

	<h1>Greystones-Delgany & Kilcoole LPF Variation No.4</h1>
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Who are you:	Agent
Name:	Beakonshaw Developments Ltd
Reference:	GDKLPF-142104
Submission Made	June 20, 2025 2:38 PM

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

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

Local Planning Framework PART A Strategy

- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole
- A.3 Factors influencing future development options
- A.4 Overall strategy

Local Planning Framework PART B Settlement Specific Objectives.

- B.2 Residential Development
- B.7 Infrastructure, including transport and flooding
- B.8 Land Use Map and Zoning
- B.9 Specific local objectives (SLOs)

Write your observations here:

See attached.

Please select which town you want to comment on:

Kilcoole

Observation relevant to the settlement:

See attached.

Upload a File (optional)

Beakonshaw_Kilcoole_FRA.pdf, 1.82MB

Our Ref: 25253
CUNNANE STRATTON REYNOLDS

Wicklow County Council
County Buildings
Whitegates
Wicklow Town

20th June 2025

ONLINE PORTAL

Dear Sir / Madam,

RE: SUBMISSION ON DRAFT GREYSTONES / DELGANY & KILCOOLE LOCAL PLANNING FRAMEWORK (LPF) 2025 BEING PREPARED UNDER PROPOSED VARIATION NO. 4 TO THE WICKLOW COUNTY DEVELOPMENT PLAN 2022 – 2028.

We, Cunnane Stratton Reynolds Ltd., Gainsboro House, 24 Suffolk Street, Dublin 2, on behalf of our client, Beakonshaw Developments Ltd of 38 Dawson Street, Dublin D02 AW24 make this submission in relation to 'Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 (CDP).

Introduction

The Greystones-Delgany and Kilcoole Local Planning Framework (LPF) 2025-2031 will form part of the Wicklow County Development Plan 2022-2028 (CDP) via the variation procedure set out under Section 13 of the Planning and Development Act 2000 (as amended).

The previous Local Area Plan (LAP), adopted in 2013, marked the first integrated planning framework for the combined areas of Greystones-Delgany and Kilcoole. The draft LPF / variation of the CDP builds on that previous LAP without any additional zoning.

In 2024, a pre-draft consultation process was conducted in accordance with Section 20 of the Planning and Development Act 2000 (as amended), based on the initial intention of WCC to prepare a Local Area Plan under Part II, Chapter II of the Act. However, following the enactment of the Planning and Development Act 2024, WCC revised its approach and has opted to implement a plan for the area through a variation to the Wicklow CDP 2022-2028.

Our first and lingering impression of the Draft LFP is that it takes an exceedingly conservative and unwarranted approach to the rezoning of lands for future development evident when one compares the draft zoning maps currently on display with that contained in the Draft LAP from 2023 and carried forward.

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There is effectively a net loss in zoned lands effectively at odds with population projections, likely future housing targets for the County and current and imminent advice from the Minister for Housing that local authorities identify future lands for residential zoning to meet a worsening housing crisis and even more ambitious, necessary housing completion targets.

This submission is structured as follows:

Executive Summary;

1. *Purpose of this Submission;*
2. *The Subject Lands and Location;*
3. *Planning Context;*
4. *Transportation;*
5. *Flooding;*
6. *Ecology & Appropriate Assessment*

Conclusion

Executive Summary

The key points from this submission are:

- Proposed Variation No. 4 and the Draft Greystones/Delgany and Kilcoole Local Planning Framework is **premature pending the imminent Directive from the Minister of Housing mandating all local authorities to identify future land suitable for residential rezoning.**
- Such a Directive will require **a review of the adopted County Development Plan**, including a review of the Core Strategy and projected population growth and housing allocations to all the County's settlements including Kilcoole. It is unclear why this Variation is placed on display now when some **fundamental redirection of the County Plan and the allocation of population growth and housing for Kilcoole will be required in just a few months.**
- Given existing previously published ministerial advice to all Chief Executives and Chairs of County Council's regarding the need to zone additional residential land and the ongoing housing crisis, which is only getting worse, it is strange that the County Council has decided not only to **zone no additional land, but to remove entirely the designation of the Strategic Land Bank**, and finally to do no more than retain the residential zoning status quo for the town by **retaining only 2 no. sites zoned as residential** from the adopted Local Area Plan **dating from as far back as 2013** (i.e. 2 no. plan cycles previous). This is completely unjustified in planning terms.
- The zoning position is being kept as it was from as far back as 2013 in a now period of worsening housing crisis and where **the Minister is advocating additional residential zoning to meet extraordinarily ambitious housing targets** that have to be met if the housing crisis is not to get worse.
- **Of only two sites that are carried forward for immediate new residential zoning (RN1), one is approved and the other is on appeal. If approved this year there is still 3 years or half the life of the LPF still to run.**
- Regarding RN2 long term residential lands, one site is on appeal, and the other site has **not so much as a planning application lodged on it since 2013** (adoption of the LAP).
- WCC's position to zone no additional lands against increased population targets set out in the NPF First Revision and new housing allocations in the county is also at odds with the **population growth of the town which grew by 330 persons or 7.8% from 2016 to 2022.**

- The population target for Kilcoole for 2028 is 4,778, of which 4,569 was identified in the 2022 Census. It would also appear from **Table 2.1 of the Proposed Variation that targets have been set against the 2016 census and not the 2022 census where significant population growth was identified within the State, the county and Kilcoole**. From that 2016 based target in Table 2.1 of the Draft LPF there is an identified requirement to accommodate an additional 209 people up to the 2028 target but one should bear in mind that the 2022 census identified a growth of 330 persons from 2016 meaning that the population target for 2028 was exceeded by 50% in 2022. There is a current shortfall in population of 94 people following construction and occupation of ref: 23/60348 since the 2022 census. This leaves a requirement for only approximately 94 people or circa 38 houses over the remaining period until 2028 if one does use the 2016 census population for the town setting aside the population growth not acknowledged in the Draft Variation. The remaining headroom within the target of 38 houses (over three years to 2028) is hopelessly out of touch with the population growth in the town over a sustained period and the minister's direction to zone more land for residential development, notwithstanding the untapped potential of the soon to be upgrade rail station and train services.
- Our client seeks the rezoning of lands for first phase residential (RN1) which broadly equates to the previous and now discontinued **SLB for which we see no justifiable reason for its discontinuance** and which lie mainly to the south of Sea Road. The remainder of our client's lands principally to the north are sought to be identified as SLB for longer term residential development. This makes sense given the projected upgrade of the rail line and services which promote this location in the town over all others for future development as recognised in pages 33-35 of the Draft LPF.
- We estimate there is a **requirement to zone for 16 ha to 25ha**, based on what we believe are flawed populations projections used by the Council based on the 2016 Census. If Kilcoole is to maintain its fair share of housing allocation in Level 4 towns it is important that the Draft LPF at least match growth forecast for Newtownmountkennedy even though it does not have a rail station. The gross developable area of clients lands is 43 ha and a net developable area of 60% equated to 25.8 ha.
- It would be reasonable to also assume that **Kilcoole will get its fair share of any future housing allocation** especially if the allocation of an additional 3,000 units at Fassaroe will not proceed due to infrastructural constraints there which we know will not be resolved any time soon.
- Having identified 16ha of land needing to be rezoned we believe that there are compelling reasons to zone part of our client's land for **immediate residential development**.
- The town has an **employment base and range of services and community facilities** sufficient to support substantial additional residential development. The town is also located close to an existing tourist attraction Glenroe Farm and to one of Ireland's leading golf courses namely Druids Glen.
- Kilcoole is just one of two Level 4 settlements with a train station the other being Rathdrum within the County. **Only Bray, Wicklow Town, Arklow and Greystones have a rail station but have limited development opportunities close to those stations**. Rathnew has a train station but is paired with Wicklow town for future development purposes.
- Ministerial Guidance indicates that development should be located in close proximity to public transport nodes and stations (in this case Kilcoole Rail Station and the bus terminus at the station). Under National Strategic Objective **NSO 1 (Compact Growth) the NDP emphasises the importance of planned, sustainable growth in towns that are supported by adequate**

infrastructure, services and amenities. The requested zoning is consistent with the objective of compact urban development and sustainable transport-led planning.

