



Kilcoole

**Local Area Plan
2008 - 2014**



Managers Report

**on submissions to the
Draft Plan
August 2008**

Kilcoole Local Area Plan 2008

Manager's Report on submissions to the draft Local Area Plan following the 1st public display period

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PART 1

1.0 1.0 Introduction

The Manager's Report is submitted under Section 20(3)(c) of the Planning & Development Act 2000; 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 response of the Manager to the issues raised taking into account the proper planning and sustainable development of the County and any relevant policies or objectives of the Government or Government Minister.

The Report is now formally submitted to the Council for consideration. The Report will be on the agenda of the County Council meeting on the 1st September 2008.

1.1 Draft Consultation Process

Following the issuing of Background Issues Paper and Consultation with Stakeholders and the General Public the Draft Kilcoole Local Area Plan was placed on display during the period on Wednesday 21st May 2008 to 2nd July 2008.

The aim of the consultation process was to enable the public and interested parties to give their observations on the Draft Local Area Plan.

A total of 38 written submissions were received. The written submissions are held on file and are available for Council and public inspection.

The list of persons or bodies who made submissions is contained in Part 3 of this Report.

1.2 Considering the Submissions

The written submissions have been analysed by the Forward Planning Unit of the County Council. The individual submissions are summarised and the opinion and recommendations of the County Manager, is given in Part 4 of this Report.

This Report is submitted to the Members for consideration.

1.3 Next Steps – Draft Local Area Plan Timetable

Following the distribution of this Report, the Council will consider the Report and decide whether to make the Local Area Plan with or without modifications or not make the plan.

Formally making the Local Area Plan is done by resolution of the Council.

During the entire plan-making process, the Council is restricted to considering the proper planning and sustainable development of the area. They must also take into account statutory obligations and any relevant Government policies and objectives in force.

Local Area Plan timetable

21 st May 2008 – 2 nd July 2008	Draft plan on public display, submissions accepted
3 rd July 2008 – 5 th August 2008	Evaluation of submissions and preparation of Manager's Report
6 th August 2008 - 31 st August 2008	Consideration by County Council Members of Manager's Report and Draft Plan
1 st September 2008	Council meeting – adopt / amend plan

PART 2 Summary of Manager's recommended amendments

Amendment 1 (submissions 1, 12, 24, 26, 29, 35)

(a) Map 1 Omit proposed CE zoning (c. 2ha) to the rear of the Holy Faith convent and revert this land to AG zoning

(b) Change text of Part B: Section 7 – Education: policies & objectives

From:-

Policies/Objectives

- Two 1.2ha sites (suitable for 16-classroom schools) shall be reserved for primary school development – one to the north-west of the existing girls' school and one in Action Area 1,
- Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school).

To:-

Policies/Objectives

- *One new 1.2ha site (suitable for 16-classroom school) shall be reserved for primary school development, located in Action Area 1,*
- *Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school).*

Amendment 2 (submission 13)

(a) Amend AA1 as follows:-

From:-

This Action Area is located east of Lott Lane, immediately north of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 12ha and is bounded to the north by Ballydonarea Lane (Reese's Lane), to the west by existing houses on Lott Lane, to the south by existing houses on Sea Road and to the east by open farmland. This Action Area shall be developed as a mixed residential, community and educational and open space zone in accordance with the following criteria:-

- Access to the Action Area shall be provided from Sea Road, the road continuing as far as Ballydonarea Lane, with an east-west link road through to Lott Lane,
- c. 6.4ha shall be developed for residential use, of a high standard of design and layout, with c. 2ha being reserved for medium density development (10-15/ha), generally comprising medium-large houses on generous sites. Apartments/duplexes shall not be considered in this area,
- Dwellings shall be positioned and orientated to provide maximum passive surveillance of the new open space area,
- c. 1.2ha shall be reserved for future primary school, to be located at an easily accessible position,
- c. 4ha shall be developed as active open space,
- Any development proposals shall have regard to the setting and curtilage of Ballydonarea House, a protected structure.

To:-

This Action Area is located east of Lott Lane, immediately north of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 12ha and is bounded to the north by Ballydonarea Lane (Reese's Lane), to the west by existing houses on Lott Lane, to the south by existing houses on Sea Road and to the east by open farmland. This Action Area shall be developed as a mixed residential, community and educational and open space zone in accordance with the following criteria:-

- *Access to the Action Area shall be provided from Sea Road, the road continuing as far as Ballydonarea Lane, with an east-west link road through to Lott Lane,*
- *c. 6.4ha shall be developed for residential use, of a high standard of design and layout, with c. 2ha being reserved for medium density development (10-15/ha), generally comprising medium-large houses on generous sites. Apartments/duplexes shall not be considered in this area.*
- *Dwellings shall be positioned and orientated to provide maximum passive surveillance of the new open space area,*
- ***c. 2.4 ha shall be provided for Community, Educational & Institutional uses, including reservation of c. 1.2ha for a future primary school, to be located at an easily accessible position,***
- ***c. 3ha shall be developed as active open space,***
- *Any development proposals shall have regard to the setting and curtilage of Ballydonarea House, a protected structure.*

(b) Amend Map 1 to provide for an additional CE zone of 1.2ha along the south side of Ballydonarea Lane.

Amendment 3 (submissions 1, 2, 15)

(a) Map 1 – show 0.5ha R1 zone in AA2

(b) Part B: Section 11 – Action Areas

Amend AA2 as follows:

From:-

This Action Area is located east of Lott Lane and south of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 2ha. This Action Area shall be developed as a residential and public open space zone in accordance with the following criteria:-

- *A maximum of 6 residential units shall be constructed within this area, on a site area not exceeding 0.5ha. The optimal location and configuration of this housing area shall be determined following an archaeological assessment of the Action Area. The design and orientation of houses shall reflect the setting of the existing the Church ruin,*
- *The remainder of the Action Area shall be provided for a public park, including an equipped playground of c.900sqm,*

The existing Church site shall be maintained as a feature in the new open space area.

To:-

This Action Area is located east of Lott Lane and south of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 2ha. This Action Area shall be developed as a residential and public open space zone in accordance with the following criteria:-

- *A public park of not less than 1.5ha, including a equipped playground of not less than 900sqm shall be provided*
- *The existing Church site shall be maintained as a feature in the new open space area*
- *The remainder of the action area may be developed for housing, at densities up to 20/ha. The optimal location and configuration of this housing area shall be determined following an archaeological assessment of the Action Area. The design and orientation of houses shall reflect the setting of the existing the Church ruin*

Amendment 4 (submission 1)

Amend zoning of 0.1ha at Creowen from E to RE.

Amendment 5 (submission 11)

(a) Amend Map 1 to include R2 zoning at Druids Glen

(b) Include an additional objective in Part B, Section 4: Residential Development' as follows:-

- *To provide for an especially high quality, discretely designed, 40 unit low density golf resort related residential development to be effectively and permanently screened from an early date from public view (including from the R761 on the east and from Kilmullin Lane on the west).*

(c) Part B, Section 12 (zoning) add new category R2 - To provide for an especially high quality, discretely designed, 40 unit low density golf resort related residential development

(d) Include R2 in the land-use matrix

Amendment 6 (submission 3)

Include an additional objective in Part B, Section 4: Residential Development' as follows:-

- *New residential development shall have regard to the (draft) "Sustainable Residential Development in Urban Areas" guidelines (DoEHLG 2008).*

Amendment 7 (submission 7, 22)

Part B, Section 4: Residential development – "policies / objectives"

Amend 6th bullet point as follows:-

From:-

- The maximum size for any single development is 100 houses / 200 apartments and any development larger than this shall be developed as a number of separate 'estates' with materially different house types, sizes and appearance

To: -

- *The maximum size for any single residential estate is 100 houses / 200 apartments. Within each estate, a range of unit types / sizes shall be provided, within an overall unified design concept. Estates shall be differentiated from each other by the use of materially different design themes and name.*

Amendment 8 (submission 28)

Change zoning of 0.3ha at Ballyphilip from AOS to AG.

Amendment 9

- (a) Amend matrix in Part B, Section 12, p17 to make residential development “permissible” “Y” in the TC zone. (submission 7)
- (b) Amend the land-use matrix on p17, part B to make “residential institution” permissible “Y” in the CE zone. (submission 35)
- (c) Insert footnote in the land-use matrix on p17 of Part B of the plan, making clear that ‘residential’ development in AG zones is permissible only in the context of Policy SS9 of the County Settlement Strategy. (submission 28)

Amendment 10 (submission 3)

Replace ‘Kilcoole Marshes SPA’ on p11 Part A and p 3 & 11 Part B to ‘Murrrough SPA’.

Amendment 11 (submission 3)

Change 8th bullet point under ‘Action Area 3, p14, Part B

From

- A public riverine park shall be provided along the existing stream on the western boundary of the Action Area. This public park shall be designated a public park, not exclusive to the residents of the development and shall be maintained open at all times. Suitable pathways and lighting / furniture shall be provided by the developer.

To

- *A public riverine park shall be provided along the existing stream on the western boundary of the Action Area. This public park shall be designated a public park, not exclusive to the residents of the development and shall be maintained open at all times. The appropriate layout, design and landscaping of this park shall be determined following consultation with the DoEHLG and Eastern Regional Fisheries Board and in particular, landscaping should incorporate native species planting, any proposed paths should be suitably set back from the riverbank and left unmown so as not to interfere with the riparian zone and night lighting shall not be provided.*

Amendment 12 (submission 4)

Add new objective under Part B, Section 10 as follows:-

- Where new development is adjoining surface waters, a minimum buffer zone of 10m shall be maintained between the riverbank and new development. The developer shall consult with the DoEHLG and the ERFB to determine the most appropriate layout, design and usage of the buffer zone.

Amendment 13 (submission 26)

Include a new objective in Part B, Section 7: Sport/Play & Parks, Open Spaces and Green Amenity:-

- To promote and facilitate the maintenance and improvement of the Mass path, as shown on Map 1.

PART 3 List of persons and bodies who made submissions

No.	Name	Agent/representative
1.	Cllr. Tom Fortune	
2.	Cllr. Derek Mitchell	
3.	Department of the Environment, Heritage & Local Government	T Halloran / P O'Sullivan
4.	Eastern Regional Fisheries Board	Pat Doherty
5.	Geological Survey of Ireland	Sophie Preteseille
6.	NRA	M McCormack
7.	BBA Architecture	
8.	Brady, John	Pat O'Connor
9.	Brady, Lucy	Pat O'Connor
10.	Brady, Paul	bps planning consultants
11.	Candarli Ltd. and Lakeford Ltd., Druids Glen Golf Club Ltd.	Kiaran O Malley & Co. Ltd.
12.	Chairperson of Board of Management, St. Brigid's N.S. and St. Anthony's N.S.	Mary Byrne
13.	O Connor, Allan	Clodagh Holmes & Associates
14.	Cullen, Dan	Ardcastle Developments
15.	Doyle, Patrick	
16.	Fahey, Patrick	BBA Architecture
17.	Finnegan, Kevin	BBA Architecture
18.	Foley T.J. and McGarry, George	bps Planning Consultants
19.	Fox, Richard	Frank O Gallachoir & Associates Ltd.
20.	Gahan, Michael & O'Connor, Mary	Pat O Connor
21.	Gammell, Chris	Quinn-Hartnett Architects
22.	Hampton Properties	Graham Kennedy
23.	Holmes, Clodagh	Clodagh Holmes & Associates
24.	Hunt, Colette	
25.	Keddy, Charlie	
26.	Kilcoole Residents & Community Development Company Ltd	Mr. Mark Blake
27.	Kimpton Vale Ltd	Ryan Walsh Associates
28.	Kuntz, Flo	Marston Planning Consultancy
29.	Lucas, Miriam Anne (Sr.)	Holy Faith Convent
30.	Mannix, Lorraine & Una Kelleher	Stephen Little & Associates
31.	Martin, Angela	
32.	Napier, John	
33.	O'Neill, Charles	The Padraig Smith Partnership
34.	Ravoc Construction Ltd. & Wilson Family	Muir Associates Ltd.
35.	Sisters of the Holy Faith	Frank O Gallachoir and Associates Ltd.,
36.	Society of Saint Vincent De Paul	Rose McGowan
37.	Toner, John	Glenroe Farm
38.	Webb, John	Pat O'Connor

