



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

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Reference:	GDKLAP-162927
Submission Made	January 30, 2024 4:35 PM

Topic

Compact Growth - Housing - Population Growth

Submission

Please refer to the attached PDFs, submitted by Thornton O'Connor Town Planning on behalf of David and Ida Kelly.

Topic

Regeneration of Communities & Places - Healthy Placemaking - Urban Design - Opportunity Sites in Wicklow Town - Rathnew

Submission

Please refer to the attached PDFs, submitted by Thornton O'Connor Town Planning on behalf of David and Ida Kelly.

Map



Site Description:

Site of approximately 7.97 Ha generally located to the north and north-west of Seagreen Park and south-east of Kindlestown Hill.

File

Q64024 Kindlestown Pre-Draft Report v2.0.pdf, 1.89MB

1904 KINDLESTOWN DEVELOPMENT - CONCEPT PROPOSAL 30.01.2024-compressed.pdf, 3.56MB



THORNTON O'CONNOR
TOWN PLANNING

Submission to Wicklow County Council

In Respect of the Pre-Draft Consultation Stage
for the *Greystones-Delgany and Kilcoole Local Area Plan*

On Behalf of David and Ida Kelly

January 2024

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Planning Department
Wicklow County Council
County Buildings
Whitegates
Wicklow Town

Tuesday, 30th January 2024

Dear Sir/Madam,

RE: Submission in respect of the Pre-Draft Consultation Stage for the Greystones-Delgany and Kilcoole Local Area Plan

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹, in association with O'Donoghue & Associates Architects², have been retained by David and Ida Kelly³ to prepare this Submission to Wicklow County Council in respect of the Pre-Draft Consultation Stage for the *Greystones-Delgany and Kilcoole Local Area Plan*.

1.1 Purpose of this Submission

The purpose of this Submission is to reflect upon the provisions of the *Greystones-Delgany and Kilcoole Local Area Plan 2013–2019*, to consider the content of the *Wicklow County Development Plan 2022–2028* and to review activity in the settlement area in order to extract beneficial insights. This is in order to provide an informed series of recommendations in relation to the forthcoming *Draft Greystones-Delgany and Kilcoole Local Area Plan*.

Specifically, this Submission seeks to provide a robust justification to support the appropriate zoning of land in the settlement, and in particular to retain and partially extend the residential zoning of lands at Kindlestown.

1.2 Location of Lands Subject to this Submission

The subject lands are comprised of 3 No. separate plots, generally located to the north and north-west of Seagreen Park and south-east of Kindlestown Hill. For simplicity of explanation, the individual parcels are identified in this Submission as A, B and C. Respectively, their approximate

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² 46 Lower Leeson Street, Dublin 2

³ Holme Hill, Chapel Road, Blacklion, Greystones, Co. Wicklow

areas are 3.74Ha, 3.05 Ha and 1.18 Ha; giving a combined area of 7.97 Ha. A total of approximately 6.79 Ha of the overall landholding is currently zoned for residential development.

Please refer to Section 3.0 below for further details of the site's location and extent.

1.3 Structure of this Submission

The Report continues with the following structure:

Section 1.0 – Introduction

Section 2.0 – Executive Summary

Section 3.0 – Site Location

Section 4.0 – Core Strategy and Population Growth in Wicklow

Section 5.0 – Audit of Land in the Settlement the Need to Retain Residential Zonings

Section 6.0 – Coherent and Integrated Infill Development

Section 7.0 – A Feasible and Viable Residential Proposal for the Subject Site

Section 8.0 – Conclusion

2.0 EXECUTIVE SUMMARY

Purpose of this Submission

- To provide a robust justification to support the appropriate zoning of land in the settlement, and in particular to retain and partially extend the residential zoning of lands at Kindlestown. The existing zoned portion accounts for 6.79 Ha or 85% of the site area.

Site Location

- The site is comprised of 3 No. plots with a total area of approximately 7.97 Ha.
- It is bound by existing development on 2 No. sides and a potential third side (subject to Planning Permission), making it an infill site contiguous to the Built-Up Area with a genuine opportunity to integrate with existing development.
- The site is within short walking and cycling distance of a host of important day-to-day services and amenities, making it a sustainable location and one that will promote active mode of transport. These include:
 - Convenience retail;
 - Childcare;
 - Healthcare;
 - Schools; and
 - Personal services.

Core Strategy and Population Growth: Revisions Required and a Progressive Approach Needed

- The Core Strategy of the *Wicklow County Development Plan 2022–2028* has allocated very limited housing growth figures of only 508 No. units and 140 No. units respectively in Greystones-Delgany and Kilcoole between Q3 2022 and Q2 2028. This conflicts with the overarching need to deliver housing in existing settlement of scale where services and infrastructure are available.
- The housing growth is founded on population targets for Greystones-Delgany and Kilcoole of 21,727 and 4,778 respectively by Q2 2028. However, County Wicklow's population growth has outstripped national change in recent years, with Greystones-Delgany's population already reaching 22,009 in Q3 2022.
- Changes to national and local population growth and its patterns are currently being considered as vital elements of updates to the *National Planning Framework*, with the ESRI tasked with revising their methodology for population projections and housing growth allocations in Core Strategies
- Recent underestimations of housing requirements for 33,000 No. units per by *Housing for All* will necessitate a more robust and progressive methodology, especially noting the reality of our housing needs being calculated as up to 74,000 No. units per annum for the coming years to meet pent-up and emerging demand.

- Regardless of the ESRI's proposed methodology, we implore the Council to take an authoritative and progressive stance on its housing requirements and distribution across the County and to seek to allocate adequate housing units and by extension, zoned land, to the Greystones-Delgany settlement in order to meet continued growth.
- We acknowledge that revisions to the Core Strategy will likely require a variation to the Development, thereby potentially slowing down the adoption of the new LAP. However, we submit that such an approach is required and should be expediated to adequately cater for housing delivery in the short- and medium-term periods.

Audit of Land: Limited Available Residential Land Remains Available

- Our audit of land zoned by the current LAP for 'new residential' uses identified 20 No. sites with the benefit of Planning Permission or a decision on an Application pending. These sites accounted for an estimated 2,669 No. units, with Grants of Planning Permission dating as far back as 2015, indicating their longstanding position.
- Development has been commenced, and in many instances has been completed, on 15 No. of the sites, accounting for up to 1,818 No. units. Therefore, this is clear intent to deliver housing in the settlement, with many Developers actively seeking to realise their Grants of Planning Permission. Of the remaining 5 No. sites, 2 No. are pending Planning Application decisions and 3 No. received Grants in just the last 12 months, so are likely to be proceeding through detail design and tendering stages before commencing.
- 14 No. sites (70%), accounting for 1,050 No. units (39%) were within the existing Built-Up Area, exceeding the *National Planning Framework's* National Policy Objective 3c to deliver 30% of units within existing settlements. This is not to factor-in units proposed and delivered on 'existing residential' sites, which would increase the number within the Built-Up Area. Therefore, there is ample scope to accommodate additional units outside the BUA whilst complying with national policy.
- Of the remaining 11 No. sites with 'new residential' zonings (including the subject site), we concluded that there are only 3 No. key sites (including the subject site) with potential for large-scale residential development. The 8 No. sites retain some potential, but this is generally limited by factors such as Tree Preservation Orders and protection objectives, ACAs, flood risk, site topography, ecology and road infrastructure.
- Therefore, we contend that given the need to broaden the housing growth and zoned land for the settlement, there is significant merit in retaining zoning at the subject site due to its sustainable location, accessibility and availability or services.

Opportunity for Coherent and Integrated Infill Development

- The benefit of zoning and developing the site will be a logical and sequential pattern of urban development that counters the emergence of disconnected, finger-like expansion of the town, and by consequence, the inappropriate leapfrogging of appropriate sites.
- It will fill a void of development that exists between the existing Built-Up Area (BUA) or Built Envelope of the town, as shown by the gap between the grey areas shown in Figure 3.1. As the purple arrows illustrate, developing the site will consolidate the

western/northern sides of the Seagreen residential development in an orderly and integrated manner.

- Additionally, the pending Planning Application decision (ABP Ref. 313229) on the site to the north further enhances the need to, and merit in, zoning and developing the subject site. The orange arrows show the coalescence of the built area that can be achieved and the interconnectedness between new and future developments.