- A rezoning would bring the rail station closer to the town but also is located on the way to the beach and coastal walk which is the **most important and frequently used public open space for the entire town.**
- The subject lands can be accessed via Sea Road where there is already an **efficient and regular bus service** and is **within walking distance of both the town centre, the beach and coastal walk, the well-used Ballydonarea Loop and the rail station.**
- Specific **transport local objective ‘GDK59A’** seeks *“To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes: a) Pedestrian and cycling infrastructure from Kilcoole Main Street to Kilcoole train station”*. Por client can deliver that local objective.
- The subject lands are serviceable and **close to existing services.**
- Whilst vehicular and public transport access can be achieved for lands sought for immediate rezoning, the subject lands are **predominantly located with the existing pedestrian loop** which runs parallel to the shore, along Sea Road, along Lott Lane and then runs along the lane north of Glenkeen Nursing Home to the shore.
- The **road network at Holywell Avenue and at Lott Lane has been designed and built to accommodate further development on this side of the town.** This is to complement the upgrade of Sea Road under local objective GDK59A which would further accommodate development.
- The subject area **immediately north of Sea Road can be considered ‘infill’** as there is a node of development located between the subject area and the train station. Development anticipated for the **south of Sea Road is an ‘urban extension’ contiguous to existing development on Sea Road** and in both instances (‘infill’ and ‘contiguous extension’) the principles of compact development set out in ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ and ‘Development Plan Guidelines for Local Authorities’ are both complied with.
- The former SLB lands in our client’s control should form the basis of RN1 lands and we believe there is **no justifiable reason for jettisoning previous SLB lands in principle** and especially from **imminent NR zoning consideration when there is substantial population growth in the town and a worsening housing crisis.** Now is the time to **bring forward former SLB lands for RN1 consideration.**
- It should be noted that lands identified in red hatching in Figure 1 below are outside the control of our client but we believe are the subject of a separate rezoning submission. Our client can provide access to those lands between Phase 1 and Phase 2 of our clients development lands which in turn would facilitate access to their most northerly lands (Phase 2) which is currently separated from Phase 1.
- A requirement for a Masterplan for the development of lands east of the town could be identified as a Strategic Local Objective (SLO).
- A **transport assessment** has been undertaken by Transport Insights and they indicate that:
 - **‘Measure RAIL3 – DART Extension’ advocates that the NTA and Irish Rail will extend the South-East DART corridor to deliver electrified rail services to Wicklow Town, via Kilcoole.**