PART 4 Considering the submissions

<p>Submission no. 1</p> <p>Cllr. Tom Fortune</p> <p>1. It is vital that the purpose of the plan as set out in Section 1 of Part A of the plan is achieved i.e. <i>“It is the purpose of this Plan to establish a framework for the planned, co-ordinated and sustainable development of Kilcoole. The aim of the Plan is to enhance and facilitate the balancing of economic, social and environmental infrastructure in order to maintain and develop a high quality of life without compromising the protection of the environment and the needs of future generations. In addition to the policies and objectives set out in the County Development Plan 2004 –2010 (CDP), that are relevant to the development of Kilcoole, it is an overarching objective of this Plan to identify the special characteristics of Kilcoole and accordingly develop and enhance the previous policies of the Kilcoole Local Area Plan 2002 in order to provide objectives which meet the town’s needs during the period up to 2014.”</i></p> <p>2. The issues raised in pre-draft consultation with regard to:</p> <ul style="list-style-type: none"> (a) town centre and retailing, (b) transport, traffic and parking, (c) community infrastructure, (d) natural and built heritage; <p>should be addressed in the plan, in particular having regard to the growth of population in Kilcoole</p> <p>3. The plan needs to address and achieve more balanced mix of housing.</p> <p>4. Kilcoole should get the full attention of the SEA process. In particular</p> <ul style="list-style-type: none"> (a) A full heritage audit should be carried out for Kilcoole (b) Need to ensure the protection of the marshlands and any adjoining lands (c) The plan needs to outline how it will incorporate the views and concerns of the prescribed SEA bodies set out in Part A Section 5.4 of the plan, for example with regard to the protection of the Kilcoole stream and water treatment. <p>5. Concerns in the draft plan in relation to the use of language such as “unlikely” and “may have”.</p> <p>6. Requests the following:-</p> <ul style="list-style-type: none"> (a) the proposed educational zoning shown on the draft plan land use zoning map be retained in the plan, (b) A play area is provided in the town within a specific timeframe, (c) The following infrastructure be provided in the town - car parking, health centre, community policing, library, citizens advice centre, community centre and tourism and sports facilities. (d) The AA2 zoning for the Doyle family be retained, (e) The submission from Eamon Byrne be considered i.e. land to be rezoned from commercial to residential.
<p>Manager's Response</p> <p>1. It is the over arching purpose of the plan to provide a framework for the planned,</p>

co-ordinated and sustainable development of Kilcoole, as set out in Part A of the draft plan. All of the draft policies, objectives and zonings have been crafted with the aim of achieving its objective.

2. All of the issues raised in the pre-draft consultation exercise have been taken into consideration in the drafting of this plan.

3. It is assumed this point relates to the tenure of houses i.e. local authority, affordable, private etc. Currently c. 15% of the housing stock in Kilcoole is within the category 'social rented'. The draft plan makes provision for the development of approximately 500 new housing units in Kilcoole during the plan period. In the event that all private developments deliver the maximum number of social housing units set out in the Housing Strategy and the Local Authority site is developed as currently envisaged with a 50:50 split between social and affordable / private housing, the proportion of 'social rented' units in the settlement could increase to 17%, which is not considered a significant increase (this does not take account of those houses that may be purchased by tenants over the plan period - those occupying social rented housing can avail of the opportunity to purchase their homes and this programme has had a high uptake in Kilcoole). It is therefore considered that the plan will allow for an acceptable mix of housing tenures.

4. An SEA is not statutorily required to be carried out for Kilcoole as the town population is less than 10,000. However "screening" of the plan was carried out in respect of SEA to determine if the plan would be likely to have significant environmental effects and would thus warrant an SEA. Following this screening process, which included consultation with the relevant environmental authorities, it was determined that the plan would not be likely to have significant environmental effects thus an SEA was not warranted.

(a) A Heritage 'inventory' already exists for Kilcoole in the list of protected items and places in the County Development Plan 2004. All of these items are listed in the draft plan. It is not a function of SEA to carry out a heritage 'audit'.

(b) The marshlands to the east of Kilcoole are protected under European and National legislation. The draft plan has had full regard to the status of this area

(c) Section 5.5 of Part A of the draft plan fully addresses the concerns raised by the environmental authorities in the SEA process. The draft plan (Part B, Section 9) also includes objectives / policies with regard to water treatment. It is within the remit of the Environment & Water Services Section of the Local Authority to address the specific concerns of these authorities with regard to surface waters and streams.

5. As with all forms of environmental assessment, SEA can only predict the likely impact of plans / programmes / projects in the context of known ecological and environmental data. As it is predictive in nature and refers to a hypothetical state of affairs, or an uncertain event that is contingent on another set of circumstances, use of 'conditional' terminology is required.

6. (a) On foot of Submission No. 12 from the Board of Management of St. Brigid's NS and St. Anthony's NS and Submission No. 35 from the Sisters of Holy Faith, it is recommended that the proposed new 2ha CE zoning to the rear of the Convent be omitted

(b) The Local Authority is committed to the provision of a playground in Kilcoole and

will use all available resources and means to ensure its delivery. It should be noted that the development of housing in proposed Action Area 2 and the Mixed Use zone on Lott Lane is dependent of the provision of playgrounds

(c) The draft plan has made provision in terms of land-use zoning for car parking, health centre, library, sports facilities, tourism and other community facilities. The plan has no role in the delivery of such facilities nor in provision of community policing

(d) It is the Manager's recommendation that the AA2 zoning be retained, subject to modification set out under Submission No. 15

(e) No submission has been to the draft plan from Eamon Byrne. A submission was received from Mr. Byrne during the pre-draft stage. The land in question is a residence adjacent to Kilcoole Industrial Estate, that is zoned 'E'. It was requested that this be zoned 'R'. It is the Manager's recommendation that is house site be modified to RE (existing residential) zoning

Managers Recommendation

Make the following amendments to the LAP:-

1. Omit proposed CE zoning (c. 2ha) to the rear of the Holy Faith convent and revert this land to AG zoning (the reasons for this being set out under Submissions No. 12 & 35)
2. Amend AA2 development criteria (as set out under Submission No. 15)
3. Amend zoning of 0.1ha at Creowen from E to RE

Submission no. 2

Cllr. Derek Mitchell

1. The plan should include an objective to provide a footpath, cycle path and lighting from the town to the station.
2. A public park and playground with car parking is needed in the town.
3. Security for the existing and future houses in AA2 will need to be considered in determining the optimal layout for this area and CCTV will assist.
4. The proposed area for housing in AA2 should be increased from 0.5ha to 0.65ha.
5. The following community facilities are needed in Kilcoole - medical centre, library, Garda sub-station and additional Main Street parking.

Manager's Response

1. The provision of a footpath, cyclepath and lighting between the town centre and the station has not been included in the draft plan for the following reasons
 - (a) Such facilities would require considerable work / disturbance to and along the public road, including re-alignment and widening. This would entail the removal of existing trees, hedgerows and other habitats. Having regard to the provisions of the County Development Plan with regard to the protection of natural habitats and biodiversity and the environmental designations in this area, it is considered that these works would significantly and negatively impact on the protection and preservation of these areas
 - (b) Until such a time as frequency of services improve at Kilcoole train station, it is not considered that such extensive works are warranted
 - (c) It is considered that such works may set a precedent for the future growth of the settlement in this direction, again contrary to the environmental amenities

of this area

2. The Local Authority is committed to the provision of a playground in Kilcoole and will use all available resources and means to ensure its delivery. It should be noted that the development of housing in proposed Action Area 2 and the Mixed Use zone on Lott Lane is dependent of the provision of playgrounds. It should be noted the proposed AA2 criteria do not make provision for a public car park at this playground.

3. The detail and layout of AA2 will be agreed at a later stage under the AA2 written agreement. This agreement will address any issues arising with the layout of this action area, including security concerns

4. The draft plan proposes to allow a maximum of 6 dwellings on a site area not exceeding 0.5ha. This equates to a density of 5/acre. This is considered a reasonable density and number of houses and consists in a zoning 'improvement' to these lands given that the entire parcel is currently zoned OS with no allowance for housing. However, the main issue in this case is the delivery of an adequately sized and located public park. It is therefore recommended that the wording of AA2 be slightly amended in order to ensure this objective is realised, regardless of the number of houses constructed in AA2.

5. The plan makes provision for adequate zoned land for the facilities listed. Furthermore, the plan sets out that the development of AA3 will require the delivery of a new town car park and community space, including a space suitable for a library.

Managers Recommendation

Make the following amendments to the LAP:-

1. Amend AA2 as follows:-

From:-

This Action Area is located east of Lott Lane and south of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 2ha. This Action Area shall be developed as a residential and public open space zone in accordance with the following criteria:-

- A maximum of 6 residential units shall be constructed within this area, on a site area not exceeding 0.5ha. The optimal location and configuration of this housing area shall be determined following an archaeological assessment of the Action Area. The design and orientation of houses shall reflect the setting of the existing the Church ruin
- The remainder of the Action Area shall be provided for a public park, including an equipped playground of c.900sqm
- The existing Church site shall be maintained as a feature in the new open space area

To:-

This Action Area is located east of Lott Lane and south of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 2ha. This Action Area shall be developed as a residential and public open

space zone in accordance with the following criteria:-

- *A public park of not less than 1.5ha, including a equipped playground of not less than 900sqm shall be provided*
- *The existing Church site shall be maintained as a feature in the new open space area*
- *The remainder of the action area may be developed for housing, at densities up to 20/ha. The optimal location and configuration of this housing area shall be determined following an archaeological assessment of the Action Area. The design and orientation of houses shall reflect the setting of the existing the Church ruin*

Submission no. 3

Department of the Environment, Heritage & Local Government

1. Kilcoole Marshes SPA. has been renamed The Murrrough SPA. This should be corrected in the plan.
2. It should be noted that the trees that are subject of a Tree Protection Order at Holy Faith Convent are gone
3. The proposed riverine park should incorporate native species planting. Any proposed paths along this riverine park should be suitably set back and left unmown so as not to interfere with the riparian zone and to prevent disturbance to species such as otters and nesting kingfishers (both protected species under E.U. directives).
4. The river and its associated riparian zones should not be lit at night to prevent disturbance to species such as bats.
5. Hedgerows should be maintained where possible and incorporated into estates and developments due to their importance as wildlife corridors.
6. The plan should refer to the draft Guidelines for Sustainable Residential Development in Urban Areas

Manager's Response

1. The above change is noted and the correction will be made to Parts A and B of the plan.
2. This is noted. A review of all protected items will be undertaken as part of the County Development Plan review
- 3 & 4. This is noted and it is recommend that the plan be amended as set out below.
5. Part B, Section 10 of the draft plan includes hedgerow protection as an objective. This objective is further re-inforced by Policy HL19 of the County Development Plan 2004: *The Council will encourage the protection of hedgerows and stone walls which are important features of traditional farming practices, which provide a unique corridor habitat for wildlife and which contribute to the visual amenities of the countryside. In particular the Council will expect all new developments to comply with the requirements for the protection of hedgerows and field boundaries and the inclusion of same within the overall development in Chapter 5 Design and Development.*
6. This is noted. It is recommended that reference to this guidance document is included in Part B, Section 4: Residential Development'

