaths, landscaping the central area with gently sloping mounds and dips to promote childrens play."</i></p> <p>2. Submission No. 160 is from the majority landowner of the action area (Townpark Estates Ltd) and the following requested are made:</p> <ul style="list-style-type: none"> (a) It is put forward that while the lands are zoned appropriately for future development, parts of the proposed AP5 are restrictive and inequitable, rendering the lands commercially undevelopable. Securing commercially viable planning permissions for sites is crucial, particularly if the community and social objectives with the action plan are to be delivered. (b) Request plan be amended in relation to: <p>1. Requirement for a Special Roads Contribution</p> <p>AP5 requires a special contribution to recent existing road improvements in the area. This is the only special contribution of its kind in the draft LAP, and is unduly onerous, jeopardising the commercial viability of these lands. This contribution is required in addition to provision of new junction south of St. Laurence's NS, associated road improvements and standard development contributions. Request that special contribution requirement be removed from plan.</p> <p>2. Amendment of 6 hectare cap on Developable Area</p> <p>AP5 allows for new residential development on a maximum area of 6ha (density 22/ha) including single storey dwellings. This cap does not reflect the zoning map or situation on the ground – the lands shown on the plan map measure c.7ha. Lands within ownership of WCC do not appear to be accounted for.</p> <p>The introduction of zoning objectives across the site negates the need for detail regarding the number of units permissible within the written statement – zoning objective can adequately control amount of units permitted over the site. Request that reference to the 6ha cap be omitted and wording amended as follows: <i>"Allow for new residential development of average density of 22/ha"</i>. Alternative suggested wording: <i>"Allow for new residential development on a maximum area of 7ha"</i></p>

(average density of 22/ha)".

3. Terms of Phasing Conditions

Proposed AP 5 requires that development should be phased such that the improved educational, community and open space facilities required be delivered in Phase 1 with a maximum of 60 residential units. Phasing conditions will render development commercially impossible to achieve as the capital outlay to put infrastructure in place cannot be justified by capping the first phase to 60 units. Request phasing controls be omitted, or alternatively request phasing as follows:

- Phase 1 – 60 units via Delgany Glen, expansion/facilities at St. Laurence's and new 60 place car park.
- Phase 2 – 60 units via L1027(Delgany-Blacklion), new junction at St. Laurence's, all weather pitch and MUGA, direct access between school and sports facilities, open space areas and landscaping.
- Phase 3 – remainder residential units via access from newly built junction south of St. Laurence's NS.

Opinion of Manager

1. While there certainly are merits to maintaining a semi wild area for children to explore and play, anti social behaviour in this area is an ongoing problem because these lands are not overlooked and are easy to 'hide' in due to the topography and tree cover. The existing objective of the plan requires that lands to be suitable landscaped and re-contoured to eliminate this problem but the objective also provides that other alternatives that would achieve similar objectives are open for consideration. While the final format that this open area will take will only be determined at the development stage, it is considered that the key objective should be to eliminate any 'hidden' areas and make this area useable and safe for all. Therefore no change is recommended to the objective
2. With regard to the requests from the majority landowner:

1. Requirement for a Special Roads Contribution

The members may recall that under the provisions of the 1999 Development Plan for Greystones – Delgany, the entirety of these lands were zoned C1 ('provide for community and/or education uses') and O (preserve public open space).

During the preparation of 2006 LAP, detailed consideration was given to the possible future development of these lands to benefit the community and how this might be achieved. It was determined that the lands in question should be designated an 'action area', 'Z2' as follows:-

An Action Plan is proposed for an 11.5 hectare site in Killincarrig (see fig. 9.2); incorporating a backland site, St. Laurence's School and an area of public open space. The site is bounded by residential development to the north namely Kenmare Heights and Kindlestown Park. The eastern boundary is defined by the rear gardens of dwellings fronting the R761. To the south and west the site backs onto Delgany Glen housing development. To the west the site adjoins a collection of single dwellings on large plots.

The objective of the Action Plan will be to review the land-use zoning and objectives for the lands, and to put forward a sustainable and integrated approach to development. Key considerations in preparing the Action Plan will be:

- *Provide potential for enhancement and expansion of St. Laurence's School and associated facilities*
- *Deliver expanded and improved sports and recreational facilities and public green space. Sports facilities proposed should be available for use by the general public and St. Laurence's School. Sports facilities should consist of all weather pitch (suitable for soccer*

/ hockey etc) and possibly flood-lit facilities.

- *Provide greenroutes across the site, linking Killincarrig, Kindlestown and Delgany.*
- *Protect existing treeline of mature Scots Pine and provide for enhancement of tree planting*
- *Allow for new residential development, up to a maximum of 40 units. Such units shall be so located within the Action Area to maximize overlooking of public green spaces, greenroutes and sports facilities.*

It was considered at that time that a small element of residential development on the lands would provide the financial impetus for development and would also allow new community facilities be overlooked by new houses thus improving supervision and safety.

During the currency of the 2006 LAP, a request was made by the majority landowner of the action area, Townpark Estates Ltd, to amend the action area and in particular, to allow additional housing. Following consideration of this proposal by both the Council executive and elected members, it was determined that revisions to the action area should be put to the public for consideration, on the basis that additional gains would accrue to the community in return for the additional housing (up to 132 units). These additional gains comprised:

- the provision of additional car parking to St. Laurence's school
- the provisions of a MUGA, along with the previously required playing pitches
- the making of a special contribution to recent existing road improvements in the area

This proposal was put to the public through the LAP amendment process and the amendment was adopted on 1st March 2010.

In light of the above, it is considered that considerable gain has accrued to the landowner by virtue of the increase in the number of housing units allowable from 40 to 132 and in this context, it is recommended that the special contribution remain in place.

2. Amendment of 6 hectare cap on Developable Area

The lands zoned R22 have been rechecked and measure 5.71ha. Lands zoned RE (WCC lands) within the action area measure 0.6ha i.e. total of 6.3ha. Some of the RE lands are not suitable in size and gradient for development, so this figure has been rounded down to 6ha. At 222 units / ha, which is the zoning allowed, this equates to 132 units.

It is considered that the text should retain the specified number, as this number was carefully arrived at in the consideration of the 2010 amendment (detailed above).

3. Terms of Phasing Conditions

Again, in regard to the additional gain achieved by the landowner in increasing the capacity of the lands from 40 units to 132 units (i.e. dwelling equivalent of 6ha x 22/ha), it is imperative that the community facilities that go hand in hand with this gain be delivered. Phasing is the best mechanism to ensure delivery. Furthermore, the road network serving the site is not adequate in its current form to serve additional housing and therefore it is essential that such works occur early in the development. Therefore it is not recommended that the phasing provisions be omitted completely.

With regard to the alternative phasing suggested:

- the provisions set out in the plan already allow for a 1st phase of 60 units, to be accompanied by improved educational / community / open space facilities and special contribution to recent existing road improvements in the area;
- the alternative community facilities proposed by the developer for Phase 1 (i.e. 'expansion/facilities at St. Laurence's and new 60 place car park', instead of 'improved educational / community / open space facilities and special contribution to recent existing road improvements in the area') are either (a) already delivered, (in that the landowner has already made land available to St. Laurence's school for car parking which is now available for use) or

<p>(b) the developer has no control over the delivery of the facilities (in that the improvement of facilities at St. Laurence's are dependent on finance and sanction from the Department of Education); therefore limited gain would accrue to the community from the development of this alternative Phase 1;</p> <p>- it is not appropriate for the development plan to specify that these 60 units can be constructed with access via Delgany Glen – this route passes through an existing housing estate and there has been concern from the outset that this route would not be able to support significant traffic increases. Such decisions are more properly the function of a planning application, where impacts on particular parcels of land can be appropriately dealt with. In this regard, the existing plan provides that:</p> <p><i>'Access to a limited number of units to be provided via Delgany Glen. The number of units allowable shall be determined following detailed traffic and junction analysis taking into account other zoned lands that may be accessed through this route'.</i></p> <p>- the Manager does not recommended that this development be allowed to proceed even with a 1st phase until firm plans (including timeline and financing) are in place for the delivery of improved open space and play facilities within the action area, particular having regard to the gains that have been achieved by the landowner in terms of increased housing capacity on the land since 2006.</p> <p>It is recommended therefore that the existing phasing provision is retained in the plan.</p>
Manager's recommendation
No change

Topic
AP6 Farrankelly Action Plan
Submission Number
32, 145, 156, 73
Summary of Issues Raised
<p>Submissions received generally against the proposed development of AP6 lands:</p> <ul style="list-style-type: none"> • Not in favour of rezoning at AP6 Farrankelly – contributes to urban sprawl, diminishes rural character of area. • These lands provide rural buffer between Delgany and Killincarrig. • R22 zoning at Farrankelly is unrealistic – R5 more appropriate. • Why is this area zoned for high density housing. • AP6 is significant habitat for wildlife – need to protect, need for a walking route along stream. • There is Pingo in the region of the rezoned section of Farrankelly which may be of interest to Council. • Not safe to add intersection to this already dangerous road (accident black spot) • All access to the Farrankelly lands (AP6) should be from the R761 and not from Priory Road. (ABP Inspector Report for temporary construction entrance at Priory Road by Borg Developments submitted). • Detrimental to amenity of adjoining properties, including properties along Priory Road. • Require explanation, in practical terms, or how <i>"residential amenity of existing adjoining properties"</i> is to be protected.
Opinion of Manager
<p>While it is noted that a number of submissions object to the proposed development of AP6 lands at Farrankelly, it is considered that the proposed development of this area is appropriate for the following reasons:</p> <ul style="list-style-type: none"> • AP6 is an 'infill' site, located within the existing settlement boundary of Greystones-Delgany and is considered to be appropriate for the development of future housing.

- The application of an average zoning of R22 is appropriate across the site. Subject to environmental constraints within the site, the density in certain areas may be required to be lower and other less vulnerable areas higher (while still retaining an average density across the site of 22/ha).
- The Council is aware of the value of the Three Trouts river and valley as a wildlife habitat. A Local Biodiversity Area Study commissioned by the Council in 2006 highlighted the various habitats of value present, in addition to a glacial meltwater channel (rather than a pingo). These areas have been zoned as open space with objectives for protecting the local biodiversity value.
- The need to ensure the protection of natural heritage is highlighted as part of the Action Plan.
- Roads issues affecting the site are considered under Topic 7: Transport and Service Infrastructure.
- In practical terms, the residential amenity of adjoining properties can be protected through the promotion of a layout and design that ensures that addresses issues such as overlooking, overbearing and overshadowing effects. The objectives of the Wicklow CDP 2010-2016 shall apply in this regard and shall be addressed in any development proposal for the site.

Having regard to the above, it is considered that the objectives as set out in the plan accord with the proper planning and sustainable development of the area and are in accordance with government planning guidelines. The objectives set out in the Draft LAP should be retained. In order to ensure the phased delivery of active open space with house, it is considered that a phasing requirement should be included.

Manager's Recommendation

Amend AP6: Farrankelly Action Plan as follows:

10.7 AP6: FARRANKELLY ACTION PLAN

This action plan is located at Farrankelly, on a site approximately 24ha in size. This are shall be developed for a mix of uses including residential and active open space, in accordance with the following:

- *Approximately 17ha to be developed for residential use.*
- *Approximately 4.5ha of land shall be provided for active open space.*
- *Lands identified at risk of flooding (under the FRA) shall be reserved as open space.*
- *Roads shall be provided in accordance with RO8, Section 7 of this plan.*
- *The residential amenity of existing adjoining properties shall be protected.*
- *Protection of natural and built heritage, including rivers and trees.*

No more than 50% of houses shall be delivered prior to the provision of the active open space.

Topic

AP7: Charlesland

Submission No.

6, 16, 27, 140, 91, 92, 78

Summary of issues raised:

1. Cllr. Derek Mitchell requests that the action plan objectives include a requirement for a bus lay-by to facilitate Aircoach
2. NTA strongly recommend that consideration is given to building both primary and post-primary schools to the north of Charlesland Road/R774, in order that neither are severed from their catchment by the dual-carriageway. Objectives to be included requiring site to be connected by

walking/cycling routes to adjoining residential areas, to enable access without use of R774. If LAP cannot be amended accordingly, significant works to R774 may be required, e.g. traffic calming, variable speed limits, pedestrian and cycle crossings and signalisation.

3. The NTA supports broad thrust of draft LAP objectives to provide jobs in order to reduce commuting but concern expressed regarding E zoned land south of Charlesland, due to remoteness from DART station and proximity to N11 interchange. Recommended that future planning permission on site be contingent on commitment to (i) no negative impact on operation of N11 interchange, (ii) subject to mobility management plan that equates to a target of up to 45- 60% trips by single-occupancy car, and car parking to be reflective, (iii) heavy goods vehicle access from N11 only, (iv) retail development not included.
4. A number of submissions were received from residents of Glenbrook Park relating the R22 and R17 housing lands opposite the estate. The R22 lands are located in AP7. The following issues are raised:
 - Residents object to possible development of site facing Glenbrook Park
 - Residents consider that enough houses have already been built in this area
 - Preservation of the prospect on the R761, designated P2 on Map B Heritage must be maintained
5. A request has been received from the landowners of the land adjoining this action area to the east that provision be made for access to their land and Charlesland golf club through from the Charlesland dual carriageway.
6. Submission No. 27 is from the principal landowner of the action area (Brambleglen Ltd):
 - (a) Are owners of bulk of lands in AP7, in addition to former Jackie Skelly fitness club to the south of AP7.
 - (b) Site for an electricity substation, located on the lands proposed for 'E: Employment' within the AP7 lands is no longer owned by the above.
 - (c) Welcome proposed zoning of 16ha for residential use and do not object to zoning of residual lands for CE and E uses. Will work to achieve the objectives of AP7.
 - (d) Note detail within 'Section 10.1 Action Plans' relating to cases where Planning Authority may agree that an action plan does not have to be agreed prior to the submission of a planning application, as follows:

"Action plan areas are areas that are designated for comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the area during the plan period. Separate applications for sections of each area will not be considered until an overall action plan has been agreed in writing with the planning authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area."

In some cases, the planning authority may agree that an action plan does not have to be agreed prior to the submission of planning applications. This will only be permitted in cases where it is likely that all objectives for the area (including phasing, provision of infrastructure, design solutions, density etc) can be successfully addressed in a planning application. This approach is generally limited to cases where the action plan lands are held within single ownership, where there is a limited amount of easily achievable objectives and where there are relatively few environmental constraints. In these cases, the planning authority shall provide written agreement, regarding the waiver of the requirement to agree an action plan, prior to the submission of a planning application."

The position, location and size of the land use zonings shown on Map A within the action plan areas are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out

below.”

It is requested that this section be amended as follows, particularly given that the bulk of AP7 is owner by the one landowner:

“Action plan areas are areas that are designated for comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the area during the plan period. Separate applications for sections of each area will not be considered until an overall action plan has been agreed in writing with the planning authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area.

In some cases, such as the Action Plan 7, the planning authority may agree that an action plan does not have to be agreed prior to the submission of planning applications. This will only be permitted in cases where it is likely that all objectives for the area (including phasing, provision of infrastructure, design solutions, density etc) can be successfully addressed in a planning application. This approach is generally limited to cases where the bulk of the action plan lands are held within single ownership, where there is a limited amount of easily achievable objectives and where there are relatively few environmental constraints. In these cases, the planning authority shall provide written agreement, regarding the waiver of the requirement to agree an action plan, prior to the submission of a planning application.

The position, location and size of the land use zonings shown on Map A within the action plan areas are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out below.”

Opinion of Manager

1. Public transport infrastructure can not be provided in isolation, and there has been no request from the principle agency, the NTA, nor from Aircoach who operate this service. In the absence of a coherent policy, or a specification of what is required, it is not reasonable to designate land for such a purpose. However, the road here is over 8m wide, and is capable of accommodating storage for 2 buses, even when the land around the road is fully developed.
2. Please see detailed full response to NTA submission (no.16) in this report in relation to these issues. No changes to the action plan objectives are required in response to the issues raised.
3. Please see detailed full response to NTA submission (no.16) in this report in relation to these issues. No changes to the action plan objectives are required in response to the issues raised.
4. Please see detailed full response to submissions from residents of Glenbrook Park on page 63 of this report in relation to these issues. No changes to the action plan objectives are required in response to the issues raised.
5. Please see detailed full response to submission from adjoining land owners to east on page 93 of this report. No changes to the action plan objectives are required in response to the issues raised.
6.
 - (a) Noted
 - (b) Noted; land ownership is not a consideration in a land-use plan
 - (c) Noted
 - (d) The change requested is not recommended as the existing wording already allows for what they are seeking. It is clear that these provisions apply to all action areas set out in the LAP and no distinction is necessary between action areas that are in multiple ownership and single ownership.

Manager's recommendation

No change

TOPIC 10: ZONING OBJECTIVES

Topic
Removal of 'ROS' (Residential Open Space) Zoning Objective
Submission Number
58, 64, 65, 111, 127, 130, 41
Summary of Issues Raised
<ul style="list-style-type: none"> Object to proposed rezoning of residential public open spaces throughout area from ROS (residential open space) to RE (existing residential) under the Draft LAP. Request that all residential open spaces retain their current ROS zoning objective "to preserve and enhance residential open space" as per the existing 'Greystones/Delgany LAP 2006-2012. Additional residential open spaces developed since the publication of the current LAP 2006 should be treated similarly. Also request that new objective be inserted into plan: "to work with and assist local community groups and residents enhancing residential open space". Concerned that revised zoning objective will open lands to development that will be detrimental to adjoining residential amenity. Space has many uses, often managed by local residents and is requirement of proper planning as set out in Government planning guidelines and Wicklow CDP 2010-2016. Proposal is not consistent with CDP policy, as required by legislation. Retention of ROS zoning is critical to their preservation. Confusing why small number of these OS areas have retained their zoning objective. Particular concern regarding rezoning of all existing ROS in Burnaby Heights, rear (east of) Castlefield Way/Castlefield Terrace, New Road/ Carrig Villas in Killincarrig. Burnaby Heights Residents Association object to rezoning of green areas in estate to RE. Recommend that green areas should be protected as 'green open spaces' and that any residential zoning would be a threat to their current purpose.
Opinion of Manager
<p>All existing housing areas, including house plots, estate roads and public open space areas, have been zoned 'RE: Existing Residential' under the Draft LAP. This is consistent with the approach undertaken in all other recently prepared land use plans in the county. All public open space areas that form part of designated open space for a housing area, is safeguarded through the following objectives of the LAP and Wicklow CDP 2010-2016:</p> <p><i>SOC8: Protect and improve public and private open space and recreation provision.</i></p> <p><i>SOC9: Public open space within residential housing estates shall be preserved and enhanced. No development shall be permitted that would compromise the integrity of these spaces. In particular, residential development shall not be permitted on designated public open space within these areas.</i></p> <p><i>OS3 of Wicklow CDP 2010-2016 prohibits non-community uses on areas of lands permitted or designated as public open space in existing residential developments.</i></p> <p>It is considered that the imposition of the above objectives will safeguard the integrity of residential public open space areas and that the Draft LAP adequately addresses the issues raised in the submissions.</p> <p>The following is a list of the main OS areas within residential areas have retained an open space zoning objective:</p> <ul style="list-style-type: none"> Open space designations within housing areas that are at flood risk. Kindlestown Hill – the open space designation at this location is retained by virtue of protected trees at this location. Dromont housing estate – the open space designation at this location is retained by virtue of a recorded monument and place.