- The **DART+ Coastal South Project** will deliver an **improved and more frequent electrified network, with additional passenger capacity and enhanced train services between the city centre and Greystones** (begin planning in mid-2025).
- Wicklow town, and consequently Kilcoole is expected to get an **hourly service by 2028 (within the lifetime of the Draft Variation)**.
- Kilcoole Rail Station platform is to be **extended by 44m** to cater for full length trains.
- The Greater Dublin Area Transport Strategy proposes the **extension of the Luas Green Line from Brides Glen to Bray** which would provide an onward connection to Kilcoole via the L2 bus route.
- Regional Policy Objective (RPO) 4.40 of the **GDA Transport Strategy supports the development of the Bray Luas Line**.
- Within the Wicklow CDP public transport objective CPO 12.21 seeks to enhance existing parking facilities at and **improve bus links to the train station at Kilcoole**.
- Objective CPO 12.3 of the CDP requires the local authority to prepare and/or update Area Based Transport Assessments and **Local Transport Plans for all Level 1-4 towns** and for these assessments to inform land use decisions.
- The subject area is located **400m from the rail station which is served by intercity services** with 3 train services northbound during the weekday morning peak period.
- Recent Bus Connects services implemented since January 2025 provide the **existing L2, X1 and X2 services**.
- There are **numerous active travel routes already in place** servicing the subject lands including the Ballydonarea Loop Walk and the Ballygannon Loop south of the rail station.
- The **occupancy of L2 buses** has been observed to be low.
- The following **amenities and key land uses are all located within a 30 minute walking catchment**: primary and secondary schools; Tesco Express and Centra; and Kilcoole Industrial Estate – in addition to the beach, the looped walks, the rail station and coastal walk.
- There are **dedicated cycle lanes** along Hollywell Avenue and parts of Sea Road. Greystones; Newcastle; Delgany; and Newtownmountkennedy are all located within 30 minutes cycle.
- The **Draft LPF identifies improvements to Kilcoole Road pedestrian facilities** which are at Phase 5 (Detailed Design and Tender) and also seeks 2 no. junction improvements along Sea Road which will **facilitate enhanced active travel to and from Kilcoole Rail Station**.
- Use of **public transport and active travel will be encouraged in this location reducing dependence on the car** thereby reducing the carbon footprint and encouraging more healthy lifestyles.
- Forecast travel demand from both phases 1 and 2 can be accommodated within the existing road network.
- The following are the key points on **Flooding** summarised based on an assessment by Langan Consulting Engineers, experts on flooding:
 - There are a substantial number of flood maps presented as part of the Proposed Variation. **Such a number of flood maps is confusing** and the reader is challenged as to which one should take precedence especially given that there is at least one ultra extreme flood scenario presented for a period three quarters of a century from now.

- Our client's lands **north of Sea Road** are subject to relatively little flooding under any present or future flood scenario.
- Our client's **lands south of Sea Road** are subject to relatively modest flooding under the **present day flood scenario** presented in the Draft Variation. Under the present day scenario and the most extreme flood scenario for 2100 the **primary access to the lands north and south of Sea Road** are not subject to any flood risk.
- Under the **present day scenario** the majority of our client's lands are not identified as flooding.
- The use of the **extreme flood scenario of HEFS++** presented by **Wicklow County Council** is not advocated by the OPW in any public policy document. Please see the various flood scenarios summarised below in Figure 5. There is no national policy or Ministerial Guidance stipulating to use the HEFS++ scenario.
- **HEFS++ is for a scenario at the year 2100** which is many statutory plan periods away when life in so many ways may be very different.
- **If a HEFS scenario is to be used and to be sufficiently conservative it should be a HEFS scenario without ++** that should be used in accordance with the relevant guidance from Intergovernmental Panel on Climate Change (IPCC)¹
- Should the **HEFS scenario (without ++)** be used this would entail a **1m rise in sea level which would substantially reduce the area of flooding shown on HEFS++ mapping**.
- Under a **more realistic, less conservative, less long term, HEFS scenario of 1m sea level rise** that area south of Sea Road would still be suitable for development as long as a site specific flood risk assessment and justification was provided in accordance with National Flooding Guidelines to support any application in the area covered by HEFS under the 1m sea rise.
- A **local objective to support requested zoning in this location could require a site specific flood assessment** to support any development of those lands under the 1m sea rise to the south.
- A **high-level ecological assessment** has been undertaken and concludes the following:
 - There are **eastern parts of the subject lands that flood**, and may be appropriate for the feeding of wintering birds. These areas will **not be developed in any case and will be retained as open space**.
 - The eastern part of the subject lands are located **close to but not within the ecologically sensitive beach network, the coast and the SAC and SPA** located therein. The eastern portion of lands directly abuts the Murrough Wetlands SAC and the Murrough SPA which are of European importance.
 - It is noted from other, more recent, planning applications, in this locality that the local waste water treatment plant is reaching capacity with the result that outfall sewage is being released to the adjacent watercourse without treatment thereby potentially polluting the Designated Site. In response, local developers have included on site waste water treatment to treat their waste water before discharging treated waste water to the

¹ IPCC, 2023: Summary for Policymakers. In: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, pp. 1-34, doi: 10.59327/IPCC/AR6-9789291691647.001

adjacent water courses to **prevent pollution of the adjacent SPA and SAC. A similar waste water arrangement will likely be required in this instance also.**

1. Purpose of this Submission

The purpose of this submission is to encourage the County Council to zone additional lands in the short term under RN1, and to seek the reinstatement of the former 'Strategic Land Bank' for longer term development further to the north.