Managers Recommendation

Make the following amendments to the LAP:-

<p>1. Replace 'Kilcoole Marshes SPA' on p11 Part A and pp 3 & 11 Part B to 'Murrrough SPA'</p> <p>2. Change 8th bullet point under 'Action Area 3, p14, Part B</p> <p>From</p> <ul style="list-style-type: none"> • A public riverine park shall be provided along the existing stream on the western boundary of the Action Area. This public park shall be designated a public park, not exclusive to the residents of the development and shall be maintained open at all times. Suitable pathways and lighting / furniture shall be provided by the developer <p>To</p> <ul style="list-style-type: none"> • <i>A public riverine park shall be provided along the existing stream on the western boundary of the Action Area. This public park shall be designated a public park, not exclusive to the residents of the development and shall be maintained open at all times. The appropriate layout, design and landscaping of this park shall be determined following consultation with the DoEHLG and Eastern Regional Fisheries Board and in particular, landscaping should incorporate native species planting, any proposed paths should be suitably set back from the riverbank and left unmown so as not to interfere with the riparian zone and night lighting shall not be provided.</i> <p>3. Include an additional objective in Part B, Section 4: "Residential Development" as follows:-</p> <ul style="list-style-type: none"> • New residential development shall have regard to the (draft) "Sustainable Residential Development in Urban Areas" guidelines (DoEHLG 2008)

<p>Submission no. 4</p> <p>Eastern Regional Fisheries Board</p> <p>1. The ERFB welcomes Wicklow County Council's commitment to apply their guidelines document to all development in the LAP zone (Part B, Section 10)</p> <p>2. The objectives as set out in the Water Framework Directive should not be compromised in relation to the protection of water quality and fisheries status of receiving waters as a result of this LAP</p> <p>3. The capacity of the WWTP must be sufficient to take and treat the increased loadings for the projected population increase. The arrangement to transfer additional effluent loadings to Greystones WWTP is only acceptable if this WWTP has available spare capacity. It is recommended that any further local development should be contingent on available capacity at Greystones and this should be stated in the plan.</p> <p>3. The ERFB would welcome the designation of lands adjacent to surface waters as areas of open preservation allowing protection / enhancement while providing open space and recreational amenity. Natural heritage objectives should include maintenance of buffer zones of at least 10m from the water's edge along both banks of surface waters in the LAP area (not just river walk areas).</p> <p>4. A Council commitment to reject proposals that would interfere with natural floodplains is recommended</p> <p>5. The ERFB welcomes that Council's commitment to implement SUDS design for surface water disposal. The policies and recommendations made under the Greater Dublin Strategic Drainage Study should be applied in development of a drainage</p>

strategy for the LAP under consideration
 6. Infrastructural development (in particular local sewerage system capacity) should precede actual development.

Manager's Response

1. Noted
2. Wicklow County Council is committed to meeting its obligations under the Water Framework Directive and it is not considered that any of the provision of the plan would compromise realisation of these objectives.
3. There are a number of locations in Kilcoole where existing development is already in close proximity to surface waters. In such situations, it is not possible to implement new set backs. However, where surface water traverse new development areas, the Council will require consultation with the environmental authorities and the implementation of protective measures and it is recommended that this be included as a requirement in the plan (also see recommendations under Submission No. 3 above with regard to AA3)
4. Chapters 9 and 10 of the County Development Plan 2004 set out the Council's policies with regard to flood plains i.e.
***Policy W7:** Within the variety of watercourses that the Council considers may be susceptible to flooding, developers may be required to provide hydraulic and flood impact information in support of their planning application. In such cases, developers must show the measures they will take to minimise flood risk, including attenuation in situ and downstream of their development to the satisfaction of the Council.*
***Policy HL 14:** The Council will discourage proposals for development that are in, or would interfere with the natural flood plain.*
 These policies will be implemented in Kilcoole and will afford the required protection to flood risk zones.
5. Noted
6. It is the stated policy of the draft plan that 'No new development shall be permitted unless there is adequate capacity in the wastewater collection and treatment systems' (Part B, Section 9)

Managers Recommendation

Make the following amendment to the LAP:-

Add new objective under Part B, Section 10 as follows:-

- Where new development is adjoining surface waters, a minimum buffer zone of 10m shall be maintained between the riverbank and new development. The developer shall consult with the DoEHLG and the ERFB to determine the most appropriate layout, design and usage of the buffer zone

Submission no. 5
Geological Survey of Ireland
1. The entire coastline from Greystones to Wicklow town including the Kilcoole coastal area is listed under the Irish Geological Society 'Coastal Geomorphology Theme' for its geological and geomorphological features. It has also been proposed as an NHA for geological heritage.
Manager's Response
The above submission from GSI has been noted, but has not bearing on this plan
Managers Recommendation
No change to LAP

Submission no. 6
NRA
No specific observations made in relation to the Kilcoole LAP.
Manager's Response
The submission from the NRA has been noted.
Managers Recommendation
No change to LAP

Submission no. 7 (mapped)
bba architecture
<p>1. An alternative route for the Kilcoole western distributor road is suggested (map provided). This alternative route would provide a link north of Kilcoole to the southern access route going through the townland of Priestsnewtown.</p> <p>2. The land use matrix for Kilcoole states that residential development is "not normally permitted" under "TC" centre zoning. It is believed this is an error and should be corrected to "permitted in principle"</p> <p>3. The objective restricting the maximum size of any estate to 100 units / 200 apartments is unduly restrictive and it is suggested that the number be increase to 300 houses or apartments or both. It is put forward that there are other means of creating 'sense of place' apart for the number of units in an estate. This restriction could also result in an oversupply of crèche facilities if one were required to be provided in every estate</p>
Manager's Response
<p>1. The suggestion is noted. The route of this road, as shown on the draft map is indicative only and gives no indication as to where it will connect to the R761 or indeed to the GSAR. The final design of this route will be determined through the normal process, which will include public participation and this is the more appropriate forum to express views on the routes of new roads.</p> <p>2. This error is noted. The matrix will be amended to make residential development "permissible" in the TC zone</p> <p>3. The number 100 houses / 200 apartments was derived after undertaking review of new estates and large developments in the area. It is considered reasonable and any number of above this has tended to result in excessively large, monotonous and repetitious developments with no sense of identity. There appears to be an</p>

unwillingness or inability of the part of designers / developers to propose alternative design, materials, height and layout to provide for visual diversity in housing areas, and market demand for standard houses is often cited as the reason. It is considered that this objective will require developers to be more imaginative in the designs and layout and foster strong new communities with a sense of identity.

The requirement that no estate be larger than 100 houses / 200 apartments does not impact on the application of childcare policy. If a developer proposes a larger scale development of say 500 units, 1-2 larger crèches will still be considered as compliant with the childcare policies. The only difference is that the 500 units must be broken up into a number of district estates.

In light of this submission and a number of following submissions, it is recommended that the wording of this policy be slightly altered to make it clearer.

Managers Recommendation

Make the following amendment to the LAP:-

1. Amend matrix in Part B, Section 12, p17 to make residential development “permissible” in the TC zone
2. Part B, Section 4: Residential development – “policies / objectives”

Amend 6th bullet point as follows:-

From:-

- The maximum size for any single development is 100 houses / 200 apartments and any development larger than this shall be developed as a number of separate ‘estates’ with materially different house types, sizes and appearance

To: -

- *The maximum size for any single residential estate is 100 houses / 200 apartments. Within each estate, a range of unit types / sizes shall be provided, within an overall unified design concept. Estates shall be differentiated from each other by the use of materially different design themes and name.*

Submission no. 8 (mapped)

Brady, John

This submission relates to a 32.25ha landholding in Ballygannon townland, between Kilcoole and Charlesland. The southern boundary of the holding is across the road from Glenroe Farm; the northern boundary adjoins the Charlesland recreational centre. It is requested that these lands be zoned ‘AG- Agricultural’.

Manager's Response

These lands are outside of the draft plan boundary. However, those parts of the holding that are shown on the Kilcoole draft plan map are proposed for ‘AG – Agriculture’ zoning

Managers Recommendation

No change to LAP.

Submission no. 9 (mapped)

Brady, Lucy

This submission relates to a c. 3.6ha landholding in Ballynerrin townland. This

holding is located across the road from Glenroe Farm and bounds the public road. It is requested that these lands be zoned for 'Phase 2' residential development.

Manager's Response

1. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an "excess factor" and substantial "headroom", given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing. The draft plan has proposed new residential zoning on the basis of the need identified by these calculations. No further residential zoning is required to meet the current populations targets and the excessive zoning of land (even for a notional 'Phase 2') may lead to population targets being exceeded, to the overall detriment of the settlement.
2. The new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-
 - Unzoned lands closest to the existing town centre shall be considered first for new zoning (the 'town centre' being taken as the Sea Road – Main Street junction).
 - Lands that meet a social or community need
 - Lands zoned AGR in the 2002 LAP shall then be considered

The lands that are the subject of this submission are located outside of the existing development boundary and are c. 1.2km from the town centre, along Lott Lane.
3. The Manager recommends against the spread of Kilcoole in this direction as it may lead to the piecemeal coalescence of Kilcoole and Greystones

Managers Recommendation

No change to LAP.

Submission no. 10 (mapped)
Brady, Paul
<p>This submission relates to three parcels of lands as follows:-</p> <p>Area 1 This area is located on the south side of Cooldross Lane, c. 600m from its junction with the regional road, to the south and west of an existing dwelling and housing estate under construction. The area measures 1.09ha and includes an existing dwelling on Cooldross Lane. The lands are proposed for AG zoning in the draft plan. (i) It is requested that the undeveloped part of the land be re-zoned from “AG” to residential development (R1). (ii) It is requested that the adjoining dwelling be zoned “RE”.</p> <p>Area 2 This area is located south of the existing E zone on the new road from Creowen to Sea Road (that serving Colaiste Chraobh Abhann and the Network Business Park). The area measures c. 2.4ha. It is requested that this land be zoned for employment use. The lands are proposed to AG zoning in the draft plan. Mr. Brady owns c. 2.24ha at this location that it already zoned E (immediately adjoining the Network Business Park) and the new zoning would comprise an enlargement of same.</p> <p>Area 3 This area is located on the north side of Ballydonarea Lane, east of the proposed plan boundary. The lands measure c. 9.26ha and are currently proposed for “AG” zoning. It is requested that these lands be zoned for ‘Phase 2’ residential development.</p>
Manager's Response
<p>Area 1: The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an “excess factor” and substantial “headroom”, given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing. The draft plan has proposed new residential zoning on the basis of the need identified by these calculations. No further residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement. It is therefore not recommended to zone Area 1 for residential or infill development.</p> <p>Area 2: This proposed re-zoning of “AG” lands south of Network Business Park along with the LAP boundary extension is not recommended. Section 8.3 of Part A of draft LAP sets out the background and rationale for employment zoning and takes into account the 2016 population projection for Kilcoole as set out in the County Development Plan, along with labour force participation rate in Wicklow, plot ratio, current zoning etc. This section clearly set out the process under which it was determined what land requirements were needed for employment use by 2016 given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for employment. In this regard, c. 30Ha (75 acres) of land is proposed for employment zonings in the draft</p>

LAP, which is sufficient to accommodate the employment needs of the 2016 population. Therefore there is no requirement for the zoning of additional lands for employment use during the current plan period.

Furthermore, the lands in question are located in proximity to an existing employment area on the southern side of the town, where it is considered that there has been excessive industrial / employment type development, leading to an inadequate mix / balance in the area.. It is therefore not considered appropriate to zone these lands for Employment purposes.