Manager's Recommendation
No change

Topic
TC Zoning Objective – Harbour Area
Submission Number
50, 61, 62
Summary of Issues Raised
<p>TC zoned land east of the railway is primarily residential in nature. In order to take account of the residential nature of these lands and to ensure the protection of residential amenity, it is suggested that the TC zoning objective definition be amended, or alternatively also suggested that this residential area could be excluded from the TC zone.</p> <p>Suggestion for amended definition: From: <i>"To provide, provide for, and improve the development of a mix of town centre uses including retail, commercial, office and civic use, and to provide for 'Living Over the Shop' residential accommodation, or other ancillary residential accommodation. To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and promote urban design concepts and linkages between town centre activity areas."</i> To: <i>"To provide for, and improve the development of a mix of town centre uses including retail, commercial, office and civic use, and to provide for 'Living Over the Shop' residential accommodation while protecting the existing residential character and amenity of the area. To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and promote urban design concepts and linkages between town centre activity areas."</i></p>
Opinion of Manager
<p>While it is acknowledged that there are a number of residential properties located in the TC zone in the harbour area, it is considered that the zoning objective is appropriate as it allows for a mix of uses on lands in proximity to the centre and harbour area. Notwithstanding the TC zoning objective, the objectives set out in the LAP and Wicklow CDP 2010-2016 require any development proposal in these areas to have regard to the existing character of the area and to the protection of residential amenity, including objectives relating to the Harbour ACA, RES5 and RES8. As such it is considered that there are sufficient mitigation objectives in place to protect the residential amenity of existing residential properties and the character of these areas.</p>
Manager's Recommendation
No change

Topic
RE Zoning
Submission Number
37
Summary of Issues Raised
<p>RE zoning is not in accordance with Regional Planning Guidelines and Guidelines for Planning Authorities for Sustainable Residential Development in Urban Areas.</p> <p>While zoning is intended to allow appropriate infill, in practical terms, it has resulted in lower densities in areas previously zoned 9/acre, 7/acre and 4/acre and in refusals for planning permissions.</p> <p>Request that if RE zoning is to be retained, it is only applied to 'Old Burnaby' and high level, edge of plan areas. Suggest the following re-wording: From: <i>"To protect, provide for and improve residential amenities of adjoining properties and areas while allowing for infill residential development that reflects the established character of the area in which it is located."</i></p>

To: *“To protect, provide for an improve residential amenities of adjoining properties and areas while allowing for infill residential development that reflects or improves the character of the area and makes the optimum use of the land in which it is located.”*

Opinion of Manager

It is considered appropriate to zone all lands that are in existing residential use as ‘RE: Existing Residential’. The zoning objective for these lands is *“To protect, provide for and improve residential amenities of adjoining properties and areas while allowing for infill residential development that reflects the established character of the area in which it is located”*.

Objective RES5 states that *“In existing residential areas, infill development shall be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties”*.

It is considered that these objectives are appropriate and consistent with the proper planning and sustainable development of the area, and are in line with higher order planning strategies and guidelines.

Regard should also be paid to the Manager’s recommended amendments to the wording of RES5 relating to the density of development allowed on RE zoned land. The Manager’s recommended amendment is set out under the rezoning submissions relating to this matter – refer to Topic 12: Rezoning Submissions.

Manager’s Recommendation

No change

TOPIC 11: FLOOD RISK ASSESSMENT

Topic
Map C: Indicative Flood Zones
Submission Number
4, 50, 61, 62 & 148
Summary of Issues Raised
<ul style="list-style-type: none"> In addition to flood zones identified within the plan area, the following additional watercourses should be considered: watercourse from Delgany Woods under the R762, watercourse from Blacklion past St.Kilian's Church, watercourse from Lidl. Three flooding reports included – (i) from Cllr. Kelleher (18 January 2013), (ii) from Cllr. Kelleher re flooding in Rathdown Park (June 2012), (iii) Ms. Marie O'Reilly, 160 Redford Park. The contents of these reports should be considered in the preparation of the flood mapping. Map C which sets out the potential flood zones of the plan area is considered to be incorrect. The map identifies an area on Victoria Road which is liable to flooding however the cause of this flooding was due to the construction of ground works relating to the "Harbour View" apartments. This pipe became blocked during times of heavy rainfall, however over the years there has been work carried out to alleviate this situation. Any flooding that occurs on the street is now as a result of surface water where the gullies have not been cleaned. In addition it is considered that the flood mapping relating to the harbour area is incorrect and should be amended to reflect the construction of the new harbour area. A survey of the existing watercourses should occur in order to fully ascertain the direction of these watercourses. In addition this survey would illustrate if any of the drains and channels are blocked or if they are not deep enough to carry the flow of water that occurs. Plan refers to 'light' flooding – contrary to evidence of recent flood events this reference should be upgraded to areas of 'high risk'. The Planning Regulations should be changed so that flooding is considered as part of each planning application; houses should not be built near watercourses.
Opinion of Manager
<ul style="list-style-type: none"> In order to address the submissions regarding additional watercourses and recent flood events it is considered appropriate to outline the principles of the Flood Risk Guidelines, which are as follows: <ol style="list-style-type: none"> (1) Avoid inappropriate development in areas at risk from flooding (2) Avoid new developments which would increase flood risk elsewhere. (3) In exceptional circumstances some development may occur in areas of flood risk provided that the issue of flood risk is managed appropriately. <p>The purpose of carrying out a strategic flood risk assessment is to identify areas that are liable to flooding and to ensure that there are sufficient mitigation objectives to control development at such locations. This may entail zoning of land in such a way that prevents new development (e.g. OS zoning which would preclude the development of housing) or the inclusion of policies / objectives relating to the type or design of development in flood risk areas.</p> <p>The watercourses that have been included on the Flood Map C were taken from the Office of Public Works (OPW) and the Water Framework Directive (WFD) databases. These sources did not identify the water systems referred to in the submissions as flood risk corridors.</p>

The additional watercourses that have been identified in submissions are piped, surface water drainage systems, predominately located in built up areas and have suffered 'flood events' as result of blockages in the surface system in the area. They are not flood risk zones or corridors in the same sense as land located along open watercourses. Therefore the appropriate solution to addressing these concerns is to

(a) ensure that the development of greenfield lands does not contribute more surface water into these systems, and

(b) ensure appropriate maintenance of these sewers

rather than to identify whole corridors as 'areas at risk of flooding' with consequent knock-on effects for future development (including small scale development such as house extension) and potential impacts on property values / house insurance.

With regard to (a), the draft plan and the County Development Plan provides for the control and management of surface water from new developments⁵ and with regard to (b) maintenance of sewers is an operational matter for the Local Authority and therefore would not form part of the criteria and requirement of the Flood Risk Guidelines.

In relation to this issue, it is recommended that the flood risk zone identified between the entrance to Delgany Wood and Mill Road should be omitted from the identified flood zones, as flooding in this area is similarly only a result of blockages in the surface water system.

- In relation to the harbour area it is noted that the flood map reflects the old harbour area and as such it is considered that a revised map would be prepared to reflect the new harbour area. Therefore the new flood map for this area will reflect the flood zone mapping contained in Appendix C, Part 10 of the Greystones Harbour Development (2011), which was prepared by ARUP consultants. In addition, after examining the flood event on the Victoria Road area, it is considered that this should be removed from the flood map as the flood event was as a result of construction works relating to nearby apartments.
- In relation to the issues regarding the maintenance, surveying and cleaning of the watercourses, this is an operational matter for the Local Authority and as such the flood zone map produced is not a guide to cleaning and maintenance; it is simply to illustrate areas prone to flooding.
- There is no reference to 'light flooding' in the draft LAP or the FRA document. There is reference however to 'low' flooding in Objective TS6; however the purpose of this objective is to ensure that in areas where it has been determined that there is a 'low risk' of flooding, a flood risk

⁵ **TS4:** To implement flood management objectives as set out in the Wicklow County Development Plan 2010-2016 and to implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009).

TS5: To restrict the types of development permitted in Flood Zone A and Flood Zone B to the uses that are 'appropriate' to each flood zone, as set out in Table 3.2 of the Guidelines for Flood Risk Management (DoEHLG/OPW, 2009). Developments that are an 'inappropriate' use for a flood zone area, as set out in Table 3.2 of the Guidelines, will not be permitted, except where a proposal complies with the Justification Test for Development Managements, as set out in Box 5.1 of the Guidelines. Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines.

TS6: Notwithstanding the identification of an area as being at low or no risk of flooding, where the planning authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment may be required to be submitted by an applicant for planning permission.

SW1 (CDP): Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks.

SW2 (CDP): Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system.

assessment can still be requested of any application for development if new information has come to light that would alter this determination. The Planning Authority does not regard any flood event as 'light' - a strategic flood risk assessment was carried out in accordance with Flood Risk Guidelines and a flood map was produced. There are mitigation objectives (TS4-TS6) and objectives contained in the County Development Plan 2010-2016 (FL1-FL9) that ensures that there is sufficient protection for areas at risk of flooding.

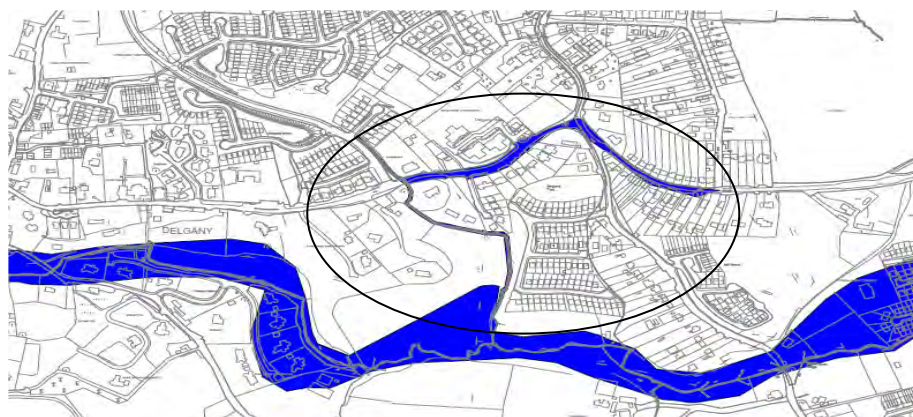
- The Planning Regulations are a matter for National Government and the Department of Environment, Community and Local Government. The Planning Authority's role is to implement and enforce these regulations and take account of any guidelines. The new Flood Risk Guidelines for Planning Authorities clearly set out that flood risk must be assessed as part of the assessment of any planning application and these guidelines are being implemented by Wicklow County Council through the adoption of appropriate policies / objectives in development plans and through the development management process.

Manager's Recommendation

Amend the flood maps as follows

- R762 at Delgany Wood

From:



To:

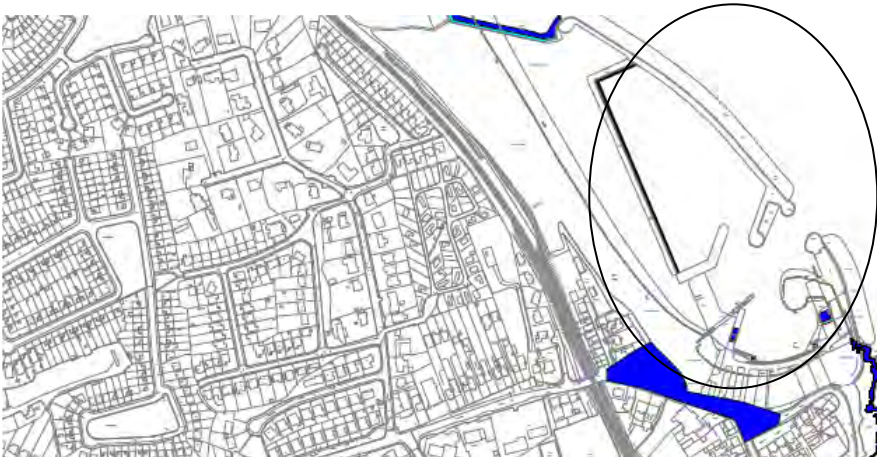


- Greystones Harbour

From:

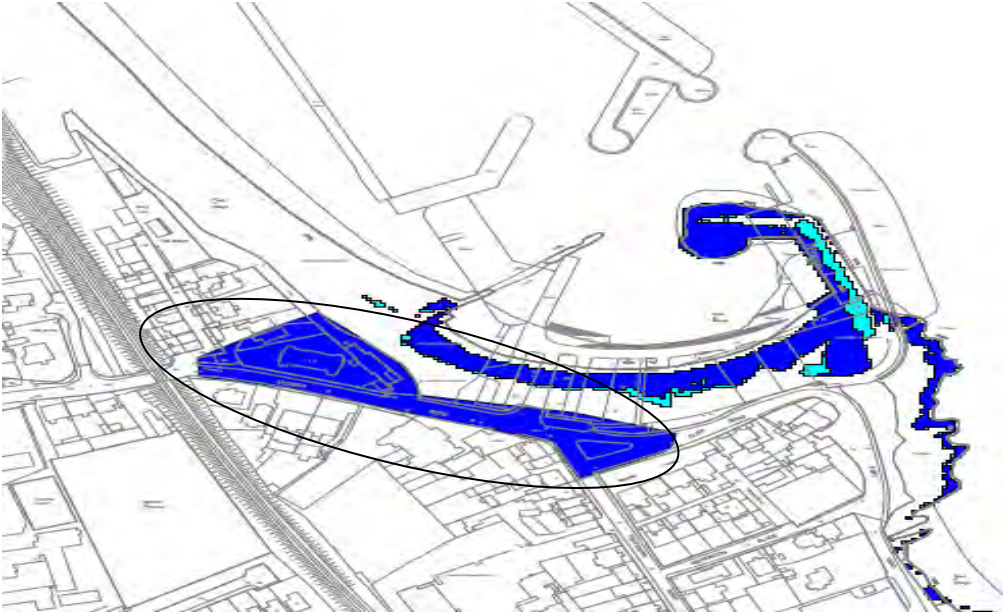


To:



- Victoria Road

From:



To:



TOPIC 12: REZONING SUBMISSIONS

No. 27

Brambleglen Ltd, Sean Mulryan and William O’Riordan of PricewaterhouseCoopers

This submission relates to AP7 lands and the former ‘Jackie Skelly’ facility at Charlesland.

1. Proposed AP7 lands

- (e) Are owners of bulk of lands in AP7, in addition to former Jackie Skelly fitness club to the south of AP7.
- (f) Site for an electricity substation, located on the lands proposed for ‘E: Employment’ within the AP7 lands is no longer owned by the above.
- (g) Welcome proposed zoning of 16ha for residential use and do not object to zoning of residual lands for CE and E uses. Will work to achieve the objectives of AP7.
- (h) Note detail within ‘Section 10.1 Action Plans’ relating to cases where Planning Authority may agree that an action plan does not have to be agreed prior to the submission of a planning application, as follows:

“Action plan areas are areas that are designated for comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the area during the plan period. Separate applications for sections of each area will not be considered until an overall action plan has been agreed in writing with the planning authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area.

In some cases, the planning authority may agree that an action plan does not have to be agreed prior to the submission of planning applications. This will only be permitted in cases where it is likely that all objectives for the area (including phasing, provision of infrastructure, design solutions, density etc) can be successfully addressed in a planning application. This approach is generally limited to cases where the action plan lands are held within single ownership, where there is a limited amount of easily achievable objectives and where there are relatively few environmental constraints. In these cases, the planning authority shall provide written agreement, regarding the waiver of the requirement to agree an action plan, prior to the submission of a planning application.

The position, location and size of the land use zonings shown on Map A within the action plan areas are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out below.”

It is requested that this section be amended as follows, particularly given that the bulk of AP7 is owner by the one landowner:

“Action plan areas are areas that are designated for comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the area during the plan period. Separate applications for sections of each area will not be considered until an overall action plan has been agreed in writing with the planning authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area.

In some cases, such as the Action Plan 7, the planning authority may agree that an action plan does not have to be agreed prior to the submission of planning applications. This will only be permitted in cases where it is likely that all objectives for the area (including phasing, provision of infrastructure, design solutions, density etc) can be successfully addressed in a planning application. This approach is generally limited to cases where the bulk of the action

plan lands are held within single ownership, where there is a limited amount of easily achievable objectives and where there are relatively few environmental constraints. In these cases, the planning authority shall provide written agreement, regarding the waiver of the requirement to agree an action plan, prior to the submission of a planning application.

The position, location and size of the land use zonings shown on Map A within the action plan areas are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out below."

2. Former Jackie Skelly facility

Facility is now largely vacant. Uses allowed under AOS zoning are restrictive. Request zoning of this building is changed from AOS to community and educational. This would widen the range of uses that could be accommodated on the site, compatible with AP7 objectives. It may be appropriate to extend the boundary of the AP7 to include the former Jackie Skelly building.

3. Lands off R761

- (a) Owners of 2.8ha between R761 and existing Charlesland scheme and 1.3ha north of Three Trouts Stream.
- (b) RO7 is redundant given the proposal to upgrade the existing bridge traversing the Three Trouts Stream. Upgrade of existing bridge negates requirement for new bridge while lands zoned for low density development in vicinity of the stream can be served from a new access off R761 or from existing road network within Charlesland scheme.
- (c) Noted that 'dezoning' of 1.3ha lands relates to flooding issues.

Manager's response

1. Proposed AP7 lands

- (a) Noted
- (b) Noted; land ownership is not a consideration in a land-use plan
- (c) Noted
- (d) The change requested is not recommended as the existing wording already allows for what they are seeking. It is clear that these provisions apply to all action areas set out in the LAP and no distinction is necessary between action areas that are in multiple ownership and single ownership.

2. Former Jackie Skelly facility

It is agreed that a CE zoning may be more appropriate to this site, particular as the current use does not itself comprise 'active open space' but instead an indoor facility and car park.

With regard to the request that this site be include in AP7, no reasoning for this request is put forward and it does not seem logical to tie an already developed site into an undeveloped action area, particularly as the purpose of action areas is to ensure that services are developed in tandem with new housing and to ensure 'planning gain' to the community.

