



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

Who are you:	Agent
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Reference:	GDKLAP-164541
Submission Made	January 31, 2024 4:49 PM

Topic

Compact Growth - Housing - Population Growth

Submission

Please see attached submission.

Topic

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

Submission

Please see attached submission.

Topic

Economic Opportunity - Tourism - Shops & Services - Community Facilities

Submission

Please see attached submission.

Topic

Heritage - Biodiversity- Green infrastructure- Climate Action- Energy

Submission

Please see attached submission.

Topic

Infrastructure - Sustainable Movement - Transportation

Submission

Please see attached submission.

File

2244 - GDKLAP-Submission-Final.pdf, 1.38MB

Our Ref: 2244 GDKLAP

Forward Planning,
Wicklow County Council,
Station Road,
Wicklow Town,
A67 FW96.

31st January 2024

Re: Draft Greystones Delgany Kilcoole Local Area Plan 2024-2030 - Issues Stage

Dear Sir/Madam

We wish to make a submission on behalf of Cairn Homes Properties Ltd in relation the Draft Greystones Delgany Kilcoole Local Area Plan. This submission relates to Coolagad and Hawkins lands. The key issues in relation to these lands within the context of the LAP are as follows:

- Lands within the LAP are should not be dezoned having regard to Development Plan Guidelines indicating that there should no loss of zoned lands.
- Both the Coolagad and Hawkins lands fully comply with the sequential test requirements and are wholly appropriate to zone for development purposes.
- The Coolagad lands, which are currently zoned for residential and open space, should retain these zonings.
- The Hawkins lands may be appropriately zoned for mixed use, as the current employment zoning has failed to deliver development.

Cairn is an Irish homebuilder founded in 2014 with a clear strategy to deliver high-quality new homes with an emphasis on design, innovation, and customer service. Following a successful initial public offering (IPO) in June 2015 to raise funds to finance the development of new homes in Ireland, Cairn is actively engaged in the delivery of some 15,000 homes over the coming years and have to date completed 7,474 homes. In 2023, Cairn delivered 1,741 new homes and increase from 1,526 new homes in 2022. To date Cairn have delivered 1,060 new homes in Wicklow and has been engaged over a long period of time in significant residential in Greystones-Delgany at Archers Wood Delgany and Glenherron Greystones. In addition, Cairn has been involved in assisting in the delivery of 2 new schools in Greystones, community and sports facilities and enterprise units. Cairn is committed to working with Wicklow County Council in the delivery of much-needed new homes together with the associated infrastructure necessary to deliver new communities with improved and high-quality amenities.

Cairn Homes welcomes the preparation of the Greystones Delgany Kilcoole LAP, which will provide an important framework for the development of the town up to 2030 and beyond. They have a keen interest in the sustainable development of the LAP area and have various landholdings within the area. Cairn Homes have two undeveloped landbanks in Greystones at Coolagad Greystones within the northeastern part of the settlement area; and the Hawkins land at Kilcoole Road on the southern side of the R774 ring road in the southern part of the settlement.

1 CAIRN ROLE IN DEVELOPMENT OF GREYSTONES-DELGANY

The lands at Coolagad total 24.8 ha with 17.1 ha of these lands are presently zoned for residential R17 and R22, active open space, open space and community and education. They form part of Action Plan 1 – Coolagad in the Greystones – Delgany and Kilcoole Local Area Plan 2013-2019. They are currently the subject of an SHD application (ABP: 313229-22) for 586 residential units in a mix of houses and apartments, community facilities and a significant area of public open space. In addition, the northern part of the site is the subject of a first party appeal relating to 98 units (P.A Reg.Ref: 23/342, ABP 317445-23). The lands are illustrated in the figure below.

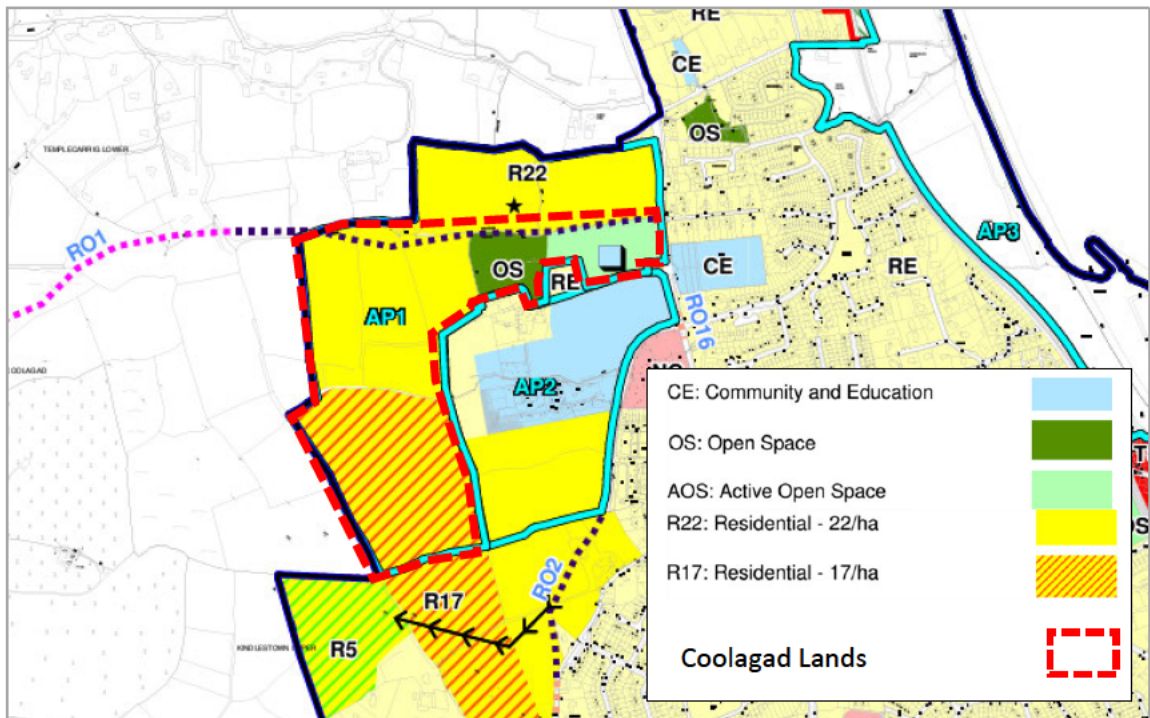


Figure 1: Greystone Delgany Kilcoole LAP 2013-2019 Extract with Lands at Coolagad Highlighted

The Hawkins lands are bounded by Kilcoole Road and the R774/L221 and total 2.53 ha. The Glenheron development lies to the north, Eden Wood to the west and Hawkins Wood to the East. Offices, the Weaver Buildings, comprising a two-storey community enterprise building (1,356 sqm) and a two-storey office building (1,376 sqm) have been developed by Cairn Homes in the south eastern portion of the overall landholding as part of the SHD development permitted under ABP Ref: ABP-305773-19 . They are currently zoned for E: Employment The lands are illustrated in the figure below.