Area 3: As set out above, no further residential zoning is required to meet the current populations targets and the excessive zoning of land (even for a notional 'Phase 2') may lead to population targets being exceeded, to the overall detriment of the settlement. The subject lands are located to the east of the current development boundary and may set an undesirable precedence for the growth of the settlement towards the sea, which would have implications for nature conservation and protected area. This zoning cannot be considered outside of the context of a full Strategic Environmental Assessment. The SEA screen carried out determined that a full SEA was not required as the plan was unlikely to have significant adverse environmental impact on environmentally sensitive receptors in the area. However, this would have to be reviewed if this zoning were to be considered and furthermore, the Habitats Directive would be likely to require an 'appropriate assessment' of the impact of the zoning on the SPA. Under 'appropriate assessment' where any possible impact is identified, the zoning cannot proceed; mitigation measures are not considered sufficient.

Managers Recommendation

No change to LAP.

Submission no. 11 (mapped)

Candarli Ltd. and Lakeford Ltd., (Druids Glen Golf Club Ltd)

This submission relates to two areas of the property

Area 1

This area is zoned R7 in the 2002 LAP, which allowed for the development of 40 golf resort related units. For various reasons, it became necessary to amend the plans for the development of these lands, arising from which only 35 units fell within the precise boundary of the R7 zone. It is requested that the R7 boundary be amended to allow for 5 additional units and that the R7 zoning be restated in the new plan.

Area 2

This area, which measures c. 8ha (c. 20 acres), is located on the west side of the regional road, between the Woodstock Business Park and the Kilcoole Industrial Estate. It is requested that this land is zoned for residential development and to provide a private 'community hospice care' facility. It is put forward that the population calculation in the draft plan should have allowed for an 'excess factor' of 13% and 'headroom' of 50%, and therefore additional land is required for residential zoning.

Manager's Response

Area 1: The Manager has no objection to this request, which does not appear to present any adverse impacts.

Area 2: The population projections set out in the draft plan (which accord with the

County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an “excess factor” and substantial “headroom”, given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing. The ‘excess factor’ of 6% applied is considered appropriate to the characteristics of Kilcoole, which would have very limited unoccupied housing stock, either second homes or ‘pieds à terre’ and until recently, very few vacant units due to market frictional factors. The draft plan has proposed new residential zoning on the basis of the need identified by these calculations. No further residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement.

The new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-

- Unzoned lands closest to the existing town centre shall be considered first for new zoning (the ‘town centre’ being taken as the Sea Road – Main Street junction).
- Lands that meet a social or community need
- Lands zoned AGR in the 2002 LAP shall then be considered

The lands that are the subject of this submission are not considered to accord with these criteria and would lead to an excessive spread of the settlement on its southern radial route.

Managers Recommendation

Make the following amendments to the LAP:-

1. Amend Map 1 to include R2 zoning, with boundary requested by submission
2. Amend text of Part B, Section 4: “Residential development” to include the following bullet point, (point 9):
 - *To provide for an especially high quality, discretely designed, 40-unit low density golf resort related residential development on lands zoned R2, to be effectively and permanently screened from an early date from public view (including from the R761 on the east and from Kilmullin Lane on the west).*
3. Part B, Section 12 (zoning) add new category R2 - To provide for an especially high quality, discretely designed, 40 unit low density golf resort related residential development
4. Include R2 in the land-use matrix

Submission no. 12 (mapped)

Chairperson of Board of Management, St. Brigid's N.S. & St. Anthony's N.S.

1. It is the opinion of the Board of Management that the site zoned “CE” located to the west of the convent is not a suitable location for the additional 16 classrooms needed during the lifetime of the plan. The preferred location for both schools would be for the lands north of the existing convent with one building catering for both schools.

2. Concerns and objections raised to the proposed “CE” zoning for another school in

AA1.

Manager's Response

1. The dissatisfaction with the location of the site identified for a new school is noted. This site was proposed on the basis on information supplied to the Local Authority regarding the schools' preferred site for an new purpose built combined school. Clearly this information was erroneous. In this regard, it is the Manager's recommendation that this site revert to 'AG'. No map of the preferred site has been provided but it is indicated that it is north of the convent. Submission No. 35 from the Sisters of Holy Faith request residential zoning for this land. Clearly if this land is not to be made available for a school, it is not consider prudent to zone it for educational purposes.

Part A of the draft plan indicates that the town will require a total of 32 primary classrooms for the 2016 population. In accordance with Department of Education guidelines, this would require either one site of 2.03ha or two sites of 1.22ha. In order to ensure a 'market factor' i.e. the possibility of sites not being release to the market, the draft plan made provision for one 1.2ha site to the west of the convent (near St. Brigid's), one 1.2ha site off Lott Lane and a possible further site to the east of the secondary school. Having regard to the Manager's current recommendation to omit the 1.2ha site to the west of the convent, it is necessary to preserve the two other zonings proposed, either of which would be adequate in size for a new 16 classroom school.

2. As set out above, the CE zoning off Lott lane (AA2) is required in order to ensure a number of sites are potentially available for new schools / school relocation.

Managers Recommendation

Make the following amendments to the LAP:-

1. Omit proposed CE zoning (c. 2ha) to the rear of the Holy Faith convent and revert this land to AG zoning
2. Change text of Part B: Section 7 – "Education": *policies & objectives*

From

Policies/Objectives

- Two 1.2ha sites (suitable for 16-classroom schools) shall be reserved for primary school development – one to the north-west of the existing girls' school and one in Action Area 1
- Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school)

To

Policies/Objectives

- *One new 1.2ha site (suitable for 16-classroom school) shall be reserved for primary school development, located in Action Area 1*
- *Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school)*

Submission no. 13 (mapped)**Mr. O Connor, Allan**

This submission relates to lands within and adjacent to proposed AA1 off Lott Lane, measuring c. 3.2ha. In the draft plan, 0.2ha is proposed for RE zoning (existing house on Lott Lane) and the remainder is in AA2, with AOS being the indicative use.

1. The submission expresses objection to the demarcation of specific zones to specific land parcels/landowners within the action area and puts forward that this provides unfair advantage to some of the landowners. . Other action areas in other plans have opted for action area with specific objectives but without specific zonings on the map. It is considered that this is a more appropriate response.

2. It is put forward that consistent approach has not been taken to all action areas; for example, AA2 does not include 'public park' zoning and AA3 does not include a CE zoning for the required library.

3. AA1 objectives require that 2ha be reserved for medium density development (10-15/ha). However, elsewhere in the draft plan 15/ha is described as 'lower density'. The figure 10-15/ha is in fact low density and should be increase to 20-26/ha given the location of Kilcoole in the County and is designation in the settlement hierarchy.

4. Active open space allocation in the plan is unbalanced. Such lands would be better located to the north or east of the proposed roadway on lands currently unzoned. The "MU" zoned land is only providing 200m² playground area while AA1 has to provide 4.6ha for open space. Therefore the quantity and location of AOS within AA1 should be re-examined and additional lands (measuring 1.8ha should be zoned for 'residential development' and 1.2ha for a nursing home

5. The "R1" and "AOS" zoning within AA1 cannot comply with AA1 objective that "dwellings shall be positioned and orientated to provide maximum passive surveillance of new open space areas".

6. An objective should be included in AA1 to cater for a retirement village.

Manager's Response

1. The issue raised is noted; however it clearly states in the draft plan that "*The position, location and size of the land use zonings shown on Map 1 within each Action Area 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 for each Action Area below*". It is therefore considered that adequate flexibility is already built in to each action area. It is not considered that unfair advantage accrues to those whose land has been marked for residential development in the plan. The residential zonings cannot be developed without the co-operation of those with OS / AOS / CE zoning and therefore an integrated and inclusive solution must be worked out by the landowner group.

2. (i) In relation to the requirement for the provision of a library within AA3, it is clearly indicated in the draft plan that this usage must be incorporated in to the new commercial and civic buildings in the TC zone.

(ii) In relation to AA2, this entire action area is proposed for OS zoning and has not specified a location for the limited housing allowed on the map, as the final location of housing will have to be determined following archeologically assessment of the entire action area. However, in light of this submission (and submission No. 23 to follow) the map shall be amended to include an indicative location for the housing in AA2

3. The County Development Plan 2004 placed a density limit of 20/ha on all residentially zoned lands outside of the County growth centres. Therefore this is

considered 'high' density for the purposes of this plan. 'Medium' density is considered to be 10-15/ha, with 'low' density anything below 10/ha. Medium density is required on part of the residentially zoned land in AA1 in order to ensure a good housing balance and mix and allow for some larger new houses in the settlement, where new development have generally of the smaller semi-detached and terraced type. The reference in the draft plan to 'lower' density is simply to make clear that 15/ha is 'lower' than 20/ha. 15/ha is not considered 'low' density anywhere in the draft plan.

4. There is no planning rationale for locating Active Open Space on lands outside of the town's development boundary, on unzoned agricultural lands. In the interest of sustainable and environmentally sensitive planning, settlements should have a range of functions and facilities located within their boundaries, at locations where they are accessible to all, not dependent on vehicular transport and not entailing excessive sprawl of the town's development area into the surrounding countryside. It is considered that the AOS required in AA1 is a suitable location for sporting facilities, being in close proximity to areas of housing and the town centre.

With regard to the MU zone, there is no suggestion in the draft plan that all of this land is to be developed for housing. The draft plan clearly sets out the zoning objective for this land, which is to *"To provide for the development of a mixed-use area, subject to the agreement of a Master Plan for the entire area"*. The ultimate breakdown of uses within this zone will be a matter for the Council members to decide, following public consultation.

There is no basis to increase the residential zoning in this action area, on the basis of the population targets for the town (see response to earlier submissions)

5. It is considered this objective can be achieved with high quality design. Furthermore, as the 'movement' of uses within the action area is clearly permissible, it would be feasible to provide opens spaces with dwellings on all sides, if this were deemed the optimum layout to achieve maximum passive surveillance.

6. It is considered that there is merit in the proposals for a nursing home, which would entail a reduction in AOS by c.1.2ha.

Managers Recommendation

Make the following amendments to the LAP:-

1. Amend AA1 as follows:-

From:-

This Action Area is located east of Lott Lane, immediately north of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 12ha and is bounded to the north by Ballydonarea Lane (Reese's Lane), to the west by existing houses on Lott Lane, to the south by existing houses on Sea Road and to the east by open farmland. This Action Area shall be developed as a mixed residential, community and educational and open space zone in accordance with the following criteria:-

- Access to the Action Area shall be provided from Sea Road, the road continuing as far as Ballydonarea Lane, with an east-west link road through to Lott Lane
- c. 6.4ha shall be developed for residential use, of a high standard of design and layout, with c. 2ha being reserved for medium density development (10-15/ha), generally comprising medium-large houses on generous sites. Apartments/duplexes shall not be considered in this area.

- Dwellings shall be positioned and orientated to provide maximum passive surveillance of the new open space area
- c. 1.2ha shall be reserved for future primary school, to be located at an easily accessible position
- c. 4ha shall be developed as active open space
- Any development proposals shall have regard to the setting and curtilage of Ballydonarea House, a protected structure

To:-

This Action Area is located east of Lott Lane, immediately north of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 12ha and is bounded to the north by Ballydonarea Lane (Reese's Lane), to the west by existing houses on Lott Lane, to the south by existing houses on Sea Road and to the east by open farmland. This Action Area shall be developed as a mixed residential, community and educational and open space zone in accordance with the following criteria:-

- *Access to the Action Area shall be provided from Sea Road, the road continuing as far as Ballydonarea Lane, with an east-west link road through to Lott Lane*
- *c. 6.4ha shall be developed for residential use, of a high standard of design and layout, with c. 2ha being reserved for medium density development (10-15/ha), generally comprising medium-large houses on generous sites. Apartments/duplexes shall not be considered in this area.*
- *Dwellings shall be positioned and orientated to provide maximum passive surveillance of the new open space area*
- *c. 2.4 ha shall be provided for Community, Educational & Institutional uses, including reservation of c. 1.2ha for a future primary school, to be located at an easily accessible position*
- *c. 3ha shall be developed as active open space*
- *Any development proposals shall have regard to the setting and curtilage of Ballydonarea House, a protected structure*

2. Amend Map 1 to provide for an additional CE zone of 1.2ha along the south side of Ballydonarea Lane.

3. Amend Map 1 to show 0.5ha R1 zone in AA2

Submission no. 14 (mapped)**Mr. Cullen, Dan**

1. Submission supports the "AG" zoning of Ballygannon Farm.
2. The farm is located outside the Kilcoole LAP boundary and it is requested this farm be included in the Greystones/Delgany development area and would request that any potential zoning of the land be linked to the Charlesland Golf Club lands.

