

	Proposed Variation No. 7 to the Wicklow County Development Plan Submission Report
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Submission Details

Ref	VAR7-152822
Who Are You?	Private Individual
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Submitted Time:	September 19, 2026 3:32 PM

Proposed Variation Parts

Topic	Part 1: Proposed Variation to town / settlement zoning maps and, where relevant, proposed new or amended site specific policy objectives.
Submission	1. Level 3: Greystones-Delgany

Topic	Part 2
Submission	Changes consequent to Chapter 3 (Core Strategy) of the County Development Plan

Topic	Part 3
Submission	2. A. Draft Strategic Environmental Assessment Environmental Report 3. C. Strategic Flood Risk Assessment 4. D. Call for Sites – Summary of Assessment

Write your observations here:

Please refer to attachment for outlined observations

Upload a File (optional)

Formal Submission on Proposed Variation No 07.pdf, 0.24MB

**Formal Submission on Proposed Variation No. 7 to the Wicklow County
Development Plan 2022–2028**

**Proposed rezoning of the Éire Óg Greystones lands, Mill Road, Greystones
Site / Submission No. 41**

To:

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town
Co. Wicklow

Re: Proposed Variation No. 7 – Objection to proposed rezoning of approximately 3.2 ha
of the Éire Óg lands from **Active Open Space** to **New Residential**

Submitted by: [Name]

Address: [Address]

Date: [Date]

1. Introduction

I wish to make a formal submission objecting to the proposed rezoning under **Proposed Variation No. 7** of approximately **3.2 hectares of the Éire Óg lands at Mill Road, Greystones from Active Open Space to New Residential**.

I respectfully request that Wicklow County Council **delete the proposed New Residential zoning and retain the existing Active Open Space zoning**.

This objection is not an objection to the principle of additional housing in Greystones, nor to the requirement for Wicklow County Council to respond appropriately to revised national housing-growth requirements.

Rather, the objection concerns the **appropriateness, necessity, sequencing and sustainability of selecting these particular lands for residential development**, having regard to:

1. their existing and established use as functioning sports and community infrastructure;
2. the absence of demonstrated and secured equivalent replacement facilities;
3. the very recent adoption of the Greystones–Delgany & Kilcoole Local Planning Framework;

4. the need to demonstrate that additional residential zoning at this location is actually required;
5. the requirement for development to be infrastructure-led and appropriately sequenced;
6. cumulative transport, water, wastewater, drainage and social-infrastructure considerations; and
7. the requirement to properly assess reasonable alternatives through the statutory environmental assessment process.

The fundamental planning question is therefore not whether County Wicklow requires additional housing.

It is:

Whether it represents proper planning and sustainable development to permanently remove established and functioning Active Open Space from a growing settlement before it has been demonstrated that these particular lands are required for housing and before equivalent replacement sporting infrastructure has been identified, secured, funded and made capable of delivery.

In my submission, that case has not been sufficiently demonstrated.

2. Executive Summary of Grounds for Objection

The proposed rezoning should not proceed for the following principal reasons.

Ground 1 – Permanent loss of established Active Open Space

The lands are not vacant, derelict or under-utilised land. They comprise established sporting infrastructure, including **two GAA playing pitches and associated club and community facilities**.

Residential rezoning would therefore result in the potential permanent loss of an existing community asset.

Ground 2 – No secured equivalent replacement provision

There is presently no demonstrated evidence that equivalent replacement sporting facilities have been:

- identified;
- secured;
- acquired or placed under enforceable control;

- granted planning permission;
- demonstrated to be environmentally and infrastructurally feasible;
- funded; and
- programmed for delivery before the existing facilities are lost.

A future intention to relocate sporting facilities is materially different from secured replacement provision.

Ground 3 – Insufficient demonstration that these particular lands are required for housing

The Greystones–Delgany & Kilcoole Local Planning Framework only took effect on **9 February 2026**, following a detailed statutory planning process.