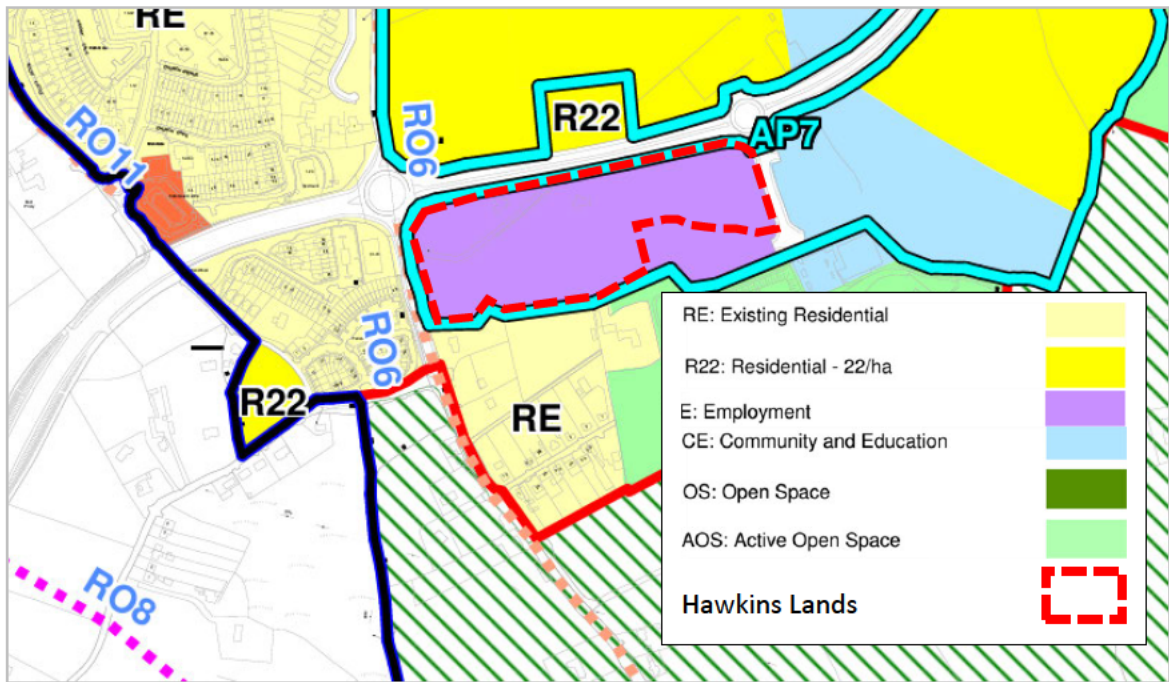


Figure 2 Greystone Delgany Kilcoole LAP 2013-2019 Extract with Hawkins Lands Highlighted

2 POLICY FRAMEWORK

The LAP will need to comply with the provisions of higher level national, regional and county development plan policies and guidelines in accordance with section 19 of the Planning and Development Act 2000. A number of key policy documents are considered below.

2.1 National Policy

National Planning Framework

The National Planning Framework (NPF) guides national, regional and local planning decisions until 2040 as the high-level strategic plan for shaping the future growth and development. There are 10 National Strategic Outcomes (NSOs). Those of particular relevance in the creation of Healthy Placemaking as defined in the Draft Plan include NSO 1- Compact Growth, NSO 4 – Sustainable Mobility and NSO 8 – Transition to a Low Carbon and Climate Resilient Society.

Several policy objectives may be considered applicable to the preparation of the Development Plan.

- **National Policy Objective 3a** - This states that it is a national policy objective to '*deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements*'.
- **National Policy Objective 11** - '*In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*' -

- **National Policy Objective 32** - *'To target the delivery of 550,000 additional households to 2040 National Policy.'*
- **National Policy Objective 33** - *'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.'*
- **National Policy Objective 35** - *'Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.'*
- **National Policy Objective 72a** – *'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.'*
- **National Policy Objective 72b** – *'When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.'*
- **National Policy Objective 72c** – *'When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.'*

The above policies are of particular relevance to the form, nature and extent of the zoning in Greystones Delgany and Kilcoole. This Framework targets the consolidation of existing settlements, particularly of cities and large towns. This means that plans will need to relate the population targets to the levels and location of future land-use zoning. Effective implementation will require substantially better linkage between zoning of land and the availability of infrastructure. In the zoning of land, planning authorities are required to apply a tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.

We highlight NPO 72b which highlights the importance of preparing an assessment of the cost of servicing zoned lands. The NPF also indicates that there are many other planning considerations relevant to land zoning beyond the provision of basic enabling infrastructure including overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops, places of employment accessibility, and to transport services etc. All of these must be weighed upon the determination of what lands should be zoned.

The NPF Roadmap of July 2018 did not form part of the statutory NPF. It forms the basis for housing and population targets for RSES for the Eastern and Midlands Region and is central to the *Housing Supply Target Methodology for Development Planning - Guidelines (Dec 2020)*. All of these documents have informed the core strategy of the Wicklow County Development Plan. However, the assumptions underpinning the population forecasts based on the 2016 census have significantly underestimated population growth, as illustrated in the 2022 Census. The ESRI, who were responsible for the forecasts underpinning the NPF Roadmap have accepted in its report *National Development Plan 2023: Priorities and Capacity*, that it has underestimated housing demands. It states:

"In spite of the ambition which underpinned the NDP, the latest information which informs the scale of needed investment suggests that the earlier level of ambition may have underestimated what is needed. The figures on population growth from Census 2022, released in May 2023, show a rate of increase which exceeded expectations. In 2022, the population stood at 5.149 million

and this was an increase of 8 per cent on the 2016 figure. With population growing more rapidly, the need for extra housing and associated infrastructure is clear.”