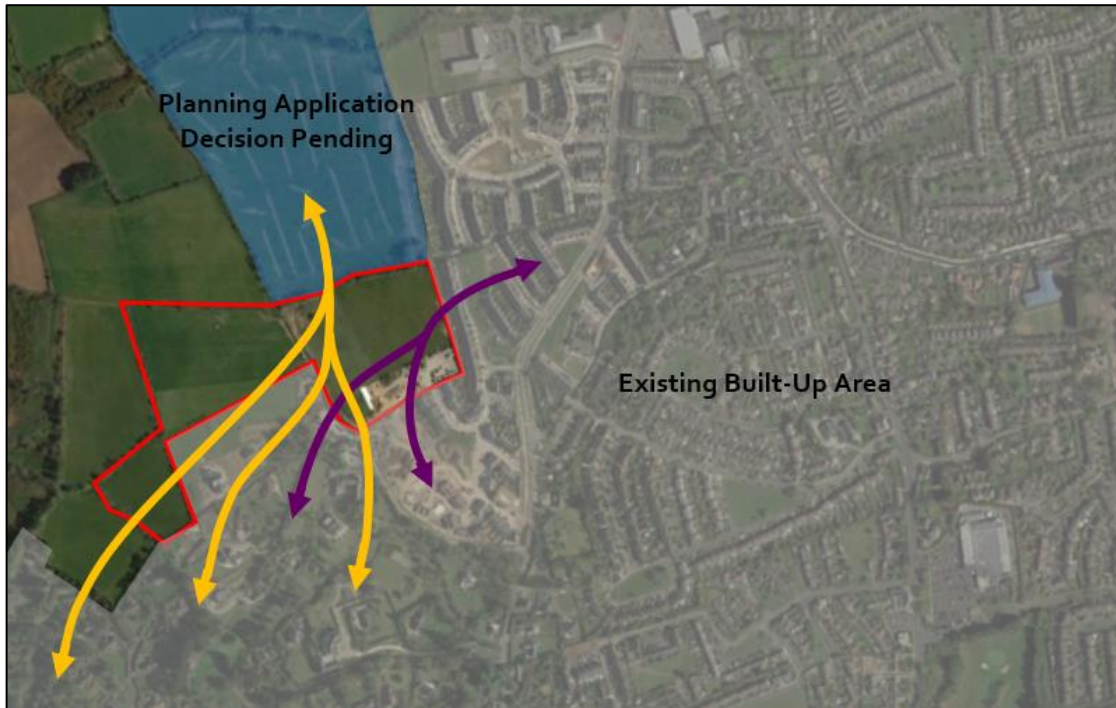


Figure 2.1: Infill development potential at the subject site with the benefit of coherently, orderly and sustainably infilling and integrating with the existing BUA and future development

Source: Google Earth (image April 2021), annotated by Thornton O'Connor Town Planning (2024)

A Genuine, Feasible and Viable Residential Proposal for the Subject Site

- Our Client has a genuine interest in delivering housing at the subject lands and recently intended to commission a Design Team to design a housing scheme at the subject site and to proceed through the planning process.
- They recently delayed appointing a Design Team and progress through planning for the site following the Council's refusal of 99 No. units proposed under Reg. Ref. 23342 due to its exceedance of the County Development Plan's Core Strategy.
- On the basis of the strong justification provided herein to support the zoning of the subject lands, our Client has appointed O'Donoghue + Associates Architects (ODAA) to prepare a high-level masterplan to demonstrate the feasibility of delivering housing at the site and to provide the Council with evidence of their intent to bring them forward for same.

- The layout (Figure 2.2) takes a holistic approach to the design, and considers and incorporates the following:
 - The topography of the lands, most notably Plot B, proposing split-level housing units with modulated forms to minimise site level interventions and to mitigate visual impacts;
 - Siting of units at the lower parts of the plots that comprise the lands to maximise natural screening provided by existing hedgerows;
 - Varied densities that respect site attributes and sensitivities;
 - Multiple 'character areas' to encourage urban legibility and architectural variety;
 - Green infrastructure links, bolstering those that are already present; and
 - Integration and connectivity with existing development to the south (Seagreen Park) and prospective development to the north (ABP Ref. 313229).

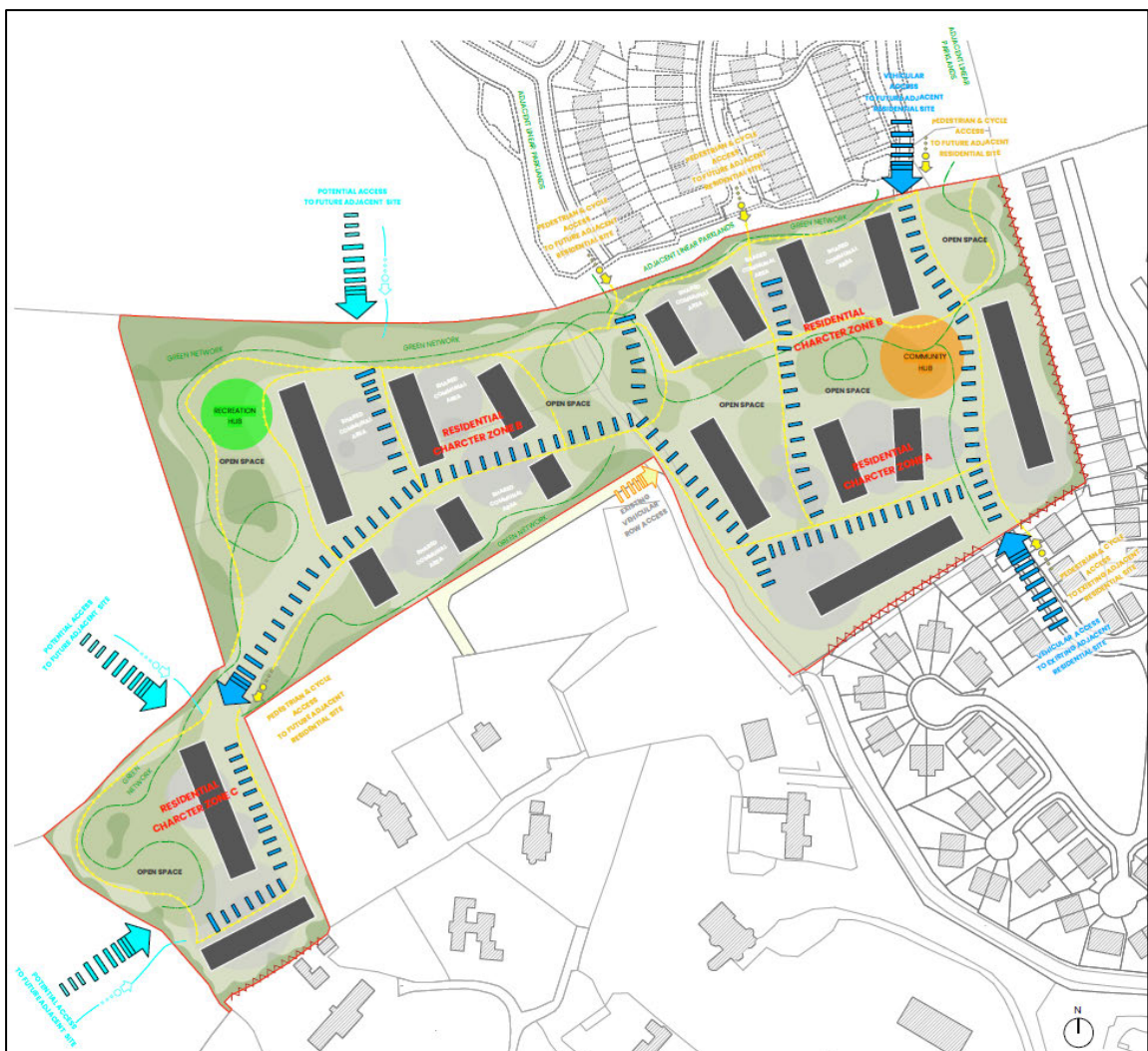


Figure 2.2: Proposed residential layout for the subject lands

Source: ODA (2024)

3.0 SITE LOCATION

3.1 Site Location and Extent

The subject site is comprised of 3 No. adjoining/abutting plots. As mentioned above, they are individually identified as A, B and C (Figure 3.1). Respectively, their approximate areas are 3.74Ha, 3.05 Ha and 1.18 Ha; giving a combined area of 7.97 Ha. Their boundaries are generally defined by existing hedgerows, trees and scrub along the eastern, northern and western sides. The southern side is a mix of different boundary types given its abuttal with various one-off residential dwellings. Existing hedgerows of mixed-quality separate the individual plots.



Figure 3.1: Location of the subject site

Source: Google Earth (image from April 2021), annotated by Thornton O'Connor Town Planning (2024)

To provide further detail to the site location and context, a series of drone images were captured in recent weeks and are provided in Figure 3.2 below. They demonstrate the interconnected nature of the site's plots and their potential to integrate with existing built development to the east and south in particular. The defining features of the hedgerow boundaries are also evident.



Figure 3.2: Drone imagery of the subject lands and its 3 No. plots, generally looking in southerly and westerly directions

Source: O'Donoghue + Associates Architects (2024)

The site is contiguous to the existing Built-Up Area (BUA) or Built Envelope. Therefore, it is an appropriate location at which to facilitate further residential development. Additionally, as will be expanded upon below, it is an 'infill' site given its abuttal by existing development on 2 No. sides and potentially 3 No. sides if the ABP Ref. 313229 Planning Application is Granted.

The potential of Sites A and B to deliver residential homes in a sustainable location has previously been recognised and acknowledged by the Council by virtue of the fact that both sites are currently zoned for residential development in their totality. Site C is not yet zoned but has the potential to also be assimilated into the urban envelope and deliver plan led sustainable growth.

3.2 Surrounding Context and Service Provision

The site is well-served by many of the basic services, facilities and amenities needed to support a new population and an expanding community. These assets are vital to meet the day-to-day requirements of people in all stage of life and the lifecycle: individuals, couples, younger and older families, and empty nesters.

As evidence of this, we have mapped some (but not strictly all) of these; including schools, childcare facilities, healthcare providers⁴, convenience retail outlets and personal services⁵ within the environs of the site (Figure 3.3). As shown, a host of these are within 10–20 minutes' walk or 2–5 minutes' cycle of the site entrance at its interface with Seagreen Park. Given national, regional and local policy efforts to use more active modes of transport in replace of the car, the location is within an accessible, reasonable and sustainable distance of these important assets.



Figure 3.3: Key services, facilities and amenities

Source: Google Earth (image from April 2021) and Google Maps (2024), annotated by Thornton O'Connor Town Planning (2024)

⁴ Examples: medical, dental and pharmacy.

⁵ Examples: hairdresser/barber, dry cleaners, beauty, etc.

4.0 CORE STRATEGY AND POPULATION GROWTH IN WICKLOW

4.1 Settlement Hierarchy and Core Strategy of the *Wicklow County Development Plan 2022–2028*

The following Sub-Sections introduce the subject site in the context of County Wicklow’s Settlement Hierarchy and Core Strategy, with the purpose being to emphasise the merit in (and need to) protecting existing zonings and to appropriately zone additional land in the LAP settlement.