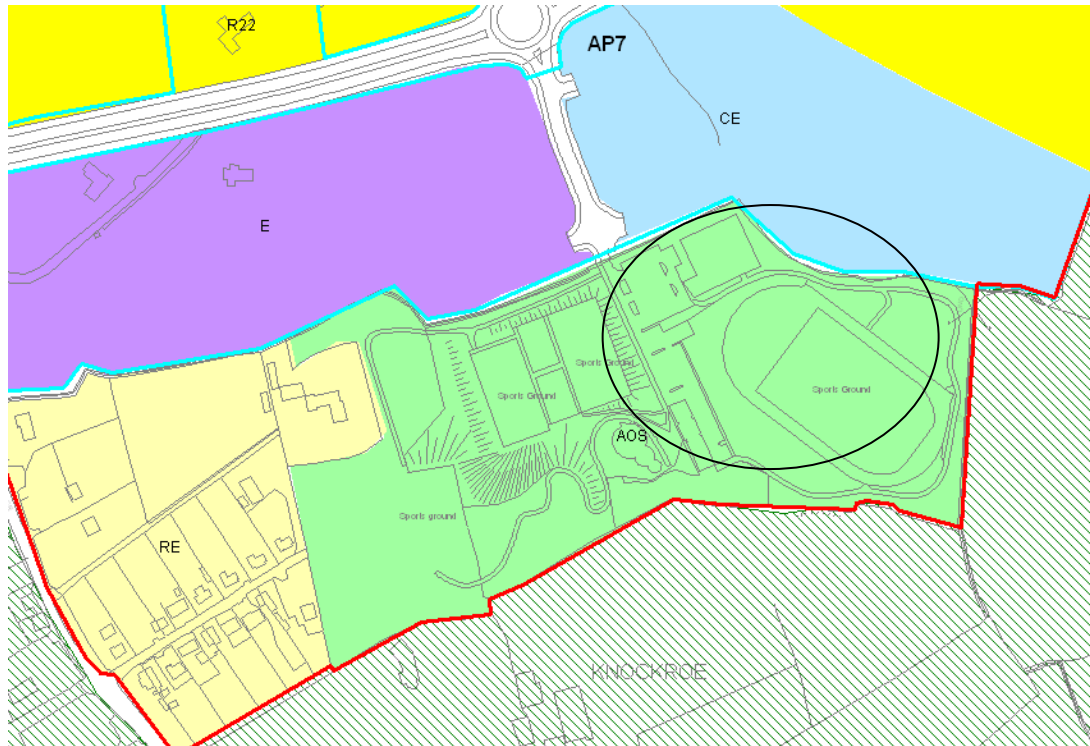
3. Lands off R761

- (a) Noted
- (b) The matter of the R07 roads objective is considered under Topic 7: Transport and Service Infrastructure. In summary, it is considered that the RO7 objective is redundant and the Manager recommends the current objective be deleted and replaced with a new objective for the improvement of the R761 from Burnaby Heights to Kilcoole, as appropriate. Refer to Topic 7 for further detail.
- (c) Noted

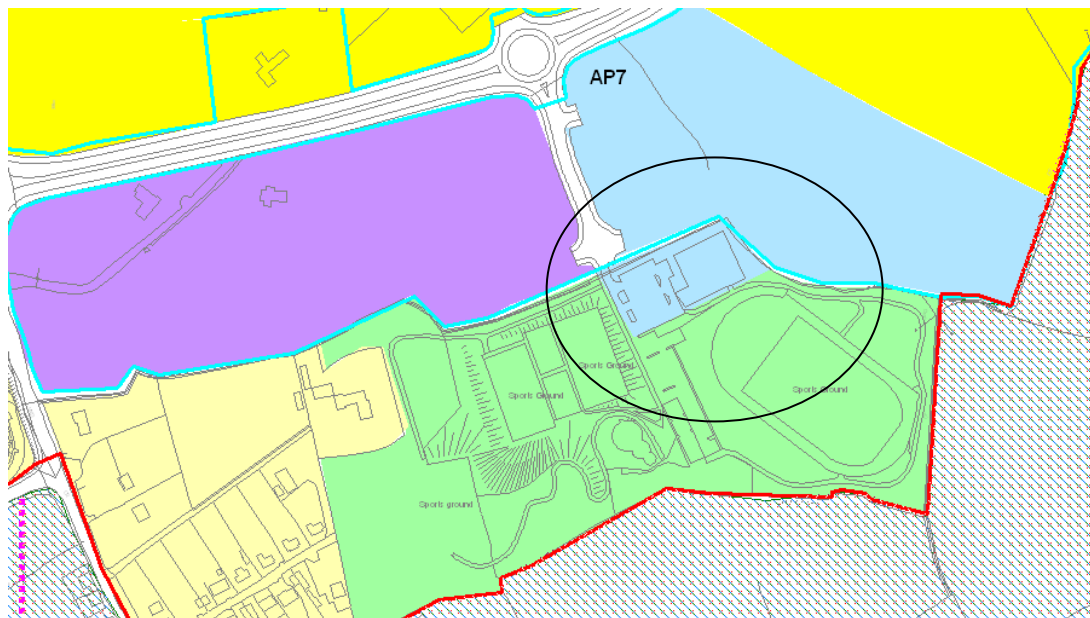
Manager's recommendation

1. Amendment to RO7 as per Topic 7: Transport and Service Infrastructure
2. Change c. 0.6ha at Charlesland from AOS to CE, i.e. Amend Map A as follows:

From



To



No. 47**Capital Securities Corporation Ltd.**

Submission relates to landholding measuring c. 7ha / 17 acres at Windgates, currently within the rural area (zoned GB – Greenbelt under Rathdown No.2 District plan, CDP 2010-2016) (Note: the submitter states that the site area is c. 20ha / 50 acres but the maps submitted do not correspond to this figure)

1. It is requested that the LAP development boundary be expanded to include these lands
2. The landowner is seeking to develop a '*seniors clinical healthcare centre*' accommodating some 170 people and the provision of a 125 bedroom hotel.

The proposed senior clinical healthcare centre is defined as '*an integrated medical healthcare facility with medical doctors and professional teams providing long term, intermediate, rehabilitation and step down medical and nursing care for seniors, the facility will also have a dedicated dementia unit. The facility will also have its own seniors Research and Development and informatics unit*'. It is put forward that the proposed uses are '*synergistic and will add value to each other if located on the one site...especially in the context if visitors and educational opportunities*'.

To facilitate this development, it is requested that the lands be zoned as follows:

- (a) The most northerly, wooded area – stay GB – c. 1ha
 - (b) The remainder - E3 'for senior clinical healthcare centre and hotel' – c. 5ha
 - (c) Alternatively, land could be zoned (i) 'Community and Education - CE' with specific objective for 'senior clinical healthcare centre' and 'Employment – E1' as 'hotels' are open for consideration in such E zones
 - (d) A final option would be to zone the land 'agricultural' within the plan boundary, but this is the submitters least preferred option.
3. It is requested that the plan make provision for policies / objectives explicitly encouraging the provision of a hotel in the town and the provision of elderly care facilities. The suggested policy regarding hotels should acknowledge that the preferred location would normally be in the town centre but that there would be consideration of each proposal on its merits given Objective TA2 of the County Development Plan. The location of a senior's healthcare centre should also be considered on its merits and in accordance with Objectives EMP17 and NH1 of the County Development Plan

Healthcare facility to include:

- 170 bed spaces - 35 for dementia patients and 135 for intermediate and long stay
- Dementia floor
- Clinical care facilities
- Seniors R&D
- Parkland and woodland access – scenic walks

Proposed Hotel to include:

- 125 bedrooms
- Conference facility
- Business centre
- Associated wellness and health spa.
- Can provide for tourist needs, business needs and residents/visitors to the proposed clinical healthcare facility.

Justification:

- Provides for the needs of an ageing population
- Provides hotel for the area
- Provides employment – 300 jobs and further 100 indirect jobs
- No suitable lands available within the settlement boundary for both of the proposed uses
- Proposed clinical healthcare centre is not suitable in urban area – rural setting more beneficial
- Two uses are synergistic and mutually reinforcing
- Proposal is supported by national, regional and local planning policy, e.g. RUR3, TA2, site located within 'corridor area', concerns about visual impact and effect on designated views and prospects can be addressed by confining development to lower parts of the site
- In planning terms there are no elements that could be construed as 'residential' in land use terms and that has a significant bearing on the land use zonings being sought

Manager's response

The Manager is supportive of all of the uses being proposed and the siting of such facilities in Greystones. However, the Manager does not consider these lands as suitable for this use for the reasons set out the follow:

The site is located in a highly scenic rural area, some distance from the built envelope of Greystones – Delgany, close to Bray Head. The land are a designated 'GB – greenbelt' in the Rathdown No. 2 District plan which forms part of the County Development Plan and are located in a landscape area designated as one of 'outstanding natural beauty'. The submitters themselves set out that the site is suitable for the uses proposed having regard to the '*elevated position*' of the site with '*commanding views*'.

Any significant development on these lands, as proposed, would seriously compromise the scenic amenity of the area and would significantly blur the distinction between Greystones and Bray, leaving very little undeveloped land along the Bray – Greystones road between the 2 settlements, particularly when one takes account of the zoning of land at Kilruddery, the relocation of Bray golf course to the northern slopes of Bray Head, the existence of an education facility immediately south of the proposed site and the extension of the Blacklion development area up to the Templecarrig Road.

It is accepted that there is an urgent need for a hotel in Greystones – the lack of a hotel is often cited as a difficulty in attracting investors into the area. The lack of a hotel also results in the tourism potential of the town not being exploited to the maximum, but a hotel at such a remove from the town centre and its associated tourist amenities such as the coast and the harbour, is unlikely to address this deficiency. While the submitter discounts a number of other possible sites in the town for such a mixed healthcare / hotel development, it is clear that there are numerous other locations in the town centre that could be developed for hotel use such as: the La Touche site, the new harbour development, the town centre expansion lands at Mill Road, the IDA lands at Mill Road, undeveloped lands around Charlesland and undeveloped residential lands around Delgany Village. The LAP makes provision for 'headroom' in residential zoning to make allowance for such lands either not being released to the market OR being utilised for some non-housing use.

With regard to the 'healthcare' aspect of the proposed development, while it is accepted that certain forms of health care such as respite / dementia centres and nursing homes may be more suited to rural / semi rural locations as their may be health benefit at being in a quiet, visually pleasing environment, the development type as proposed includes a range of other health facilities (such as elective surgery, post operative care) which would be more suited to a location within a settlement. A proposal for a smaller scale respite / dementia centre or nursing homes would be considered more positively, with appropriate setting and design that allowed the development to blend into this scenic landscape.

While it is stated that there is no 'residential' element to this proposal, this is not fully clear, it would appear that the provision of long stay 'retirement homes' forms part of the proposal.

With regard to Objectives TA2 and RUR3 referred to in the submission (see below) which address the development of hotels generally and commercial developments in rural areas, while these objectives could allow a development of this nature be considered on 'unzoned' or agricultural lands, the provisions of the Rathdown No. 2 District Plan 2010-2016 would however make the development of a hotel a 'material contravention' of the County Development Plan as hotels are specifically 'not permitted' in the greenbelt zone.

TA2 *To positively consider the development of new hotels⁶ in all parts of the County, with particular preference for locations in larger settlements (Levels 1-6 of the County settlement hierarchy). In other, more rural locations (villages / rural areas), it must be demonstrated that*

- *the area proposed to be served by the new development has high visitor numbers associated with an existing attraction / facility;*
- *a need for new / additional hotel type accommodation for these visitors has been identified having regard to the profile of the visitor and the availability and proximity of existing hotels in the area;*
- *the distance of the location from a significant settlement is such that visitors to the area / attraction are unlikely to avail of existing hotel facilities.*

RUR3 *To permit the development of commercial / industrial developments in rural areas, where it is proven that the proposed development requires to be located in the rural area and will have a positive impact on the location.*

Manager's recommendation

No change

No. 80

Patrick Fahey

This submission relates to a parcel of land measuring c. 1.68ha / 4.15acre at Creowen, Kilcoole. The lands are located to the rear and east of Colaiste Chraobh Abhainn.
Lands zoned CE under current Draft LAP.
Lands currently zoned CE under current Kilcoole LAP.

Request lands be rezoned to 2.05 acres R (residential) and 2.1 acres CE (community / educational). This division is suggested on the basis that a possible school extension may be in the order of 6-8 classrooms, which would most probably located on existing pitch site. The school would then require a new pitch which could be partially located on the existing school site and partially on the subject piece of land.

Rationale:

- Zoned lands required to achieve growth target
- Site ideally located with roads access, adjacent to school and employment uses
- Lands within existing built-up envelope
- Infill development
- Due to residential development to the north and east of the site, residential use is the only sustainable use of the site.
- Site can be serviced

⁶ A building, or part thereof, where sleeping accommodation, meals and other refreshments and entertainment, conference facilities, etc., are available to residents and non-residents, and where there is a minimum of twenty rooms en suite. A hotel includes an 'apart hotel'.

<ul style="list-style-type: none"> • No listed views • Other zonings may impact negatively on adjoining residential amenity • In the draft 2002 LAP, these lands were zoned for residential use. Zoning removed to accommodate other landowners who have not developed. Submitter has proven record in developing its land. • School developments may never happen – unfair that lands left idle
Manager's response
<p>The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan.</p> <p>It is important to note that:</p> <ul style="list-style-type: none"> (a) The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this; (b) Based on this population target, an appropriate amount of land has been zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities); (c) Enough land has been zoned in the plan to meet the target for 2019 (the lifetime of the plan) plus an additional 3 years beyond the life of the plan up to 2022 as recommended in Ministerial guidelines on development plan ('headroom'). (d) In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development <p>The rezoning of these lands from 'CE' to 'R' would increase the residential development potential within the settlement and allow for the population of the settlement population to extend beyond that allocated under the Regional and County population allocations and would therefore be considered not consistent with the Regional and County Strategy.</p>
Manager's recommendation
No change

No. 87
Richard Fox
<p>This submission relates to lands measuring c. 3.9ha at Cooldross Middle, Kilcoole. The lands are located immediately east of the Holywell development, east of the new distributor road.</p> <p>In the draft LAP, the lands are zoned:</p> <ul style="list-style-type: none"> - 2.2ha SLB – strategic land bank - 1.7ha unzoned – outside plan boundary <p>It is requested that these lands be zoned for residential development.</p> <p>Rationale:</p> <ol style="list-style-type: none"> 1. Subject site was included in the 1998 draft LAP – surprising that has not been included in plans since this time. A considerable amount of other land that was rezoned for residential development in 1998 remains undeveloped. Many of the other sites that are undeveloped have access/infrastructure issues, whereas subject site does not, e.g. Bullford AP9, Sea Road AP8, Kilcoole. 2. Lands are suitable for residential development as: <ol style="list-style-type: none"> (a) They are adjacent to existing built up area (b) Roads access available – newly constructed distributor road.

- (c) Within easy walking distance
- (d) No flooding issues
- (e) 1.6ha of lands currently zoned AGR (2008 LAP), i.e. next lands most suitable for development.
- (f) Proximity to town centre
- (g) Could be considered infill site.

3. Lands are more suitable for development compared to other zoned land:
- (a) Subject lands closer to town centre than RE zoning on Sea Road, MU Lott Lane and R22 Lott Lane (AP8).
 - (b) The site is required to complete the roundabout on Cooldross Lane that will tie in with the Eastern Distributor Road.
 - (c) Could incorporate the completion of this roundabout and the further upgrade of a section of Cooldross Lane as an objective of this plan in conjunction with the rezoning of a section of this site for residential development. Drainage issues could be addressed.

Manager's response

1. While a number of zoning options were considered for Kilcoole during the period 1998-2002, any proposed zoning contained in published / consultative drafts were legally superseded by the adopted LAP of 2002. In that plan, the more westerly part of this holding was designated an 'AGR' zoning. This was described as '**To provide for agricultural uses**' with a note '*Strictly without prejudice to the Council's right to make alternative land use zoning objectives, these lands are amongst those lands that the Council currently deems most likely to be considered in the next development plan if necessary during the period 2007-2016*'.

The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan. It is important to note that:

- The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
- Based on this population target, an appropriate amount of land has been zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities);
- Enough land has been zoned in the plan to meet the target for 2019 (the lifetime of the plan) plus an additional 3 years beyond the life of the plan up to 2022 as recommended in Ministerial guidelines on development plan ('headroom').
- In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development

Upon assessment of the housing / land zoning needs for Kilcoole up to 2022, it was determined that a total of 775 new housing units would be required to meet the 2022 population target. It was also determined that existing zoned housing land has capacity to deliver 782 units. Therefore there was no necessity to zone previously unzoned / AGR lands for further residential development.

The new SLB (strategic land bank) zoning is essentially the same as the former AGR zoning – these are lands that are in general terms likely to be suitable for residential development, but are not needed during the period of the current plan having regard to population / housing targets.

It is not correct to say that other lands that were zoned for residential development in 1998 have not been developed and therefore there is an argument at this time for the rezoning of these lands. Between 2002 and 2011, the population of Kilcoole has increased from 2,862 persons to 4,063 persons (increase of c. 42%), generally as a result of the development of new houses built on lands zoned in 2002. In fact, of the land zoned 'R' in 2002 for new housing, c. 23ha out of c.33ha has been developed.

Reference is made in the submission to 3 zoned housing sites and it is stated that these sites face access and infrastructural issues that cannot be remedied in the short term and in comparison, the proposed land does not face such constraints. The sites indicated are (a) AP9, (b) AP8 and (c) R22 lands on Cooldross Lane. It is not agreed that there are any serious access or infrastructural impediments to sites (b) and (c), while the requirements for new road construction in AP9 may result in a longer lead in time for AP9. However, this will allow for a natural phasing of development in the town up to 2019. Regardless of these issues, the AP9 area is so close to the town centre that it could not rationally or reasonably be omitted.

2. Noted

3. (a) The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan. It is important to note that:
- The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
 - Based on this population target, an appropriate amount of land has been zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities);
 - Enough land has been zoned in the plan to meet the target for 2019 (the lifetime of the plan) plus an additional 3 years beyond the life of the plan up to 2022 as recommended in Ministerial guidelines on development plan ('headroom').
 - In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development

Upon assessment of the housing / land zoning needs for Kilcoole up to 2022, it was determined that a total of 775 new housing units would be required to meet the 2022 population target. It was also determined that existing zoned land has capacity to deliver 782 units. Therefore there was no necessity to zone previously unzoned lands for further residential development.

With regard to the other zoned lands referred to:

- RE on Sea Road: RE stands for 'existing residential' – this zoning reflects the current use of the site and it is not therefore comparable to the submitters unzoned agricultural land
- MU on Lott Lane: This land was acquired by the Local Authority with public funds to provide for housing and community services for the people of the area. In this context, it is considered more suitable for development as it delivers a gain to society. The zoning of the land in question will not deliver similar benefits to the community.
- R22 lands in AP8 are to be developed as part of the larger block of land close to the town centre and will provide planning gain to society by delivering public open space, community facilities and access road to benefit the wider community. The zoning of the land in question will not deliver similar benefits to the community.

(b) This site is not required for the completion of the roundabout described – this roundabout is under construction already and is nearing completion.

(c) There is no necessity to upgrade Cooldross Lane beyond the new roundabout that would warrant the zoning of these lands, as this lane serves a small number of rural dwellings / holdings. Furthermore, no drainage issue on this lane have been identified by Council staff.

Manager's recommendation

No change

This submission relates to lands measuring c. 15ha lands at Sea Road, Kilcoole.

Under Draft LAP these lands are partly zoned SLB ('to provide a strategic land bank for future phases of development of the settlement after the lifetime of this plan') and partly unzoned. All of the lands are located outside the 'settlement boundary'.

This is a very detailed and technical submission setting out various calculations in support of the rezoning of this land to residential use. An Appropriate Assessment report is also submitted to address any concerns about the proximity of the lands to the Natura 2000 site.

1. Population targets and zoning calculations

- (a) It is put forward that while the plan calculations appropriately determine the amount of housing growth required in Kilcoole up to 2022 (775 units), the zoning of sufficient land for 782 units is too tightly drawn. This is contrary to good planning practice which advised a specified amount of over-zoning to allow for flexibility of choice, the potential that zoned land may not be delivered for development etc. It is suggested that an additional market factor of 30% be applied.
- (b) It is put forward that the population growth targets for Kilcoole are too low, given its status in the County Settlement Strategy, its location advantages, its strong physical, social and economic infrastructure and strong propensity to grow.
- (c) The use of a 5.6% vacancy rate in the future is inappropriate as it (a) does not accord with figure supplied by the RPGs (6.5%) and does not allow for obsolescence.
- (d) There are a number of miscalculations in the capacity of zoned land; in particular (a) the 2.4ha of R22 land at Cooldross Lane (which is zoned at a density of 22/ha) is stated as having a capacity of 74 units while 22×2.4 is 53; (b) the 0.34ha site at Cooldross Lane junction is stated as having a capacity of 31 units, while 0.34×22 is 7 units.

In light of the above, it is put forward that there is a zoning shortfall of 295 units or 13 ha at a density of 22/ha

2. Suitability of these lands for residential zoning

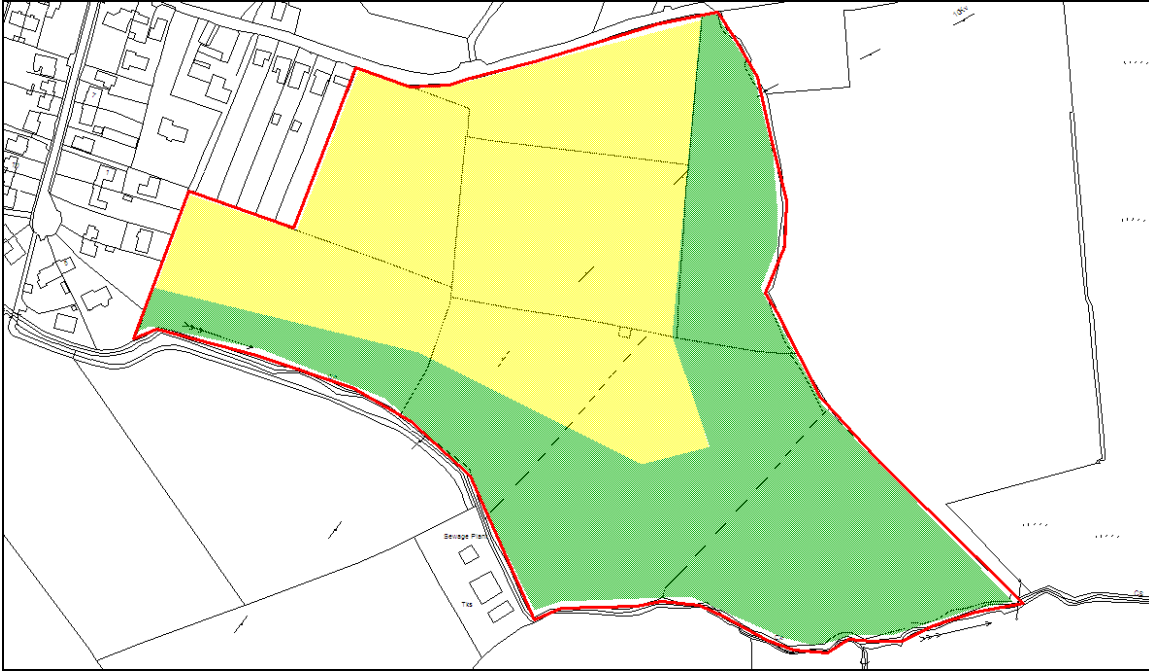
It is requested that 7.5ha of this holding be rezoned for residential development and remainder be zoned open space, as shown on drawing submitted and all lands to be included within the settlement boundary.