Population forecasts are currently being updated, which will feed into a review of NPF forecasts, RSES targets and county development plan housing and zoning requirements. It is evident that there will be increased in housing requirements for the period to 2031. This forms an important element of the current Judicial Review against the Wicklow County Development Plan 2022-2028, which is set within the context of the ESRI’s acknowledgement [2022/922JR]

Development Plans – Guidelines for Planning Authorities (June 2022)

While the subject plan is a local area plan, the Development Plan Guidelines sets out important guidance for the zoning, identification of land use strategies and phasing and sequencing of development. This is of relevance, as the local area plan is setting out the zoning framework and overall form of Greystones-Delgany-Kilcoole. A clear methodology is established for the preparation of the housing demand and zoning requirements across all settlements within the planning authority area. While these guidelines relate to development plans, there are certain provisions that are of relevance to the subject LAP, as the Wicklow County Development Plan 2022-2028 has deferred zoning decisions to individual LAP preparation.

Section 4.4.1 states that:

“It is a policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning”

Section 4.4.3 states:

“In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.”

This is key to ensuring delivery of housing and is important when interpreting the *Housing Supply Target Methodology for Development Planning - Guidelines (Dec 2020)*, and in making the case for an additional 25% in housing supply numbers. The Guidelines introduce an important concept in section 4.4.4, which establishes the concept of ‘*Long-Term Strategic and Sustainable Development Site*’, which may be developed after the 6 year period of the Plan. This is a key concept, which needs to be given due consideration in the Wicklow CDP as it allows for long term planning and investment decisions, which are not otherwise facilitated by the 6 year period of a statutory plan.

Section 6.2.3 indicates that:

“It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.”

The Guidelines advocate a stepped approach to sequential zoning of lands. The steps are as follows:

- Step 1 – Settlement Capacity Audit will comprise housing estimates for tier 1 and tier 2 services lands.
- Step 2 – In accordance with the sequential test, zoning for residential development land should ensure that this land is closest to the settlement core, including infill and redevelopment sites. The exercise should be based upon quantum of housing that would be delivered on individual parcels
- Step 3 - Tier 1 lands proximate to the core should be zoned first
- Step 4 - Where it is necessary to zone further land which is not serviced, this should be done in a sequential manner.

The Guidelines indicate that the “...the purpose of the sequential approach is to avoid development ‘leapfrogging’ to less centrally locations”

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

The aim of the guidelines is to set out key planning principles which can be reflected in development plans and local area plans. In relation to development plans, the guidelines highlight the sequential approach to zoning and development, where undeveloped lands close to public transport should be prioritised and zonings for new development should be contiguous to existing built up areas. It sets out density criteria for different locations: a) city and town centres b) brownfield sites within towns or cities c) public transport corridors d) inner suburban e) institutional and f) outer suburban/greenfield. The density range for outer suburban/greenfield is between 35 to 50 units per hectare.

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Local Area Plans – Guidelines for Planning Authorities (2013)

The Guidelines highlight that LAPs should contain policies and objectives which:

- Link the local area plan to the corresponding core strategy of the development plan with a clear vision and set of strategies to deliver that vision in the local area plan;
- Focus on identifying and meeting the needs of communities;
- Promote local economic development and employment growth;
- Integrate environmental considerations into local planning, particularly in relation to the effects of climate change, maximising bio-diversity, and providing green infrastructure;
- Ensure that adequate provision is made for schools;

- Encourage smarter travel patterns through more compact, less sprawling, and better structured urban areas and facilitating more sustainable and healthier travel habits such as walking, cycling, and the use of public transport; and
- Deliver high-quality urban design that improves people's quality of life.

Strategies should be developed in conjunction with stakeholders. The accompanying manual indicates that a range of strategies should be investigated and that alternative strategies in conjunction with the SEA process should be developed. These should be assessed against criteria and the appropriate strategy should be brought forward into the plan.

Housing Supply Target Methodology for Development Planning - Guidelines (Dec 2020)

These guidelines set out how core strategies of development plans should calculate the provision for housing over the period of the Plan. The methodology is somewhat prescriptive and complex. In addition, the Guidelines set out the housing targets for different counties. They allow for an additional 25% to facilitate convergence with the NPF strategy where justified. Such justification relates to compliance with NPF objectives and the provisions of the relevant RSEs.

Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2023)

The guidelines high that Local Area Plans have a role in translating development plan policies and objectives to a district or neighbourhood level and provide for a more in-depth consideration of planning issues that are specific to a particular area. The guidelines set out policies in relation to settlement, place and density. Policies on density should be tailored to local circumstances.

2.2 Regional Policy

Eastern and Midland Regional Assembly –Regional Spatial & Economic Strategy (RSES) (2019-2031)

The Regional Economic and Spatial Strategy (RSES), considers the wider Dublin Metropolitan Area (DMA) home to 1.4 million people, covering the continuous built-up city area and includes the highly urbanised settlements of Swords, Malahide, Maynooth, Leixlip, Celbridge, Bray and Greystones, which have strong connections with the city. It sets out 16 Regional Strategic Outcomes (RSOs), including RSO 1 – Sustainable Settlement Patterns and RSO 2 – Compact Sustainable Growth.

In relation to Compact Sustainable Growth,

- *RPO 3.2: Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.*
- *RPO 3.3: Local authorities shall, in their core strategies identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for new Apartments Guidelines' and the 'Urban Development and Building Heights Guidelines for Planning Authorities'.*

The RSES establishes three regions, the Metropolitan Area, the Core Region and the Gateway Region. It also establishes the settlement hierarchy. Metropolitan Key Towns are large economically active service towns located within the Dublin Metropolitan Area, with high quality transport links and capacity for increased residential and employment densities at strategic transport nodes. The RSES identifies Bray and Wicklow as Metropolitan ‘Key Towns’. The next level is Level 4 Self-Sustaining Growth Towns, which are towns that contain a reasonable level of jobs and services which adequately caters for the people of its service catchment. The identification of this level is left to be defined by development plans. This may include sub-county market towns and commuter towns with good transport links, which have capacity for continued commensurate growth. This strategy is summarised below in Figure 3.