Manager's Response

1. Noted
2. It is suggested that Ballygannon farm be included in the Greystones/Delgany area and linked to any future zonings in relation to Charlesland Golf Club; however as these lands are outside the LAP boundary for Kilcoole this proposal is outside the

remit of this Local Area Plan. Any request for this land to be included in the Greystones/Delgany area can only be addressed within the remit of the Greystones/Delgany Local Area Plan which is due to be reviewed in 2012.

Managers Recommendation

No change to LAP

Submission no. 15 (mapped)

Mr. Doyle, Patrick

This submission relates to AA2 which is in the ownership of Mr. Doyle

1. The proposals in the draft plan to reserve only 0.5ha (i.e. 25% of the landholding) for family houses is unacceptable. The lands have been in Byrne / Doyle family for generations and are the only lands available for the descendants of Patrick Doyle for the construction of family homes.

2. An alternative is proposed as follows:-

- 0.66ha to be reserved for 5 family homes, with an entrance off Sea Road
- 0.67ha to be reserved for one further family home and a buffer zone adjacent to the ruined Church, with entrance off Lott Lane (for Kieran & Clodagh Doyle)
- 0.65ha to be reserved for public park

Manager's Response

All of the AA2 land is currently zoned OS in the 2002 LAP and therefore **none** of this land is currently available for Doyle / Byrne family members to build dwellings. The draft plan allowed for the construction of a total of 6 dwellings on a land take of 0.5ha/1.24acres. This is considered a reasonable amount of land for the provision of family dwellings. At normal maximum density of 8/acre, this would allow for the construction of c. 10 houses of 125sqm or 7 houses of 175sqm. The expansion of the housing zone would be to the detriment of the future park, with 0.65ha proposed not considered to be a reasonable trade off for the allowance of housing on this 'open space' land. In this regard, it is recommended that a minimum size is set for the park, with the remainder being available for development, up to normal densities of 8/acre, for the number of houses the family see fit.

It is not possible to determine the optimal layout of this action area until an archaeological assessment is carried out. It may transpire that the best location for a park is in fact surrounding the Church, as this land may not be approved for house construction. Kieran & Clodagh Doyle previously applied for permission on the site suggested for a house in this submission, and this application was withdrawn following a report from the Department of Arts, Heritage, Gaeltacht and the Islands / Duchas advising that permission be refused due to the strong possibility that archaeological material may be discovered on the site.

Managers Recommendation

Make the following amendment to the LAP:-

Amend text of AA2 as follows:-

From:-

This Action Area is located east of Lott Lane and south of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 2ha. This Action Area shall be developed as a residential and public open space zone in accordance with the following criteria:-

- A maximum of 6 residential units shall be constructed within this area, on a site area not exceeding 0.5ha. The optimal location and configuration of this housing area shall be determined following an archaeological assessment of the Action Area. The design and orientation of houses shall reflect the setting of the existing the Church ruin
- The remainder of the Action Area shall be provided for a public park, including an equipped playground of c.900sqm
- The existing Church site shall be maintained as a feature in the new open space area

To:-

This Action Area is located east of Lott Lane and south of the Wellfield housing development, in the townland of Ballydonarea, as shown on Map 1. This Action Area measures c. 2ha. This Action Area shall be developed as a residential and public open space zone in accordance with the following criteria:-

- *A public park of not less than 1.5ha, including a equipped playground of not less than 900sqm shall be provided*
- *The existing Church site shall be maintained as a feature in the new open space area*
- *The remainder of the action area may be developed for housing, at densities up to 20/ha. The optimal location and configuration of this housing area shall be determined following an archaeological assessment of the Action Area. The design and orientation of houses shall reflect the setting of the existing the Church ruin*

Submission no. 16 (mapped)**Mr. Fahey, Patrick**

This submission relates to lands in Creowen (to the east of Colaiste Chraobh Abhann, bounded to the south by the new road and to north by Woodstock housing estate) which are currently zoned "C1" in the existing 2002 plan and measure c. 1.7ha / 4.15 acres. It is requested to rezone this area to part "R" (2.05acres) (eastern part of the lands) with the remaining area close to the school and outside of the school site area to remain "C" zoned lands (2.10acres) enabling the school to expand.

Manager's Response

1. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an "excess factor" and substantial "headroom", given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing. No further residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement.

The new residential zonings proposed had regard the following spatial criteria (as set

out in Part A of the draft plan):-

- Unzoned lands closest to the existing town centre shall be considered first for new zoning (the 'town centre' being taken as the Sea Road – Main Street junction).
- Lands that meet a social or community need
- Lands zoned AGR in the 2002 LAP shall then be considered

The lands that are the subject of this submission are not considered to accord with these criteria and would lead to an excessive spread of the settlement on its southern boundary

2. The Manager strongly recommends against the reduction in size of the CE (Community & Education) zoning at this location for the following reasons

(a) The reduction of potential CE zoning is considered premature until such a time that the long-term space needs of the secondary school are determined by the Department of Education.

(b) Having regard to Submissions No.'s 12 & 35, the CE zoning to the rear of the Convent is recommended to be omitted. However, given the projected population growth for the town and environs, the plan should make provision for zoned land for 32 primary classrooms. This equates to either one 5-acre site or a number of smaller sites for 8 or 16 classroom schools. The current primary schools (which have between them 16 classrooms) will require a site of min. 3 acres and therefore it is imperative that at least one additional site of min. 3 acres is maintained in the plan area. In order to ensure that one additional 3-acre site is provided, it is considered prudent to maintain 3 primary school sites in the town. The sites identified are

- the existing site occupied by St. Anthony's (c. 4 acres)
- the school site identified in AA1 (c. 3 acres)
- this site at Creowen, in the event that it is not needed for expansion by the secondary school (c. 4 acres)

Note: The site occupied by St. Brigid's is considered unlikely to be suitable for expansion to 16 classrooms.

In the event that Colaiste Chraobh Abhann does not require expansion land (for example, if a new school is constructed in Newtownmountkennedy), this zoning can be re-visited in the next plan period.

Managers Recommendation

No change to LAP.

Submission no. 17 (mapped)

Mr. Finnegan, Kevin

This submission relates to land (c. 23.5ha / 58 acres) located at Ballygannon, which is zoned "GB" in the 2002 plan but are outside of the draft plan area. It is requested that this landholding be rezoned "R" or "AGR". The lands are bounded to the east by the railway and the sea.

Manager's Response

1. The lands are outside of the draft plan area. All lands outside of the draft plan that are shown on the map are shown as 'AG' lands, reflecting their current function.
2. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes

into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an “excess factor” and substantial “headroom”, given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing. No further residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement.

The new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-

- Unzoned lands closest to the existing town centre shall be considered first for new zoning (the ‘town centre’ being taken as the Sea Road – Main Street junction).
- Lands that meet a social or community need
- Lands zoned AGR in the 2002 LAP shall then be considered

The lands that are the subject of this submission are not considered to accord with these criteria and would lead to an excessive spread of the settlement on its northern side and lead to the possible undesired coalescence of Kilcoole and Greystones

3. This zoning cannot be considered outside of the context of a full Strategic Environmental Assessment. The SEA screen carried out determined that a full SEA was not required as the plan was unlikely to have significant adverse environmental impact on environmentally sensitive receptors in the area. However, this would have to be reviewed if this zoning were to be considered and furthermore, the Habitats Directive would be likely to require an ‘appropriate assessment’ of the impact of the zoning on the SPA. Under ‘appropriate assessment’ where any possible impact is identified, the zoning cannot proceed; mitigation measures are not considered sufficient.

Managers Recommendation

No change to LAP.

Submission no. 18 (mapped)

Mr. Foley, T.J. and McGarry, George

This submission relates to land (2.89ha) at Ballydonarea within AA1. Part of the land is located in proposed AA1 (c.1.2ha CE & c. 0.6ha AOS) and part (c. 1.1ha) is located outside of the draft plan boundary and proposed AG zone. It is requested that this holding be zoned ‘E’ - employment

Manager's Response

1. This proposed re-zoning of “AG” lands, along with the LAP boundary extension, is not recommended. Section 8.3 of Part A of draft LAP sets out the background and rationale for employment zoning and takes into account the 2016 population projection for Kilcoole as set out in the County Development Plan, along with labour force participation rate in Wicklow, plot ratio, current zoning etc. This section clearly set out the process under which it was determined what land requirements were needed for employment use by 2016 given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in

the Regional Planning Guidelines and the demand for employment. In this regard, c. 30Ha (75 acres) of land is proposed for employment zonings in the draft LAP, which is sufficient to accommodate the employment needs of the 2016 population. Therefore there is no requirement for the zoning of additional lands for employment use during the current plan period.

2. As set out the response to Submission 16 above, sufficient CE zoned lands are required in the town in order to ensure that there are opportunities for primary school expansion.
3. The Manager is opposed to the reduction in AOS as proposed. This submission, taken in conjunction with Submission No. 13, would result in a reduction in AOS in AA1 by c. 3.6ha, leaving only 0.4ha AOS in the entire action area. This is the only new area of AOS proposed in the draft plan.

Managers Recommendation

No change to LAP.

Submission no. 19 (mapped)

Mr. Fox, Richard

This submission relates to lands measuring c. 3.9ha in Cooldross middle, to the south and east of the eastern Distributor Road. These lands are zoned 'AG' in the draft plan, partly inside and partly outside of the plan boundary.

Manager's Response

Part of the lands in question (c. 1.7ha) were designated 'AGR' in the 2002 LAP. The remainder were designated 'AG1'. 'AGR' lands were zoned for agricultural uses, but strictly without prejudice to the Council's right to make alternative land use zoning objectives, these lands were considered to be amongst those lands that the Council deemed most likely to be considered for zoning in the next development plan if necessary during the period 2007-2016. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an "excess factor" and substantial "headroom", given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing.

The new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-

- Unzoned lands closest to the existing town centre shall be considered first for new zoning (the 'town centre' being taken as the Sea Road – Main Street junction).
- Lands that meet a social or community need
- Lands zoned AGR in the 2002 LAP shall then be considered

The lands in question were considered, being currently zoned 'AGR'; however, once lands closer to the town centre and lands that met a social or community need were factored in, no further new lands were required for residential zoning. No further

residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement.

Managers Recommendation

No change to LAP.

Submission no. 20 (mapped)

Mr. Gahan, Michael and Ms. O Connor Mary

This submission relates to landholding of c. 11.3ha in Ballydonarea immediately north of the proposed "MU" zoning in the draft plan. It is requested that this land be zoned 'R'. It is indicated that this land will no longer be suitable for farming given the zoning proposed on adjacent lands ('MU' to south and 'AT' to north).