It is put forward that that these lands are suitable for this use for the following reasons:

- the lands adjoin the existing built up area of the town
- the lands have frontage onto Sea Road where reasonable sightlines could be provided
- the lands are relatively level with no distinct features
- water services infrastructure could accommodate additional housing development at this location (report submitted in this regard from Barrett Mahoney Consulting Engineers)
- any flood risk areas along the stream can be avoided
- site within walking distance of Kilcoole rail station, bus services and Kilcoole town centre, it is ideally suited to residential development and in line with planning policy for the promotion of public transport
- the development of these lands could deliver/contribute to delivery of footpath links from Kilcoole town centre to the station/sea
- the development of these lands could accommodate the delivery of lands / access routes for any future upgrade of Kilcoole WWTP

- any development on these lands could be so designated as to avoid adverse impacts on the adjoining area of Area of Outstanding Natural Beauty
- the lands could be developed without causing adverse impacts on the adjacent Natura 2000 site (report in relation to this issue submitted by Dr. Patrick Moran of FERS Ltd)

Proposed zoning



3. Reports submitted

(a) Infrastructure Report

Surface water: SW can be drained to the stream, and SUDS measures should be used to fully control the quantity and quality of SW discharge from the site.

Wastewater: It is proposed that the wastewater which will have a p.e. of 307, can be drained to the existing WWTP in Kilcoole. This plant has spare capacity but WCC has advised that there is an issue with water quality due to discharges from the plant. It is suggested that financial contribution from the development of this site could be used to upgrade the plant.

Flood risk: It is proposed that no development will occur on this site within flood zones A and B as per the FRA prepared for the draft plan.

Roads and transportation: Site is in close proximity to the railway station, the 84 bus terminates 250m from this site, the N11 transport corridor is 3km west of Kilcoole; road widening and footpath provision could be accommodated by the development of this site.

(b) Ecological Report

It is indicated that the purpose of the report is to record the habitats present on the subject lands and to assess the potential ecological value of those habitats.

Manager's response

1. Zoning calculations

- (a) Given the projected demand of 775 additional housing units, the provision of adequate zoned land for 782 units is correct – the duration of this plan is only up to 2019, and the demand up to that date is actually only 583 units (see page 1 of Appendix A). The plan zones land for an additional 199 units to allow for 'market factor' or 'headroom' i.e. flexibility, in the event that some lands do not deliver the number of units envisaged and where landowners do not release their lands to the housing market.
- (b) The population targets for Kilcoole are a matter for the County Development Plan and are not open for review through the LAP process. However, it is worth noting that considerable discussion has been held over the years about the population target for Kilcoole and the general consensus is that Kilcoole, as a small town, which has experienced rapid growth between 2002 and 2011, and is not designated in any higher order strategies as a 'growth town', has already absorbed an adequate amount of the new housing development, particularly having regard to the services that are available. The town is in fact lacking in public transport services, school capacity, play areas and community spaces.
- (c) The 2010 Regional Planning Guidelines for the GDA indicate that Local Authorities should plan for a vacancy rate of 6.5% in 2022, compared to 9.9% in 2006 (average GDA rate). As set out in the RPGs, this vacancy level reflects the need for the market to operate efficiently with a normal turnover of stock. The figure was chosen on the basis of research drawing on experience for within the EU and USA. This figure includes an 'obsolescence factor' of 0.5% per annum, which could be considered in the low range but reflects the fact that almost 40% of the housing stock in the State is under 10 years old.

Therefore the RPGs advocate an approach whereby Planning Authorities should plan for a falling vacancy rate from 2006 levels, until an 'equilibrium rate' of 6.5% is reached in 2022. However, the vacancy rate in this LAP area is already lower than 6.5% which makes sense given the high demand for houses in this area and a lack of obsolescence. It therefore is considered more rational to apply and maintain the current vacancy rate of 5.6% for the area moving forward.

It should be noted that the application of a 6.5% figure would result in there being a need for 2,196 units in Kilcoole in 2022 as opposed to 2,177 as set out in the draft plan i.e. a difference of 19 units. Given this small difference and given that the plan provides 'headroom' of 199 units, it is not considered that the use of 5.6% instead of 6.5% makes a fundamental difference to the overall zoning provisions in the plan and certainly would not warrant to the zoning of 7.5ha of land for housing.

- (d) The R22 lands at Cooldross Lane have current planning permission for 74 units. Similarly, the lands at Cooldross Lane junction have extant permission for 31 units. While these are above the 'zoning capacity', the number permitted is considered to be the best indicator of capacity. Furthermore, it should be noted that a density of 22/ha means 22 units of 125sqm standard size or 2,750sqm of housing floor space per hectare. Where smaller houses / duplexes / apartments are provided, more units per hectare can be considered so long as the overall cap of 22 x 125sqm per hectare is not breached.

Therefore no changes are recommended as it is considered that the figures and calculations provided in the plan are accurate and robust. Nothing in the submission would warrant the zoning of 7.5ha of additional land.

2. Reports submitted

- (a) While it is correct that there is 'spare capacity' in the Kilcoole WWTP in terms of BOD loading, the discharges from the plant are currently regularly exceeding a number of parameters, in particular ammonia and orthophosphate levels. At this time therefore this plant has no capability to take any additional inflows until this problem is rectified, which will entail expenditure in new systems. There is currently no funding secured for these works although a request has been made for same from the DoE. Were this funding secured, this would only address the current flows in to the plant. This is thus

only a short term solution.

Any additional flows into the plant would necessitate much more significant upgrades and considerable investment. This is not considered the most efficient, economic or environmentally approach and an alternative plan has already been developed and approved in principle by the DoE which entails the construction of a new regional wastewater treatment plant at Leamore, which would take in wastewater from Kilcoole, Newcastle, Newtownmountkennedy and Kilpedder.

Therefore this proposal (i.e. to constructed an additional 165 units with connection to this plant and a special contribution towards plant upgrades) is not viable or realistic and is therefore not recommended.

(b) At the outset of this report, it is stated that the purpose of the report is to record the habitats present on the subject lands and to assess the potential ecological value of those habitats.

The following findings are important to note:

Freshwater habitats: It is noted that there is a stream present which connects to a number of ditches through the subject lands. It is noted that this habitat has the potential to support numerous species of both flora and fauna of conservation concern and forms a direct source-pathway-receptor linkages between the lands and the Natura 2000 site.

Woodland and scrub habitats: The hedgerows provide invaluable ecological corridors and are likely to be of great importance with regard to breeding birds and have the potential to support bat roosts, bats being a species of Annex IV of the EU Habitats Directive

The study concludes that some fields to the east of the holding have the potential to support several plant species of conservation concern and habitats for foraging conditions for over wintering wildfowl, while the fields to the west side of the holding are of less ecological significance. Therefore the report concludes that a full ecological impact assessment and Appropriate Assessment would certainly be required to establish any potential impacts on the adjacent Natura 2000 site.

This study supports the Manager's view that any development on these lands may have the potential to cause significant adverse impacts on the adjacent Natura 2000 network and unless a full Appropriate Assessment is carried out which rules out significant adverse impacts on the Natura 2000 network, the members of precluded from zoning these lands.

Having regard to the fact that it has been clearly demonstrated that these lands are not required to be zoned to meet population targets, the Manager does not recommend that the members initiate the process of a full Appropriate Assessment being carried out of the plan solely for the purpose of justifying the zoning of these lands.

Manager's recommendation

No change

No. 141

Paul O'Toole (PCOT Architects) on behalf of landowner of AP9: Bullford Action Plan

This submissions relates to AP9: Bullford Action Plan (zoned R22 and TC, including public park along existing stream) and the SLB lands to the north of same.

It is requested that the SLB lands be zoned R22

Rationale:

- a) It is uncertain when road objective R09 will be implemented. Inclusion of SLB will enable landowner to engage with adjoining landowners to the north with a view to agreeing options for access routes that could provide short term alternative to R09.
Exclusion of SLB lands from AP9 will cause sterilisation of AP9 lands, due to limitations on

	<p>access to R22/TC zoned lands or alternatively the Council will be unable to source funding for necessary infrastructure.</p> <p>b) Residential zoned lands in AP9 have been reduced by c. 4 acres to accommodate an increase in size of the riverine park. Objective of 2008 plan for AGR lands (“that the Council currently deems most likely to be considered in the next development plan during the period 2007 to 2016”) should be implemented to compensate for this reduction in residential zoned lands.</p>
	<p>Manager’s response</p>
	<p>a) Road objective R09 is the proposed Kilcoole ‘western distributor’ which starts at Creowen / Bullford and ends north of Kilcoole at Priestsnewtown. This road is located to the west of AP9. The plan provides that the most southerly part of this road is a short to medium term objective, while the mid and northerly sections are long term objectives.</p> <p>The plan provides that the development of AP9 shall include a connecting link from Kilcoole Main Street to the western distributor. This road will provide for access to AP9 from the Main Street and the western distributor.</p> <p>The development of AP9 is not dependent on the long term element of the western distributor being developed; therefore it is not correct to say that AP9 cannot be developed until the long term part of the objective is delivered. In fact the plan explicitly allows for the development of AP9 prior to completion of the link road from Main Street through to the western distributor - Objective R09 states: <i>To provide for the development of a local access road in conjunction with the development of zoned lands at AP9; Bullford Action Plan and to provide for the development of a through link road from Main Street to the Western Distributor Road. This section of the route is necessary for the opening up of zoned lands (AP9 and E lands at Bullford Farm). Only 50% of development on these lands shall be permitted before the southern part of this road is completed.</i></p> <p>Therefore there is no justification in road infrastructure provision terms for the requested change in zoning of the SLB lands.</p> <p>b) It should be noted that the AGR zoning is described as ‘To provide for agricultural uses’ with a note ‘<i>Strictly without prejudice to the Council’s right to make alternative land use zoning objectives, these lands are amongst those lands that the Council currently deems most likely to be considered in the next development plan if necessary during the period 2014-2020</i>’.</p> <p>The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan. It is important to note that:</p> <ul style="list-style-type: none"> - The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this; - Based on this population target, an appropriate amount of land has be zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities); - Enough land has be zoned in the plan to meet the target for 2019 (the lifetime of the plan) plus an additional 3 years beyond the life of the plan up to 2022 as recommended in Ministerial guidelines on development plan ('headroom'). - In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development <p>Upon assessment of the housing / land zoning needs for Kilcoole up to 2022, it was determined that a total of 775 new housing units would be required to meet the 2022 population target. It was also determined that existing zoned housing land has capacity to deliver 782 units. Therefore there was no necessity to zone previously unzoned / AGR lands for further residential development.</p>

The re-zoning of these lands from 'SLB' to 'R' would increase the residential development potential within the settlement and allow for the population of the settlement population to extend beyond that allocated under the Regional and County population allocations and would therefore be considered not consistent with the Regional and County Strategy.

Manager's recommendation

No change

No. 153

Sisters of the Holy Faith

This submission relates to lands measuring c. 21.5ha lands owned by the Trustees of the Sisters of the Holy Faith, Kilcoole. While the preparation of a plan is welcomed, the submitters consider that some aspects of the plan would unacceptably prejudice the long-term interests of the Sisters of the Holy Faith for what appears to be no justifiable planning reason.

It is requested that the draft LAP be amended as follows:

- Settlement boundary and LAP boundary: The positions of the settlement and LAP boundaries should be extended to include the subject lands
- Zone part of the subject lands for residential use: Approximately 6.4ha portion of the subject lands to the west of the main buildings and to the south of the long-term road objective should be zoned for residential use.
- Zoning objective and Matrix: LAP should incorporate a comprehensive zoning matrix that sets out the land uses that will be permitted in principle, not normally permitted and prohibited within each of the zoning objectives proposed.

Rationale:

- A significant part of subject lands are de-zoned from 'AG: Agriculture' to 'white land' with no zoning status. All lands outside settlement boundary are in the 'rural area' and objectives of Wicklow CDP 2010 apply. At no other point along the western side of Kilcoole is the proposed alteration so evidently contrived that it would raise questions as to the grounds, planning or otherwise, on which it is based. The alteration is inexplicable and has no evident planning rationale. The proposed alignment discriminates the property interests of the Sisters.
- There appears to be misapprehension that as the western part of the subject lands are undeveloped open lands it is functionally separate to the overall site or has no function at all
- It seems it is assumed that the current use of the subject lands by the Sisters is established and therefore is no immediate prospect of this changing. However currently unforeseen changes in the priorities of the Sisters both in terms of their work and where they carry out their work may change at some point in the future and the LAP should incorporate provisions that could accommodate such a scenario should it arise
- Draft LAP is inequitable and discriminatory – on one hand the settlement boundary specifically incorporates other objectives which impact on their lands such as the reservation for a school and the road alignment and yet on the other, designates the majority of their lands as rural unzoned land or green belt.
- The subject lands are not remote or marginal in the settlement pattern of Kilcoole
- Manner in which draft plan addresses zoning matrix is contrary to draft LAP guidelines for planning authorities, is unsatisfactory and open to wide interpretation as to be meaningless in ascertaining what would/ would not be appropriate development within zoning objectives. During preparation of current plan, land use matrix was altered to ensure that 'residential institutions' are permissible in CE zones.

Future population Growth and Residential Development

RPG assumptions for the calculation of future growth have not been applied, as required by legislation, with the consequence that the requirement for housing growth is less than would be the case if correct provisions were applied. The stated housing requirement in the Draft LAP up to 2022 is 138 units short / 6.3 ha. Proposed that the portion of the subject lands to the west of the main buildings and to the south of the long-term road objective, which is c. 6.4ha is zoned for residential use. These lands comply with the principles for the provision of new housing set out in Section 3.3 of the draft plan.

Manager's response

Zoning changes

In the 2002 adopted LAP for Kilcoole, the lands in question were zoned

- C1 (c. 2.8ha),
- OS1 (c. 2.6ha),
- AG1 (12ha),
- GB (4ha)

In the 2002, a 'plan boundary' was not clearly identified, therefore it is not possible to say whether some part of these lands were 'outside' the plan boundary.

In the 2008 LAP, the lands were zoned

- CE (c. 4.8ha),
- OS (c. 2.6ha),
- AG (c. 14ha)

i.e. increase in CE zoned land by 2ha and removal of GB designation (change to AG). 2ha of the AG was however identified clearly as being outside of the LAP boundary.

In the draft LAP, the lands are proposed to be zoned as follows:

- CE (c. 4.8ha)
- OS (c. 2.6ha)
- GB (c. 5.6ha)
- outside of plan boundary – white land (8ha)

As is evident, the principal 'use' zonings of CE and OS remain exactly as provided in the 2008 LAP. The principal changes relate to the treatment of other lands to the north and west of the convent.

In 2008, all of these lands were zoned 'AG' - *To protect and provide for agriculture and amenity in a manner that protects the physical and visual amenity of the area and demarcates the urban and rural boundary*. The range of uses that were allowable (as set out in the land-use zoning matrix of the plan) was severely restricted.

The change of some of these lands to 'white lands' or unzoned land has the effect of taking these lands outside of the scope and restriction of the LAP, but into the ambit of the County Development Plan alone.

The change from c. 5.6ha of 'AG' lands to 'GB' lands has the following impacts:

- the use objective changes from:
'To protect and provide for agriculture and amenity in a manner that protects the physical and visual amenity of the area and demarcates the urban and rural boundary'
to:
'To generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes'.

The impact of this change is considered negligible and essentially restates the position that these lands are to be viewed as agricultural lands outside of the development 'zone' of the town

- Section 11: Zoning of the Draft LAP should be amended to include 'residential institution' as a use that is generally appropriate for community and educational zoned land- refer to Manager's recommendation.

Boundaries

With regard to the LAP boundary and 'settlement' boundary as set out in the draft LAP:

- It is not correct to say that this is the only landholding on the western side of Kilcoole that has been subject to a 'rationalisation' of the LAP boundary through the exclusion of former AG lands – starting from the Newtownmountkennedy Road, lands to the west of the Bullford employment zone, lands to the west of AP9 and lands to the west of the SLB zone north of AP9 have all been subject to this amendment. Therefore it is completely erroneous to say that the Sister have somehow discriminated.
- All attempts have been throughout the plan to rationalise the LAP boundary by the exclusion of such AG lands; this practice is also evident on the east side of Kilcoole, such as adjoining the MU zoned lands.
- With regard to the 'settlement' boundary, which is essentially the area within which development in each settlement is targeted to occur (and differentiates such areas from SLB lands and greenbelt areas), it is clearly illogical to have agriculturally zoned land within a 'development' area when development is not envisaged and strictly controlled on such lands.

Request for residential zoning

The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan. It is important to note that:

- The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
- Based on this population target, an appropriate amount of land has be zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities);
- Enough land has be zoned in the plan to meet the target for 2019 (the lifetime of the plan) plus an additional 3 years beyond the life of the plan up to 2022 as recommended in Ministerial guidelines on development plan ('headroom').
- In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development

Upon assessment of the housing / land zoning needs for Kilcoole up to 2022, it was determined that a total of 775 new housing units would be required to meet the 2022 population target. It was also determined that existing zoned housing land has capacity to deliver 782 units. Therefore there was no necessity to zone previously unzoned / differently zoned lands for further residential development.

The re-zoning of these lands from 'white lands' to 'R' would increase the residential development potential within the settlement and allow for the population of the settlement population to extend beyond that allocated under the Regional and County population allocations and would therefore be considered not consistent with the Regional and County Strategy.

With regard to the calculation of housing land carried out by the Planning Authority, it is correct that the household size applied for the target year of 2022 is slightly higher than that envisaged by the RPGs. The household size utilised in the draft plan was determined following lengthy consultation with the elected members for the plan area giving detailed consideration to the local Census 2011 results and the characteristics of the area. The RPGS are not prescriptive in this regard, but are simply 'guidelines' that the Planning Authority must be generally consistent with in their application to local plans.

With regard to the vacancy rate used, the RPGs indicate that Local Authorities should plan for a vacancy rate of 6.5% in 2022, compared to 9.9% in 2006 (average GDA rate). As set out in the

RPGs, this vacancy level reflects the need for the market to operate efficiently with a normal turnover of stock. The figure was chosen on the basis of research drawing on experience for within the EU and USA. This figure includes an 'obsolescence factor' of 0.5% per annum, which could be considered in the low range but reflects the fact that almost 40% of the housing stock in the State is under 10 years old.

Therefore the RPGs advocate an approach whereby Planning Authorities should plan for a falling vacancy rate from 2006 levels, until an 'equilibrium rate' of 6.5% is reached in 2022. However, the vacancy rate in this LAP area is already lower than 6.5% which makes sense given the high demand for houses in this area and a lack of obsolescence. It therefore is considered more rational to apply and maintain the current vacancy rate of 5.6% for the area moving forward.

