

	<h1>Greystones-Delgany & Kilcoole LPF Variation No.4</h1>
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Who are you:	Private Individual
Name:	Sarah Doyle
Reference:	GDKLPF-212732
Submission Made	June 20, 2025 9:29 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART A Strategy

- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole

Local Planning Framework PART B Settlement Specific Objectives.

- B.4 Tourist Development
- B.9 Specific local objectives (SLOs)

Please select which town you want to comment on:

Greystones/Delgany

Observation relevant to the settlement:

Please find attached my submission for review

Upload a File (optional)

Variant4_WCountryDevP_Doyle_180625.pdf, 0.76MB

Submission to Wicklow County Council – Variation No. 4

Submitted by: Sarah Doyle

Subject: Submission for Recognition of Glen of the Downs Wellness Retreat Site under Variation No. 4

Site Location: Former Glen of the Downs Golf Club, Coolnaskeagh, Delgany, Co. Wicklow (Eircode A63 DW40)

Date: 18th June 2025

1. Background and Site Context

I am the owner of lands at A63 DW40 (as outlined in Annex 1 Map), formally Glen of the Downs Golf course. As owner of the property, I wish to see the land and brownfield site re-developed as a Wellness and retreat site. The remaining lands of the Glen of the Downs golf course have been rewilded with native Irish forestry. This unique location offers views of both Sugarloaf mountains and forestry, we have an opportunity to create a hub what will facilitate access to some of North Wicklow most impressive assets and landscapes, for both the local community and tourists alike.

A previous planning application for a broader wellness proposal (Ref. 25/27) was refused by Wicklow County Council. Key issues cited included:

- Lack of sufficient justification for siting in a rural, AONB-designated landscape
- Uncertainty regarding wastewater treatment system compliance
- Perception that the use was more suited to an urban context
- Concerns over visual sensitivity, particularly the introduction of new built forms

As a native to the area who still resides in close proximity to the site and indeed who family farms the local area, I whole hearty wish to ensure the site and surrounding area is respected, protected and celebrated as an area of outstanding natural beauty.

In response to that decision, I am happy to restructure any further submission to align with both the letter and spirit of the Wicklow County Development Plan and Local Planning Framework. However, the Planners Report despite highlighting CPO 11.7 supporting the re-use of existing buildings, showed how they struggled to align the concept of Wellness within Couty Development plan, citing at one point *“it could be argued that there is no real specific objective in the CDP which fits this particular case.”*

Therefore, I wish for Wicklow County Council and elected members to consider the variations here within suggested that would facilitate the re-development of this site to be:

- Focused exclusively on wellness, ecotherapy and nature immersion activities including outdoor recreational activities such as Spa trials, walking, yoga and related activities — directly leveraging the rural setting as essential to the offering
- Nature-based education, craft workshops, and passive tourism
Reuse of existing building footprint and the addition of sensitive new structures such as sauna and hot tubs designed for full landscape integration and immersion.
- Phased introduction of low-impact, sedum-roofed accommodation cabins

Of course all subject to standard planning protocols and practices requiring, among others:

- A full site suitability and WWTS report in line with EPA 2021 CoP
- Visual sensitivity addressed via strategic siting, native landscaping, and limited built massing

This submission requests specific amendments and additions to Variation No. 4 of the Greystones–Delgany & Kilcoole Local Planning Framework to support and enable this development in alignment with local, county, and national policy.

2. Requested Variations

(A) Recognition of the Glen of the Downs Site as a Tourism & Wellness Node

Add the site of the former Glen of the Downs Golf Club (A63 DW40) to Section 5.3.2 as a site suitable for small-scale, integrated nature-based wellness tourism.

Justification:

- Existing building and brownfield context
- Excellent screening within AONB
- Replanted native woodland and ecological sensitivity around the site
- Strong tourism potential due to proximity to the N11, the Great and Little Sugarloaf, and Wicklow Trails
- Single landholding with a coherent development vision

(B) Liaison with local landowners for an Indicative Trail Link to Wicklow Trails Network

I believe that other landowners could agree to permit (under conditions) potential walking trail corridor linking Glen of the Downs Nature Reserve to:

- Coolnaskeagh Ringfort (W103071)
- Coolagad Hillfort
- The Sugarloaf Way and Bohilla Lane routes

Justification:

- Supports CPO 9.32, 9.35, 9.36
- Enhances passive recreation in the AONB
- Ties in cultural heritage and biodiversity access
- Serves Wicklow's green infrastructure goals

(C) Policy Inclusion for Nature-Based Wellness Development

Add a new tourism sub-objective under Section 5.3 of the County Development Plan to: Support nature-based wellness development in appropriate rural locations, particularly where existing structures are reused, and activities support physical and mental wellbeing.