Manager's Response

1. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an "excess factor" and substantial "headroom", given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing. The draft plan has proposed new residential zoning on the basis of the need identified by these calculations. No further residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement.
2. The new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-
 - Unzoned lands closest to the existing town centre shall be considered first for new zoning (the 'town centre' being taken as the Sea Road – Main Street junction).
 - Lands that meet a social or community need
 - Lands zoned AGR in the 2002 LAP shall then be considered

The lands that are the subject of this submission are located outside of the existing development boundary and are not considered to meet these criteria
3. The Manager recommends against the spread of Kilcoole in this direction as it may lead to the piecemeal coalescence of Kilcoole and Greystones
4. The zoning to the north of this land is for 'AT' – agri tourism. This is in order to facilitate the future of the enterprise at Glenroe Farm. It is not per se a 'development' zoning and would not result in this landholding being non viable for its current agricultural use.
5. This zoning cannot be considered outside of the context of a full Strategic Environmental Assessment. The SEA screen carried out determined that a full SEA was not required as the plan was unlikely to have significant adverse environmental impact on environmentally sensitive receptors in the area. However, this would have to be reviewed if this zoning were to be considered and furthermore, the Habitats Directive would be likely to require an 'appropriate

assessment' of the impact of the zoning on the SPA. Under 'appropriate assessment' where any possible impact is identified, the zoning cannot proceed; mitigation measures are not considered sufficient.

Managers Recommendation

No change to LAP

Submission no. 21 (mapped)

Mr. Gammell, Chris

Mr. Gammell owns 4.3 acre holding in the zone designated AA1.

1. It is put forward that the zoning within AA1 disproportionately favours particular landowners and does not necessary reflect the most appropriate arrangement.
2. It is suggested that "CE" lands in AA1 would be better located to the immediate east of the existing houses on Lott Lane (immediately north of Wellfield), with "R" lands running north-south from Ballydonarea Lane to Sea Road, to include proposed "CE" and "R1" lands as shown in the draft plan.

Manager's Response

The issue raised is noted; however it clearly states in the draft plan that "*The position, location and size of the land use zonings shown on Map 1 within each Action Area 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 for each Action Area below*". It is therefore considered that adequate flexibility is already built in to each action area. It is not considered that unfair advantage accrues to those whose land has been marked for residential development in the plan. The residential zonings cannot be developed without the co-operation of those with OS / AOS / CE zoning and therefore an integrated and inclusive solution must be worked out by the landowner group.

Managers Recommendation

No change to LAP.

Submission no. 22

Hampton Properties

The objective restricting the maximum size of any estate to 100 units / 200 apartments is unduly restrictive. It is put forward that there are other means of creating 'sense of place' apart for the number of units in an estate. This restriction could also result in an oversupply of crèche facilities and unnecessary duplication of estate roads and entrances, and poor use of land.

Manager's Response

The number 100 houses / 200 apartments was derived after undertaking review of new estates and large developments in the area. It is considered reasonable and any number of above this has tended to result in excessively large, monotonous and repetitious developments with no sense of identity. There appears to be an unwillingness or inability of the part of designers / developers to propose alternative design, materials, height and layout to provide for visual diversity in housing areas, and market demand for standard houses is often cited as the reason. It is considered that this objective will require developers to be more imaginative in the designs and layout and foster strong new communities with a sense of identity.

The requirement that no estate be larger than 100 houses / 200 apartments does not

impact on the application of childcare policy. If a developer proposes a larger scale development of say 500 units, 1-2 larger crèches will still be considered as compliant with the childcare policies. The only difference is that the 500 units must be broken up into a number of district estates.

In light of this submission and an earlier submission, it is recommended that the wording of this policy be slightly altered to make it clearer.

Managers Recommendation

Make the following amendment to the LAP:-

Part B, Section 4: Residential development – “policies / objectives”

Amend 6th bullet point as follows:-

From:-

- The maximum size for any single development is 100 houses / 200 apartments and any development larger than this shall be developed as a number of separate ‘estates’ with materially different house types, sizes and appearance

To: -

- *The maximum size for any single residential estate is 100 houses / 200 apartments. Within each estate, a range of unit types / sizes shall be provided, within an overall unified design concept. Estates shall be differentiated from each other by the use of materially different design themes and name.*

Submission no. 23

Ms. Holmes, Clodagh

It is put forward that an inconsistent approach has been taken in the draft plan to Action Areas, in relation to zoning and specific objectives. For example, although land uses in AA1 are delineated on the draft map and include CE and AOS uses, the draft map does not use the same formula in AA3 where CE uses are set out as being required in the text (new library) or in AA2 where residential and open spaces are required in the text but the location of each is not shown on the map.

The submission expresses objection to the demarcation of specific zones to specific land parcels/landowners within the action area and puts forward that this provides unfair advantage to some of the landowners.

- (i) It is requested that the same approach used in the Greystones - Delgany LAP is applied whereby uses are not delineated on the plan map as this will ensure deliverability and will allow landowners to reach equitable agreements

Manager's Response

As set out in response to Submission 13 above:-

1. The draft plan that “*The position, location and size of the land use zonings shown on Map 1 within each Action Area 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 for each Action Area below*”. It is therefore considered that adequate flexibility is already built in to each action area. It is not considered that unfair advantage accrues to those whose land has been marked for development in the plan. The ‘development’ zonings cannot be developed without the co-operation of those with OS / AOS / CE zonings and therefore an integrated and inclusive solution must be worked out by the landowner group.

2. (i) In relation to the requirement for the provision of a library within AA3, it is clearly indicated in the draft plan that this usage must be incorporated into the new

<p>commercial and civic buildings in the TC zone.</p> <p>(ii) In relation to AA2, this entire action area is proposed for OS zoning and has not specified a location for the limited housing allowed on the map, as the final location of housing will have to be determined following archaeological assessment of the entire action area. However, in light of this submission (and submission No. 13 above) the map shall be amended to include an indicative location for the housing in AA2</p> <p>3. With regard to the Greystones - Delgany LAP</p> <ul style="list-style-type: none"> - Z1 related to the harbour, which comprised one landowner (action plan agreed) - Z2 related to the land around St. Lawrence's school. This included three landowners and no agreement has been reached to date - Z3 related to the County Council offices site, again one landowner - Z4 related to St. David's School, again one landowner - Z5 related to Blacklion lands, again one landowner. This action area has been agreed. <p>This evidence would appear to suggest that the Greystones – Delgany LAP approach to action areas is either more equitable or efficient than that applied in this draft plan.</p>
<p>Managers Recommendation</p> <p>Amend Map 1 to show 0.5ha R1 zone in AA2</p>

<p>Submission no. 24 (mapped)</p>
<p>Ms. Hunt, Colette</p> <p>This submission is in relation to the Holy Faith Convent</p> <ol style="list-style-type: none"> 1. It is requested that the appraisal of the Convent as set out in the draft LAP includes an appraisal of the setting as set out in the NIAH. 2. The plan map should be updated to include the location of the walled garden (the school backs up to a walled garden). 3. Any rezonings in the area of the Convent must take account of the setting as a whole. Lands to the west of the Convent are unsuitable for "CE" zoning as development would affect the views of the Downs Hill, the Glen of the Downs and Sugarloaf Mountain and instead the whole Convent site should be zoned "OS" including the walled garden. 4. The western link road should be constructed outside convent land boundaries. 5. The mass path must also be protected which partly runs along the Convent lands. 6. The Convent currently operates a spirituality centre, which would be negatively impacted by the proposed "CE" zoning and new school.
<p>Manager's Response</p> <ol style="list-style-type: none"> 1. This submission has been noted; however, changes to the existing Protected Structure listing and description cannot be altered within the remit of the Kilcoole LAP and can only be amended within the County Development Plan 2004-2010 review.. 2. The walled garden is evident on the map 3. In light of Submission No.'s 12 & 35, it is proposed to amend the proposed zoning at this location and to omit the CE expansion area to the rear of the Convent (see Submission No.'s 12 & 35) 4. Noted. The route of this road, as shown on the draft map is indicative only. The final design of this route will be determined through the normal process, which will include public participation and this is the more appropriate forum

<p>to express views on the routes of new roads.</p> <p>5. Noted</p> <p>6. Noted</p>
<p>Managers Recommendation</p> <p>Make the following amendments to the LAP:-</p> <ol style="list-style-type: none"> 1. Omit proposed CE zoning (c. 2ha) to the rear of the Holy Faith convent and revert this land to AG zoning 2. Change text of Part B: Section 7 – Education: policies & objectives <p>From</p> <p>Policies/Objectives</p> <ul style="list-style-type: none"> • Two 1.2ha sites (suitable for 16-classroom schools) shall be reserved for primary school development – one to the north-west of the existing girls' school and one in Action Area 1 • Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school) <p>To</p> <p>Policies/Objectives</p> <ul style="list-style-type: none"> • One new 1.2ha site (suitable for 16-classroom school) shall be reserved for primary school development, located in Action Area 1 • Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school)

Submission no. 25

Mr. Keddy, Charlie

1. It is requested that the proposed draft plan not be adopted because Kilcoole is already overdeveloped .
2. It is put forward that the plan does not accord with the Strategic Planning Guidelines, which specify that only “local need” is accommodated in the village.
3. The County Development Plan 1999 stated the land on the sea side of Main Street (R761) from Ballynerrin to the north and the railway station at Wicklow to the south must be protected.

Manager's Response

1. It is noted that Kilcoole has undergone expansion in the last 12 years; however, the scale of expansion has been in accordance with the desired growth levels adopted by the elected Council members in the County Development Plans of 1999 and 2004. It is not considered that the town is overdeveloped at present and it is considered that it has scope for expansion, given the availability of services (infrastructural and community), considerable employment opportunities and its good transport connections to the DART at Greystones and to the Dublin City by bus and rail.
2. Kilcoole is designated a ‘Small Growth Town I’ in the County Development Plan 2004 which is in accordance with the Regional Planning Guidelines. In such towns, there is a ‘local growth’ restriction applied in order to ensure that at least 50% of those purchasing new homes in the town have an established connection to the

County.

3. The draft plan represents consolidation of the town along its east side, does not entail expansion beyond the previous plan area or the indicative new eastern distributor road. The proposed zonings do not impact on the amenities or preservation of the coastal zone.

Managers Recommendation

No change to LAP.

Submission no. 26

Kilcoole Residents and Community Development Company Ltd.

1. It is put forward that the population calculations and the calculation of the amount of required residential land based on these calculations in the draft plan are incorrect. In particular, it is put forward that population targets have already been exceeded.
2. New AOS and OS zonings welcomed
3. The proposed location of the new amalgamated primary school should be north of the convent, rather than west as proposed in the draft plan
4. The need for an additional primary school zone in AA1 is questioned
5. No further planning permissions should be granted prior to addressing the issue of school capacity.
6. Welcome the maintenance of CE zoning to east of secondary school
7. The town requires expansion of community facilities in particular a library, upgraded and improved health centre, Citizens information services, improved policing facilities
8. Welcome that the draft plan has no zoned any more land for industrial development
9. The plan should include specific policies in relation to future shop fronts and facades along with an appropriate policy for advertising signs. Shopping and commercial developments must be restricted to the Main Street and compliment the overall visual aspects of the adjoining buildings
10. Need to establish traffic, pedestrian and bicycle facilities for the village and its surrounds. A traffic audit should be carried out.
11. The Council should adopt a policy with regard to all new and existing shop fronts. The facades of the existing public houses and petrol station and garage/showroom should be encouraged to upgrade to reflect a more traditional village look
12. The Council should adopt a policy for restricting and monitoring advertising
13. The Council should adopt a policy specifically stating that no commercial vehicles should be allowed to park within estates or public roads
14. The Council must address the lack of infrastructure in the town and must ensure infrastructure is in place before new development permission are granted
15. The 2002 LAP included an 'AGR' zoning which were lands likely to be considered for development zoning in the next plan. While some of these are now proposed for zoning, some are not, while other lands are now proposed for zoning.
16. There is no need for additional social or affordable housing in Kilcoole and through the purchase and development of the proposed 'MU' zone, the Council will significantly increased social imbalance in the town
17. The plan does not address facilities at the beach and train station
18. The plan should make provision for the development of tourism in the town and environs, particularly the marsh area

19. The greenbelt between Kilcoole and Greystones set out in the previous plan should be re-instated
20. The open space area along the river bank within the 2002 LAP has been reduced within the 2008 draft plan and must be returned to the original area
21. It is requested that no further residential development be allowed to occur any closer to the beach along the Sea Road other than those approved to date
22. The LAP should identify and re-inforce importance of rights of way.