It should be noted that the application of a 6.5% figure would result in there being a need for 2,196 units in Kilcoole in 2022 as opposed to 2,177 as set out in the draft plan i.e. a difference of 19 units. Given this small difference and given that the plan provides 'headroom' of 199 units, it is not considered that the use of 5.6% instead of 6.5% makes a fundamental difference to the overall zoning provisions in the plan and certainly would not warrant to the zoning of 6.4ha of land for housing.

Zoning Matrix

Draft LAP guidelines issued by the Minister suggest that the provision of a land-use zoning matrix should be normal practice and that LAPs should aim to be as clear and concise as possible. However, in the preparation of this LAP detailed consideration was given to this issue and it was considered that an overly prescriptive list of all possible uses in all possible zones would severely restrict the flexibility of the Planning Authority to consider any application on its merits. This approach has worked well in other development plans and it is recommended that this approach be maintained.

Manager's recommendation

Amend 'Section 11: Zoning' as follows:

*Uses generally appropriate for **community and educational** zoned land include community, educational and institutional uses include burial grounds, places of worship, schools, training facilities, community hall, sports and recreational facilities, **residential institutions**, utility installations and ancillary developments for community, educational and institutional uses in accordance with the CDP.*

No. 160

Townpark Estates Ltd.

This submission relates to lands measuring c. 6.2ha owned by Townpark Estates Ltd, Kindlestown Lower, Greystones (AP5, Killincarrig Action Plan)

It is put forward that while the lands are zoned appropriately for future development, parts of the proposed AP5 are restrictive and inequitable, rendering the lands commercially undevelopable. Securing commercially viable planning permissions for sites is crucial, particularly if the community and social objectives with the action plan are to be delivered.

Request plan be amended in relation to:

1. Requirement for a Special Roads Contribution

AP5 requires a special contribution to recent existing road improvements in the area. This is the only special contribution of its kind in the draft LAP, and is unduly onerous, jeopardising the commercial viability of these lands. This contribution is required in addition to provision of new junction south of St. Laurence's NS, associated road improvements and standard development contributions. Request

that special contribution requirement be removed from plan.

2. Amendment of 6 hectare cap on Developable Area

AP5 allows for new residential development on a maximum area of 6ha (density 22/ha) including single storey dwellings. This cap does not reflect the zoning map or situation on the ground – the lands shown on the plan map measure c.7ha. Lands within ownership of WCC do not appear to be accounted for.

The introduction of zoning objectives across the site negates the need for detail regarding the number of units permissible within the written statement – zoning objective can adequately control amount of units permitted over the site. Request that reference to the 6ha cap be omitted and wording amended as follows: *“Allow for new residential development of average density of 22/ha”*. Alternative suggested wording: *“Allow for new residential development on a maximum area of 7ha (average density of 22/ha)”*.

3. Terms of Phasing Conditions

Proposed AP 5 requires that development should be phased such that the improved educational, community and open space facilities required be delivered in Phase 1 with a maximum of 60 residential units. Phasing conditions will render development commercially impossible to achieve as the capital outlay to put infrastructure in place cannot be justified by capping the first phase to 60 units. Request phasing controls be omitted, or alternatively request phasing as follows:

- Phase 1 – 60 units via Delgany Glen, expansion/facilities at St. Laurence's and new 60 place car park.
- Phase 2 – 60 units via L1027(Delgany-Blacklion), new junction at St. Laurence's, all weather pitch and MUGA, direct access between school and sports facilities, open space areas and landscaping.
- Phase 3 – remainder residential units via access from newly built junction south of St. Laurence's NS.

Manager's response

1. Requirement for a Special Roads Contribution

The members may recall that under the provisions of the 1999 Development Plan for Greystones – Delgany, the entirety of these lands were zoned C1 ('provide for community and/or education uses') and O (preserve public open space).

During the preparation of 2006 LAP, detailed consideration was given to the possible future development of these lands to benefit the community and how this might be achieved. It was determined that the lands in question should be designated an 'action area', 'Z2' as follows:-

An Action Plan is proposed for an 11.5 hectare site in Killincarrig (see fig. 9.2); incorporating a backland site, St. Laurence's School and an area of public open space. The site is bounded by residential development to the north namely Kenmare Heights and Kindlestown Park. The eastern boundary is defined by the rear gardens of dwellings fronting the R761. To the south and west the site backs onto Delgany Glen housing development. To the west the site adjoins a collection of single dwellings on large plots.

The objective of the Action Plan will be to review the land-use zoning and objectives for the lands, and to put forward a sustainable and integrated approach to development. Key considerations in preparing the Action Plan will be:

- *Provide potential for enhancement and expansion of St. Laurence's School and associated facilities*
- *Deliver expanded and improved sports and recreational facilities and public green space. Sports facilities proposed should be available for use by the general public and St.*

Laurence's School. Sports facilities should consist of all weather pitch (suitable for soccer / hockey etc) and possibly flood-lit facilities.

- *Provide greenroutes across the site, linking Killincarrig, Kindlestown and Delgany.*
- *Protect existing treeline of mature Scots Pine and provide for enhancement of tree planting*
- *Allow for new residential development, up to a maximum of 40 units. Such units shall be so located within the Action Area to maximize overlooking of public green spaces, greenroutes and sports facilities.*

It was considered at that time that a small element of residential development on the lands would provide the financial impetus for development and would also allow new community facilities be overlooked by new houses thus improving supervision and safety.

During the currency of the 2006 LAP, a request was made by the majority landowner of the action area, Townpark Estates Ltd, to amend the action area and in particular, to allow additional housing. Following consideration of this proposal by both the Council executive and elected members, it was determined that revisions to the action area should be put to the public for consideration, on the basis that additional gains would accrue to the community in return for the additional housing (up to 132 units). These additional gains comprised:

- the provision of additional car parking to St. Laurence's school
- the provisions of a MUGA, along with the previously required playing pitches
- the making of a special contribution to recent existing road improvements in the area

This proposal was put to the public through the LAP amendment process and the amendment was adopted on 1st March 2010.

In light of the above, it is considered that considerable gain has accrued to the landowner by virtue of the increase in the number of housing units allowable from 40 to 132 and in this context, it is recommended that the special contribution remain in place.

2. Amendment of 6 hectare cap on Developable Area

The lands zoned R22 have been rechecked and measure 5.71ha. Lands zoned RE (WCC lands) within the action area measure 0.6ha i.e. total of 6.3ha. Some of the RE lands are not suitable in size and gradient for development, so this figure has been rounded down to 6ha. At 222 units / ha, which is the zoning allowed, this equates to 132 units.

It is considered that the text should retain the specified number, as this number was carefully arrived at in the consideration of the 2010 amendment (detailed above).

3. Terms of Phasing Conditions

Again, in regard to the additional gain achieved by the landowner in increasing the capacity of the lands from 40 units to 132 units, it is imperative that the community facilities that go hand in hand with this gain be delivered. Phasing is the best mechanism to ensure delivery. Furthermore, the road network serving the site is not adequate in its current form to serve additional housing and therefore it is essential that such works occur early in the development. Therefore it is not recommended that the phasing provisions be omitted completely.

With regard to the alternative phasing suggested:

- the provisions set out in the plan already allow for a 1st phase of 60 units, to be accompanied by improved educational / community / open space facilities and special contribution to recent existing road improvements in the area;
- the alternative community facilities proposed by the developer for Phase 1 (i.e. 'expansion/facilities at St. Laurence's and new 60 place car park', instead of 'improved

<p><i>educational / community / open space facilities and special contribution to recent existing road improvements in the area'</i>) are either (a) already delivered, (in that the landowner has already made land available to St. Laurence's school for car parking which is now available for use) or (b) the developer has no control over the delivery of the facilities (in that the improvement of facilities at St. Laurence's are dependent on finance and sanction from the Department of Education); therefore limited gain would accrue to the community from the development of this alternative Phase 1;</p> <ul style="list-style-type: none"> - it is not appropriate for the development plan to specify that these 60 units can be constructed with access via Delgany Glen – this route passes through an existing housing estate and there has been concern from the outset that this route would not be able to support significant traffic increases. Such decisions are more properly the function of a planning application, where impacts on particular parcels of land can be appropriately dealt with. In this regard, the existing plan provides that: <p><i>'Access to a limited number of units to be provided via Delgany Glen. The number of units allowable shall be determined following detailed traffic and junction analysis taking into account other zoned lands that may be accessed through this route'.</i></p> <ul style="list-style-type: none"> - the Manager does not recommend that this development be allowed to proceed even with a 1st phase until firm plans (including timeline and financing) are in place for the delivery of improved open space and play facilities within the action area, particular having regard to the gains that have been achieved by the landowner in terms of increased housing capacity on the land since 2006. <p>It is recommended therefore that the existing phasing provision is retained in the plan.</p>
Manager's recommendation
No change

No. 167
Wilson family
<p>This submission relates to a landholding measuring c. 63ha owned by the Wilson family at Bullford, Kilcoole.</p> <p>It is requested that:</p> <ol style="list-style-type: none"> 1. Road and zoning layout as proposed in the last development plan be retained. The new road as proposed would dissect the farm and family home in two – reference should be made to proposals as requested by original planning permission. 2. Proposal for riverine park should revert back to proposal as set out in 2008 plan to provide for river walk. 3. Proposed access road is in conflict with the Bullford Business park future development plan – proposed new road raises security concerns for the existing tenants of the currently gated business park.
Manager's response
<ol style="list-style-type: none"> 1. The zoning layout on this holding is only altered by way of a moderate increase in the width of the open space along the river. This has resulted in a very slight reduction in the employment zoned land by c. 0.35ha. This alteration is necessary to reflect lands at risk of flooding and therefore no change is recommended <p>The indicative alignment of the Kilcoole western distributor in the draft 2013 plan is the same as that shown on the 2008 adopted plan, so it is unclear what the point being made is. The draft plan does however allow for an alternative route if found to be viable – using the existing estate road into the Bullford Business Park. This route would potentially have impacts on the users of Bullford Business Park but this issue could potentially be addressed at detailed design stage. This alternative road line is intended to give options to the owners of these lands, as at present continued development of their lands is contingent on constructing part of the Western Relief</p>

<p>Road. The alternative proposed in the plan is to allow the landowners/developers to consider proposing using roads (existing and proposed) necessary for servicing the Business Park, in place of constructing an additional parallel road. The existing road layout from the existing Kilcoole Plan is being retained. What has been included in the current plan is an alternative that the landowner is entitled to ignore. This alternative should thus remain in the plan.</p>
<p>2. As set out above, the necessary width of the park has been determined following flood risk assessment of the area.</p>
<p>3. As detailed above, the final route of the road is a matter for later detailed design. The purpose of showing indicative routes in a land use plan is to keep potential options open.</p>
<p>Manager's recommendation</p>
<p>No change</p>

<p>No. 21</p>
<p>Borrah Ltd</p>
<p>This submission relates to lands measuring c. 0.22ha at Blacklion, Greystones</p> <p>Lands currently zoned T2 under existing LAP 2006-2012.</p> <p>Lands zoned RE in draft LAP</p> <p>Request that lands be zoned SLC (Small Local Centre) and R22 zoning</p> <p>Rationale:</p> <p>The lands have a current commercial usage and are suitable for a mixed small local centre and residential uses. The site is within 10 minute walking distance to Greystones Town Centre.</p>
<p>Manager's response</p>
<p>The subject lands are situated and directly accessed off the R761 in a predominantly residential area. While it is acknowledged that there are existing commercial activities on part of the site, it is not considered appropriate to rezone this site to facilitate a small local centre given its location and proximity to the already designated area for such activities at Blacklion.</p> <p>The RE zoning would allow for uses other than residential where that use is compatible with that area and the overriding objectives for the settlement; the plan also provides guidance regarding development that doesn't conform with the zoning objective i.e.</p> <p><i>Many uses exist where they do not conform to the designated zoning objective. When extensions to, or improvements of premises accommodating such uses are proposed, each shall be considered on its merits and permission may be granted where the development does not adversely affect the amenities of properties in the vicinity and does not prejudice the proper planning and development of the area (Section 11., under Table 11.1)</i></p> <p>It is considered this provision addresses concerns about the future development of such 'non conforming' uses.</p>
<p>Manager's recommendation</p>
<p>No change</p>

No. 63
Catherine and Niall Delaney
<p>This submission relates to lands measuring c. 0.4ha at Riverfield Lodge, Delgany (adjacent to the new Delgany Wood by-pass roundabout)</p> <p>Land zoned RE under draft LAP and under the 2006 LAP. Request land rezoned from RE to R22.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Lands comprise bungalow at northern end. The remainder of land were former agricultural lands including disused agricultural barn. These former agricultural lands do not form part of the curtilage of the existing bungalow. • Proposal conforms with sequential test • Existing pattern of permitted and completed development on adjacent lands is estate type housing – this can be replicated on subject lands. • Serviced by mains infrastructure. • Access to public roads • Isolated lands within an R22 zoned area. • Only 20% lands are in use for existing bungalow and its curtilage. • Existing rural style bungalow house type is anomalous in this area.
Manager's response
<p>The RE zoning description in the draft Plan states “<i>Within existing residential areas, regard shall be paid at all times to the overriding objective of the Council to protect the residential amenity of these areas and to only allow infill residential development where this reflects the character of the existing residential area. Apartments will not normally be permitted on sites surrounded by predominantly single family occupied housing estate developments</i>”.</p> <p>Having regard to the above, it should be noted that the RE zoning while not specifying a density for this area does allow for infill development that reflects the established character of the area. It is considered that this zoning provides sufficient scope within which the subject lands can be developed in an appropriate manner within the lifetime of the plan in keeping with the surrounding developments.</p> <p>However, in the interest of clarity, it is recommended that RES5 be amended as follows:</p> <p>RES5: On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in ‘Table 11.1: Zoning Matrix’.</p> <p>In existing residential areas, infill development shall generally be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.</p>
Manager's recommendation
<p>Amend the plan as follows: (new text in red)</p> <p>Section 3.4 ‘Density’</p> <p>RES5: On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in ‘Table 11.1: Zoning Matrix’.</p> <p>In existing residential areas, infill development shall generally be at a density that respects the</p>

established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.

No. 72

Dromont Residents Association

1. Under draft LAP, lands at Dromont have been re-zoned from R5 (2.5 units/ha) to RE 'Existing Residential'. Land owners request rezoning to allow 8-10 units/ha.

Rationale:

- Housing estate is operating from a septic tank system. Permission granted for connection to mains system under PRR 10/2502, the cost of which is now prohibitive. Proposed rezoning will make funding of mains sewer infrastructure more viable.
 - Land is scarce and should be used to maximum benefit. Planning should not be discriminatory (refer RSC Vs Dublin City Council). Lands in the vicinity of Dromont have been zoned R22 (Carrowbeg, East Hall and Melwood). There should be no discrimination between Dromont lands and these other lands – it is unfair and not transparent that same zoning density has not been applied across the area.
2. Request that 'Carrowbeg' and 'East Hall' (including gate lodge and front entrance, walls, stables and outhouses) are added to the Record of Protected Structures
 3. Regarding road objective RO3, it is requested that RO3 be replaced with objective to widen the existing road. RO3 requires knocking of mature trees, destruction of part of East Hall and is costly.
 4. Request that the group of trees and woods which form the boundary between Dromont and Carrowbeg along the public open space of Dromont be protected and listed as TPO under Section 205 of Act.

Manager's response

1. It is considered that the RE zoning, while not specifying a density for this area, does allow for infill development that reflects the established character of the area. It is considered that this zoning provides sufficient scope within which the subject lands can be developed in an appropriate manner within the lifetime of the plan in keeping with the surrounding developments.

However, in the interest of clarity, it is recommended that RES5 be amended as follows:

RES5: On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in 'Table 11.1: Zoning Matrix'.

In existing residential areas, infill development shall generally be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.

2. All full review of the Record of Protected Structures within the County was carried out during the

<p>preparation of the Wicklow County Development Plan 2010 where submissions were invited regarding the listing (and delisting) of structures considered worthy of protection. Carrowbeg and East Hall were not identified during this process nor were they proposed to be listed. A further review in the preparation of this plan in light of the NIAH was carried out, and as neither of these dwellings are identified on the NIAH, neither were recommended to be added to the RPS. While this may be the case, the plan does contain objectives (in particular HER1) and those listed in the County Development Plan 2010-2016, which are considered to provide sufficient protection to these buildings.</p> <p>3. The proposed road objective is considered appropriate and will facilitate the redevelopment of these lands in accordance with the zoning objective in this area while also facilitating the completion of the longer term road objective of linking the R-762-37 to Blacklion. The road line on the map is indicative only and will require further analysis over the lifetime of the plan including details of alignment, tree preservation where necessary or appropriate the protection of the setting of the existing dwellings in this area.</p> <p>4. The County Development Plan 2010-2013 objectives are applicable to this issue in particular Section 17.4 'Woodlands, Trees and Hedgerows' which encourage conservation over felling. These objectives state that trees should be preserved where deemed appropriate even though they may not be listed with a tree preservation order. It is not considered necessary therefore to specifically list these trees.</p>
<p>Manager's recommendation</p> <p>Amend the plan as follows: (new text in red)</p> <p>Section 3.4 'Density'</p> <p>RES5: On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in 'Table 11.1: Zoning Matrix'.</p> <p>In existing residential areas, infill development shall generally be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.</p>

<p>No. 77</p>
<p>Tom Evans and Gabrielle Lindsay-Evans</p>
<p>This submission relates specifically to the submitters landholding of c. 1.43ha located outside the settlement boundary at Knockroe on the west side of the regional road and to the wider block of lands surrounding the site of c. 7.75ha which includes the submitters land and lands to the north, south and east of their holding.</p> <ol style="list-style-type: none"> 1. It is requested that all of these lands should be zoned RE 2. With regard to long term road objective R09 (Kilcoole western distributor), object to this objective <p>Rationale:</p> <ul style="list-style-type: none"> • The area has the characteristics of an established residential area, e.g. c.30 existing houses, mains water and effluent collection systems, footpaths, public lighting, bus stops.

<ul style="list-style-type: none"> • Regard should be paid to the Council's investment in infrastructural improvements at Knockroe, e.g. public sewerage systems and road improvements to new Kilcoole Road roundabout at Eden Gate. This road should be widened thus negating need for another road. • The GB zoning objectives are not relevant to the Knockroe area • The proposed road would divide the submitters' lands. This area is known locally as 'The Rocks', and is home to protected animals and forms a riverine wildlife corridor leading to Kilcoole Marshes and 'The Murrough'. Many different forms of watercourses in this area. Consideration should be given to the environmental impact of the road along the valley and on general area.
Manager's response
<p>Of the larger 7.75ha area identified, c. 5ha is located on the east side of the regional road and is proposed in the draft plan to be zoned RE. This reflects the fact that these lands at already developed for housing (in the main by the Knockroe development).</p> <p>The remainder, on the west side of the road, encompassing the submitters lands and additional lands to the south and north (up to Prettybush corner), are proposed for 'GB' zoning in the draft plan. These lands are currently zoned 'AG' in the Kilcoole LAP 2008.</p> <p>While it is acknowledged that there are existing houses occupying these lands and a RE zoning may seem appropriate, one must bear in mind that such a zoning allows for new residential development. This is not considered an appropriate location on the periphery of the settlement to allow for such new development, as this would allow for a gradual creeping of new development out of south Greystones along the very highly trafficked regional road towards Kilcoole, clearly blurring the distinction between the two settlements. It is also questionable whether land should be zoned that can only access on to this regional route</p> <p>Furthermore, the zoning of these lands for 'RE' would impact on the compatibility of the housing zoning provisions with the population targets for the towns set out in the LAP and County Development Plan.</p> <p>Therefore this proposals is not recommended</p> <p>In regard to the proposed road alignment please refer to the response to Submission 34.</p>
Manager's recommendation
No change

No. 115
Laneree Ltd.
<p>This submission relates to lands measuring c. 5.6ha at Stylebawn, Delgany which includes Stylebawn House and Clara House.</p> <p>Lands zoned R2.5 and OS (adjoining river) under draft LAP. Lands zoned R5 (2.5/ha) and green corridor adjoining river under current 2006 LAP.</p> <p>Request</p> <ul style="list-style-type: none"> • Southern portion of subject lands, to south of Three Trout's Stream, be zoned R5 (5/ha) • Northern portion of subject lands, to the north of Three Trout's Stream, be zoned for village centre (VC) development.