4.1.1 Settlement Hierarchy

Despite the Local Area Plan combining them, the *Wicklow County Development Plan 2022–2028* separates Greystones-Delgany and Kilcoole into different settlements for the purpose of its Core Strategy. Greystones-Delgany is identified as (Level 3) ‘Self-Sustaining (Growth) Town’ in the Plan’s Settlement Hierarchy, which...

*“...are towns that contain a reasonable level of jobs and services which adequately cater for the people of its service catchment. These may include sub-county market towns and commuter towns with **good transport links**, which have **capacity for continued commensurate growth to become more self-sustaining**. These towns are regionally important local drivers providing a range of functions for their resident population and their surrounding catchments including housing, local employment, services, retail and leisure opportunities.*

*The RSES recognises that towns in the Metropolitan Area and Core Region tend to have experienced strong commuter focused growth but some of these towns offer potential for increased residential densities at high quality public transport hubs and **can accommodate average or above average growth to provide for natural increase**, service and/or employment growth, where appropriate.” [emphasis added]*

Kilcoole is identified by the Development Plan as a (Level 4) ‘Self-Sustaining Town’, which...

“...require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. There is a strong emphasis on aligning population growth with employment growth to make these towns more self-sustaining and capable of accommodating additional growth in the future.”

Both settlements have grown in recent years and have the potential for further carefully considered expansion, in line with a broadening of social infrastructure and employment/economic opportunities. **Further residential development is especially strongly justified and logical for Greystones-Delgany given its rail service, and due to its existing scale and ability to create a critical mass** necessary to support new and existing businesses and to sustain the provision and expansion of local services.

4.1.2 Core Strategy

The Core Strategy, the detail of which is extracted in Table 4.1 below, has calculated population growth, housing targets and zoning requirements based on 2016 Census data using the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020) (Guidelines that are discussed in further detail below).

It indicates that for the period 2021–2031, a housing target of some 1,078 No. units and 190 No. units are respectively required for Greystones-Delgany and Kilcoole. Although the Council’s assessment includes the 2016–2020 period, the 2017–2022 completion and 2021–Q2 2022 estimated completions during these years were excluded.

Noting the Development Plan’s life, 2022–2028, further nuance is provided in its Housing Strategy in an untitled table on an numbered page in Section 2.2. It notes “*Housing Growth*” between Q3 2022 and Q2 2028 of only 508 No. units and 140 No. units respectively in Greystones-Delgany and Kilcoole. **This growth is founded on population targets for Greystones-Delgany and Kilcoole of 21,727 and 4,778 respectively by Q2 2028.**

We contend that this growth is incredibly limiting (as overall numbers), unrealistic (in terms of the LAP settlement’s potential and market demand to live there) and unsustainable (given the LAP settlement’s location, existing infrastructure, services and amenities). In fact, we note that the single Planning Application of ABP Ref. 313229 alone (586 No. units) would exceed the Q3 2022 and Q2 2028 “*Housing Growth*” figure for Greystones-Delgany specifically. Yet this Planning Application was lodged in April 2022 and still awaits a decision; which in and of itself illustrates the difficulties associated with single and very large residential proposals.

Settlement	Population and Housing				Zoning							
	A	B	C	D	E	F	G	H	I	J	K	L
	Census 2016 Population	Census 2016 (%)	Housing Target 2016-2031 (Less 2017-2020 Completions)	Housing Target (% of 2031 County Target)	Development Capacity of Existing Zoned Lands	Development Capacity of Existing Zoned and Within Built-up Area	Development Capacity of Existing Zoned Lands Outside Built-up Area	Development Capacity of Existing Zoned Lands Within Built-up Area as % of Total Development Capacity	Units Required to be Provided Outside of Built-up Area (Units)	Surplus Capacity of Existing Zoned Lands Outside Built-Up Area (Units)	Surplus Lands Outside of Existing Built-up Area	Method of Addressing Shortfall / Surplus
County Wicklow	142,425	100%	11,719	100%	-	-	-	-	-	-	-	-
Greystones-Delgany	18,021	13%	1,078	9%	2,900	1,700	1,200	59%	0	1,200	30	7.5 Ha already under construction; remaining surplus will be addressed in next LAP.
Kilcoole	4,244	3%	190	2%	600	460	140	77%	0	140	5	Surplus will be addressed in next LAP.
LAP Total	22,265	0.16	1,268	0.11	3,500	2,160	1,340	-	0	1,340	35	-

Table 4.1: Core Strategy Table A (LAP Towns) illustrating housing targets and land requirements up to 2031 in the Development Plan's Core Strategy

Source: Core Strategy Table A (LAP Towns) in the *Wicklow County Development Plan 2022–2028*

4.2 Strong Population Growth in the Settlement and County

The State’s population grew by 8.1% to 5.15 million between 2016 and 2022. Whilst this was approximately ‘in line’ with the *National Planning Framework’s* projection of 5.1 million, **we note that the growth of County Wicklow was greater than this, at 9.4%. Greystones-Delgany’s growth was markedly greater again, increasing by 3,869 people or 21.3% between the same years.** Even with Kilcoole’s more muted growth of 7.8%, the combined LAP settlement’s population still grew by 18.8%. These figures are elaborated upon in Table 4.2.

Measure	Greystones-Delgany	Kilcoole	Combined LAP Settlement	Wicklow	State
2016	18,140	4,239	22,379	142,425	4,761,865
2022	22,009	4,569	26,578	155,851	5,149,139
Change (No.)	3,869	330	4,199	13,426	387,274
Change (%)	21.3%	7.8%	18.8%	9.4%	8.1%

Table 4.2: Population change between 2016 and 2022

Source: CSO (2023)

These findings are the result of inward-migration accommodated by new residential development (discussed in Section 5.0 below), but also natural increases as births outstrip deaths. It is evidence of the settlement’s infrastructure, and local service provision that make it an attractive and sustainable location in which to live.

The consequence of this strong local growth (**which sees the Development Plan’s Q2 2028 population target for Greystones-Delgany having already been passed**) is that there is a reduction in available zoned lands and by an extension, a need to zone more. However, this reality is contrary to the Core Strategy’s assertion that “*remaining surplus will be addressed in next LAP*”, which implies ‘dezonings’ or the application of phasing restrictions which will act as impediments to appropriate growth.

4.3 Need for Revisions to Core Strategy Methodologies

The patterns of population growth have been acknowledged by the Department of Housing, Local Government and Heritage, who stated in June 2023 that:

“In acknowledgment of the changing profile of Ireland’s population structure, the department has engaged the Economic and Social Research Institute (ESRI) to update their previous independent and peer-reviewed research on Structural Housing Demand research which was published in December 2020 and forms the basis for the calculation of housing supply targets at local authority level. The work of the ESRI is dependent on the release of Census 2022 data by the CSO. The data provides the evidence base to inform any revision to the National Planning Framework and subsequently any update to housing supply targets as set out in Housing for All.”⁶ [emphasis added]

This update forms part of a wider review and revision of the *National Planning Framework*, with Minister Housing, Local Government and Heritage, Darragh O’Brien, adding that:

⁶ Press Release: Minister O’Brien outlines revision process for National Planning Framework. Published 20th June 2023.

"The review will be evidence based, with demographic modelling undertaken by the ESRI to inform our housing targets and zoning requirements..."

As we know there are uncommenced planning permissions for approximately 80,000 homes nationwide and enough land zoned for approximately 300,000 homes." [emphasis added]

Evidently, revisions to the methodology required to model population growth and the resulting requirement for zoned land are expected imminently as we note that a draft revised *National Planning Framework* was due for publication and consultation during the period November 2023 and January 2024, with amendments during February 2024 and final adoption of the plan expected in March 2024.

We are optimistic that the ESRI's new methodology⁷ will support a more progressive approach to population projections and land-use zoning designations given the significant failure of housing supply to keep up with population growth in recent years. This is in light of the Minister acknowledging that there is "enough land zoned for approximately 300,000 homes" and low targets of just 33,000 No. units per years (see by *Housing for All*), but with estimates from multiple parties indicating that the annual housing requirement for the state for the coming years is up to 50,000 No. units⁸ or even up to 62,000 No. units⁹ per annum. **However, Dr Ronan Lyons has been recorded as stating that up to 74,000 No. units¹⁰ per annum are, in fact, required.** These figures are from informed parties and are all markedly greater than the now dated and inaccurate housing target of *Housing for All*.

Regardless of the forthcoming revisions to the ESRI's methodology, we implore the Council to take a progressive approach with respect to the population projections, settlement allocations and land-use zoning designations of the County. We acknowledge that revisions to the Core Strategy will likely require a variation to the Development, thereby potentially slowing down the adoption of the new LAP. However, we submit that such an approach is required and should be expediated to adequately cater for housing delivery in the short- and medium-term periods.

4.4 Justification for Additional Population and Household Allocations

As has been demonstrated above, we assert that the Development Plan Core Strategy's population and housing targets for the 2022–2028 period (and even extending this to include the 2022–2031 period) are not a realistic reflection of the County's (nor the settlement's) recent population growth, its requirements and both its potential and capacity.

Forthcoming changes to the housing target methodology are optimistically hoped to be more progressive in identifying population change and accommodating housing supply. In this light,

⁷ Which we understand will replace the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020).

⁸ Minister Simon Coveney in April 2023: <https://www.independent.ie/news/up-to-50000-homes-a-year-needed-to-meet-demand-minister-admits/42439785.html#:~:text=News-,Up%20to%2050%2C000%20homes%20a%20year%20needed%20to%20meet%20demand,%20000%20social%20homes%20in%202022.&text=Ireland%20needs%20up%20to%2050%2C000,than%20it%20did%20last%20year>.