Indeed if CPO 11.4 was modified from *“To only permit the development of a tourism or recreational facility in a rural area in cases where the product or activity is dependent on its location in a rural situation”* to *“The proposed use is demonstrably enhanced by, or functionally dependent on, the rural setting, natural landscape, or tranquility of the area”*

Justification:

- Addresses a clear gap in policy between health, tourism, and landscape
- Aligns with Healthy Ireland, Failte Ireland’s Wellness Tourism Strategy, and CDP CPO 11.3/11.4

(D) Clarification of Visual Policy for Landscape-Compatible Uses

Add a note to Landscape Character Area 8 (LCA8) policy that:

Low-profile, nature-based wellness uses that do not disrupt skyline features or protected view corridors may be considered in areas of visual sensitivity, subject to landscape and visual assessment.

Justification:

- Protects views while providing criteria for appropriate development

- Supports innovation in tourism and diversification in AONB contexts
- Allows proper assessment and mitigation to be brought into decision-making

(E) Reuse of Existing Rural Buildings

Clarify in Section 5.6 (Rural Economy) that:

Re-use of existing rural structures for tourism, wellness, cultural, or educational purposes will be supported where development is of a low-impact nature and tied to wider sustainable development goals. An extension to promoting more than just farm building reuse, could be greatly beneficial county wide.

Justification:

- Prevents rural building dereliction
- Encourages local economy and seasonal employment

3. Supporting Materials

I am prepared to provide:

- A phased development masterplan for the site
- A draft LVA and visual mitigation strategy
- Trail connectivity overlays and ecological enhancement proposals
- A wellness and cultural tourism business concept plan

4. Conclusion

This submission supports the strategic goals of Variation No. 4 and the County Development Plan by promoting:

- Sustainable, health-oriented tourism
- Heritage-sensitive landscape integration
- Enhanced access to nature and cultural assets
- Responsible reuse of brownfield rural land

I respectfully request that the planning authority consider these proposed variations for inclusion in the final Framework document. I would welcome the opportunity to discuss this proposal further with Councilors and the Planning Department alike.