Before additional land is rezoned, the Council should transparently demonstrate:

- the revised housing requirement specifically attributable to Greystones–Delgany;
- the capacity of land already zoned for residential development & what material housing-growth change occurred after adoption.
- extant permissions;
- housing currently under construction;
- realistic activation assumptions;
- infill and brownfield capacity;
- the contribution of recently zoned lands; and
- why established Active Open Space must now be included.

Additionally publish a settlement-specific land-budget reconciliation and explicit written reasons for departing from the February 2026 strategy.

Ground 4 – Failure to demonstrate that the sequential approach has been exhausted

Established sports land should not effectively become a first-line source of additional residential land simply because it lies within the urban area.

The Council should demonstrate that reasonable alternatives involving:

1. town-centre opportunities;
2. brownfield land;
3. infill land;

4. under-utilised land;
5. existing residentially zoned land; and
6. other suitable candidate sites

have been properly considered before functioning Active Open Space is rezoned.

Ground 5 – Infrastructure and cumulative development capacity

Any additional residential zoning should be supported by current evidence demonstrating that transport, water, wastewater, drainage, schools and community infrastructure can accommodate the cumulative development already planned for Greystones–Delgany together with the additional development facilitated by Proposed Variation No. 7.

Ground 6 – Environmental assessment and reasonable alternatives

The Strategic Environmental Assessment should expressly assess the consequences of losing operational sports infrastructure, including effects upon:

- population;
- human health;
- recreation;
- community infrastructure;
- sustainable transport;
- material assets; and
- cumulative development.

It should also meaningfully assess the reasonable alternative of **retaining the existing Active Open Space zoning**.

3. Existing Use of the Lands Is a Material Planning Consideration

The Éire Óg lands should not be considered simply as approximately 3.2 hectares of potentially developable urban land.

They constitute an **existing operational sporting and community facility**.

The facility includes:

- two playing pitches;
- floodlit sporting provision;

- clubhouse facilities;
- dressing accommodation;
- indoor sports/function space; and
- meeting/community accommodation.

The principal pitch is also used for significant sporting fixtures.

This distinction is important.

There is a fundamental planning difference between:

rezoning vacant or under-utilised land for housing

and

rezoning functioning community infrastructure for housing.

The latter creates an immediate opportunity cost for the settlement.

The relevant assessment should therefore consider not merely the number of residential units potentially capable of being delivered on the lands, but also **what Greystones would lose in order to obtain those units.**

4. Existing Demand for Sporting Infrastructure

The existing use of the lands is particularly relevant because the available evidence does not indicate that the sporting facilities are redundant or surplus to requirements.

On the contrary, Éire Óg Greystones has previously identified a requirement for **additional playing capacity, particularly associated with juvenile participation.**

That is an important consideration.

Where an existing sporting organisation is already experiencing pressure for additional capacity, the planning response should not ordinarily be to reduce existing capacity unless a demonstrably superior replacement solution has first been secured.

The proposed rezoning therefore risks creating the following sequence:

1. existing sporting capacity is rezoned for residential development;
2. development value and expectations attach to the land;
3. existing sporting activity subsequently requires relocation;
4. replacement land must then be identified;
5. planning, environmental, access and infrastructure issues must be resolved;

6. funding must be secured; and
7. replacement facilities must eventually be constructed.

That sequence creates a material risk that **housing development becomes certain while replacement sporting provision remains aspirational.**

That would not represent balanced or sustainable settlement planning.

5. Replacement Provision Must Precede, Not Follow, the Loss

If Wicklow County Council considers that residential development of the Éire Óg lands is nevertheless appropriate, the minimum planning safeguard should be that **equivalent or better replacement facilities are secured before the existing facilities can be lost.**

Replacement should not simply mean identifying another parcel of land.

The replacement facility should be demonstrated to provide, at minimum:

- equivalent playing-pitch capacity;
- appropriate pitch dimensions and quality;
- equivalent floodlighting capability;
- changing and clubhouse facilities;
- community accommodation;
- appropriate parking;
- safe pedestrian access;
- cycling accessibility;
- public-transport accessibility;
- appropriate road access;
- drainage and utility infrastructure; and
- the ability to accommodate existing and reasonably foreseeable future demand.

The replacement location should also be assessed against the accessibility of the existing Mill Road location.