This request is consistent with sustainable urban growth policies at a national, regional and local level, housing delivery objectives, and guidance on zoning.

The extent of the subject site is shown in **Figure 1** below, along with key infrastructure, local amenities and land uses.

Given the severity of the housing crisis and the urgent need to address housing supply shortages both locally and nationally, it is essential to maximise the efficient use of serviced land that is contiguous to the town or infill, as is the case with our client's lands, especially given the proximity of the train station.

The lands in question we are seeking immediate rezoning for residential (RN1) were essentially previously identified Strategic Land Bank (SLB) south of Sea Road. That former designation should not have been deleted as there is insufficient consideration given to the strategic growth of the town. The need for additional zoning and appropriateness of this location are justified through projected population growth, revised housing allocations, capitalise on provision of community and social infrastructure and importantly proximity to the rail station – Kilcoole being only one of six towns in the county with a railway station and in anticipation of the anticipated and politically supported rail upgrade. It does not make sense for the railway line and train station to be upgraded for no apparent purpose other than to serve future development in Kilcoole.

A requirement for a Masterplan for the development of lands east of the town could be identified as a Strategic Local Objective (SLO).

2. The Subject Lands and Location

2.1.1 Lands in Question

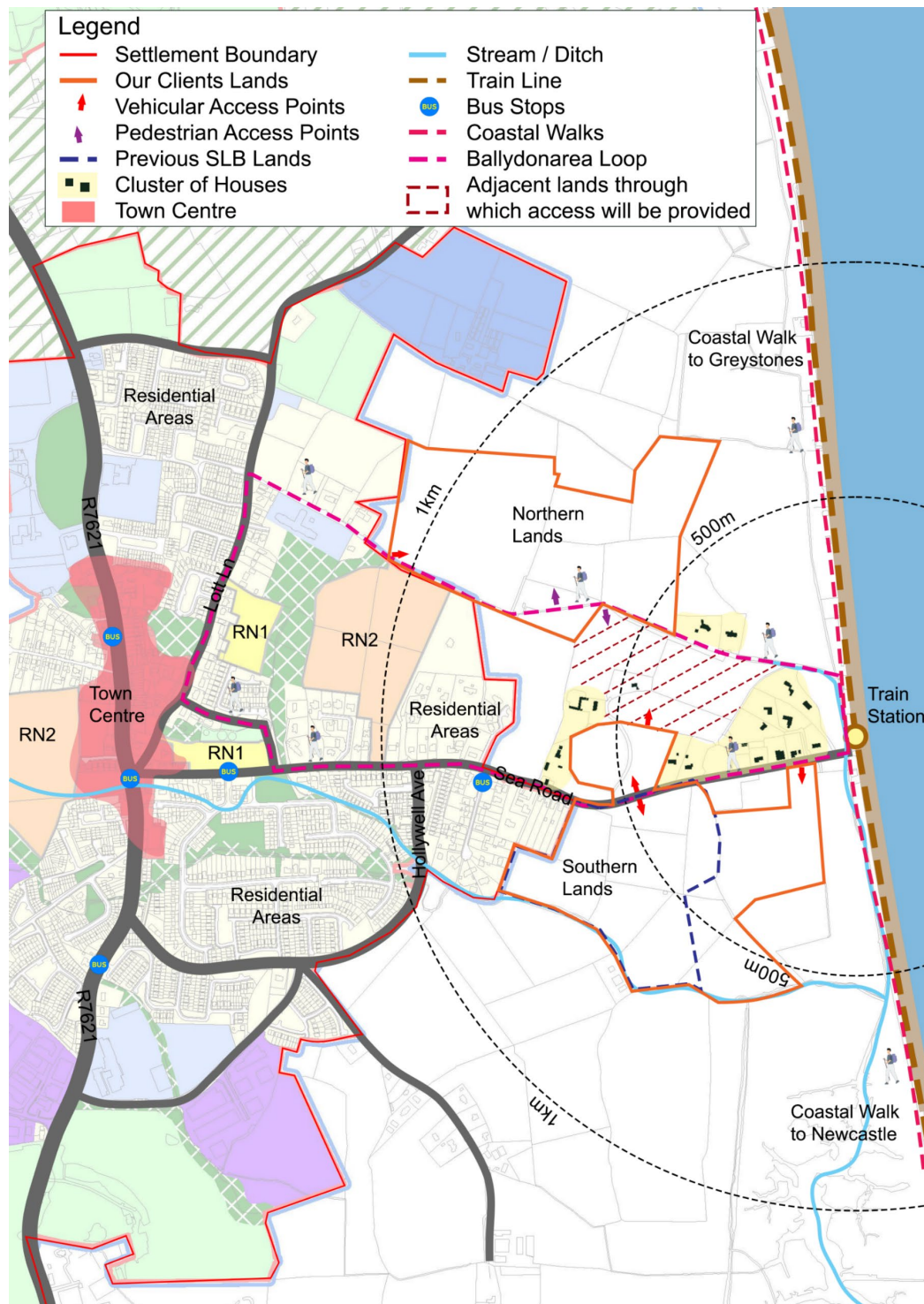
The lands in question are outlined in red within Figure 1 below. The total area of the lands in our clients' landholding is 43ha. Lands mainly south of Sea Road and for a small area just north of Sea Road measure 22.6 ha and these lands fall within Area 2 of the LPF analysis. Lands further north of Sea Road measures 20.4 ha and these lands, however partially fall within Area 1 of the LPF analysis. Our client's lands south of Sea Road and immediately north of, and contiguous to, Sea Road are sought for RN1 zoning with the lands further north of Sea Road sought for RN2 or identified as SLB should that zoning be reinstated.

