



Greystones - Delgany & Kilcoole Draft LPF Amendment Stage Submission - Report

Who are you:	Private Individual
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Reference:	GDKLPF-105516
Submission Made	November 12, 2025 10:59 AM

Topic

LAP - Proposed Material Amendments No 22 Submission

Submission

Support for Amendment 22 – Carmelite Convent Lands

I welcome Amendment 22, which safeguards the community gain associated with Planning Permission 21/959. If completed as approved, this development will deliver a much-needed community centre, playground, open space, and retail units—essential elements to foster a village identity for Delgany and meet local needs.

Topic

LAP - Proposed Material Amendments No 26 Submission

Submission

Objection to Amendment 26 – Bellevue Hill Zoning

I oppose the Proposed Material Amendment 26, which seeks to extend the urban boundary to include the 29-acre Bellevue Hill site (c. 12.5ha) and rezone it from unzoned rural land to AOS 'Active Open Space', with a new Specific Local Objective (SLO 12). While I support the provision of sports facilities, this proposal is flawed on

environmental, planning, and community grounds.

1. Environmentally Sensitive and Unsuitable Site

Bellevue Hill borders the Glen of the Downs Nature Reserve (pNHA and SAC) and forms part of a vital ecological corridor of native wet woodland, marsh, and scrub. These habitats are increasingly rare in North Wicklow and provide essential ecosystem services—water filtration, flood mitigation, carbon storage—and support diverse wildlife including pollinators, amphibians, birds, and small mammals.

The site contains a stream known locally as the Brown Trout Stream, which supports aquatic invertebrates and trout, indicating high ecological status. Development here risks irreversible damage through runoff, sedimentation, and pollution, with downstream impacts on the Three Trouts River system.

2. Planning Shortfalls and Need for Due Diligence

The LPF fails to accurately map the site's ecological features or proximity to protected areas. There is no clear road access, and no acknowledgement of the site's hydrological and habitat connectivity to Glen of the Downs. The eastern portion—approximately four acres—contains undisturbed wet woodland and the Brown Trout Stream, which merit specific protection.

Wicklow County Council's own planners and Chief Executive have recently opposed this zoning, citing poor accessibility and unsuitability for development. The proposal contradicts:

- The National Biodiversity Action Plan (2023–2030)
- The Wicklow County Development Plan's green infrastructure objectives
- The EU Habitats Directive, which mandates avoidance of habitat fragmentation near designated conservation sites

3. Risk of Precedent and Zoning Creep

Active Open Space zoning has been used elsewhere to justify ancillary development. Section 14.8.9 of the Dublin City Development Plan allows limited residential/retail development on Z9 lands under certain conditions. Locally, Proposed Alterations 30 and 31 suggest rezoning parts of Greystones and Delgany Golf Clubs from AOS to residential. This raises serious concerns that Bellevue Hill could follow a similar trajectory, opening the door to further development in a highly sensitive area.

4. Community Impact and Accessibility

The Glen of the Downs stands as a vital sanctuary—a space for education, reflection, and deep connection with the natural world. To urbanise this land would be to erase one of the final wild corridors on our urban edge, compromising the legacy we owe to future generations.

Accessibility is also a concern. The road network is unsuitable for increased traffic, and families reliant on walking or public transport may struggle to access facilities here.

5. Specific Local Objective 12 – Practical and Ecological Issues

SLO 12 mandates a surfaced, publicly accessible looped trail for walking and running. This would necessitate extensive lighting, posing a serious threat to sensitive habitats and protected species including bats and birds. The clause permitting breaks in hedgerows “insofar as is possible” directly contradicts the stated aim of preservation. In practice, access would require cutting through native woodland and hedgerows, further fragmenting these ecosystems.

Moreover, the site's steep topography would demand significant earthworks to accommodate pitch construction, with likely negative effects on watercourses and local biodiversity.

6. Oversight and Enforcement

In the wake of the council vote, residents have reported tree-felling and vegetation clearance—now subject to investigation. These actions underscore the urgent need for robust environmental oversight to safeguard biodiversity, watercourses, and natural habitats.

Recommendations

I respectfully urge the Local Authority to:

- Retain the site's current rural/natural zoning and exclude it from the urban boundary
- Commission an independent ecological and hydrological assessment before any future zoning decisions
- Consider zoning the stream and wet woodland area as Open Space 2 (Nature) to preserve it as part of the

county's Green Infrastructure

- Pilot an Ecological Network mapping project around Glen of the Downs to support informed, biodiversity-led planning.

Nature's resilience is a rare gift—one we must not take for granted. This land calls for protection and renewal, not concrete and construction.

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Submission on Proposed Material Amendments to the Greystones.docx, 0.02MB

Submission on Proposed Material Amendments to the Greystones-Delgany and Kilcoole Local Planning Framework

Dear WCC Planners and Councillors,

I am writing to express my support for Proposed Material Amendment 22 and my objection to Proposed Material Amendment 26.

Support for Amendment 22 – Carmelite Convent Lands

I welcome Amendment 22, which safeguards the community gain associated with Planning Permission 21/959. If completed as approved, this development will deliver a much-needed community centre, playground, open space, and retail units—essential elements to foster a village identity for Delgany and meet local needs.

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Thank you for your time and expert consideration.

Yours sincerely,

Carina Holmes