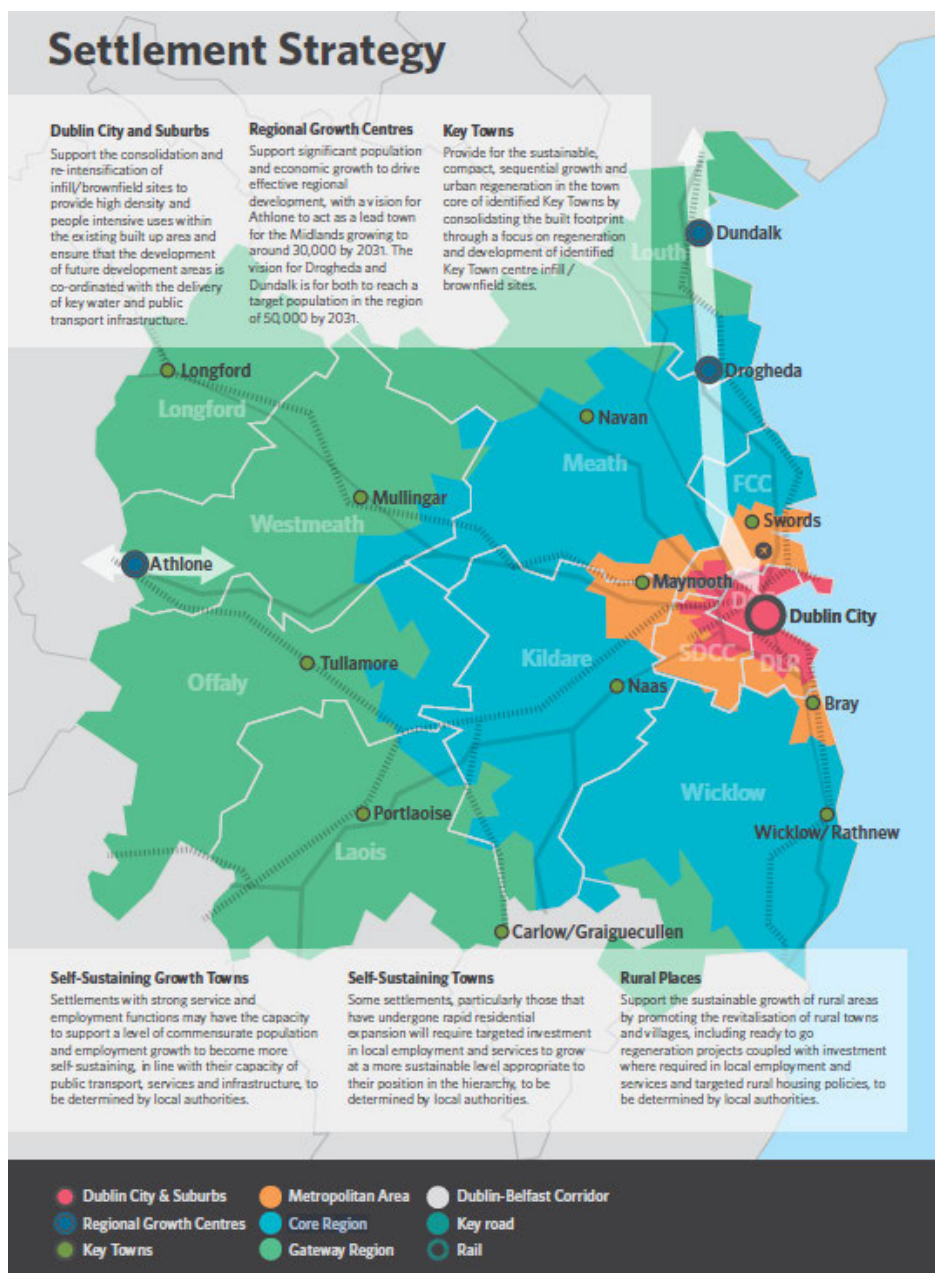


Figure 3: RSES Settlement Strategy

The Dublin Metropolitan Area Strategic Plan (MASP) supports employment generation at strategic locations within the metropolitan area to strengthen the local employment base and reduce pressure on the metropolitan transport network, including; future employment districts in Swords and Dublin Airport/South Fingal; Maynooth; Bray; Greystones; Dunboyne-Portrane; and Leixlip. The RSES supports delivery of the strategic park and ride projects including at Greystones. Key transport infrastructure investments in the metropolitan area as set out in national policy include continuing to provide DART services on the South-Eastern Line as far south as Greystones. The MASP area is indicated in Figure 2 below. It can be seen that Greystones is included within the MASP area.