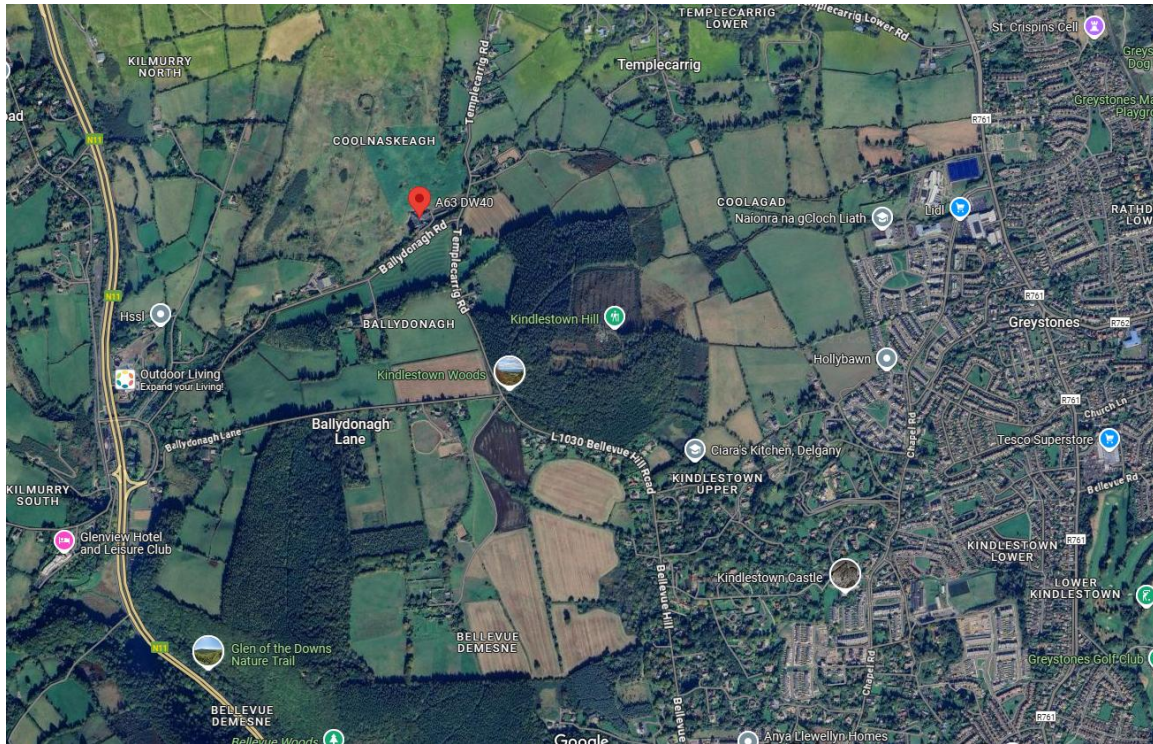
Kind regards,

Sarah Doyle
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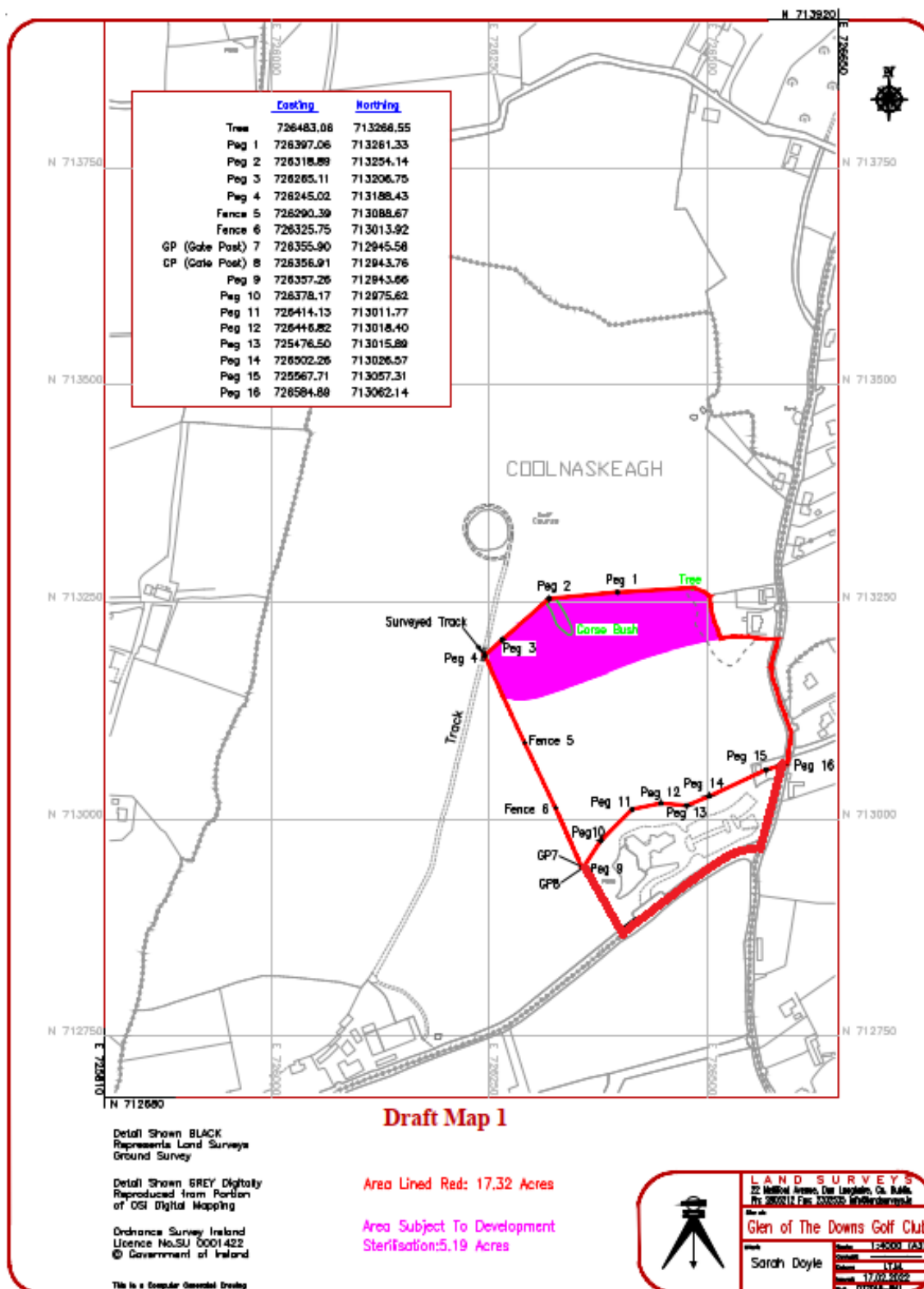
Annexes

Annex 1: Site Location Map

Aerial view of the site including road access and proximity to the Sugarloaf.



Annex 2: Site Contour and Peg Survey



Annex 2: Existing Trail & Heritage Connectivity Map