⁹ Housing Commission unpublished report sent to Minister O'Brien in November 2022: <https://www.irishtimes.com/ireland/housing-planning/2023/01/26/ireland-needs-almost-double-amount-of-new-builds-in-housing-targets-research-finds/>

¹⁰ Dr Ronan Lyons in October 2023: <https://businessplus.ie/news/houses-building/>

we respectfully request that the Council takes an approach which aims to maximise housing delivery.

As an extension of this, we are firmly of the opinion that retaining the residential zoning that applies to the majority of the subject lands and extending that zoning to incorporate Plot C will accord with the principles of proper planning and sustainable development and the need to continue accommodating housing delivery and at a well-located infill site.

5.0 AUDIT OF LAND IN THE SETTLEMENT AND THE NEED TO RETAIN RESIDENTIAL ZONINGS

To understand the quantum of development undertaken in recent years and to determine how little residential land remains available, we have undertaken an audit of lands zoned by the current LAP as being for 'new residential' uses. This is part of the justification to support the appropriate (1) retention of existing and (2) expansion of new, residential zonings at the subject site.

This audit, which ultimately seeks to understand the availability of land remaining for residential development, is undertaken in the context of:

- Evidential shortcomings in the Development Plan's Core Strategy, which are discussed above and aided by this exercise; and
- The Development Plan's implied intention that residential **dezonings** may take place or onerous phasing limitations may be applied as part of the forthcoming LAP's preparation, despite a continued need for additional land¹¹.

For clarity, the current LAP's 'new residential' zonings fall under a series of different designations that also prescribe relevant densities (units per hectare – uph) to be applied to specific sites¹². They are listed as follows:

- **R22:** Residential – 22/ha
- **R17:** Residential – 17/ha
- **R15:** Residential – 15/ha
- **R10:** Residential – 10/ha
- **R5:** Residential – 5/ha
- **R2.5:** Residential – 2.5/ha
- **SpecialR:** Special Residential

5.1 Audit Methodology

The audit methodology involved the following steps:

- Review and identification of 'new residential' zoned lands that were indicated as undeveloped on the LAP's zoning map.
- A check of the sites' relevant planning histories using the National Planning Application Database¹³ (NPAD) and Wicklow County Council's online planning register¹⁴.
 - Planning Applications for small developments (generally less than 5 No. units were not included, as they mostly related to one-off housing units) were excluded.
- Sites with the benefit of Planning Permission or a decision on a Planning Application:
 - Were categorised in terms of their position within the existing Built-Up Area (BUA) or 'Built Envelope'.
 - Were further assessed to determine if development had commenced.

¹¹ In relation to zoning in Greystone-Delgany, 'Table A' of the Development Plan's 'Core Strategy Tables', states that "*remaining surpluses will be addressed in next LAP*".

¹² The zoning designation RE: Existing Residential, which can facilitate new development, has not been included in this audit.

¹³ <https://www.myplan.ie/national-planning-application-map-viewer/>

¹⁴ <https://www.wicklow.ie/Living/Services/Planning/Planning-Applications/Online-Planning>

- Sites with benefit of Planning Permission or a decision on a Planning Application were then excluded from the audit on the basis that they could be reasonably assumed as having delivered housing or as being capable of or expected to deliver housing.
- The remaining 'new residential' zoned sites were then identified as assessed in terms of their residential development potential, which considered a range of different factors including (as examples): planning, ecology, archaeology and individual site attributes.

5.2 Determining the Status of Sites Zoned New Residential

A total of 20 No. sites zoned with 'new residential' designations were identified in the audit. They are listed in Table 4.3 and mapped on Figure 5.1 below as Sites A–T.

Of the 20 No. sites, 18 No. had the benefit of Planning Permission, with 1 No. having been refused by Wicklow County Council but subject to an appeal to An Bord Pleanála and 1 No. a Strategic Housing Development (SHD) pending a decision by An Bord Pleanála. The Applications accounted for an estimated 2,669 No. units. Whilst this exceeds the Core Strategy's envisaged "housing growth" for the settlement, it should be noted that **many of the sites commenced and even completed development before the Development Plan review began**, and certainly before it came into force.

Development has been commenced, **and in many instances has been completed**, on 15 No. of the sites, accounting for up to 1,818 No. units. **Therefore, this is clear intent to deliver housing in the settlement, with many Developers actively seeking to realise their Grants of Planning Permission.** Setting aside the 2 No. sites where a decision on Planning Permission is pending, the 3 No. sites that have yet to commence development (accounting for 166 No. units) received Final Grants within the last 12 months, so are reasonably likely to be proceeding through the compliance and tendering stages prior to commencement of development.

Site	Reg. Ref. (Primary)	Units (No.)	Final Grant / Planning Status	Development Commenced On-Site	Location Relative to the BUA
A	141031, 161066, 17245, 191089	215	Various. Earliest: 23/01/2015	Yes	Contiguous
B	22168 / 305773 (ABP)	354	19/02/2020	Yes	Contiguous
C	171267	24	15/02/2018	Yes	Contiguous
D	161412	192	06/10/2017	Yes	Within
E	16792	50	15/12/2016	Yes	Within
F	20647	41	25/01/2021	Yes	Within
G	141073	50	16/01/2015	Yes	Within
H	305476/311676 (ABP)	426	15/01/2020	Yes	Contiguous (Infill)
I	151307	89	09/10/2017	Yes	Within
J	21960	56	11/12/2023	No	Within
K	21959	99	20/12/2023	No	Within
L	141505	43	15/04/2015	Yes	Within
M	161301, 20488, 22407	128	Various. Earliest: 10/01/2018	Yes	Within
N	18678	74	20/03/2019	Yes	Within
O	21553	19	23/02/2022	Yes	Within

Site	Reg. Ref. (Primary)	Units (No.)	Final Grant / Planning Status	Development Commenced On-Site	Location Relative to the BUA
P	22765	11	20/04/2023	No	Within
Q	20624	99	07/05/2021	Yes	Within
R ¹⁵	313229 (ABP)	586	Decision pending	N/A	Contiguous
S	22429	99	Appeal decision pending	N/A	Within
T	15260	14	06/07/2016	Yes	Contiguous (Infill)

Table 4.3: Position of sites and units relative to the existing Built-Up Area

Source: Collated by Thornton O'Connor Town Planning (2024) using the National Planning Application Database (NPAD), Wicklow County Council's online planning register, Google Earth and the National Building Control and Market Surveillance Office's Building Control Management System

¹⁵ 2 No. separate Planning Applications pertain to Site R. The first to be submitted applies to the whole of the site and is a Strategic Housing Development (SHD) of 589 No. unit. A decision by An Bord Pleanála is pending. The second to be submitted (Reg. Ref. (23342) applies to a northern portion of the site (overlapping the proposed SHD extent) and accounts for 98 No. units. It was refused by the Council and is now on Appeal to An Bord Pleanála. For the purposes of this audit, we have opted to only use the former Application given it is a larger scheme and assuming the Applicant would proceed with it rather than the smaller development.

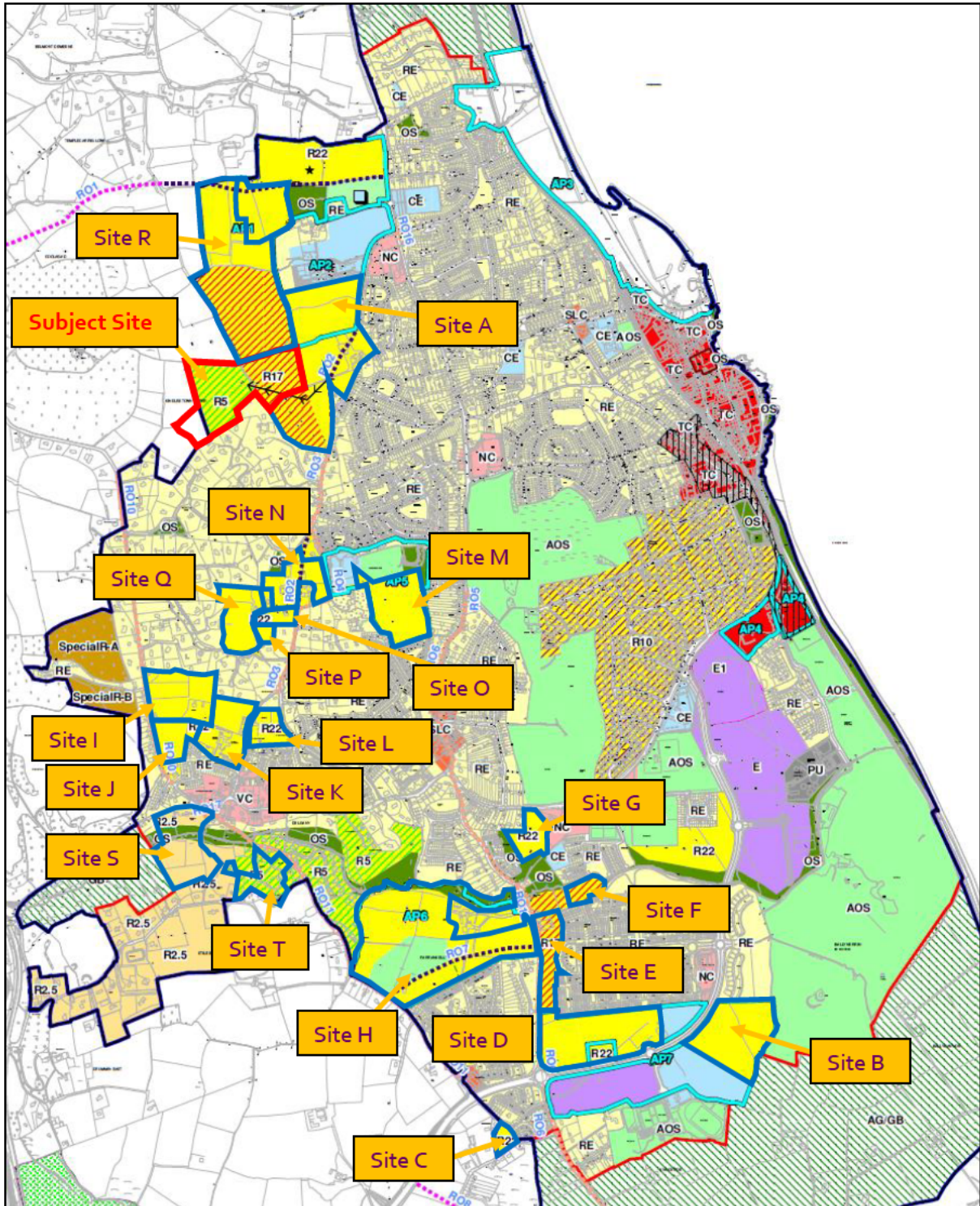


Table 5.1: Position of sites and units outlined in blue relative to the existing Built-Up Area