Rationale:

R5 proposal

- There is extant permission on lands for 11 dwellings (PRR 07/1150). This permission results in density of 2/ha. The permission includes for the retention of an existing residential dwelling and Stylebawn House and its gardens on the northern part of the site, with proposed dwellings on southern portion. However, there is potential to increase density.
- Development control is appropriate mechanism to protect features of note on site – restrictive upper limits on density does not allow for potential for increased densities to be investigated.
- Extant permission has unit size 292-563m². There is no market for this dwelling type. There is potential to reduce size of units and increase number across the site.
- Inefficient use of lands in such close proximity to a village centre.
- Increase in density would not lead to any significant incremental detrimental environmental impact – ability of the topography of the site to accommodate residential development has been demonstrated.
- Site not constrained by flooding with exception of OS lands.
- Extant permission demonstrates capacity of site services and access.
- Planning policy documents support increase in density.
- Would reflect permitted densities to east of site.

VC proposal

- Lands immediately adjoin existing village core.
- Despite objectives within draft LAP to promote the role of Delgany as a village centre, no additional land is zoned for TC development.
- Frontage to R762
- Three Trout's Stream has potential to form visually attractive feature in village centre development.
- A VC zoning would allow for an appropriate use to be provided in protected Stylebawn House, contributing to protection of protected structure.

Manager's response

VC zoning

The existing Stylebawn House is a listed structure within the Record of Protected Structures as set out in the Wicklow County Development Plan and includes the entire curtilage of the house including the walls entrance ways, outbuildings and gardens.

The VC zoning for Delgany is set out under RT8 where it is an objective *"To provide for the development of a mix of uses within Delgany village centre, which provide for the day-to-day needs of its local community, including local retail, service and commercial outlets and leisure and community facilities, to a degree that is akin to its designation as a Level 4 Centre"*.

While the designation of the house, ancillary buildings and gardens is noted, it is considered that there is merit in rezoning the lands currently zoned R2.5 to the north of the Three Trout's Stream as Village Centre. The subject lands are situated in the core area of the Village Centre and if zoned would facilitate the expansion of the Village Centre in a manner commensurate with the objective RT8.

The subject lands form a key site in the potential future expansion of the existing village of Delgany and although this may be restricted in terms of the extent of potential development that can take place without impacting or detracting from this listed building it is considered that facilitating the potential development of these lands through a village centre zoning is justified.

R5 zoning

In accordance with the current LAP, the lands have a theoretical development capacity of 14 units, inclusion Stylebawn House and Clara House. Assuming that some of the curtilage of this protected structure could not be developed, the capacity may be reduced to c. 11 units. The current 'green corridor' is an objective rather than a 'zoning' and therefore would not curtail the number of units achievable, just their location on the site. There is permission for 11 units on these lands.

In accordance with the current Flood Risk Guidelines, the former green corridor, which is a flood zone, is proposed to be formally zoned 'OS' to ensure no development can occur in this area. This reduces the available development land to c. 4.65ha (including Stylebawn and Clara House), which would have a development capacity of 11 units. Subtracting 3 units as before, the capacity is now reduced to 8 units.

To increase density to 5/ha would allow for the potential development of 17 units i.e. an increase from the current LAP and permission granted by 6 units.

This is considered very minor in terms of the overall population and housing targets for the wider settlement. However the key factor in the suitability of this land for additional housing is the location of the lands in a very rural fringe area and the road access serving the site. In these regards, it is considered that given the low density requested (5/ha or 2/acre) and given that the developer would be required to significantly improve Blackberry Lane and its junction with the village centre to secure permission, it is considered that this proposal can be recommended.

Subject to the introduction of an objective to improve Blackberry Lane, it is considered that the density of all lands with access off this part of the lane could be similarly increased from R2.5 to R5.

In light of the omission of the R2.5 zoning in this area, it is recommended to rezone the existing residential properties to east and west of the new VC zoning for existing residential use.

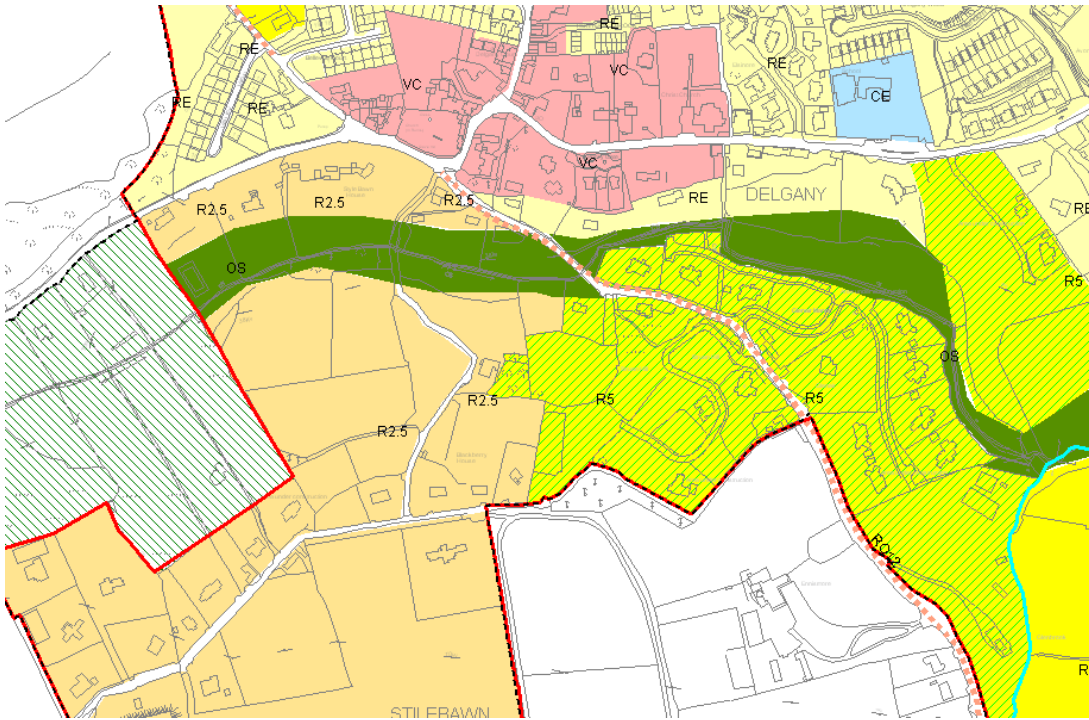
Manager's recommendation

1. Amend the RE zoning to the north of the Three Trout's Stream and zone these lands VC Village Centre as set out below.
2. Increase density on the remainder to 5/ha
3. Rezone existing residential properties to east and west of new VC zoning from R2.5 to RE: Existing Residential (i.e. 'Glenowen', Glen Road and properties at Priory Road/Blackberry Lane intersection)
4. Include a new road objective in the plan

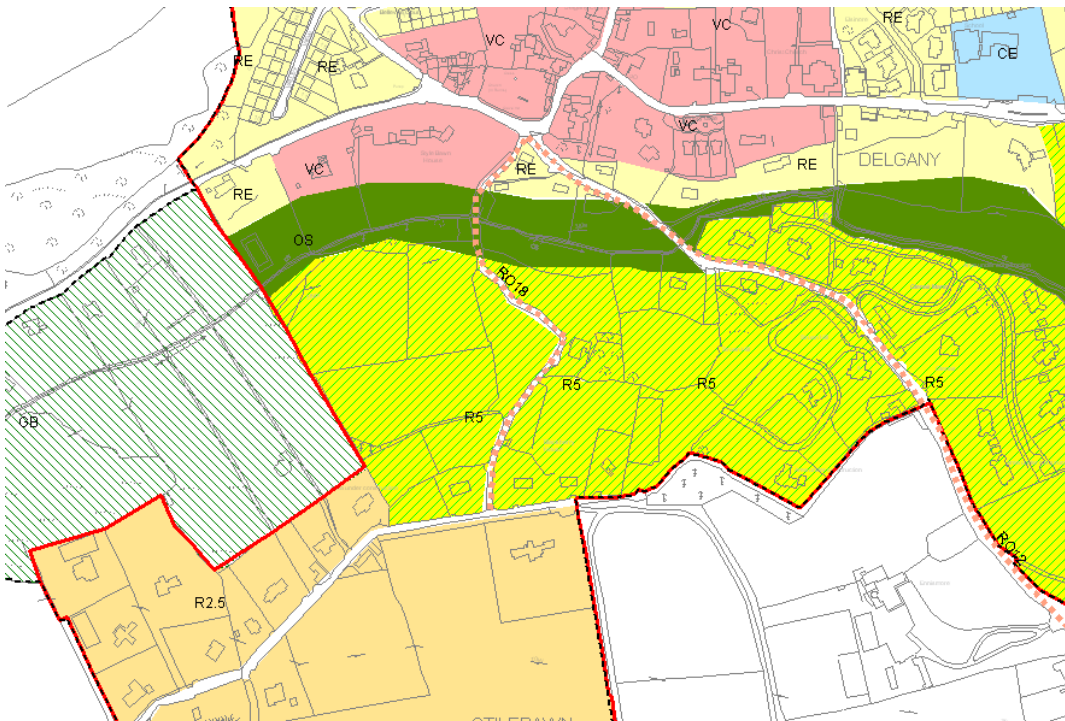
RO18: To provide for improvements to width, alignment, public lighting and pedestrian facilities along Blackberry Lane and provide for improvements to the junction of Blackberry Lane with the R762 at Delgany village.

Amend Map A as follows:

From



To



No. 154
David Tempany
<p>This submission relates to lands measuring c. 2ha at Knockroe, immediately south of the Charlesland AP. Under draft LAP lands are zoned RE.</p> <p>Landowner is in support of proposed zoning, as set out in the draft LAP and has intention to develop in the future. Consider LAP average density of 22/ha would be an appropriate density for these lands.</p>
Manager's response
<p>The content of the above submission is noted. This site is an infill site between the zoned land at Charlesland and the Knockroe housing development and is mostly occupied by 2 existing dwellings.</p> <p>The RE zoning description in the draft Plan states <i>"Within existing residential areas, regard shall be paid at all times to the overriding objective of the Council to protect the residential amenity of these areas and to only allow infill residential development where this reflects the character of the existing residential area. Apartments will not normally be permitted on sites surrounded by predominantly single family occupied housing estate developments"</i>.</p> <p>Given the location of the subject lands on the periphery of the settlement boundary for Greystones/Delgany it is not considered appropriate to zone these lands R22 however it should be noted that the wording of this zoning facilitates the development of infill housing that reflects the character of the existing residential area. Taking this into consideration the RE zoning on these lands could potentially facilitate the development of residential units at a higher density than that typically indicated by infill housing once it does not impact on the residential amenity of the area.</p>
Manager's recommendation
No change

No. 161
Sarah Tracey (Fox's Farm)
<p>This submission relates to lands measuring c. 25.5ha at Rathdown Upper, Greystones, located just north of the 'settlement boundary' between the regional road and the coast, on both sides of the railway line.</p> <p>Lands zoned GB under draft LAP.</p> <p>Request lands be zoned R10, OS and CE.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Site forms natural boundary to the northern end of Greystones. A low level, low density development would be suitable. • Lands east of railway be zoned OS/parkland to compliment the public/heritage parklands in AP3. • Car park adjacent to cliff walk is proposed and possibility for toilets • Access is available and lands can be serviced. • A roadway to AP3 is possible to achieve across these lands. • Existing hedgerows to be retained.

Manager's response

The subject lands fall within the GB zoning as set out in the draft Greystones-Delgany and Kilcoole LAP however they also fall within Cell 2 of the Wicklow Coastal Management Plan where the following objectives are applicable:

1. To protect and enhance Bray Head, in accordance with the SAAO.
2. To maintain and enhance public right of ways on Bray Head and in particular the cliff path from Bray to Greystones.
3. To facilitate the development of services and facilities for visitors such as suitable signage, footpath surfaces, notice and maps, while preserving the rugged and natural character of the area and its paths.
4. To protect all listed views and prospects to or from Bray Head as set out in the Bray Town Development Plan and Wicklow County Development Plan.
5. Development, which would reduce existing areas of heathland, maritime grassland and wooded areas, will not normally be permitted except for reasons of overriding public interest.
6. To facilitate existing agricultural usage of Bray Head, in a sustainable and suitable manner which does not compromise either landscape quality or habitat diversity.
7. To strictly regulate and manage development in this cell to protect its amenity and green break function between the built up area of Bray and Greystones. Within this area, the following restrictions apply:-
 - a. Residential development shall be strictly limited to those persons engaged in agriculture in this cell and who can demonstrate a definable economic need to live on the farm holding;
 - b. The highest standards of siting and design will be rigorously enforced for any developments in this area;
 - c. Commercial and industrial development will be prohibited in the cell.
8. To require an Environmental Impact Assessment to be submitted in respect of any planning application which the Planning Authority considers would be likely to have significant effects on the environment of the area.

This coastal cell zoning is in place as this area is of high amenity value and is considered to be under significant pressure from development. It is considered that the maintenance of the GB is essential to protect the scenic amenities of this area and to prevent a gradual creep of development from north Greystones towards Bray Head, an area of special amenity.

With regard to the residential development proposal (c. 17ha @ 10/ha i.e. 170 units), this proposed rezoning would increase the residential development potential within the settlement and allow for the population of the settlement to extend beyond that allocated under the Regional and County population allocations and would therefore be considered inconsistent with the Regional and County Strategy.

It is important to note that:

- (a) The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
- (b) Based on this population target, an appropriate amount of land has been zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities);
- (c) Enough land has been zoned in the plan to meet the target for 2019 (the lifetime of the plan) plus an additional 3 years beyond the life of the plan up to 2022 as recommended in Ministerial guidelines on development plan ('headroom').
- (d) In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development

With regard to the park proposal (lands between the railway line and the coast), there is not considered to be any necessity for such a large formal park in this area, particularly as such a park is

being delivered on land to the south as part of the harbour development. Similarly, the development of car park in this area is not necessary given the availability of car parking in the harbour area.
Manager's recommendation
No change

No. 124
Patrick McCusker
In favour of land use zoning objective of R22 for lands at Drumbure House, Delgany
Manager's response
Noted
Manager's recommendation
No change

No. 136
R. O'Caoimh
<p>This submission relates to lands measuring c 2.25 acre / 0.9ha at Convent Road, Delgany (located at new roundabout junction with recently completed relief road extension).</p> <p>Site zoned R3 in current LAP, i.e. 10 units/ha.</p> <p>Under draft LAP land zoned RE Existing Residential – <i>“To protect, provide for and improve residential amenities of adjoining properties and areas while allowing for infill residential development that reflects the established character of the area in which it is located”</i>.</p> <p>In addition, RES5 states <i>“In existing residential areas, infill development shall be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties.”</i></p> <p>It is requested that the zoning revert to 10/ha.</p> <p>Rationale: The permitted density on the site is greater than the density of existing residential development on the lands adjacent to the site. The proposed RE zoning is therefore not appropriate and does not take into account the previously permitted development.</p> <ul style="list-style-type: none"> - Planning permission granted for 9 dwellings on site (PRR 08/1160 & 08/1786) – development commenced with site works and construction of 1 dwelling. - Zoning objective is not conclusive and leaves actual achievable density subject to individual opinion. - Sites in immediate vicinity have established character of 1 unit/acre, whereas Delgany Wood has density greater than 10/ha.
Manager's response
<p>The RE zoning description in the draft Plan states <i>“Within existing residential areas, regard shall be paid at all times to the overriding objective of the Council to protect the residential amenity of these areas and to only allow infill residential development where this reflects the character of the existing residential area. Apartments will not normally be permitted on sites surrounded by predominantly single family occupied housing estate developments”</i>.</p> <p>It is not considered that this zoning inhibits the development of these lands in line with the planning permission granted or would effect any future amendments to this application regarding density as this zoning facilitates the development of these lands in a suitable manner and density in keeping with the surrounding area.</p>

However, in the interest of clarity, it is recommended that RES5 be amended as follows:

RES5: On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in 'Table 11.1: Zoning Matrix'.

In existing residential areas, infill development shall **generally** be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. **However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.**

Manager's recommendation

Amend the plan as follows: **(new text in red)**

Section 3.4 'Density'

RES5: On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in 'Table 11.1: Zoning Matrix'.

In existing residential areas, infill development shall **generally** be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. **However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.**

No. 152, 2

Paddy Shanahan

Request extension of settlement boundary of Kilcoole to include land adjoining property of 'Dun na Ri', Sea Road, Kilcoole, and to zone this land RE, in order to enable family member to build a house. These lands are located on the north side of Sea Road, at the very eastern edge of the settlement boundary.

Cllr. Tom Fortune supports this submission.

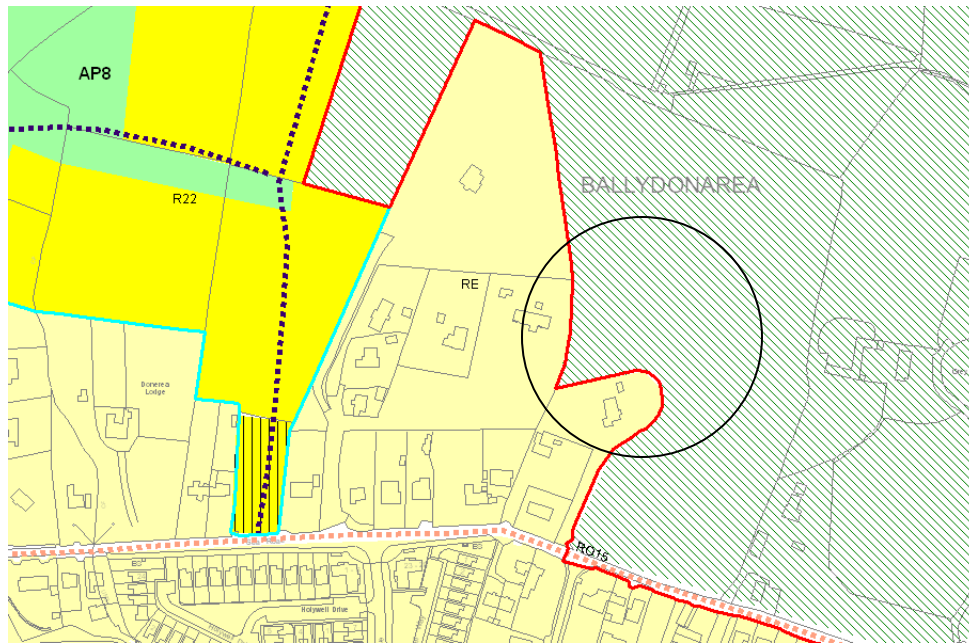
Manager's response

This request is considered reasonable.