Relocating sporting facilities to a peripheral location that generates substantially greater car dependency would not necessarily constitute an equivalent planning outcome.

6. A Binding Delivery Mechanism Is Essential

A policy aspiration that replacement facilities will be provided at some future date would not adequately protect the community interest.

If the Council proceeds with the rezoning notwithstanding this objection, Proposed Variation No. 7 should contain a **specific and binding site objective** preventing the loss of the existing sporting facilities until replacement provision is operational.

Such an objective should provide, in substance, that:

No residential development resulting in the cessation, displacement or material reduction of the existing sporting use shall commence until equivalent or superior replacement sporting and community facilities have been fully secured, appropriately consented, serviced, constructed and made operational.

The replacement should be available **before**, rather than after, the existing facilities cease operating.

This is important because once residential zoning is adopted, the strategic planning balance affecting the lands changes materially.

The appropriate time to protect replacement provision is therefore **at plan-making stage**.

7. The February 2026 Local Planning Framework Is Highly Relevant

The timing of Proposed Variation No. 7 requires particular scrutiny.

The **Greystones–Delgany & Kilcoole Local Planning Framework** took effect on **9 February 2026**.

That statutory planning process considered matters including:

- population growth;
- residential land requirements;
- infrastructure;
- transport;
- social infrastructure;
- environmental constraints;
- flood risk;

- open space; and
- settlement development.

The adopted framework reportedly provides approximately **38 hectares of residential land in Greystones–Delgany, arranged through phased development.**

Proposed Variation No. 7 therefore arises only a relatively short period after completion of a comprehensive statutory planning exercise.

That does not prevent the Council from responding to revised national housing requirements.

It does, however, create a strong requirement for the Council to explain transparently **why the recently adopted land-use strategy is already insufficient and why these particular Active Open Space lands must now be rezoned.**

8. Revised Housing Targets Do Not Automatically Justify This Site

I acknowledge that revised national Housing Growth Requirements materially increase the housing requirement applicable to County Wicklow.

That is an important planning consideration.

However, an increased county-level housing requirement does not logically establish that **every candidate site submitted for residential zoning should be accepted.**

Nor does it establish that functioning Active Open Space should automatically be rezoned.

The revised housing requirement should instead trigger a transparent planning exercise establishing:

1. the revised county requirement;
2. its distribution through the settlement hierarchy;
3. the resulting requirement for Greystones–Delgany;
4. existing zoned-land capacity;
5. realistic housing yield;
6. extant permissions;
7. development under construction;
8. likely activation;
9. infrastructure capacity;

10. brownfield and infill opportunities; and

11. any residual requirement for additional greenfield zoning.

Only after that exercise can the necessity for Site 41 properly be established.

9. A Settlement-Specific Housing Land Budget Should Be Published

Before adopting the proposed rezoning, Wicklow County Council should provide a clear and auditable **Greystones–Delgany housing land budget**.

That assessment should identify:

Matter	Evidence required
Revised housing requirement	Number of additional dwellings allocated specifically to Greystones–Delgany
Existing zoned land	Area and realistic dwelling yield
Extant permissions	Permitted but unbuilt dwellings
Construction	Units currently being delivered
Activation	Realistic probability and timing of development
Phase 1 lands	Capacity and infrastructure status
Phase 2 lands	Capacity and infrastructure status
Brownfield/infill	Realistic additional capacity
Infrastructure	Serviced/serviceable status
Additional requirement	Residual land requirement after the above
Site selection	Why Site 41 performs better than reasonable alternatives

Without this reconciliation, it is difficult to establish that the loss of existing Active Open Space is **necessary rather than merely convenient**.

10. Sequential Development and Compact Growth

National and regional planning policy supports compact growth.

However, compact growth should not be interpreted as meaning that every open space within an urban footprint is suitable for residential development.

A sustainable sequential approach should ordinarily prioritise:

1. vacant and derelict sites;
2. brownfield land;
3. town-centre regeneration;
4. infill opportunities;
5. under-utilised land;
6. existing appropriately zoned residential land; and thereafter
7. additional land demonstrated to be necessary.