Source: Collated by Thornton O'Connor Town Planning (2024) using the National Planning Application Database (NPAD), Wicklow County Council's online planning register, *Greystones-Delgany and Kilcoole Local Area Plan 2013–2019* Google Earth and the National Building Control and Market Surveillance Office's Building Control Management System

The audit also took into consideration the location and context of the sites relative to existing development. It revealed that the vast majority of proposals – 14 No. sites (70%) – have come forward within the existing BUA or Built Envelope, accounting for 1,050 No. units (39%).

Therefore, the delivery of housing in the settlement is ahead of the *National Planning Framework's* (2017) National Policy Objective (NPO) 3c¹⁶ which is to build at least 30% of homes within the existing BUA of towns such as Greystones-Delgany.

This is considered to be particularly important and relevant both in relation to the limited remaining developable land (discussed in greater detail below) and in the context of facilitating much-needed additional housing delivery outside the existing BUA whilst still complying with the *National Planning Framework's* important NPO.

Of the remaining units, 440 No. were identified on sites that we deemed to be 'contiguous (infill)' such that they adjoined/abutted the BUA and acted as infill development between 2 No. or more areas of existing development. A further 1,179 No. units were deemed to be on sites that were contiguous to the existing BUA. From our review of the settlement's Planning Applications, we did not identify any large residential proposals on zoned site's that were at a remove (i.e. separate) from the existing BUA.

Site Position Relative to BUA	Sites		Units	
	Number	Percentage	Number	Percentage
Within	14	70%	1,050	39%
Contiguous (Infill)	2	10%	1,179	44%
Contiguous	4	20%	440	16%
Total	20	1%	2,669	100%

Table 4.4: Position of sites and units relative to the existing Built-Up Area

Source: Thornton O'Connor Town Planning (2024)

5.3 Assessing the Residential Development Potential of Remaining Land

Informed by the foregoing, and assuming that the 2 No. pending Planning Applications are Granted Permission, this would leave just the subject site and the 10 No. sites/landholdings identified on Figure 5.2 below available for *possible* development. **Per Table 4.5, we have individually assessed each of these sites to determine their ultimate residential development potential; however, the findings reveal potential to be limited in most cases.**

¹⁶ NPO 3c: "Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints."

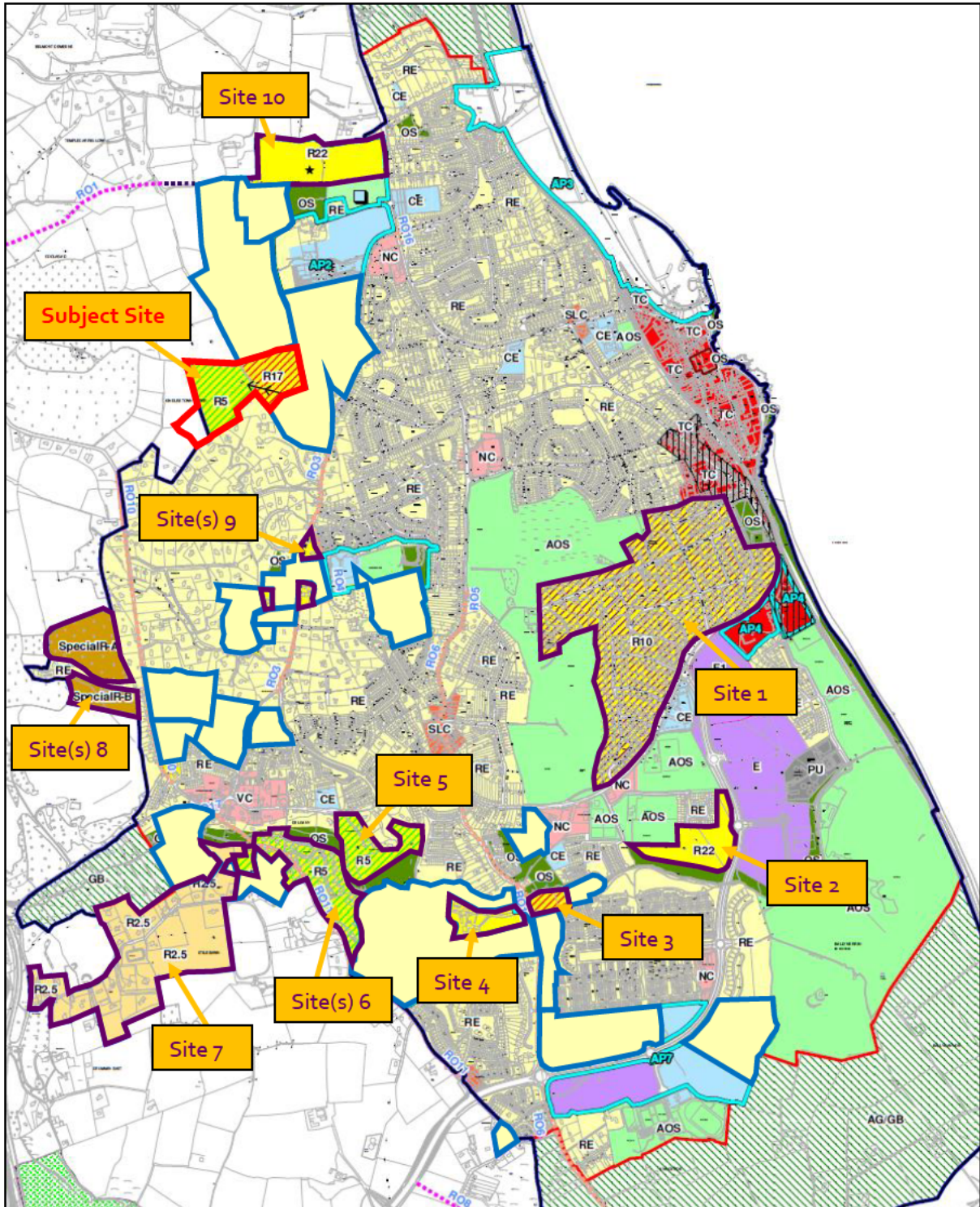


Figure 5.2: Remaining 'new residential' sites in the Greystones-Delgany settlement indicatively outlined in purple

Source: Collated by Thornton O'Connor Town Planning (2024), with the *Greystones-Delgany and Kilcoole Local Area Plan 2013–2019* as the basemap

Site	Key Considerations and Development Potential
Subject Site	<p>No impediment to development. Contiguous (infill) site categorisation given it abuts existing BUA on more than 1 No. side. Proximate to a host of local services, facilities and amenities makes it a sustainable and well connected location at which to accommodate additional housing (Section 3.o).</p> <p>Significant potential exists at the site for much-needed housing delivery that will integrate with existing and proposed residential development, as facilitated by the access point from Seagreen Park to the south-east and the indicative access from ABP Ref. 313229 to the north. Topography of Plot B will require careful design and site layout to minimise level changes and to mitigate visual impact, but early investigations demonstrate that this can be achieved (see Section 7.o).</p> <p><u>Consequently, there is a strong basis upon which to retain the existing zoning designation at plots A and B, and to expand their zoning in an orderly manner to include plot C.</u></p>
1	<p>Whilst given a 'new residential' zoning designation by the current LAP, in our opinion this is an area with limited development potential of scale, other than for <i>ad hoc</i>, occasional delivery of small schemes. The well-established nature of this residential is unlikely to lead to significant delivery of housing and increased densities. This opinion is further bolstered by:</p> <ul style="list-style-type: none"> • The Burnaby ACA designation that applies to most of the area; • The presence of multiple Protected Structures; • The presence of multiple tree of value, as evidence by a Tree Protection Order and numerous Tree Protection Objectives in the current LAP; and • Multiple, small-scale landowners.
2	<p>A Part 8 Planning Application for development at this site was submitted in 2019, but subsequently withdrawn due to an error in the newspaper notice (according to the withdrawal letter). However, revised proposal appears to have come forward since.</p> <p>It is contiguous to the existing BUA. It is of a size and shape that would easily accommodate a relatively large residential development. Despite the withdrawal of the Planning Application, it retains good development potential. However, flood risk mapping provided by the current LAP suggests that parts of its southern and western extents may be within Flood Zones A and B. Furthermore, a review of street view and satellite imagery suggest that the site may contain a suite of ecological sensitivities that need to be careful managed. Additionally, we note the that the LAP and the National Monuments Service's <i>Historic Environment Viewer</i> identify the presence of an archaeological feature on the site, which may require further investigation and may limit the site's overall potential. It is noted in the Sites and Monuments Record (SMR) as 'W1013-072----'.</p> <p>However, for the purposes of this high-level exercise, we are of the opinion that the site should be retained for residential development.</p>
3	<p>This site is located within the BUA, making it an appropriate place at which to develop housing. However, we note that it is a highly constrained site owing to its relatively small size, its mature boundary hedges, steep topography and</p>