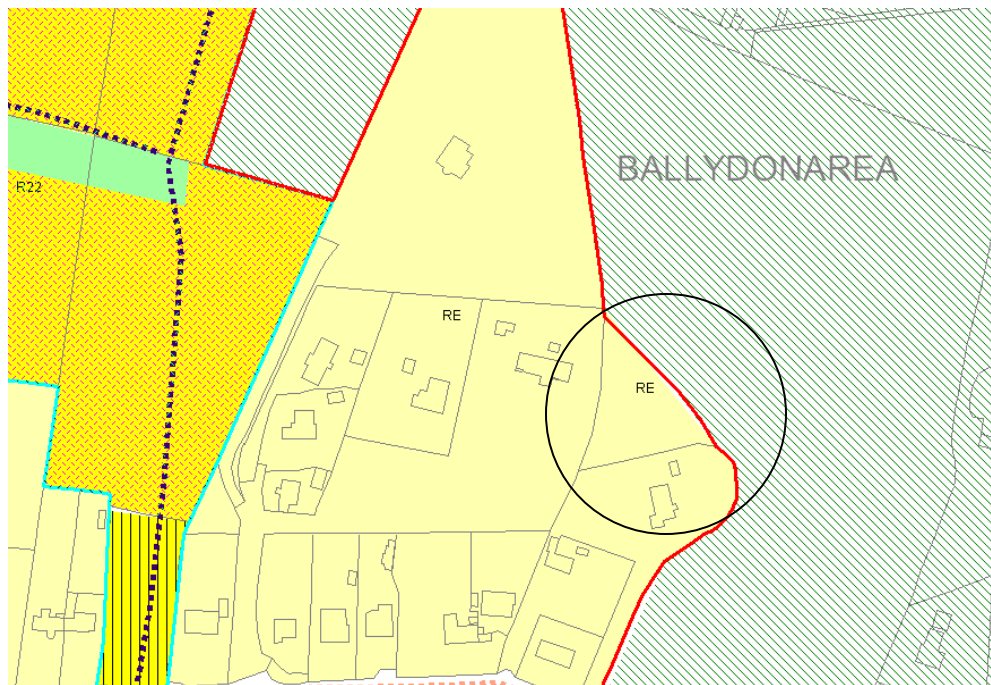
Manager's recommendation

Amend the plan as follows:

From:



To:



No. 133
Emer O'Brien
<p>This submission relates to land measuring c. 0.95ha located on the regional road R761 just south of Prettybush corner, on the west side of the road (opposite Knockroe housing). The lands are currently occupied by five dwellings.</p> <p>The lands are zoned 'GB' in the draft LAP</p> <p>It is requested that the land be zoned RE</p> <p>Rationale:</p> <p>Lands contain residential properties which are fully serviced, on a transport route and adjoin the proposed LAP boundary. Their inclusion would not injure or impact the proposed greenbelt as the southern-most boundary aligns with that of the existing residential lands on the eastern side of the R761 thus maintaining a defined boundary line for the GB lands.</p>
Manager's response
<p>While it is acknowledged that there are existing housing occupying these lands and a RE zoning may seem appropriate, one must bear in mind that such a zoning allows for new residential development. This is not considered an appropriate location on the periphery of the settlement on a busy road to allow for such new development, as this would allow for a gradual creeping of new development out of south Greystones along the regional road towards Kilcoole, clearly blurring the distinction between the two settlements.</p> <p>Furthermore, the zoning of these lands for 'RE' would be likely to incur pressure to also zone the intervening undeveloped lands between this site and Prettybush corner, which would compound this leakage effect and in turn, impact on the compatibility of the housing zoning provisions with the population targets for the towns set out in the LAP and County Development Plan.</p> <p>Therefore this proposals is not recommended</p>
Manager's recommendation
No change

No. 40
Bernard Burke
<p>This submission relates to lands measuring c. 0.4ha on Convent Road, Delgany, just north of the roundabout with the Delgany Wood by-pass and opposite 'The Nurseries'. There is an existing house on this site 'Waterstone House'.</p> <p>These lands are zoned 'RE – existing residential' in the draft LAP</p> <p>It is requested that the lands be rezoned R10 – new residential development at 10/ha (4/acre)</p> <p>Rationale:</p> <p>The lands in question are situated alongside the Delgany – Blacklion Road and have established a right to connect to the existing sewer network. The lands are zoned R5 (4 houses per acre) in the current Greystones/Delgany LAP.</p>

Manager's response
<p>The RE zoning description in the draft Plan states “<i>Within existing residential areas, regard shall be paid at all times to the overriding objective of the Council to protect the residential amenity of these areas and to only allow infill residential development where this reflects the character of the existing residential area. Apartments will not normally be permitted on sites surrounded by predominantly single family occupied housing estate developments</i>”.</p> <p>The RE zoning facilitates the development of these lands in a manner consistent with the surrounding developments and therefore if a development proposal containing 4 houses or more per acre is considered consistent with this objective it may be permissible subject to normal planning criteria. It is therefore not considered that this zoning inhibits the development of these lands.</p> <p>However, in the interest of clarity, it is recommended that RES5 be amended as follows:</p> <p>RES5: On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in ‘Table 11.1: Zoning Matrix’.</p> <p>In existing residential areas, infill development shall generally be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.</p>
Manager's recommendation
<p>Amend the plan as follows: (new text in red)</p> <p>Section 3.4 ‘Density’</p> <p>RES5: On undeveloped residentially zoned land, it is an objective of the Council to provide for the development of sustainable residential communities up to a maximum density, as prescribed by the land use zoning objectives indicated on Map A and described in ‘Table 11.1: Zoning Matrix’.</p> <p>In existing residential areas, infill development shall generally be at a density that respects the established character of the area in which it is located, subject to the protection of the residential amenity of adjoining properties. However, where previously unsewered, low density housing areas become served by mains sewers, consideration will be given to densities above the prevailing density, (up to 10 / ha, depending on local circumstances), subject to adherence to normal siting and design criteria.</p>

No. 52
Cherry family
<p>This submission relates to a landholding of c. 9ha at Blackberry Lane, Delgany. The lands are located on the north side of the lane, towards its western end, near the N11.</p> <p>The lands are outside the draft LAP boundary.</p> <p>It is requested that the land be included in the LAP and zoned:</p> <ul style="list-style-type: none"> - 2.83ha (7 acres) R2.5 - remainder (6.2 ha / 15.3 acres) GB – greenbelt <p>The lands requested to be zoned R2.5 are L-shaped and are located along Blackberry Lane itself and a private driveway serving 3 existing dwellings.</p>

<p>Rationale:</p> <ul style="list-style-type: none"> - Lands adjoin R2.5 zoned lands - The development of adjoining lands for housing has impacted on the ability to commercially farm the lands - Blackberry Lane is now a residential road whereas once it was an agricultural access lane. - This land is the only area on the lane with road frontage that has not been developed. - These lands have become a de facto part of the Greystones – Delgany but the exclusion of these lands from the LAP means that this is not recognised. - LAP zoned lands surround the site on 3 sides. - A substantial greenbelt area is proposed to be retained. - The zoning of this land would allow for the development of houses for local residents who have grown up on the lane and therefore make the community more sustainable.
<p>Manager's response</p> <p>There is c. 12ha of zoned (R2.5) undeveloped land on Blackberry Lane carried forward from the previous development land. Taking into account the existing level of development on the lane (c.30 houses) and those additional houses that may be developed on the zoned undeveloped land (potential capacity of c. 30 dwellings), it is considered that the road itself has reached its full traffic capacity.</p> <p>This road is extremely narrow in width, has no footpaths or cycleway and no public lighting. Use of this lane by pedestrians is very hazardous as in many places there is no verge within which one can take refuge from passing cars.</p> <p>Therefore it is not recommended that these lands be zoned for new development.</p>
<p>Manager's recommendation</p> <p>No change</p>

<p>No. 57</p>
<p>Clive and Eithne Dalby</p> <p>This submission relates to a landholding of c. 0.4ha located at Blackberry Lane, Delgany.</p> <p>Approximately 0.2ha of the site is zone R2.5, with the remainder outside of the plan boundary.</p> <p>Request to extend the zoned area around their property to match the physical boundaries of the property on the ground, as granted by planning permission. This will not facilitate any extra development on the site.</p>
<p>Manager's response</p> <p>The request is considered reasonable.</p>
<p>Manager's recommendation</p> <p>Amend map in line with curtilage of existing house (map included in Part II).</p>

No. 98
Leo Harmon
<p>This submission relates to lands measuring c. 1.2a lands at Stilebawn, Delgany (Priory Road)</p> <p>The lands are located outside of the draft LAP boundary, to the rear of a row of dwellings which front onto Priory Road.</p> <p>It is requested that the land be zoned R2.5.</p> <p>Rationale:</p> <ul style="list-style-type: none"> - this zoning would allow for the development of dwellings by the landholder's children, which would be difficult to achieve without appropriate zoning - the lands are adjacent to a number of existing dwellings and would be a natural extension of the boundaries of the settlement
Manager's response
<p>In the crafting of the draft plan, detailed consideration was given to both the appropriate location for the Greystones – Delgany settlement boundary and the possibility of additional development along Priory Road. It was determined that Priory Road formed a natural southern boundary for the settlement to the east of Struan Hill, with lands on the 'town' side (i.e. north) being zoned for development and lands to the south not being zoned. This is still considered the most appropriate boundary.</p> <p>The lands in question do not have frontage onto Priory Road and therefore it would be illogical to zone these lands without zoning additional lands surrounding them. This would require a complete reconsideration of the future development potential for this area and indeed could require revisions to zoning elsewhere in the settlement so that housing and population targets would not be breached. This is not considered an appropriate course of action just to provide for a small number of family homes.</p> <p>It should be noted that the Harmon homestead and farm (of which the subject site forms part) has been registered to Mr. Leo Harmon since 1971 (according to the land registry) and it is understood from local knowledge that the holding may have been owned by previous generations of the family. The family would therefore appear to have long standing links to this area, with Mr. Harman's children having been brought up here. Therefore it is very likely that Mr. Harman's children would be eligible for permission on these lands as rural housing applicants. Therefore it is not necessary for these lands to be zoned to accommodate dwellings for immediate family members.</p>
Manager's recommendation
No change

No. 25
Paul Brady, Ballynerrin Farm Kilcoole
<p>This submission relates to a farm of 9.38ha at Ballydonarea, Kilcoole. This farm is located immediately east of the MU zone on Lott Lane.</p> <p>These lands are zoned 'GB – greenbelt' in the draft LAP</p> <p>It is requested that the lands be rezoned AG – agriculture</p> <p>Rationale:</p> <p>Landowner has made major financial investment into potato processing plant. Investment has been given on valuation of farm holding as agricultural land as opposed to greenbelt zoning, which has a</p>

lower valuation. Change in statue of land increases financial vulnerability of land owner.
Manager's response
<p>Having regard to the purpose of a greenbelt, that is the provide a 'separation' zone between two expanding settlements to ensure that they do not merge, it is considered that these lands are not required to be zoned GB having regard to their location east, rather than north of Kilcoole. It is therefore recommended that they be omitted from the GB area and omitted from the LAP.</p> <p>It should be noted that no provision is made in the draft plan for an 'AG' zone – in order to rationalise and simplify the plan (so that it will be more understandable to the general public); any previously zoned AG lands have been omitted from this LAP. Policies and objectives relating to the development of these lands will be as set out in the County Development Plan for rural areas.</p>
Manager's recommendation
<p>(a) Omit these lands from the GB zone (b) Amend the LAP boundary</p> <p>See Map 1 below</p>

No. 55
Dan Cullen
<p>This submission relates to land at Ballygannon, Kilcoole (no particular parcel of land identified)</p> <p>These lands are zoned 'GB – greenbelt' in the draft LAP</p> <p>It is requested that the lands be rezoned AG – agriculture</p> <p>No rationale behind this request is provided.</p>
Manager's response
<p>A number of similar submissions have been made in relation to the proposed GB lands between Kilcoole and Greystones, in particular request ton rezone these land to 'agriculture' (see Submissions 24, 25 and 84). In light of these it is recommended that alterations be made to the boundary of the greenbelt in this area, to reflect the area that warrants extra protection to ensure development from south Greystones does not merge with north Kilcoole.</p> <p>Having regard to the purpose of a greenbelt, that is the provide a 'separation' zone between two expanding settlements to ensure that they do not merge, it is considered some lands in the Ballygannon area are not required to be zoned GB having regard to their location east, rather than north of Kilcoole. It is therefore recommended that they be omitted from the GB area and omitted from the LAP.</p> <p>It should be noted that no provision is made in the draft plan for an 'AG' zone – in order to rationalise and simplify the plan (so that it will be more understandable to the general public); any previously zoned AG lands have been omitted from this LAP. Policies and objectives relating to the development of these lands will be as set out in the County Development Plan for rural areas.</p>
Manager's recommendation
No change

No. 84
E. Finnegan
<p>This submission relates to a landholding measuring c. 24ha at Ballygannon, Kilcoole. These lands are immediately northeast of the proposed Tourism Zone at Glenroe Open Farm.</p> <p>These lands are zoned 'GB – greenbelt' in the draft LAP</p> <p>It is requested that the lands be rezoned AG – agriculture</p> <p>Rationale: Financial investment made in farm. Funds based on valuation of farm as agricultural land as opposed to GB zoning, which has much lower valuation. Any change in statue of land places owner of lands in vulnerable financial situation.</p>
Manager's response
<p>Having regard to the purpose of a greenbelt, that is the provide a 'separation' zone between two expanding settlements to ensure that they do not merge, it is considered that these lands are not required to be zoned GB having regard to their location east, rather than north of Kilcoole. It is therefore recommended that they be omitted from the GB area and omitted from the LAP.</p> <p>It should be noted that no provision is made in the draft plan for an 'AG' zone – in order to rationalise and simplify the plan (so that it will be more understandable to the general public); any previously zoned AG lands have been omitted from this LAP. Policies and objectives relating to the development of these lands will be as set out in the County Development Plan for rural areas.</p>
Manager's recommendation
<p>(a) Omit these lands from the GB zone (b) Amend the LAP boundary</p> <p>See map 1 below</p>

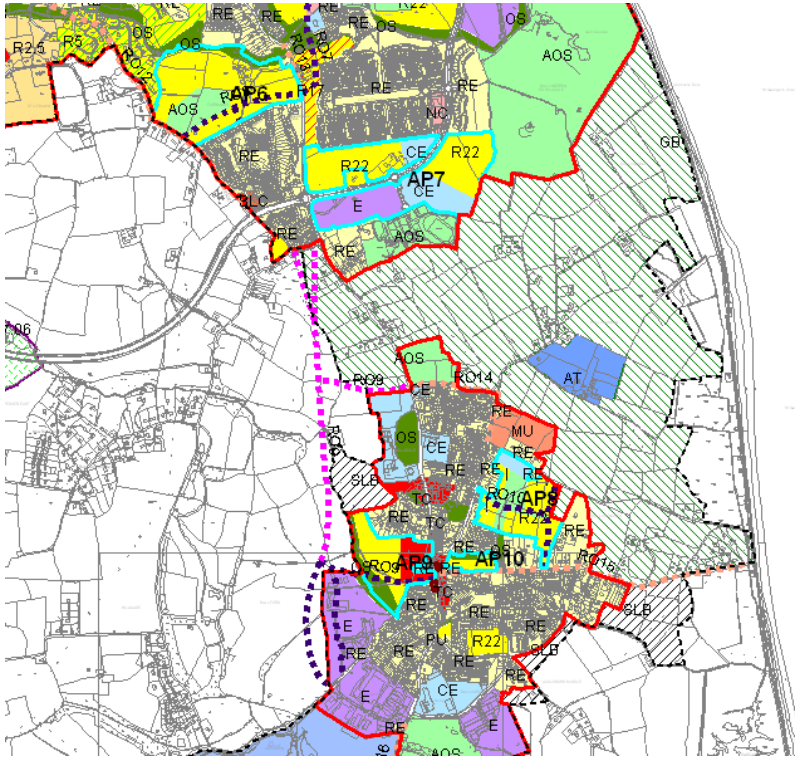
No. 24
John Brady, Ballynerrin Farm Kilcoole
<p>This submission relates to a farm of c. 78 acres, at Ballynerrin, Kilcoole, which is located north of Glenroe open farm, just south of Charlesland golf club and the Charlesland sport centre.</p> <p>These lands are zoned 'GB – greenbelt' in the draft LAP</p> <p>It is requested that the lands be rezoned AG – agriculture</p> <p>Rationale: Landowner has made major financial investment into potato processing plant. Investment has been given on valuation of farm holding as agricultural land as opposed to greenbelt zoning, which has a lower valuation. Change in statue of land increases financial vulnerability of land owner.</p>

Manager's response
<p>The (draft) plan states the following objective with regard to land zoned GB:</p> <p><i>HER 10: Within greenbelt areas, it is the objective of the Council to generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes. The following objectives shall apply to the greenbelt areas:</i></p> <ul style="list-style-type: none"> <i>• Greenbelt areas form part of the rural area. As such, the rural development objectives and standards of the Wicklow County Development Plan 2010-2016 shall apply as appropriate. Rural housing may be permitted subject to compliance with the rural development objectives and standards of the CDP. The Coastal Zone Management Plan objectives, as set out in Chapter 18 of the CDP shall apply to areas designated a 'coastal cell'.</i> <i>• Protect the integrity of Natura 2000 sites in accordance with objective HER2.</i> <i>• Protect listed views/prospects and other features of natural and built heritage</i> <i>• Provide for the development of greenroutes in the area. In particular, facilitate the development of (i) a pedestrian/cycling route between Lott Lane, Kilcoole and Shoreline Sports Park, Charlesland, and (ii) a coastal walk, having due regard to environmental designations and compliance with the EU Habitats Directive, and to restrict development that interferes with the achievement of this objective.</i> <p>It is clear that the primary use envisaged for these areas is agriculture and there is nothing in the objective that would inhibit appropriate agricultural development, in accordance with the normal siting / design provisions of the County Development Plan.</p> <p>Furthermore, having regard to the purpose of a greenbelt, that is to provide a 'separation' zone between two expanding settlements to ensure that they do not merge, it is considered, given that these lands are contiguous to zoned and / or already developed lands at Charlesland, that these lands retain the proposed GB zoning.</p> <p>It should be noted that no provision is made in the draft plan for an 'AG' zone – in order to rationalise and simplify the plan (so that it will be more understandable to the general public); any previously zoned AG lands have been omitted from this LAP. Policies and objectives relating to the development of these lands will be as set out in the County Development Plan for rural areas.</p>
Manager's recommendation
No change

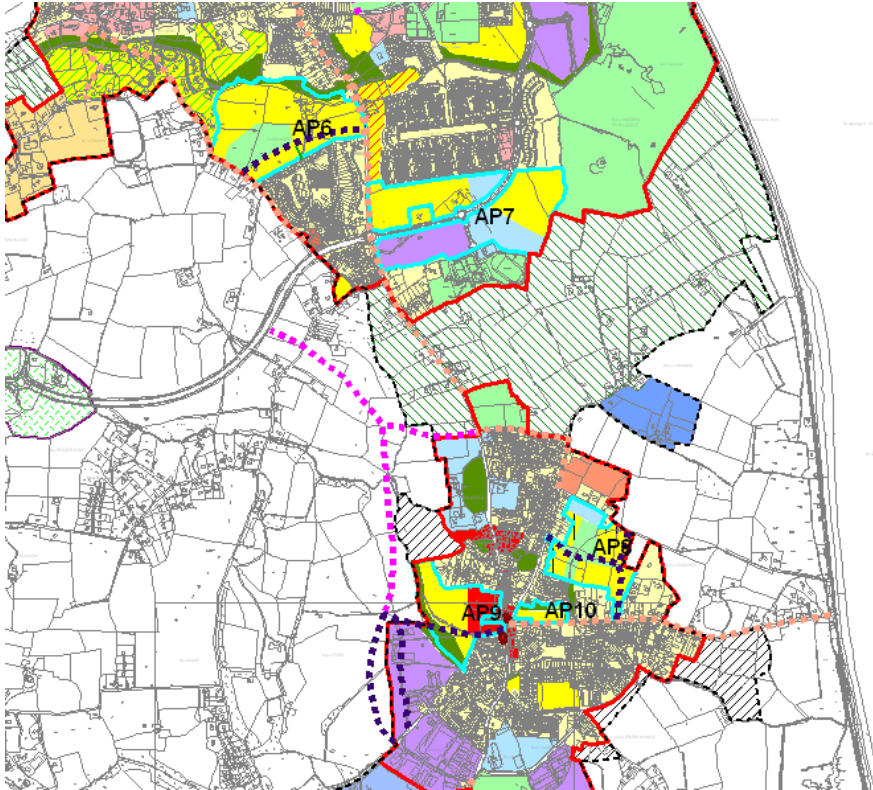
Map 1: Managers recommendation regarding the GB Zoning:

Remove GB zoning on lands zoned to the south of the AT zoning within the Kilcoole Settlement boundary and amend the plan boundary as demonstrated below:

From:



To:



No. 54

Cornerpark Estates Ltd.