Manager's Response

1. The population calculations upon which the draft plan was based are set out in Part A of the draft plan. The County Manager is satisfied that these figures are accurate and robust. The submitter's calculation appear flawed on a number of grounds, in particular:-
 - the baseline Census utilised for calculations is 1996 rather than the more up to date 2006
 - the household size figure used is not consistence with Regional Planning Guidelines or Department of the Environment, Heritage & Local Government guidelines
 - the submitter incorrectly states that permissions previously granted used an occupancy factor of 2.99
 - no 'excess factor' or headroom' figures have been integrated into calculations
2. Noted
- 3-4. The dissatisfaction with the location of the site identified for a new school is noted. This site was proposed on the basis on information supplied to the Local Authority regarding the schools' preferred site for a new purpose built combined school. Clearly this information was erroneous. In this regard, it is the Manager's recommendation that this site revert to 'AG'. No map of the preferred site has been provided but it is indicated that it is north of the convent. Submission No. 35 from the Sisters of Holy Faith request residential zoning for this land. Clearly if this land is not to be made available for a school, it is not consider prudent to zone it for educational purposes.
Part A of the draft plan indicates that the town will require a total of 32 primary classrooms for the 2016 population. In accordance with Department of Education guidelines, this would require either one site of 2.03ha or two sites of 1.22ha. In order to ensure a 'market factor' i.e. the possibility of sites not being released to the market, the draft plan made provision for one 1.2ha site to the west of the convent (near St. Brigid's), one 1.2ha site off Lott Lane and a possible further site to the east of the secondary school. Having regard to the Manager's current recommendation to omit the 1.2ha site to the west of the convent, it is necessary to preserve the two other zonings proposed, either of which would be adequate in size for a new 16 classroom school.
5. Wicklow County Council consults regularly with the Department of Education regarding the provision / expansion if schools but has no direct role in the delivery of new / expanded schools. The Department of Education is kept updated on the progress of new development and the growth of new housing in towns, in is fully aware of location where deficiencies exist and on the basis of information provided to them, it has a programme for the role out and development of new / expanded schools
6. Noted
7. The draft plan has provided for sufficient zoned land to facilitate the community facilities desired. The plan has no function in the delivery of these services.

8. Noted

9. The location and design of new retail / commercial buildings on the Main Street is addressed in the draft plan. No specific reference is made to shop fronts and advertising as there are sufficient polices already set out in the County Development Plan to address these items (Chapter 5, Section 5.4)

10. A significant road and footpath improvement programme has been undertaken recently in Kilcoole and traffic congestions problems have been significant reduced. Cycleways have been constructed / required where feasible. Facilities for public transport providers have been provided in terms of bus stops, footpath build-outs etc. It is not clear what kind of 'traffic audit' is requested and what the aims of this would be. Wicklow County Council is committed to the improved of all forms of transport and will, where resources allow, carry out further improvement.

11. This is addressed under point (9) above

12. This is addressed under point (9) above

13. The issue of illegal parking of heavy vehicles is not a matter for a development plan but rather a traffic enforcement issue

14. The Council is committed to the delivery of appropriate infrastructure to serve the needs of existing and future residents. Where there is no capacity in infrastructure systems (e.g. water, wastewater disposal etc) the Council will restrict development as necessary. The Council will support other agencies in the delivery of other services

15. The logic behind the selection of certain lands for zoning is set out in Part A, Section 8.1.

16. The Council is required to fulfil its housing obligations and where necessary, acquire land for the delivery of housing. There are a considerable number of individuals and families on the housing list in Kilcoole and the Council is required to accommodate their needs. As set out in response to Submission No. 1 above, it is not considered that the development of future lands will considerably alter the current housing tenure balance in Kilcoole.

17. The beach and train station are outside of the plan area and are not therefore specifically addressed in this plan. The Council is committed to working with relevant agencies to address and deficiencies at these locations

18. The draft plan does not specifically address tourism other than the inclusion of an agri-tourism zoning at Glenroe Farm as the County Development Plan fully addresses tourism in County. It is not considered necessary to re-iterate all of the County Development Plan policies in this LAP.

19. It is immaterial whether the land between Kilcoole and Greystones is designated 'GB' or 'AG' – essentially the same restrictive policies apply. In the interest of simplification and consistency with other plans in the County, one rural / agricultural designation is applied in the plan.

20. A buffer zone of 10m along surface waters is proposed in the draft plan in accordance with Eastern Regional Fisheries Board recommendations.

21. No expansion of the development envelope of the town towards the coast, beyond existing development, is proposed in the draft plan

22. Rights-of-way are addressed in County Development Plan. The amenity walk from Kilcoole to Kilquade (the Mass Path) is shown on the draft plan map

Managers Recommendation

Make the following amendments to the LAP:-

1. Amend CE zoning and education section of Part B as set out under

Submissions No.'s 12, 24 & 35

2. Include a new objective in Part B, Section 7: Sport/Play & Parks, Open Spaces and Green Amenity
 - To promote and facilitate the maintenance and improvement of the Mass path, as shown on Map 1

Submission no. 27 (mapped)

Kimpton Vale Ltd.

This submission relates to both AA3 lands and the lands immediately north of AA3, measuring c. 15.3ha. These lands are currently proposed for AG zoning in the draft plan.

1. It is requested that the AG lands be zoned for residential development. These lands were previously zoned 'AGR' which were considered under the last plan to be those lands most suitable for zoning in the next plan.
2. The draft plan requires that access to AA3 be via the southern part of the 'Western Distributor Road' and places a restriction of the quantum of development that can occur until this part of the road is completed from the Main Street to the Newtownmountkennedy Road (50%). It is put forward that as this road is partly outside of the control of Kimpton vale and is partly located on unzoned lands, it is outside of the control of Kimpton vale to complete. It is requested than an objective be inserted into the plan that the Local Authority will complete this section of the road in a timely manner. It is further requested that the 50% restriction be omitted.

Manager's Response

1. The lands in question were designated 'AGR' in the 2002 LAP. 'AGR' lands were zoned for agricultural uses, but strictly without prejudice to the Council's right to make alternative land use zoning objectives, these lands were considered to be amongst those lands that the Council deemed most likely to be considered for zoning in the next development plan if necessary during the period 2007-2016. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an "excess factor" and substantial "headroom", given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing.

The new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-

- Unzoned lands closest to the existing town centre shall be considered first for new zoning (the 'town centre' being taken as the Sea Road – Main Street junction).
- Lands that meet a social or community need
- Lands zoned AGR in the 2002 LAP shall then be considered

The lands in question were considered, being currently zoned 'AGR'; however, once lands closer to the town centre and lands that met a social or community need were factored in, no further new lands were required for residential zoning. No further residential zoning is required to meet the current populations targets and the excessive

zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement.

2. The 'Western Distributor Road' in the long term may provide an alternative access route to Kilcoole, by-passing the Main Street. However, in the short to medium term, this road, and in particular the southern part of it, has the sole function of opening up development land at both Bullford Farm and AA3. Therefore it is incumbent on the developer to ensure the delivery of the road.

The 50% restriction is considered appropriate, otherwise all traffic generated by the development would be channelled directly to Main Street, which may give rise to traffic congestion and management issues.

Managers Recommendation

No change to LAP.

Submission no. 28 (mapped)

Mrs. Kuntz, Flo

This submission relates to land with proposed "AOS" zoning within Kilcoole Golf club. The area concerned is 0.3ha containing a glasshouse that is associated with the current commercial agricultural/horticultural use of the property to the south-west, which does not form part of Kilcoole Golf club.

1. It is requested that the zoning of this site is changed from the proposed "AOS" in the draft plan to "agriculture".

2. In the event that rezoning of the Golf Club is being considered, it is requested that the rezoning of the subject lands be considered in the same context.

3. It is submitted that the plan should recognise in the land-use matrix that rural housing in accordance with the County settlement strategy is allowed in agricultural zones.

Manager's Response

1. Noted. It is recommended that the designation of this site be changed from AOS to AG

2. Noted. There are no current proposals to alter the zoning of the Golf Club

3. In accordance with the County Development Plan, Policy SS9 applies to rural areas, which includes all lands designated AG in this plan.

Managers Recommendation

Make the following amendments to the LAP:-

1. Change zoning of 0.3ha at Ballyphilip from AOS to AG

2. Insert footnote in the land-use matrix on p17 of Part B of the plan, making clear that 'residential' development in AG zones is permissible only in the context of Policy SS9 of the County Settlement Strategy

Submission no. 29 (mapped)

Sr. Lucas, Miriam Anne

1. This submission is opposed to the proposed "CE" zoning to the rear of the Convent, which is half way across the walled garden.

2. This submission is opposed to the proposed draft zoning of "OS" the area to the front of the convent, as this is private property.

3. The proposed link road to the west of the Main Road should not contain bright lights as it would negatively affect the night skyline in that direction.

4. (i) The objective to protect hedgerows and habitats etc. in Kilcoole has not been

upheld in recent developments (developments on Sea Road and Lott Lane).
(ii) Some current developments undergoing in the village have caused obstruction to the landscape due to elevated nature of the sites (development under construction at the junction of the Kilcoole Main Road and L5525).

Manager's Response

1. This objection is noted. On foot of this submission and No.'s 12, 24 and 35, it is recommended that this CE zoning be omitted.
2. In the 2002 plan, this land was zoned OS1 – “to preserve and provide open space”. In the draft plan it is proposed to be zoned OS – “to preserve, provide and improve recreational amenity and passive open space”. As privately owned lands, the future use of the land is in the landowners control and the plan does not require that it be delivered to the community for active use.
3. Noted. The final design of this route will be determined through the normal process, which will include public participation and this is the appropriate forum to express views on the design of new roads.
4. (i) The implementation of such objectives is a function of the development management process at application and decision stage and therefore outside the remit of this plan.
(ii) It is not clear which development is referred to but all applications for development are assessed in the context of the policies of the County Development Plan or relevant LAP. The more appropriate forum for expressing dissatisfaction with the design of a new development is through making a submissions / observation on that application.

Managers Recommendation

Make the following amendments to the LAP:-

1. Omit proposed CE zoning (c. 2ha) to the rear of the Holy Faith convent and revert this land to AG zoning
2. Change text of Part B: Section 7 – Education: policies & objectives

From:-

Policies/Objectives

- Two 1.2ha sites (suitable for 16-classroom schools) shall be reserved for primary school development – one to the north-west of the existing girls' school and one in Action Area 1
- Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school)

To:-

Policies/Objectives

- One new 1.2ha site (suitable for 16-classroom school) shall be reserved for primary school development, located in Action Area 1
- Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school)

Submission no. 30 (mapped)

Mrs. Lorraine Mannix & Ms. Una Kelleher

This submission relates to lands measuring c. 6.47ha at Priestsnewtown to the north-

west of Kilcoole. The land is proposed for AG zoning in the draft plan and are partly outside of the wider plan area. Access to the lands is from the Kilquade Road. It is requested that this land be zoned for the residential development.

Manager's Response

1. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an "excess factor" and substantial "headroom", given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing. The draft plan has proposed new residential zoning on the basis of the need identified by these calculations. No further residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement.

2. The new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-

- Unzoned lands closest to the existing town centre shall be considered first for new zoning (the 'town centre' being taken as the Sea Road – Main Street junction).
- Lands that meet a social or community need
- Lands zoned AGR in the 2002 LAP shall then be considered

The lands that are the subject of this submission are located outside of the existing development boundary and are c. 3km from the town centre by existing road. They are disjointed from the existing and proposed development 'envelope' of the settlement and do not present themselves as a logical expansion area.