Site	Key Considerations and Development Potential
	abuttal to the north by Flood Zone A. Therefore, whilst it retains development potential, in our opinion it is likely that it is limited in its overall scale.
4	<p>Although zoned for residential development, this site currently accommodates a series of commercial units, as well what we understand to be 1 No. house. The unlikely reality of this plot coming forward for housing is evidenced by the fact that the ABP Refs. 305476/311676 are being developed so as to envelop it entirely except from its existing Kilcoole Road entrance to the east.</p> <p>We contend that the commercial activity that these units provide is a positive contribution to the local mix of land-uses and should be retained and promoted. In our opinion, a change of zoning type to an enterprise or commercial zoning should be considered by the Council to avoid the difficulties associated with non-conforming uses.</p> <p>In addition to the above, we note that the site also immediately abuts Flood Zone A to the north, which may also create risks for sensitive residential uses at the site.</p> <p>Therefore, we contend that Site 4 has limited realistic development potential.</p>
5	Site 5 benefits from being within the existing BUA. However, in our opinion it has very limited development potential due to its restricted size, shape, topography (with a pronounced slope and height) and the prevailing pattern of low-rise, low-density development.
6	<p>Whilst the 2 No. parcels the comprise Site 6 are zoned for new residential development in the current LAP, we contend that that have very limited to no development potential, expect for carefully considered small scale designs in terms of both architecture and engineering. This is due to the prevailing development pattern in the area (low-rise, low-density) and its less central location.</p> <p>However, it is principally due to the following constraining factors:</p> <ul style="list-style-type: none"> • The presence of 2 No. Protected Structures; • The presence of 3 No. Tree Protection Objectives (assuming they are to be retained); • The presence of many mature, well-established hedgerows; and • The Flood Zone A risk associated with much of its northern and eastern sides.
7	The sites currently includes a series of low-density, dispersed dwellings on large plots. There are some larger plots of irregular shapes with moderate to limited development potential given the prevailing patterns and scale of developments, tight rural road network at Blackberry Lane and Priory Road, and presence of mature, well-established hedgerows.
8	The plots that comprise Site 8 have in our opinion very limited development potential due to their sensitive location/context; at an elevated position, ecological sensitivities and built-heritage sensitivities. In addition, we are mindful that the site context is low-density in nature and withdrawn from the settlements centres of Greystones and Delgany (on the very edge of the BUA), thereby negatively incentivising the use of private cars.
9	The relatively small plots that comprise Site 9 are all within the existing BUA and have dwellings already present, thereby limiting (1) the likelihood that

Site	Key Considerations and Development Potential
	they will come forward for development and (2) their potential to deliver significant additional dwellings. The wider landholdings that they comprised parts of have already yielded additional housing. We contend that there is very limited to no realistic development potential thereat.
10	From our high-level investigations, there are no notable constraints to the development of the site. However, it is located on the extreme northern edge outside the BUA. In fact, if development of Site R to the south does not come forward, it may result in the site being isolated and disconnected from the rest of the settlement. Its reasonably regular shape and decent frontage onto the R761 bestow it with good development potential. Mature hedgerows binding and traversing the site will need to be carefully considered and incorporated into a future design.

Table 4.5: Development potential of remaining 'new residential' sites

Source: Thornton O'Connor Town Planning (2024)

5.4 Audit Conclusions: Highlighting Key Sites for New Residential Development

Evidently, in our opinion there are only 3 No. key sites with 'new residential' zonings prescribed by the current LAP reasonably available for development of new neighbourhoods (Figure 5.3):

- The subject site;
- Site 2; and
- Site 10.

Whilst some of the sites 'removed' in Section 4.2.2 above as part of the audit, as well as many sites with mixed-use and the 'RE: Existing Residential' zonings, retain the possibility of yielding additional housing, we contend that this is likely to be *ad hoc* in nature and generally of limited scale.

Whilst we note the constraints of the Core Strategy placed upon the zoning of lands and delivery of housing, adequate additional land must remain available. This is vital to deliver housing generally, but also to provide options given most sites have already been subject to development and to avoid an overreliance on a small number of sites (with and without Planning Permission) that may not come forward for development. Beneficially – as discussed elsewhere in this submission – we are aware that revised project methodologies from the ESRI are due to be circulated soon, which will result in greater housing targets, thereby adding even further validity to our case to zone the subject site.

This is all aided by the sequential mapping shown on Figure 5.3, with the 3 No. key sites all approximately equidistant from Greystones town centre (approx. 1,750m), and within reasonable distances of Neighbourhood Centres. Consequently, they are all accessible and well served site. In addition, the sequential mapping up to 1,750m does not incorporate any new sites outside the existing settlement boundary, thereby further justifying their zoning designations.

Accordingly, we contend that these 3 No. sites should all benefit from residential land-use zoning designations, with the subject site in particular an appropriate area for same due to its lack of constraints, proximity to local amenities and contiguous infill categorisation.

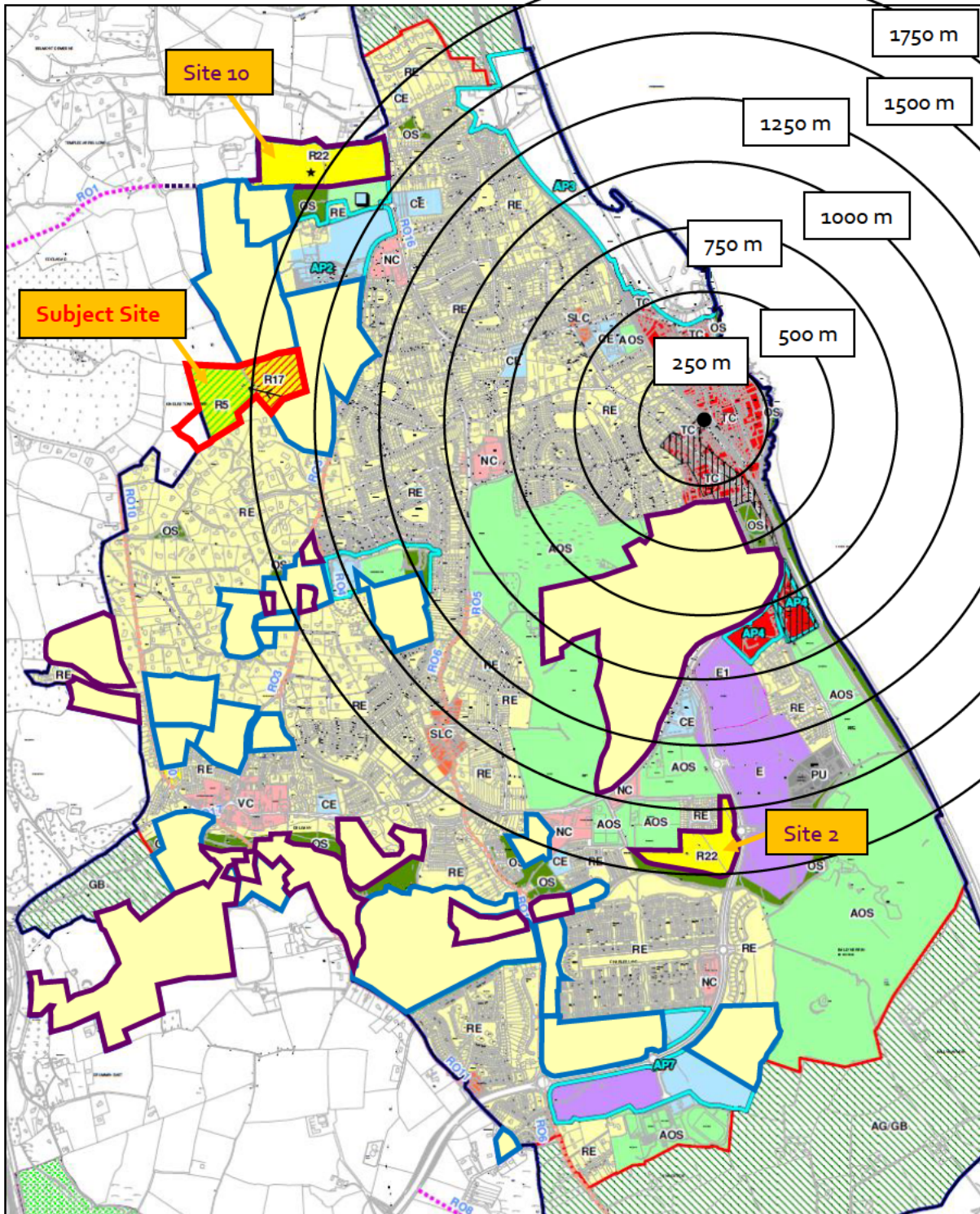


Figure 5.3: Key remaining 'new residential' sites in the Greystones-Delgany settlement identified: Subject Site, Site 2 and Site 10

Source: Collated by Thornton O'Connor Town Planning (2024), with the *Greystones-Delgany and Kilcoole Local Area Plan 2013–2019* as the basemap

6.0 COHERENT AND INTEGRATED INFILL DEVELOPMENT

The zoning and development of the subject site will facilitate and result in the coherent infilling of development in this part of the settlement. The benefit will be a logical and sequential pattern of urban development that counters the emergence of disconnected, finger-like expansion of the town, and by consequence, the inappropriate leapfrogging of appropriate sites.