Functioning sports pitches are fundamentally different from vacant land.

They already perform an important urban function.

Accordingly, the Council should demonstrate why the housing requirement cannot reasonably be accommodated through less socially disruptive alternatives before removing established Active Open Space.

11. Social Infrastructure Must Grow With Population

Housing growth cannot be considered independently from community infrastructure.

Additional population creates additional demand for:

- schools;
- childcare;
- healthcare;
- recreation;
- sports facilities;
- parks;
- community facilities; and
- sustainable transport.

It would be contradictory to increase the residential capacity of Greystones while simultaneously reducing established recreational capacity unless equivalent replacement provision is secured.

This is particularly important in a settlement experiencing sustained population and housing growth.

The planning assessment should therefore consider **net social-infrastructure capacity after development**, rather than simply the gross number of additional dwellings facilitated.

12. Transport and Accessibility

Transport concerns should also be assessed cumulatively.

Previous planning analysis for Greystones has identified significant outward commuting and substantial reliance upon private cars.

The relevant question is therefore not simply whether a future residential development can provide a technically acceptable vehicular entrance.

The strategic assessment should consider:

- cumulative traffic generated by existing permissions;
- development of recently zoned residential lands;
- Proposed Variation No. 7;
- school-related peak traffic;
- sporting-event traffic;
- pedestrian connectivity;
- cycling connectivity;
- public-transport capacity; and
- the transport consequences of relocating existing sporting activity.

The last point is particularly important.

If existing centrally accessible sporting facilities are displaced to a more peripheral location, the rezoning could simultaneously:

- generate additional residential trips at Mill Road; and
- increase car journeys associated with relocated sporting activity.

That potential displacement effect should form part of the strategic transport assessment.

13. Water and Wastewater Infrastructure

I do **not** suggest that there is presently conclusive evidence demonstrating that Greystones lacks water or wastewater capacity.

Indeed, previous consultation evidence indicated that Uisce Éireann considered capacity sufficient for the growth assumptions applicable at that time.

However, Proposed Variation No. 7 responds to **increased housing-growth requirements**.

The relevant question is therefore whether infrastructure remains adequate for the **revised cumulative development scenario**.

The Council should demonstrate that the proposed residential lands are either:

- fully serviced; or
- demonstrably serviceable within the relevant plan period.

The assessment should address:

- potable water;
- wastewater network capacity;
- wastewater treatment capacity;
- surface-water drainage;
- SuDS;
- required network reinforcement;
- delivery responsibility;
- funding; and
- timing.

Where infrastructure upgrades are required, residential zoning should be appropriately phased against their delivery.

14. Flood Risk and Surface-Water Management

I do not rely upon an unsupported assertion that the Éire Óg lands are subject to unacceptable flood risk.

Instead, I request that the Council demonstrate clearly, by reference to the Strategic Flood Risk Assessment and associated mapping, that the proposed residential zoning satisfies the applicable flood-risk planning requirements.

The assessment should include:

- fluvial risk;
- pluvial/surface-water risk;
- climate-change allowances;
- downstream effects;
- attenuation requirements; and
- cumulative effects arising from additional impermeable development.

Any material flood constraint should be resolved at zoning stage rather than deferred entirely to a future planning application.

15. Strategic Environmental Assessment

The SEA accompanying Proposed Variation No. 7 should not assess Site 41 solely in terms of conventional ecological constraints.

The loss of functioning sports infrastructure engages broader SEA considerations, particularly:

- **population;**
- **human health;**
- **material assets;**
- **land use;**
- **sustainable transport;**
- **community infrastructure; and**
- **cumulative effects.**

The SEA should therefore expressly consider the consequences of removing existing recreational capacity from a growing settlement.

16. Reasonable Alternatives

A particularly important issue is whether reasonable alternatives have been adequately assessed.

For Site 41, those alternatives should include:

Alternative A – Retain the existing Active Open Space zoning

This should form the baseline alternative.

Alternative B – Meet additional housing requirements through existing residentially zoned land

The realistic capacity and activation potential of existing zoned land should be established.