3. The Manager recommends against the spread of Kilcoole in this direction as it may lead to the piecemeal coalescence of Kilcoole and Kilquade

Managers Recommendation

No change to LAP.

Submission no. 31

Ms. Martin, Angela

This submission is concerned with the need for a new community centre in Kilcoole.

Manager's Response

Part A of the draft plan sets out an assessment of community facilities in the town. Given the existence of two existing community halls, no need for a further centre was identified. However, the point raised is duly noted and in order to ensure community needs were met, the draft plan did make provision for new community space in the proposed new 'town centre' in AA3 (Part B, p.14 "*Any development proposals for this Action Area shall include proposals for community uses, in particular a new library facility*")

Managers Recommendation

No change to LAP.

Submission no. 32
Mr. Napier, John
<ol style="list-style-type: none"> 1. One disabled car parking space should be provided at the P.O. and health centre. 2. The access from the Lower Green onto the Main Street should be improved with a roundabout/traffic lights/box junction with double yellow lines either side of the junction
Manager's Response
<p>The Main Street has recently been improved, including road re-alignment, improved footpaths and delineated on-street car parking. Furthermore, a private landowner has made his land available to the public for a town car park on the main street. Unfortunately, there is inadequate width in the public road at the Post office to provide an on-street car parking space and illegal parking at this location causes immediately congestion. The level of traffic movements at the Main Street – Upper Green junction would not warrant traffic light, roundabout or yellow box and the main safety issue again appears to be illegal parking of cars on-street which inhibits sight lines.</p> <p>These are not issues that the plan can specifically address.</p>
Managers Recommendation
No change to LAP.

Submission no. 33 (mapped)
Mr. O Neill, Charles
<p>This submission relates to a 15.3ha landholding in the townland of Ballydonarea, on the south side of Sea Road, to the immediate east the existing development edge of the town. The land extend as far south at the sewage treatment plant and the stream and adjoin the boundary of The Murrough SPA</p> <p>It is requested that the land be zoned part R1/R2 (proposed residential and proposed residential – low/medium density) and part AOS. It is proposed that the AOS zone be developed as a 'leisure and amenity park'. It suggested that the population calculations err on the conservative side and that a higher 'excess factor' and 'headroom' should be applied and that there is a demand for more residential zoning.</p>
Manager's Response
<ol style="list-style-type: none"> 1. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an "excess factor" and substantial "headroom", given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and the demand for housing. The 'excess factor' of 6% applied is considered appropriate to the characteristics of Kilcoole, which would have very limited unoccupied housing stock, either second homes or 'pieds à terre' and until recently, very few vacant units due to market frictional factors. The draft plan has proposed new residential zoning on the basis of the need identified by these calculations. No further residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being

exceeded, to the overall detriment of the settlement.

The new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-

- Unzoned lands closest to the existing town centre shall be considered first for new zoning (the 'town centre' being taken as the Sea Road – Main Street junction).
- Lands that meet a social or community need
- Lands zoned AGR in the 2002 LAP shall then be considered

The lands that are the subject of this submission are not considered to accord with these criteria and would lead to an excessive spread of the settlement on its eastern side.

2. This zoning cannot be considered outside of the context of a full Strategic Environmental Assessment. The SEA screen carried out determined that a full SEA was not required as the plan was unlikely to have significant adverse environmental impact on environmentally sensitive receptors in the area. However, this would have to be reviewed if this zoning were to be considered and furthermore, the Habitats Directive would be likely to require an 'appropriate assessment' of the impact of the zoning on the SPA. Under 'appropriate assessment' where any possible impact is identified, the zoning cannot proceed; mitigation measures are not considered sufficient.

Managers Recommendation

No change to LAP.

Submission no. 34 (mapped)

Ravoc Construction Ltd. & Wilson Family

This submission relates to Bullford Business campus and Bullford farm

1. It is requested that the restriction placed on the development of the E lands at this location (Part B, Section 8: Policies / objectives "Reserve land for the Western Distributor Road. The northern part of this route is currently considered a long-term strategic objective, while the southern part is necessary for the opening up of zoned lands (AA3 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" be omitted as it presents an excessively onerous restriction on the development of this employment area, which is already restricted pending the construction of the Ballyronan link road at the N11

2. It is noted that the land-use matrix in the draft plan has altered some of the uses permissible on E lands and it is requested that the matrix revert back to the 2002 plan.

3. Public access to the proposed riverine park area should not be facilitated until the adjacent residentially zoned land is developed, in order to reduce possibilities of mis-use of the area.

Manager's Response

1. It is considered necessary to maintain the restriction set out in the draft plan, in order to ensure the delivery of this necessary piece of infrastructure. This E zone measures c. 11ha and there is permission to develop c. 7ha of the site (c.12,000sqm). The construction of the southern part of the western distributor road is an integral part of the permission granted. Further planning permissions have however allowed c. 9,000sqm of this development to proceed pending the construction of this road. This

is c. 50% of the development capacity of the site (c. 19,000sqm). Therefore this policy does not alter the status quo.

2. The submission contains a substantial number of errors with regard to the uses that were allowable under the previous plan. For example, it is put forward that 'Church' was 'Y' in the 2002 plan when in fact it was 'X'. Similar, it is stated that 'heavy vehicle park' was 'X' in the previous plan, when it was actually 'Y'. No further assessment of this part of the submission requires to be carried out, as it is clearly erroneous.

3. The draft sets out that proposed park is only to be developed and made open to the public upon development of AA3. Part B, Section 11: Action Area 3 states, "A public riverine park shall be provided along the existing stream on the western boundary of the Action Area. This public park shall be designated a public park, not exclusive to the residents of the development and shall be maintained open at all times. Suitable pathways and lighting / furniture shall be provided by the developer"

Managers Recommendation

No change to LAP

Submission no. 35 (mapped)

Sisters of the Holy Faith

This submission relates to the lands occupied by the Sisters, measuring c. 21.5ha. The land are currently proposed for CE and OS zoning

It is requested that the lands be rezoned as follows:-

1. The area around the Convent building (c. 3.3ha) to be rezoned RE – existing residential, to reflect its existing use and possible future uses for holiday and retreat style activities
2. Omit the proposed new 2ha CE zoning to the rear of the Convent but maintain the existing 0.66ha CE area to the west/south of St. Brigid's for future expansion
3. Rezone c. 3.6ha for residential development (currently proposed for AG zoning)

Manager's Response

1. It is considered appropriate to retain the CE zoning for the existing Convent but to alter the land-use matrix to ensure that 'residential institutions' are permissible in such zones. It is not considered appropriate to allow for tourism or holiday type uses on this zoning but any application for such use, where linked to the overall use of the site as a religious centre, can be considered on its merits
2. With regard to this submission, and Submission No.'s 12, 24 & 29, it is recommended that the proposed 2ha CE zoning to the rear of the Convent building be omitted
3. The population projections set out in the draft plan (which accord with the County Development Plan 2004) and the calculation of required land zoning are set out in Section 7 of Part A of the draft plan. The quantity of zoned land required takes into account the 2006 census population, permissions granted and constructed since 2006 and existing permissions, which have yet to begin construction. These sections clearly set out the process under which it was determined what land requirements were needed in order to accommodate the projected population in 2016. The calculations also provide for an "excess factor" and substantial "headroom", given the strategic location of the settlement of Kilcoole, its designation as a Small Growth Town I in the Regional Planning Guidelines and

the demand for housing. The draft plan has proposed new residential zoning on the basis of the need identified by these calculations. No further residential zoning is required to meet the current populations targets and the excessive zoning of land may lead to population targets being exceeded, to the overall detriment of the settlement.

Furthermore, the new residential zonings proposed had regard the following spatial criteria (as set out in Part A of the draft plan):-

- Unzoned lands closest to the existing town centre shall be considered first for new zoning (the 'town centre' being taken as the Sea Road – Main Street junction).
- Lands that meet a social or community need
- Lands zoned AGR in the 2002 LAP shall then be considered

The lands that are the subject of this submission are not considered to accord with these criteria and would lead to an excessive spread of the settlement on its north-western side.

Managers Recommendation

Make the following amendments to the LAP:-

1. Amend the land-use matrix on p17, part B to make 'residential institution' permissible 'Y' in the CE zone

2. Omit proposed CE zoning (c. 2ha) to the rear of the Holy Faith convent and revert this land to AG zoning

3. Change text of Part B: Section 7 – Education: policies & objectives
From

Policies/Objectives

- Two 1.2ha sites (suitable for 16-classroom schools) shall be reserved for primary school development – one to the north-west of the existing girls' school and one in Action Area 1
- Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school)

To

Policies/Objectives

- *One new 1.2ha site (suitable for 16-classroom school) shall be reserved for primary school development, located in Action Area 1*
- *Land of c. 1.6ha shall be reserved adjacent to Colaiste Chraobh Abhann for future school expansion. In the event that it is determined that this land is not needed for this school, this site shall be reserved as an alternative primary school location (suitable for 16-classroom school)*

Submission no. 36 (mapped)

Society of Saint Vincent De Paul

This submission relates to SVP proposals to develop a housing scheme to the south of St. Brigid's school in Kilcoole, but does not contain any specific observations on the

draft plan. It would appear that the submission is endeavouring to show how the proposals would be consistent with the other objectives of the plan.
Manager's Response
The lands in question are proposed for TC zoning, which is no change from the 2002 plan. Positive pre-planning discussions have already been carried out.
Managers Recommendation
No change to LAP.

Submission no. 37 (mapped)
Mr. Toner, John
This submission relates Glenroe Farm. It is requested that the AT zoning be extended to include the entire landholding and agri-tourism activities are already occurring on the lands.
Manager's Response
The boundaries of the AT zone proposed in the draft plan correspond to the area for which planning permission exists for the agri-tourism facility. Having regard to the proximity of the eastern part of the holding to The Murrough SPA, this suggested zoning cannot be considered outside of the context of a full Strategic Environmental Assessment. The SEA screen carried out determined that a full SEA was not required as the plan was unlikely to have significant adverse environmental impact on environmentally sensitive receptors in the area. However, this would have to be reviewed if this zoning were to be considered and furthermore, the Habitats Directive would be likely to require an 'appropriate assessment' of the impact of the zoning on the SPA. Under 'appropriate assessment' where any possible impact is identified, the zoning cannot proceed; mitigation measures are not considered sufficient.
Managers Recommendation
No change to LAP.

Submission no. 38 (mapped)
Mr. Webb, John
This submission relates to a landholding of c. 9.5ha at Cooldross Lower (at the far eastern end of Cooldross Lane). The landowner desires to utilise existing disused agricultural buildings as a wood chip manufacturing plant and requests the appropriate zoning for the site.
Manager's Response
These lands are c. 300m from the proposed development boundary of the settlement and are located in a rural, undeveloped area. While improvements to Cooldross Lane are planned to be carried out from the new roundabout back to the R761, no improvements are proposed for the c. 300m section between the roundabout and this site. This lane is not considered suitable without substantial improvement for the type of facility proposed. The County Development Plan generally does not allow for industrial type development in rural areas. For these reasons, zoning is not recommended. This zoning cannot be considered outside of the context of a full Strategic Environmental Assessment. The SEA screen carried out determined that a full SEA was not required as the plan was unlikely to have significant adverse environmental

impact on environmentally sensitive receptors in the area. However, this would have to be reviewed if this zoning were to be considered and furthermore, the Habitats Directive would be likely to require an 'appropriate assessment' of the impact of the zoning on the SPA. Under 'appropriate assessment' where any possible impact is identified, the zoning cannot proceed; mitigation measures are not considered sufficient.

Managers Recommendation

No change to LAP.