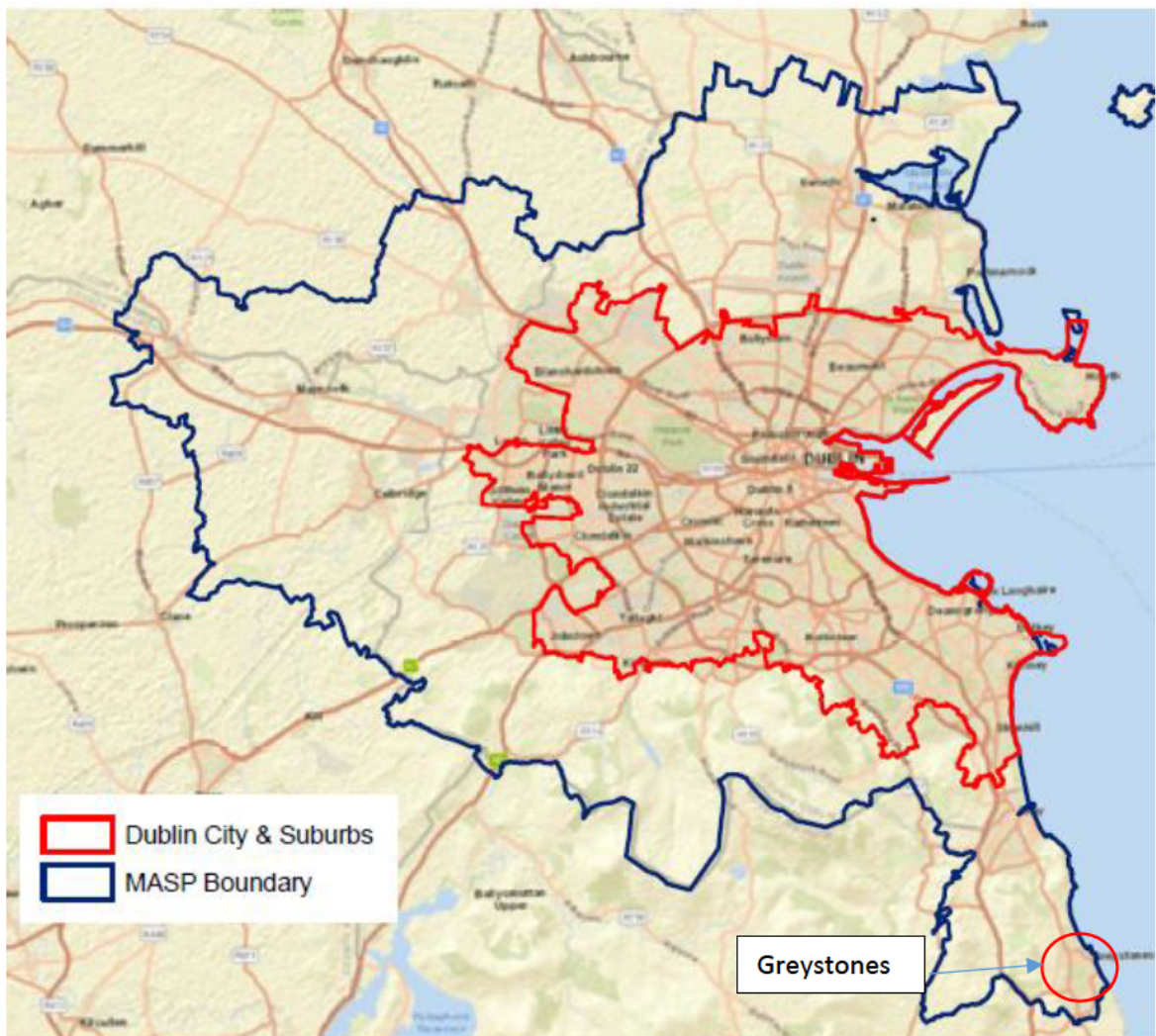


Figure 4: Dublin MASP and Greystones

Having regard to the long lead in time for planning, design and development, a prioritisation and indicative phasing has been applied to strategic development areas based on any identified infrastructure and/or site constraints and linked to the delivery of strategic public transport, key infrastructure and service provision. Phasing periods are 2026 (short term), 2031 (medium term) and 2040 (long term).

The RSES breakdown population forecasts for each County in Appendix B. This indicates a population of Wicklow County rising from 142,500 in 2016 to 155,000-157,500 in 2026 and 225-231,500 in 2031. There is a further allowance of transition population targets in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP, including Greystones which is well served by public transport.

2.3 Local Policy

Wicklow county development plan 2022-2028

Chapter 3 - Core Strategy

The chapter sets out the housing demand to reflect the requirements of the NPF Roadmap and the Ministerial Guidelines issued in December 2020. The housing targets contained in the aforementioned guidelines allow for an increase of 25% over and above the target up to 2026 where justified and to facilitate convergence with the NPF Roadmap. In addition, there is a transfer from other counties to Bray as allowed for in the RSES MASP. This is a further 20%. Table 3.4 of the Draft Plan outlines the housing demands on which the Core Strategy and all other figures are based.

The Strategy sets out the settlement hierarchy

- Level 1 – Metropolitan Area Key Town – Bray
- Level 2 – Core Region Key Town – Wicklow-Rathnew
- Level 3 – Core Region Self Sustaining Growth Town – Arklow, Greystones/Delgany, Blessington

Towns in Level 3 are targeted for growth rates of 25%-30%, with slight variations based on capacity / past trends. The Plan suggests that growth in Greystones – Delgany will exceed this target range before the end of the plan period due to legacy housing developments under construction.

Table 3.5 of the Plan sets out the housing targets to Q2 2028 and Q4 2031. It indicates that 508 additional units are required between Q3 2022 and Q2 2028 and a further 170 are required between Q3 2028 and Q4 2031. The settlement strategy, housing target numbers and quantum of required zoned land is set then out in Table A of the County Development Plan. For Greystones Delgany, it indicates that the housing target for 2016-2031 is 1,078 taking (less completions 2017-2020), that the development capacity of existing zoned land is 2,900 ha, of which 1,700 ha is in the built up area, and 1,200 ha is outside the built up area. The table indicates that there is an excess of 30 ha outside of the existing built up area which will be addressed in the LAP. The Development Plan acknowledges in section 3.5 that all of these figures relating to the surplus of zoned land is based on and “...having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA”.

Zoning will be detailed in new local area plans for Bray Municipal District (including Enniskerry and Kilmacanogue); Wicklow Town – Rathnew; Greystones - Delgany – Kilcoole; Arklow and Environs; and Blessington

The Plan sets out the following principles for zoning:

1. Compact Growth – a minimum of 30% of the targeted housing growth shall be directed into the built up area of Level 1 to 4 settlements.

2. Delivery of Housing and Population Targets - Zonings will be structured to deliver the core strategy housing targets.
3. Higher Densities - zonings will be delivered in accordance with higher densities in Ministerial Guidelines.
4. Sequential Approach – priority 1 (town centre/brownfield), priority 2 (RSES strategic sites), priority 3 (infill within existing CSO town boundary), priority 4 (greenfield: tier 1 serviced and sequentially adjacent to town boundary; tier 2 unserviced and sequentially adjacent to town boundary)

Chapter 4 Settlement Strategy- Greystones-Delgany

As a designated Level 3 Self-Sustaining Growth Town within the metropolitan area, Greystones-Delgany is a strong town, served by high quality transport links to Dublin and the surrounding towns. The Plan indicates that this status is meant to reflect its growth between 2016 and 2022. It is indicated that the population should increase from 18,021 in 2016 to 21,727 by Q2028. However, it is noted that the 2022 census indicates that the population is already 22,009. The town is located on the DART/rail line, has good quality bus links and easy access onto the M/N11. The settlement should aim to be economically self sustaining, with a population including its catchment that is able to support facilities including high quality secondary education service, a small hospital or Primary Health Centre type facility and comparison retail centre.

Chapter 6 - Housing

The Plan sets out key housing principles for the creation of sustainable communities. Sustainable communities require a variety of house types, sizes and tenures. It is important that new multi-unit residential development provides an appropriate mix that caters for a variety of household types and sizes.

Zoning

The zoning / designation of greenfield land for new housing shall adhere to the following principles:

- Application of the ‘sequential approach’;
- Application of compact growth targets;
- Creation of ‘walkable’ 10 minute neighbourhoods;
- Promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of any rail or light rail stop or 500m of bus routes will be prioritised;
- Application of the tiered zoning approach in accordance with NPO 72 whereby land that is fully serviced is differentiated from land that can be serviced within the lifetime of the plan;
- Lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritised;
- Cognisance will be taken of the need to provide upmost protection to the environment and heritage, particularly of designated sites, features and buildings;
- Examine environmental constraints including but not limited to biodiversity, flooding, and landscape;
- The need to maintain the rural greenbelt between towns.

Phasing

The development of zoned / designated land should generally be phased in accordance with the sequential approach:

- Development shall extend outwards from the centre of settlements with undeveloped land closest to the centre and public transport routes being given preference, i.e. ‘leapfrogging’ to peripheral areas shall be resisted;
- A strong emphasis shall be placed on encouraging infill opportunities and better use of under-utilised land; and
- Areas to be developed shall be contiguous to existing developed areas.