Alternative C – Prioritise brownfield and infill opportunities

This would potentially deliver compact growth without sacrificing functioning community infrastructure.

Alternative D – Select alternative candidate sites

If additional greenfield zoning is genuinely required, sites that do not involve the loss of established sporting infrastructure should be considered first.

Alternative E – Defer Site 41 pending secured replacement provision

If the Council considers the lands strategically suitable in the longer term, rezoning could be deferred until replacement sporting facilities are demonstrably deliverable.

The existence of these alternatives means that the choice is not simply between **rezoning Éire Óg or failing to meet housing targets.**

17. Matters That Should Not Be Deferred to a Future Planning Application

Certain detailed matters can appropriately be addressed through a future planning application.

However, the following are fundamentally **strategic plan-making questions**:

- whether established Active Open Space should be lost;
- whether additional residential zoning is necessary;
- whether Site 41 is preferable to reasonable alternatives;
- whether replacement sporting provision is achievable;

- whether the settlement has sufficient social-infrastructure capacity;
- whether development is appropriately sequenced; and
- whether cumulative infrastructure capacity exists.

These matters should therefore be resolved **before the zoning decision is made**.

A future planning application cannot retrospectively correct an inadequately justified strategic zoning decision.

18. Precaution Against an Irreversible Planning Outcome

The consequences of retaining the existing Active Open Space zoning are reversible.

If future evidence conclusively demonstrates that:

- additional residential land is required;
- alternative sites are unsuitable;
- infrastructure is available; and
- equivalent replacement sporting facilities have been secured,

the zoning can be reconsidered through an appropriate statutory planning process.

The consequences of residential rezoning are materially different.

Once residential zoning is adopted:

- development expectations arise;
- land values may change;
- pressure for development increases; and
- retention of the existing sporting use becomes progressively more difficult.

Where the evidence supporting the loss of an established community asset remains incomplete, the more sustainable planning approach is therefore to **retain the existing zoning until the necessary conditions have been demonstrated**.

19. Requested Decision

For the reasons set out above, I respectfully request that Wicklow County Council **not adopt the proposed New Residential zoning of approximately 3.2 hectares of the Éire Óg lands**.

The preferred outcome should be:

Retention of the existing Active Open Space zoning.

This would not prevent the Council from reconsidering the long-term planning of the lands through a future statutory process if circumstances materially change.

20. Alternative Safeguards if the Council Proceeds With Rezoning

Without prejudice to the primary objection above, if Wicklow County Council nevertheless determines that residential rezoning should proceed, I request that the Variation incorporate binding site-specific objectives providing that:

20.1 Replacement facilities

No existing playing pitch or associated sporting/community facility shall cease operation until equivalent or superior replacement facilities are fully operational.

20.2 Land control

Replacement lands must be demonstrably secured and under appropriate long-term ownership or control before residential development proceeds.

20.3 Equivalent capacity

Replacement provision must provide at least equivalent:

- pitch capacity;
- sporting functionality;
- floodlighting;
- changing facilities;
- clubhouse/community accommodation; and
- ancillary infrastructure.

20.4 Accessibility

Replacement facilities must provide equivalent or better accessibility by:

- walking;
- cycling;
- public transport; and
- private vehicle.

20.5 Planning and environmental consent

All necessary planning, environmental and infrastructure approvals for replacement facilities must be secured before development resulting in the loss of the existing facilities commences.

20.6 Delivery

Replacement facilities must be **constructed and operational**, rather than merely planned or permitted, before the existing facilities are lost.

20.7 Infrastructure sequencing

Residential development should be phased against confirmed:

- transport capacity;
 - water supply;
 - wastewater capacity;
 - surface-water infrastructure; and
 - required community infrastructure.
-

21. Conclusion

The case against the proposed rezoning can be summarised simply.

The Éire Óg lands are **not unused land awaiting a productive purpose**.

They already perform a productive and important purpose for Greystones.

They provide established sporting and community infrastructure within a settlement experiencing continuing population and housing growth.

There is unquestionably a legitimate public interest in delivering additional housing. There is equally a legitimate public interest in ensuring that housing growth does not occur through the unnecessary or premature loss of the very social infrastructure required to support a growing population.