This submission relates to land measuring c. 9.87 ha at Chapel Road, Blacklion, Greystones.

Submission:

- Draft LAP increased densities on the land so that the indicative number of permissible houses has increased from 135 to 157 (16%). However it is still not commercially viable to develop at the densities proposed in draft LAP.
- Average density of 16/ha is contrary to Government planning guidelines for urban areas and CDP 2010.
- Half the site is the only greenfield infill development land within the draft LAP that is zoned at low density of R10. All other neighbouring undeveloped zoned lands at a similar contour are either zoned R17 or R22.

Rezoning Proposal – Option A – R10 to R22 Zoning

- All subject lands to be zoned R22 – this density necessary to achieve house types and a layout that is attractive to current market.
- Suggest that a precautionary caveat should be included within the plan (similar to that included for AP1 i.e. design of development to reduce visual impact on views towards Kindlestown Hill) that design and layout be appropriate to the rising topography of the site. This would be equitable treatment.
- Appropriate density considering proximity to neighbourhood centre, while still low having regard to 'Sustainable Residential Density in Urban Areas' (2009) guidelines.
- In order to balance out Table 1.3 of Appendix A, the number of dwellings allocated to other

<p>areas within the settlement could be reduced, e.g. RE lands.</p> <ul style="list-style-type: none"> RES7 applies only to certain lands. Subject lands are not identified as being constrained in either the SEA Report or Draft LAP. <p><i>Rezoning Proposal – Option B – R10 to R17</i></p> <ul style="list-style-type: none"> Rezoning of sufficient part (i.e. c.3ha) of the R10 zone to R17, at the 65m contour, to provide a reasonable transition between the built up edge of the settlement and very low density housing, and the more open or higher lands beyond the development boundaries. The balance of subject lands to retain the R22 zoning (c.7ha). Would be commercially viable Precautionary caveat could be applied, similar to zoned lands within AP1. Corresponding adjustment to housing allocation for RE infill lands could be made to balance out Table 1.3. Approach consistent with national and regional planning strategy and Wicklow CDP 2010. <p>Request that amendments sought to the draft LAP be appropriately reflected in Variation no.3 to Wicklow CDP 2010, as appropriate.</p>
<p>Manager's response</p> <p>The proposal put forward by the applicant, put simply, requests that the density of the subject lands at Chapel Road measuring c. 9.87ha be increased from R22 and R10 to either A) all being R22 or B) 6.58ha R22 with a smaller portion of lands c. 3.29ha of lands to the south of the site being zoned R17 in keeping with the adjoining zoning to the immediate north west.</p> <p>A previous permission was granted on the overall lands for c. 135 units under Planning Ref. No. 09/290 and ABP Ref. No. PL27.234655. Having examined the contents of the previous application in terms of density/layout and design and taking into consideration the location, elevated nature of the subject lands and surrounding pattern of development it is considered that a density of R22 across the whole site as proposed in Option A would be inappropriate, however taking into consideration the details of the previous granted permission, it is felt that a density of R17 can be achieved without significantly altering the layout of the previously permitted development.</p> <p>In addition it is considered reasonable to allow for a zoning of R22 (1.646ha) along the eastern section of these lands as they are at a similar level to the lands to the immediate north that also form part of this overall site.</p> <p>It is therefore recommend that the zoning on these lands be altered in accordance with Option B as proposed and 6.58ha of land be zoned R22 with the remaining lands measuring 3.29ha be zoned R17 as indicated in the map below.</p> <p>It is recommended that an objective be introduced in the plan to ensure that any development of this area shall be designed in a manner that is appropriate to the topography of the site and the visual transition between the rural and urban area.</p>
<p>Manager's recommendation</p> <p>1) Amend the zoning map as set out below in Map 2A.</p> <p>2) The increase in density will result in an additional 43 units at this location. Taking this in to consideration and in order to ensure that the zonings of the plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan it is proposed that c.2 ha of land to the north of the plan area within Action Area AP1 be removed in accordance with Map 2B below.</p> <p>This 2ha of land will be made up of 1.19ha of land to the extreme north east of this action area at</p>

Redford House being omitted (including the small OS zoning adjoining these lands) with the remaining 0.81ha be removed from the western section of these lands.

This recommended change will require the wording for this action area to be altered to reflect this reduction in lands **(from 31ha of development for residential units to 29ha of development for residential units)** however the phasing of this action area and the unit numbers proposed within each phase will not be altered with this reduction in units falling within Phase 4.

Amend Table 1.3: Greystones-Delgany – Land to provide for housing growth up to 2022, Appendix A.

3) Amend the settlement boundary for Greystones/Delgany in this area and amend the LAP boundary. See Map 2B below

4) Amend RES7 as follows:

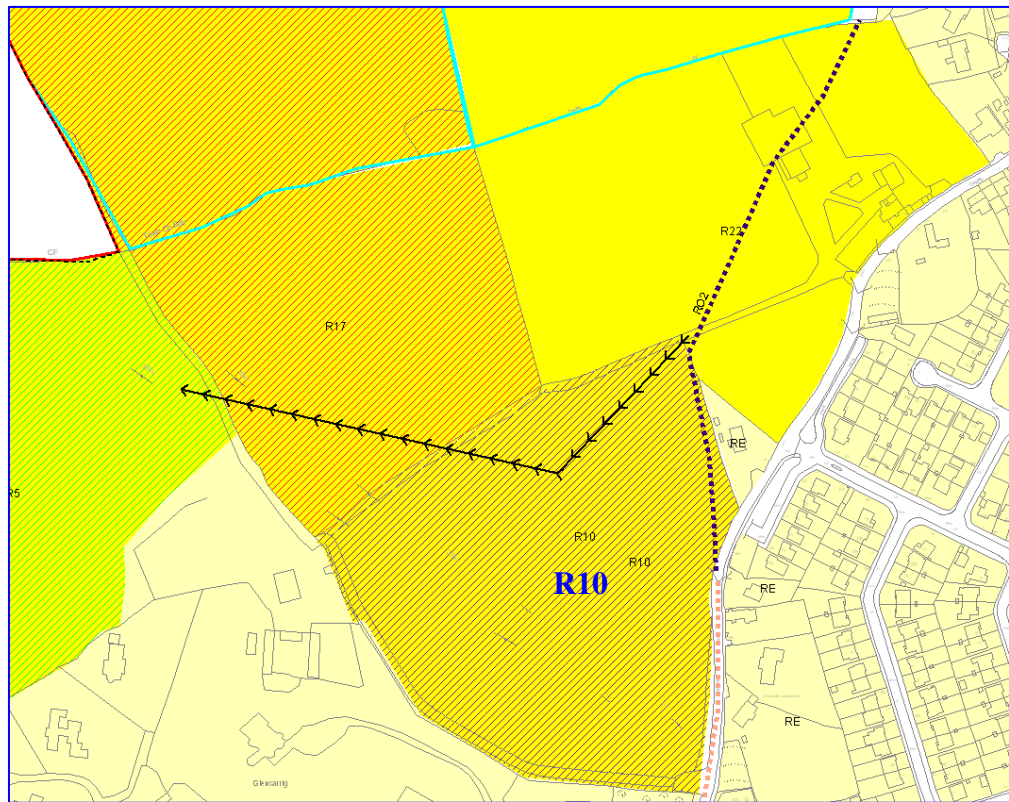
RES7: Notwithstanding the zoning objectives set out within this plan, lower density residential developments may be required at certain locations; where by virtue of environmental, topographical and service constraints, including lack of public mains infrastructure, poor road access, steep gradients, flooding issues and significant coverage of natural biodiversity; a lower density of development is preferable. This objective applies to all land zonings within the plan area.

~~Having regard to these type of constraints,~~*In particular, the planning authority will limit growth in the amount of housing, on lands zoned 'R2.5: Residential (2.5/ha)' and 'R5: Residential (5/ha)' along Blackberry Lane, Delgany and lands zoned RE: Existing Residential at Kindlestown Upper and Bellevue Demesne. In these areas housing shall generally be restricted to the development of low density single housing, subject to all matters being addressed to the satisfaction of the planning authority.*

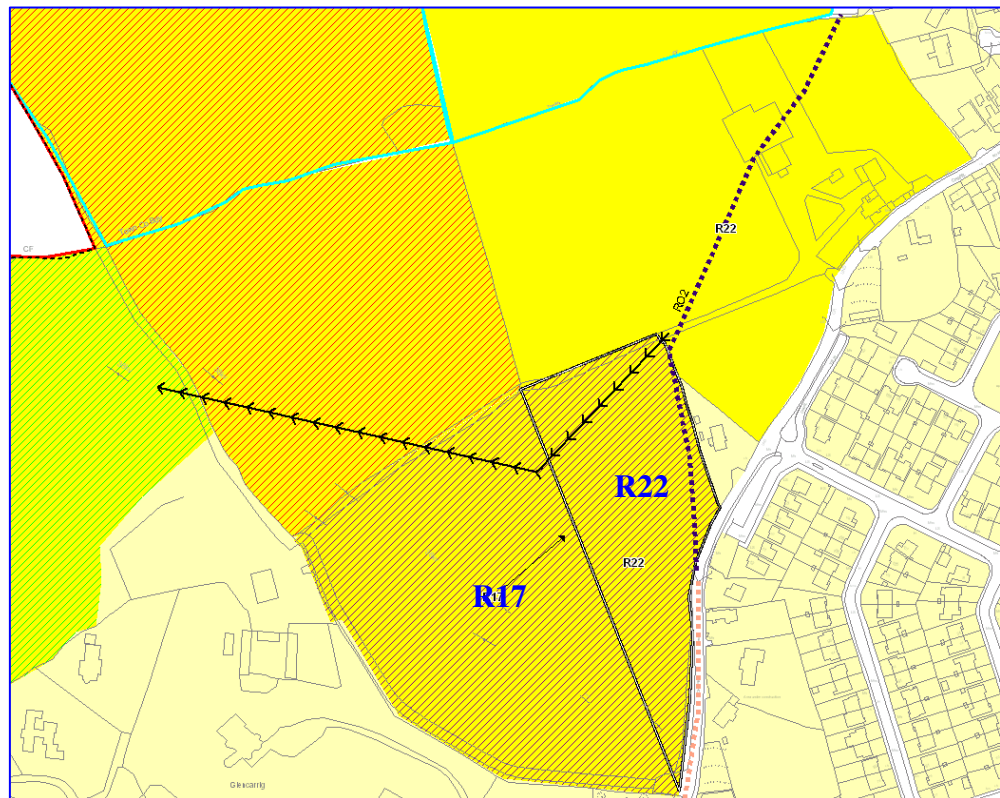
On land zoned R17/R5/R22 in the Kindlestown Upper/Coolagad vicinity, the design and layout of developments shall be appropriate to the topography of sites and the necessity to ensure that there is a visual transition between these developed lands and the unzoned agricultural lands/Kindlestown Hill to the rear of the site. Regard shall be paid to the protection of the visual amenity of the area, including views of Kindelstown Hill and to the objectives of the Blacklion ACA.

Map 2A: Lands at Chapel Road:

From:



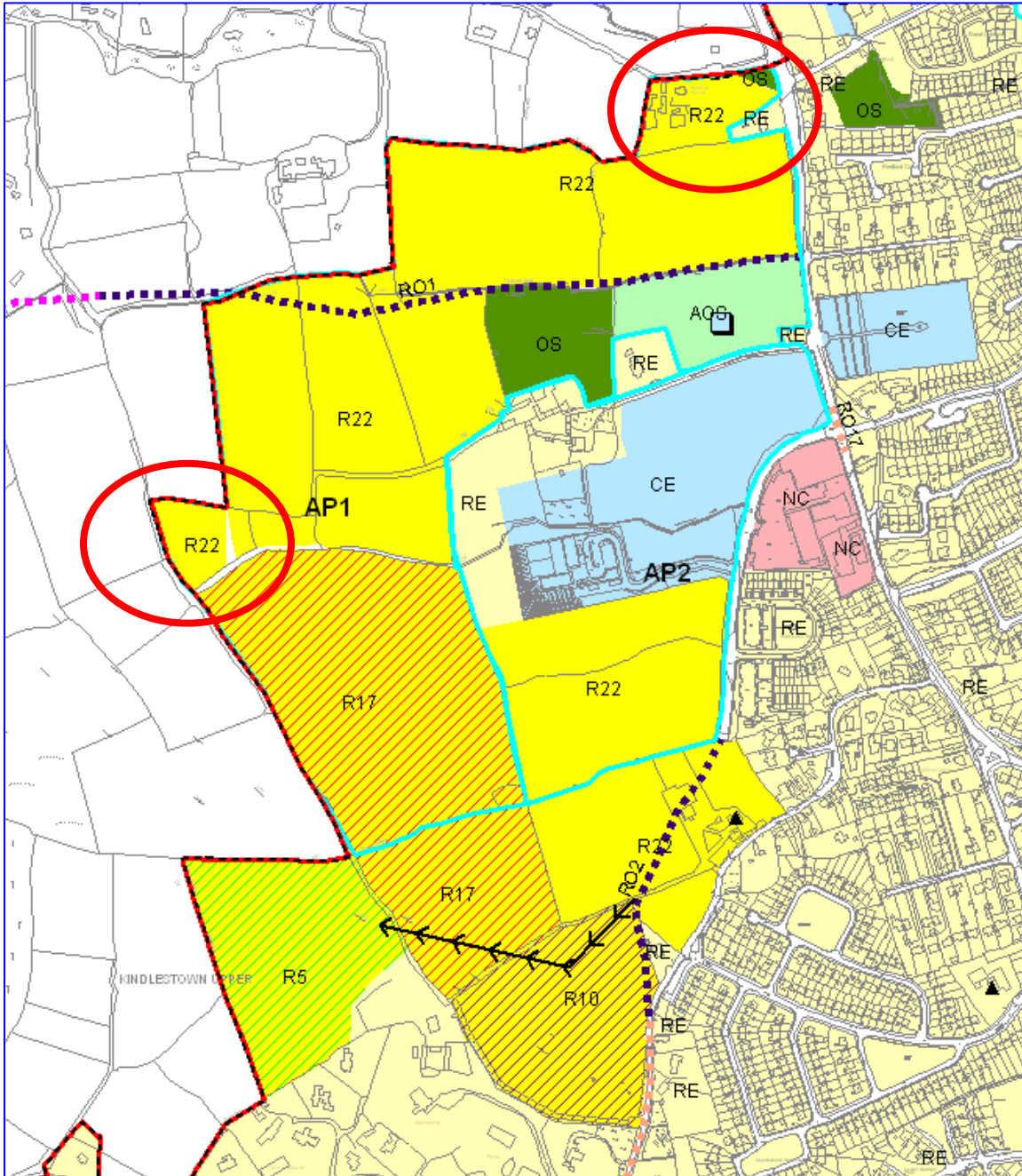
To:



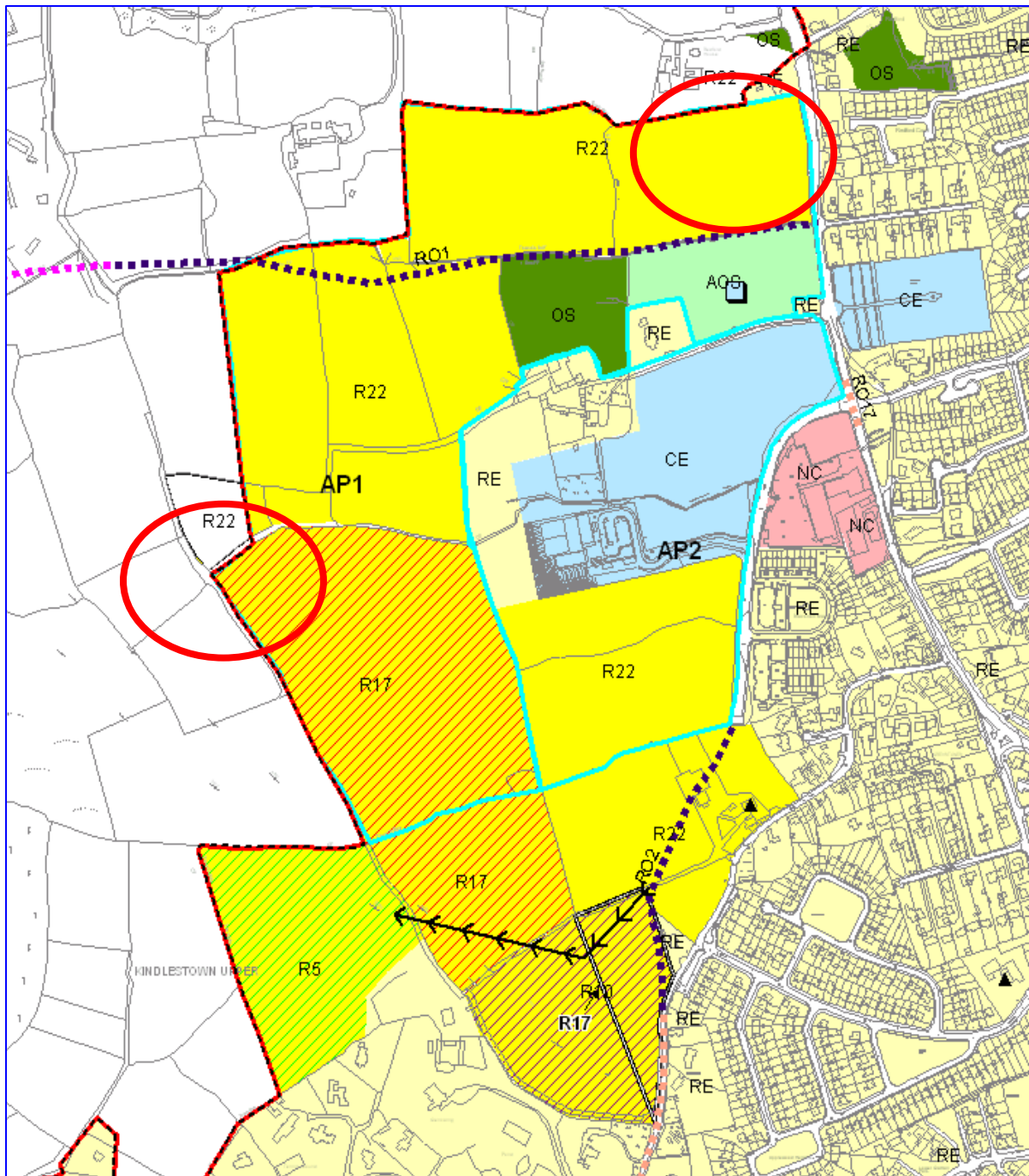
Map 2B:

2ha of R22 land within AP1 to be removed, a small section of OS to be removed and the AA, Settlement and LAP boundaries to be amended to reflect this recommended change.

From:



To:



TOPIC 13: MISCELLANEOUS

Topic
Minor Typographical Errors
Submission Number
4
Summary of Issues Raised
<p>List of minor typographical errors included – for correction:</p> <ol style="list-style-type: none"> Page 2, Section 1.4. Belview should be Bellevue. Page 10. Greystones DART Station should be Greystones Railway Station. <p>Appendix A, page viii. Liatha should be Liath, Gloch should be gCloch</p> <p>Appendix A, page viii. St. Lawrence's should be St. Laurence's.</p> <p>Appendix B, pages vi and vii. St. Killian should be St. Kilian, one L.</p> <p>Appendix B, page viii. Sommerville should be Summerville's of Greystones.</p> <p>Appendix B, page viii. St. Bridget should be St. Brigid.</p> <p>Appendix B, page vii. Dencairn should be Duncairn.</p>
Opinion of Manager
It is agreed that the minor typographical errors should be corrected, as appropriate.
Manager's Recommendation
Amend text to correct minor typographical errors, as appropriate throughout the plan.