Conversely, zoning and developing the site will fill a void of development that exists between the existing Built-Up Area (BUA) or Built Envelope of the town, as shown by the gap between the grey areas shown in Figure 6.1. As the purple arrows illustrate, developing the site will consolidate the western/northern sides of the Seagreen residential development in an orderly and integrated manner.

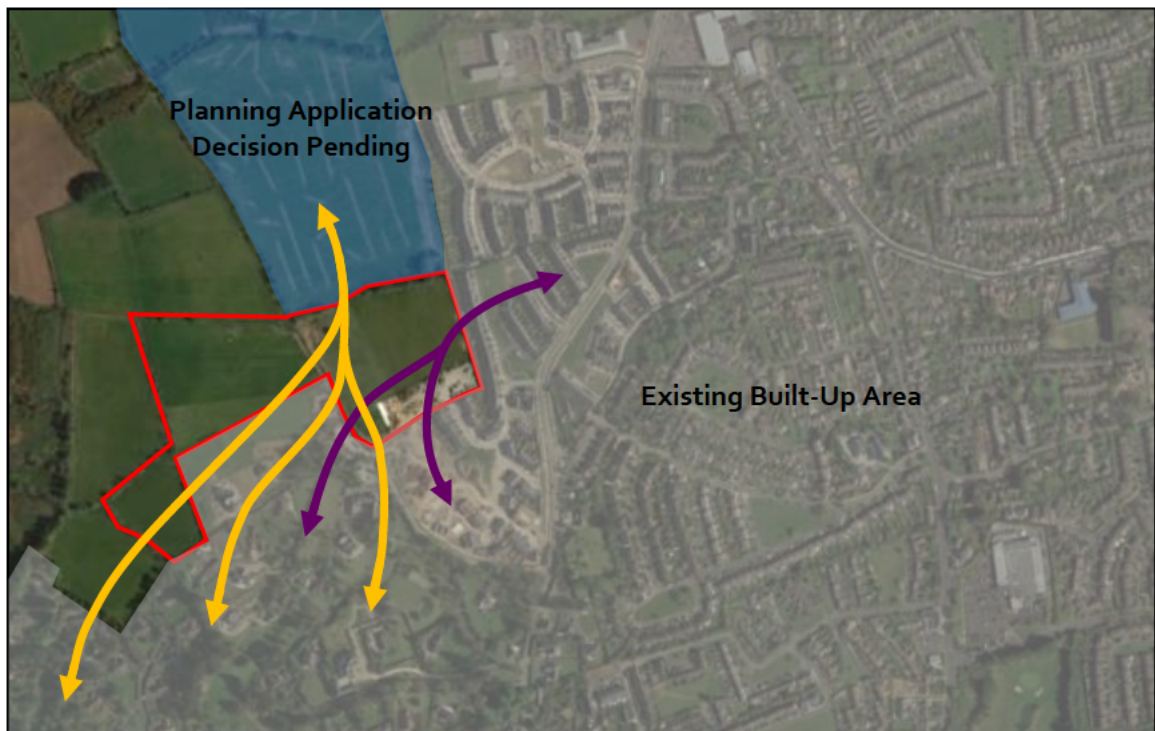


Figure 6.1: Infill development potential at the subject site with the benefit of coherently, orderly and sustainably infilling and integrating with the existing BUA and future development

Source: Google Earth (image April 2021), annotated by Thornton O'Connor Town Planning (2024)

Additionally, the pending Planning Application decision (ABP Ref. 313229) on the site to the north further enhances the need to, and merit in, zoning and developing the subject site. This is especially the case when the proposed site layout for that development indicates a road layout that can be extended to facilitate connections into/with the subject site (Figure 6.2). The orange arrows show the coalescence of the built area that can be achieved and the interconnectedness between new and future developments.

Failure to zone and develop the subject site will result in an isolated series of undeveloped fields that stymie the prospect of integrated and permeable development that delivers much-needed high-quality homes.



Figure 6.2: Site layout of the proposed residential development to the north of the subject site, with the possibility of a future connection to the latter shown (outlined in blue)

Source: *Site Layout Plan – Overall* prepared by McCrossan O’Rourke Manning Architects (2022), submitted under ABP Ref. 313229

7.0 A FEASIBLE AND VIABLE RESIDENTIAL PROPOSAL FOR THE SUBJECT SITE

Our Client has a genuine interest in delivering housing at the subject lands and recently intended to commission a Design Team to design a housing scheme at the subject site and to proceed through the planning process. However, the Council's refusal of 99 No. units proposed under Reg. Ref. 23342 due to its exceedance of the County Development Plan's Core Strategy housing figures raised concerns with respect to the prospect of securing a Grant of Planning Permission. The fundamental basis of this refusal cast doubt on the possibility of any additional housing coming forward in the settlement during the remaining life the Development, despite an acute need remaining.

However, on the basis of the strong justification provided herein to support the zoning of the subject lands, our Client has appointed O'Donoghue + Associates Architects (ODAA) to prepare a high-level masterplan to demonstrate the feasibility of delivering housing at the site and to provide the Council with evidence of their intent to bring them forward for same.

The layout and supporting documentation are contained in the enclosed booklet, with the former provided overleaf for ease of review. The layout takes a holistic approach to the design, and considers and incorporates the following:

- The topography of the lands, most notably Plot B, proposing split-level housing units with modulated forms to minimise site level interventions and to mitigate visual impacts;
- Siting of units at the lower parts of the plots that comprise the lands to maximise natural screening provided by existing hedgerows;
- Varied densities that respect site attributes and sensitivities;
- Multiple 'character areas' to encourage urban legibility and architectural variety;
- Green infrastructure links, bolstering those that are already present; and
- Integration and connectivity with existing development to the south (Seagreen Park) and prospective development to the north (ABP Ref. 313229).

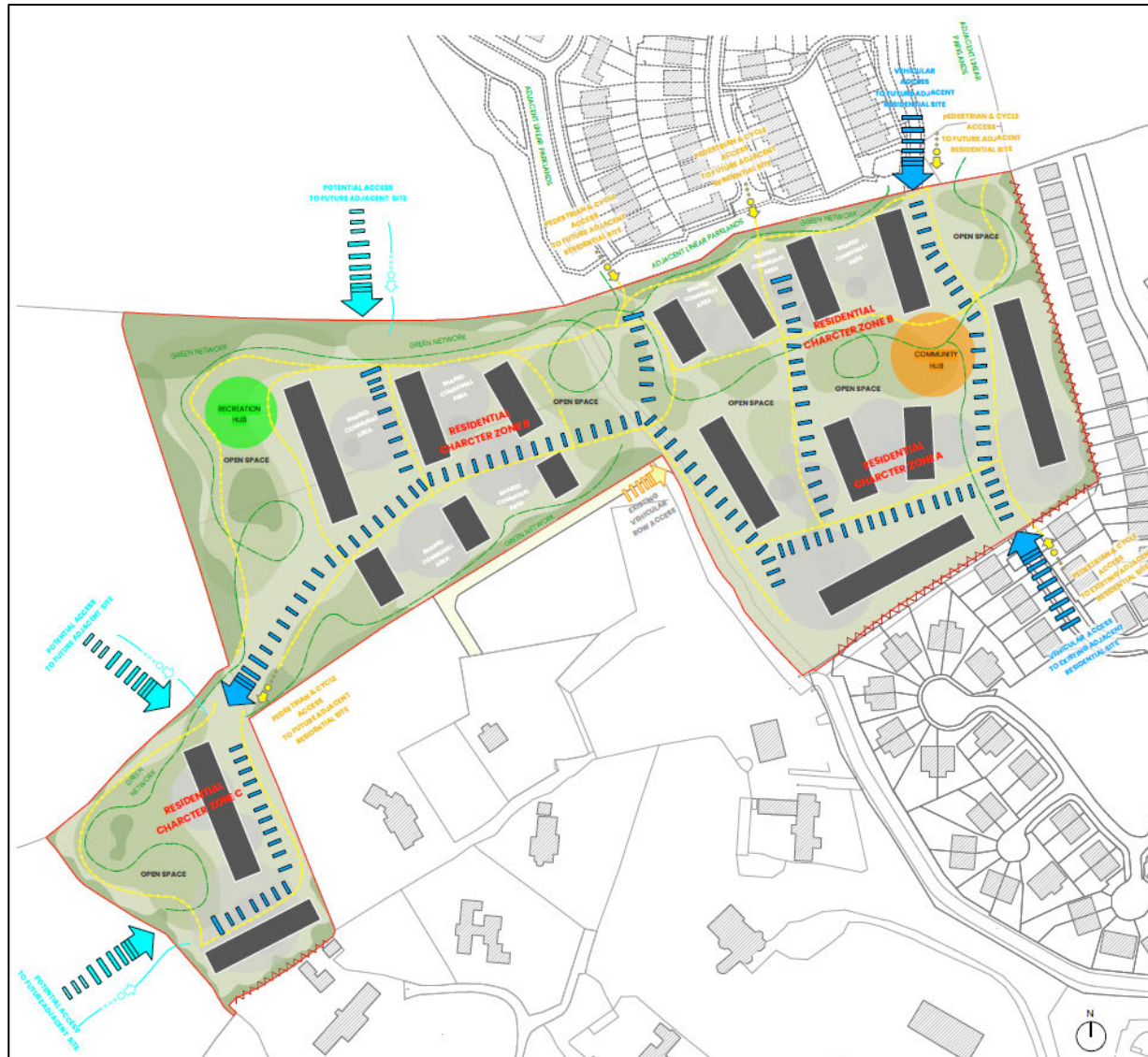


Figure 7.1: Proposed residential layout for the subject lands

Source: ODAA (2024)

8.0 CONCLUSION

This submission to the Issues Paper in respect of the forthcoming *Draft Greystones-Delgany and Kilcoole Local Area Plan* has provided a robust justification to support the appropriate zoning of land in the settlement, and in particular to retain and partially extend the residential zoning of lands at Kindlestown.