Those objectives are not mutually exclusive.

The appropriate planning response is to demonstrate first:

1. **how much additional residential land Greystones–Delgany actually requires;**
2. **what capacity already exists within recently zoned and permitted lands;**

3. **whether brownfield, infill and alternative sites can satisfy the residual requirement;**
4. **whether infrastructure can accommodate the cumulative growth proposed; and**
5. **where, when and how equivalent replacement sporting facilities will be delivered.**

Until those matters have been satisfactorily demonstrated, the proposed residential rezoning of functioning Active Open Space is **premature and insufficiently justified**.

Accordingly, I respectfully request that Wicklow County Council:

Delete the proposed New Residential zoning relating to the Éire Óg lands under Proposed Variation No. 7 and retain the existing Active Open Space zoning.

Alternatively, the Council should **defer the rezoning** until a settlement-specific housing-land assessment, infrastructure-capacity assessment and binding replacement-sports-facility strategy have been completed and subjected to appropriate public and environmental assessment.

Yours faithfully,

Terry & Rebecca Gray

[REDACTED]

[REDACTED]

[REDACTED]

Date: 19th September 2026

Reference Schedule:

Source/status	Provision/page	Relevance
Planning and Development Act 2000, as amended — statute	ss.9–10, 13, 28; SEA/AA provisions	Development-plan content, variation, guidelines and assessments; PV7 is being processed under s.13.
Planning and Development Act 2024 — statute, transitional relevance	s.27	Continues existing s.28 Guidelines as National Planning Policy Guidance.
Planning and Development Act 2024 — enacted; commencement/application to PV7 to be confirmed	s.46	Spatial capacity, infrastructure and community-facility elements of future housing strategy framework.
Wicklow CDP, Chapter 3/Core Strategy	Compact Growth; sequential and infrastructure principles	Requires prioritisation of infill/brownfield and infrastructure-led zoning.
Wicklow CDP, Chapter 6	CPO 6.20	Infrastructure, SIA, accessibility and phasing of significant housing.
Wicklow CDP, Chapter 7, §7.4, approx. pp.9–16	CPOs 7.1, 7.5, 7.14, 7.29–7.31, 7.40–7.42	Community need, sport, clustering, open-space protection and replacement tests.

Source/status	Provision/page	Relevance
Wicklow CDP, Chapter 12	CPO 12.3	Local Transport Plan/ABTA to inform Greystones land-use decisions.
GDK LPF/Variation No.4 and Variation No.5	Written statement; Map 1	Operative statutory framework; effective 9 February 2026, with March 2026 map update.
PV7 Part 1	Site 41, pp.35–36	Proposed AOS-to-New Residential/Community and Education changes.
Revised NPF 2025	NPO 11	Phased, sequential growth having regard to capacity.
Revised NPF 2025	NPO 101	Tiered distinction between serviced and serviceable land.
Revised NPF 2025	NPOs 77–78	SuDS, climate resilience and flood-risk-led placemaking.
EMRA RSES	RPOs 3.4, 4.3, 4.8–4.11, 4.16, 8.14, 9.8	Settlement capacity, infrastructure, compact growth, transport and community/recreation access.

Source/status	Provision/page	Relevance
Housing Growth Requirements Guidelines 2025	Core Strategy assessment, SCA, tiering and additional provision, particularly pp.6–10 and 16	Updated growth supports housing but retains settlement-capacity, servicing and SEA tests.
Development Plans Guidelines 2022	Chs.4–5	Evidence-led Core Strategy, zoning, sequential development and reasonable alternatives.
Sustainable Residential Development and Compact Settlements Guidelines	Open space, accessibility, urban greening and SuDS	Quality, healthy placemaking and open-space requirements; continued by 2024 Act s.27.opr+1
Flood Risk Management Guidelines	Sequential approach and Justification Test	Applies at plan/zoning stage where flood risk arises.
OPR Greystones–Delgany–Kilcoole submission	Recommendations 1, 5 and 12	Zoning rationale, LTP-informed land use, social/civic infrastructure and servicing evidence.