Density

Table 6.1 indicates that for large towns including Greystones Delgany, the following density provisions should be applied:

- Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station.
- Outer Suburban / Greenfield Sites: Minimum density of 35 – 50 dwellings per hectare.
- Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares.

3 ISSUES PAPER AND SUBMISSION

3.1 Issues Identified by Wicklow County Council

Wicklow County Council has identified a series of issues and themes relating to the emerging LAP. Submissions are made below in relation to these themes.

3.2 Housing – Population - Compact Growth

3.2.1 CDP Housing Targets

Principle 2 relating to zoning, as outlined in the CDP, indicates that development should be delivered in accordance with housing targets. The Issues Paper states that

“Greystones-Delgany and Kilcoole will need approximately 850 new homes built between now and 2031 [It is estimated that growth in these settlements will exceed this target range before the end of the plan period due to legacy housing developments under construction].”

This suggests that the LAP will rezone existing zoned lands, or defer development beyond the 6 year period of the Plan. It should be noted that this is contrary to national policy, as outlined in the Development Plan Guidelines, that existing zoned lands should not be down zoned. As highlighted above in section, it has been acknowledged by the ESRI that the forecasts and population targets on which the core strategy figures are based are fundamentally flawed, having regard to the overall level of population growth between 2016 and 2022. The NPF targets will be reviewed which will necessitate amendments to the RSES and the core strategies of development plans. If the Greystones Delgany Kilcoole LAP bases its settlement strategy on the housing target numbers in the CDP core strategy, it will be open to the same challenges and uncertainties as the CDP itself.

For these reasons, we respectfully suggest that the Council should base its settlement strategy for the LAP on first principles of availability of services, sequential development, and the delivery of community facilities and services.

3.2.2 Step 1 – Tiering Servicing

Coolagad Lands

These lands are fully serviceable by potable water supply, foul sewerage and surface water infrastructure. Footpaths serve the lands and the external road network is capable of accommodating development. The issue of public transport will be considered below. The issue of whether the lands are serviced is fully considered in the Residential Zoned Land Tax (RZLT) appeal relating to the lands (ABP: 316656-23) where the Board found that they were indeed serviced and should be the subject of the RZLT.

Hawkins Lands

Similarly, the Hawkins lands are fully serviced with potable water supply, foul sewerage and surface water infrastructure. This is reflected in the planning permission ABP Ref: ABP-305773-19 which includes the Weaver Buildings. The surrounding road network is capable of accommodating a mixed use form of development, which would include residential, services, shops and petrol filling station, in addition to community facilities in the form of a nursing home.

3.2.3 Step 2 - Sequential Approach and Compact Growth

Both the Coolagad and Hawkins lands fully comply with the principles of compact growth and the sequential test as set out in Principle 1 in the County Development Plan, which seeks a minimum of 30% of the housing target to be provided with the built up area, and up to 70% of new residential development is allowable on the edge of the settlement. The Development Principles for the Sequential Approach are set out below.

Principle 4 – Sequential Approach classifies the priority locations for new residential development into four categories, which include:

- **Priority 1** – designated ‘town’, ‘village’ and ‘neighbourhood centre’ also referred to as the ‘primary zone’;
- **Priority 2** – strategic sites as identified by the RSES and the Metropolitan Spatial Area Plan;
- **Priority 3** – infill within the built envelope of the town as defined by the CSO town boundary,
- **Priority 4** – where there is a need for greenfield residential development, a two-tier approach will be taken as per the NPF:
 - Tier 1 – Serviced Zoned Land, whereby the land are able to connect to existing development services and for which there is service capacity available. Such lands would either be located within the existing built-up footprint or be contiguous to existing developed lands. A sequential approach will be applied to zoning.
 - Tier 2 – Serviceable Zoned Land, where the lands are not currently sufficiently serviced but have the potential to become fully serviced. An infrastructural assessment would need to be carried out to justify the zoning of such lands. The sequential approach discussed above would also apply.

MDB has undertaken research of site capacity and planning permissions in Greystones and Delgany since the LAP came into operation (please see appendix I). These are summarised as follows and detailed in Table 1 (as illustrated on Figures 5 and 6).

Table 1: Overall summary to cover 2013 (date of LAP start) to 2023

2013-2023	
No. of units permitted	1,923
No. units completed	1,494
No. units commenced	230
No. in planning (FI or appeal)	240
No. of units permitted not commenced	106

The overall pattern of development is clearly shown as operating very effectively in accordance with the Sequential principle. Planning permissions and development have been directed to infill and edge of settlement locations as directed by LAP policy over a period of 10 years.