Existing Core Strategy population and house targets for the settlement need to be revisited to reflect the reality of population growth and housing demand in the area; but this need not be a market-driven action. Such revisions are also valid given the appropriateness of Greystones-Delgany (and Kilcoole) as a sustainable town within which to accommodate higher rates of population growth. This is due to its existing levels of service provision, existing businesses and employment opportunities, and existing and planned public transport.

Supporting larger settlements like Greystones-Delgany (and Kilcoole) to achieve greater levels of population growth should be seen as a positive, progressive and practical means of securing sustainable development. This is especially so given their ability to deliver a critical mass for successful growth that simply cannot be achieved in many of the County's much smaller settlements.

Therefore, in light of recent population growth and numerous sites within the settlement coming forward for development, we contend that there is a robust case for zoning the subject site for residential uses due to its: (1) contiguous and infill position, (2) its sequential appropriateness compared with other possible residential sites, and (3) its proximity to a host day-to-day services, facilities and amenities.

As has been shown above and in the enclosed materials prepared by ODAA, there is clear evidence (1) that the site can be successfully, coherently and holistically developed and (2) that our Client has a genuine intention to deliver housing at the site.

Consequently, we respectfully request that in drafting the land-use zoning maps for the Draft Greystones-Delgany and Kilcoole Local Area Plan, the Council act to zone the subject site for residential development.

We trust that the observations set out in this Submission will prove insightful, and look forward to reviewing the content of the *Draft Greystones-Delgany and Kilcoole Local Area Plan* in due course.

Yours faithfully,



Sadhbh O'Connor
Director
Thornton O'Connor Town Planning

ODAA

1904 – KINDLESTOWN DEVELOPMENT, CO. WICKLOW

CONCEPT PROPOSAL | 29. 01. 2024



SITE SUBJECT AREA



01. VIEW EAST TOWARDS PLOT A



02. VIEW SOUTH EAST TOWARDS PLOT B



03. VIEW SOUTH TOWARDS PLOT C



04. VIEW NORTH EAST TOWARDS PLOT A & B

SITE - EXISTING AERIAL IMAGES



PLOT B
Example of modulated split level housing units appropriate for the topography of PLOT B



PLOT B
Example of intermediate and tiered semi-public spaces appropriate for the topography of PLOT B



PLOT A
Example of modulated housing where the units are required to negotiate a gentle but gradually increasing slope

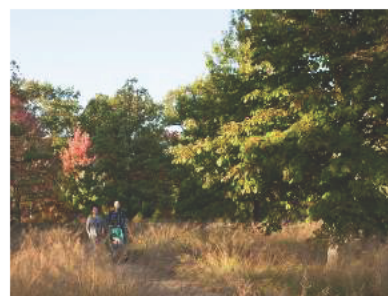


PLOT A
Example of modulated built forms and massing to mitigate visual impact.



PLOT A
Example of landscaping in a semi-public open space

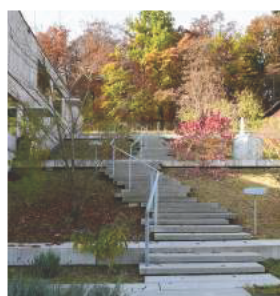
PROPOSED SITE STRATEGY



Proposed green network and recreation spaces to integrate with existing vegetation and native hedgerows



Improved pedestrian and cycling connectivity and opportunities



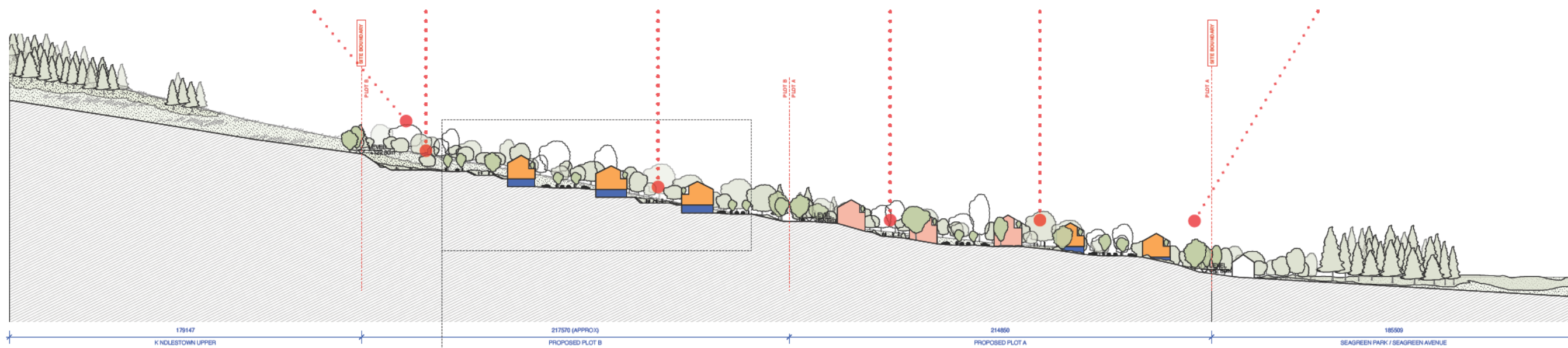
Undulating and terraced landscaping solutions for both the public and private spaces appropriate for the varying topography of Plot A, Plot B and Plot C



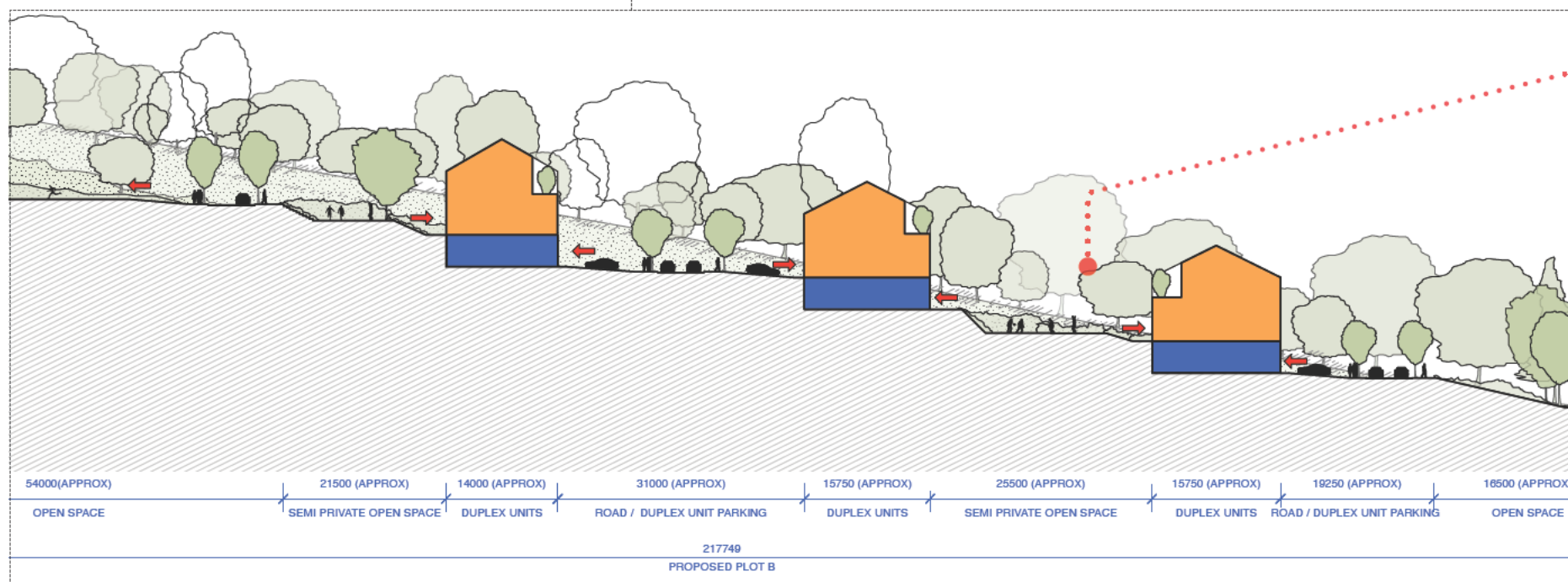
Semi-public and communal spaces to reflect differing character zones across the three plots



Proposed green network and intermediate landscaped spaces to integrate with existing boundary and edge conditions



Site Section



Detailed Site Section



Semi-public and communal spaces to reflect differing character zones and topography across the three plots



Legend

SUBJECT SITE - INDICATIVE TYPICAL SECTIONS



Example of modulated split level housing units appropriate for the topography of PLOT B



Example of modulated split level housing units appropriate for the topography of PLOT B



Example of modulated split level massing appropriate for the topography of PLOT B



Example of modulated split level housing units appropriate for the topography of PLOT A & C



Example of modulated split level housing units appropriate for the topography of PLOT A & C



Example of modulated split level housing units appropriate for the topography of PLOT A & C

TYOLOGIES – MODULATED SPLIT LEVEL HOUSING



Example of modulated built forms and massing to mitigate visual impact.



Example of modulated built forms and massing to mitigate visual impact.



Example of modulated built forms and massing to mitigate visual impact.

TYPOLOGIES - HOUSING



Proposed steps and intermediate tiered landscaped spaces to integrate with existing boundary and edge conditions



Example of proposed lighting finishes



Example of proposed mixed paving and textures



Proposed green network and recreation spaces to integrate with existing vegetation and native hedgerows

TYOLOGIES – LANDSCAPING