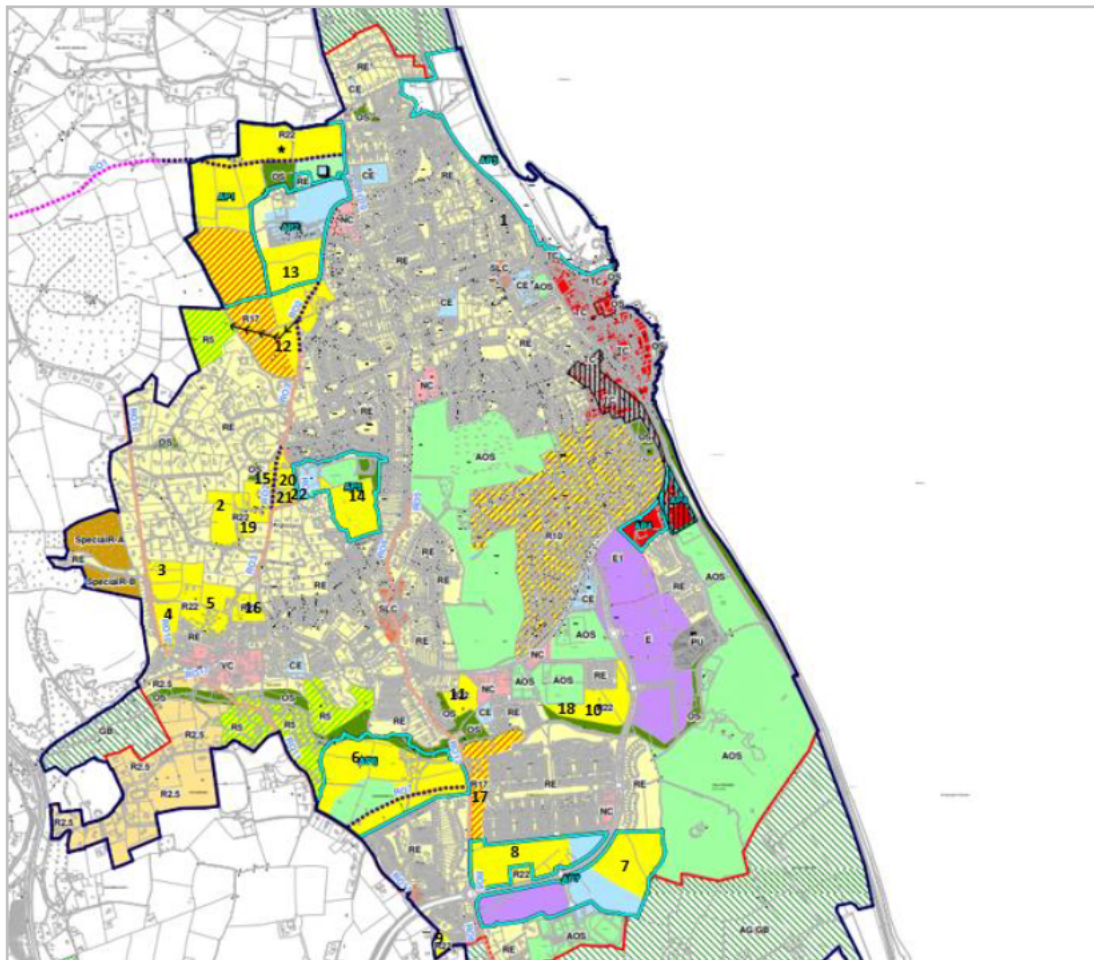


Figure 5 Location of Planning Permission shown in Appendix I



Figure 6 Permitted developments shown in red and sites at pre-application or current application stage in blue

The Sequential Approach to Zoning for Residential Development is addressed at section 6.2.3 of the Development Plan Guidelines for Planning Authorities 2022.

It notes the Town Centre First and compact growth approach can be achieved through the prioritisation of lands closest to the centres of settlements. Planning authorities are therefore required to utilise a sequential approach when considering proposals for land-use zoning, in particular for residential development. The sequential approach is to avoid development 'leapfrogging' to less centrally located areas. This approach is reinforced by the Compact Growth Guidelines.

Other key factors in the application of the sequential approach and the identification of lands suitable for zoning is that due consideration should be given to the relationship with the edge of the built up area, and availability of existing and planned community and social infrastructure. Wicklow County Council's policy through the LAP has been effective at delivering town centre sites (Priority 1) as well as Priority 2 and 3 sites in facilitating growth of the settlement to date. Having regard to the build-out of the LAP sites over a period of 10 years, it is entirely appropriate at this juncture to deliver Priority 4 lands that are on the edge of the built-up area adjoining services, schools while delivering new amenities and social infrastructure. The figure below illustrates the relationship between both the Coolagad and Hawkins lands to these key urban elements.



Figure 7 Catchment map illustrating proximity of sites to Greystones town centre, Dart and bus services

Coolagad Lands

These lands are immediately contiguous to the existing built up area. Figure 7 above illustrates that all intervening lands have been built on and that these lands are appropriate to zone from a sequential perspective. The lands are within 2km of the railway station and there is a bus service immediately adjacent to site. Appendix II illustrates that there adequate school provision in the

area, with Temple Carraig Secondary School immediately adjacent to the lands and the Greystones Educate Together and Gaelscoil na Gloch Liath in close proximity. The Blacklion neighbourhood centre is also adjacent, providing local services. The lands are eminently suitable for zoning for residential purposes and conform to the principles of the 10 minute settlement.

Hawkins Lands

These lands have been zoned for employment purposes since 2006. However, despite this zoning over a prolonged period of time, the lands have not been developed for employment purposes. The Weaver Buildings in the southeastern part of the overall zoned lands have been developed as part of the SHD for lands to the east. However, there are challenging market conditions in letting the buildings. It is proposed that the Hawkins lands be rezoned from enterprise to ***mixed use***, which could potentially accommodate a range of land uses such as commercial enterprise / incubator, residential, offices, nursing home and a petrol filling station.

These lands accord with the principles of sequential development, and they are edge of built up area with built form to the north, east and west. They are serviced by good road infrastructure and are within 3km of the railway station and are served the 84X bus services along Kilcoole Road and the R774. Commercial floorspace has already been developed in phase 1 of the overall development. However a pure commercial/enterprise development of the overall lands is not viable owing to the change in market demands, with a significant decline in the demand for offices arising from changes on work patterns and working from home practices. This matter is considered further in relation to employment below.

3.3 Sustainable Communities, Place-Making and Urban Design

The local area plan needs to focus on creating viable and sustainable communities. Adopting the principles of the '10 minute settlement' will contribute to this objective. The development of the Coolagad and Hawkins lands will focus on regeneration in order to achieve more vibrant and sustainable communities.

Coolagad Lands

The current SHD application with An Bord Pleanala has demonstrated that the lands are capable of accommodating a mix of unit types and sizes which will cater for the housing needs of the different age groups and household sizes, thereby responding to the evolving needs of the community. This large land bank, under the zoning in the current LAP includes for a large area of active open space with community and creche facilities which will serve both the future residents, but also those in the surrounding area. These lands can be developed in accordance with an action or masterplan which may set out the key parameters in the development of the site. Such a master plan can be agreed with the Council's executive, as part of a planning application, or in advance of submitting an application. The higher level s28 guidelines and CDP standards can translated into more detailed guidance in the LAP.

Hawkins Lands

A mixed use zoning of these lands will allow for a sustainable form of development with commercial, enterprise, residential and potential to provide for local services. The mono employment use has failed to materialise and a mix of uses and development types will assist in creating a sense of place, contribute to a sustainable community and facilitate an appropriate urban design framework.

3.4 Employment Objectives

The CDP seeks to develop further employment opportunities in Greystones -Delgany. Cairn have contributed significantly to provision in Phase 1 of the Hawkins development (Weaver Buildings), which accommodates 2,700sqm in two buildings. However, as indicated above market demands have experienced a structural change in relation to this form of development. According to BNP Paribas Real Estate, the take up in Dublin office space dropped by 63% in the third quarter of this year compared to the same three months last year. According to industry experts, the decline is attributed to occupiers leveraging remote work opportunities, leading to a reduction in office space. Additionally, there has been a shift in demand away from tech firms, which historically had larger office space requirements. During the period between July and September this year, only 8.4% of take-up was attributed to this sector, marking its lowest share since quarterly records began. It is clear that the dynamics of remote working/flexible working arrangements have weakened the relationship between job growth and office demand. Additionally, the tech sector's substantial growth during Covid-19, followed by a sharp decline in tech leasing, has heightened office occupancy rates, lessening the need for commercial floor space. In contrast, the demand for additional housing to combat the ongoing accommodation crisis remains exceedingly high. There is consequently a need to consider other forms of development which cater for employment, including potentially a nursing home and filling station, in addition to a further limited provision of offices on the site. The IDA's strategic site has now secured permission for media development which will in part reinforce Greystones employment base. However, without a pre-identified user of employment lands, particularly FDI and large users, development of employment lands is very challenging. To retain a solely enterprise and employment type zoning on these lands is likely to result in the non-development of important accessible and serviced lands.

3.5 Heritage and Biodiversity

The SHD scheme and associated EIAR put forward in respect of the development of the Coolagad lands demonstrates that relevant national monuments on the site can be treated with sensitivity to the satisfaction of the National Monuments Division. Development of these lands can be carefully designed to ensure the protection of biodiversity, while addressing any flood risk issues associated with watercourse flowing through the lands. The EIAR prepared for that scheme also illustrates that important views and prospects around the site can be protected. There are no specific challenges on the Hawkins lands relating to heritage and biodiversity.

3.6 Transport and Infrastructure

The two sites can be developed to the satisfaction of Uisce Eireann and with appropriate surface water infrastructure can be put in place. A minor upgrade to the entrance to the Coolagad lands is required, but this can be accomplished in agreement with the Council. Contributions from the development of these lands to any upgrades in required infrastructure can be achieved through the application of development contributions or land value sharing tax, as required.

4 CONCLUSIONS AND SUMMARY

The principal points of our submission are as follows:

- We respectfully contend that there should be no downzoning of lands within the LAP area, and that the provisions relating to zoning and phasing should not be guided by the core strategy figures in the CDP which are currently subject of legal challenge.
- The approach to the zoning of land should be based on first principles of availability of services and the sequential test.
- Both the Coolagad and Hawkins lands fully comply with the sequential test requirements and are wholly appropriate to zone for development purposes. Coolagad is suited to residential and open space zoning, while Hawkins lands may be appropriately zoned for mixed use.
- Adopting the principles of the '10 minute settlement' will contribute to this objective. The development of the Coolagad and Hawkins lands will focus on regeneration in order to achieve more vibrant and sustainable communities.
- A mixed use form of development at the Hawkins lands, with different forms of development offering different employment and residential opportunities will achieve the objectives in relation to promoting sustainable patterns of development in Greystones
- Both the Coolagad and Hawkins lands can be developed in a manner which respects heritage and biodiversity.

Greystones has the potential to provide for much needed housing in the form of sustainable communities and Cairn have a strong record in delivering on all elements to support communities. With the requested inputs, the LAP can provide a strong and robust framework to guide development going forward.

Yours faithfully


MACCABE DURNEY BARNES

APPENDIX I - PERMISSIONS IN GREYSTONES-DELGANY

Map ID	Planning Ref	No. of Units	Last Relevant Date	Status	Note	
1	18925/An Planeala 304492-19 planning permission 21/331	Bord ref. and no.	82	ABP Decision: 18/06/19	All units commenced	
2	20/624		99	Decision: 03/07/20	30 units commenced	
3	15/1307		89	Decision: 06/04/17 (extended in 2022)	16 units commenced	
4	21/960		56	08/12/21	Appealed	Overlap with Delgany SHD (308467) under JR.
5	21/959		99	08/12/21	Appealed	
6	Sh201903		426	14/11/19	Completed	Farrenkelly SHD
7	Sh201904		354	23/12/2019	Completed	Glenheron SHD
8	16/1412		192		Completed	Charlesland Cairn
9	171267		24	12/12/17	Constructed	WCC Part 8
10	Planning phase		n/a	n/a	Planning phase	WCC Part 8
11	141073		32	09/10/2014	Constructed	
12	141031 extended 2019		187	01/10/2014	Constructed	Seagreen Estate
13	141952 extended 2017		130		Constructed	Waverly estate
14	16/1301		132	ABP decision: 10/01/18	74 units commenced	
15	21553 and ABP.311408		19	26/08/2021	Not commenced	

16	126930 (extending 07/1554)	25	23/02/2013	Completed	
17	16792	50	08/09/16	Constructed	Charlesland Cairn
18	20647	41	Decision 01/09/20	Not commenced	WCC Part 8
19	22/765	11	Decision 23/02/23		
20	18678	74	Decision 20/11/18	Constructed	
21	23276	85	FI requested May 23	Further Information pending	
22	20/488	66	24/11/20	28 units commenced	

APPENDIX II – SCHOOLS IN GREYSTONES DELGANY**Primary Schools**

School Name	Address	2019 Enrolment	2022 enrolment	Change (in number)	Change (%)	Distance from Coolagad (in km)
St Laurence National School	Kindlestown Lower, Delgany, Co. Wicklow	684	664	-20	- 2.92	1.5
Greystones Community National School	Charlesland, Greystones, Co. Wicklow.	216	377	161	74.54	2.8
Delgany National School	Delgany, Co. Wicklow	227	218	-9	- 3.96	2.6
St Kevin's National School Scoil Naomh Caoimhghin	Rathdown Rd, Rathdown Lower, Greystones, Co. Wicklow	507	479	-28	- 5.52	0.9
St Brigid's National School	Trafalgar Rd, Rathdown Lower, Greystones, Co. Wicklow	493	450	-43	- 8.72	2
Greystones Educate Together NS	Blacklion, Greystones, Co. Wicklow	465	458	-7	- 1.51	0.5
St Patrick's National School 12554M	Church Rd, Rathdown Lower, Greystones, Co. Wicklow	273	362	89	32.60	1.4
Gaelscoil na Gloch Liath 20301C	Blacklion, Greystones, Co. Wicklow	435	320	-115	- 26.44	0.5
Kilcoole Primary School	Main Street, Kilcoole	610	578	-32	-5.24	5
	Total	3,300	3328	28	0.85	

Secondary Schools

School Name	Address	2019 Enrolment	2022 Enrolment	Change (in number)	Change (%)	Distance from Coolagad (in km)
Greystones Community College	Greystones Tennis Club, Mill Road, Greystones, Co. Wicklow	Established 2020	287	n/a	n/a	2.0
Temple Carrig Secondary School	Blacklion, Greystones, Co. Wicklow	812	916	104	12.81	0.5
Saint David's Holy Faith	Kimberley Rd, Rathdown Lower, Greystones, Co. Wicklow	579	731	152	26.25	2.1
	Total	1,391	1,934	256		