It should be noted that lands identified in red hatching in Figure 1 below are outside the control of our client but we believe are the subject of a separate rezoning submission. Our client can provide access through their own lands along the northern boundary of Sea Road and provide vehicular access into the red hatched third party lands to the north, who would then facilitate reciprocal access through their site to our client's lands further to the north. In this manner there is a cooperative arrangement between the respective landowners so that the requirement for vehicular access from the north and the country lane off Lott Lane can be avoided.

2.1.2 Kilcoole and Environs

The town is 3 kms south of Greystones, 14 kms north of Wicklow Town and approximately 28 kms south of Dublin City. The town has a railway station at the beach and is one of only six towns served by a train station in the county of Wicklow. The town is described as a Level 4 town below the larger settlements of the County including Wicklow Town, Bray and Arklow. Kilcoole is just one of the two Level 4 towns with a railway station. That on its own would be sufficient to justify its elevation in the County Wicklow Settlement hierarchy.

Figure 1: Site Context



Kilcoole Industrial Estate and Network Enterprise Park are two large employment areas located south-west of the town indicating further justification for additional residential development as a matter of sustainability. Employment in the town is sufficient to warrant an increase of its resident population and elevate Kilcoole status in the settlement hierarchy.

Woodstock Demesne, Druids Glen Golf Course and Druids Health Golf Course are some of the recreational activities close to the town. Community facilities include the Kilcoole Primary School, St. Anthony's School and Kilcoole Community Centre, St Anthony's Kilcoole FC, Kilcoole GAA and Colaiste Chraobh Abhann, which are all within the town environs and provide the necessary social infrastructure to support future residential zoning.

It is noted in the Wicklow Tourism webpage that Kilcoole is known as the fictional village of Glenroe as shown in RTE's popular soap opera. Kilcoole is also known for its beautiful coastline and is also considered an attraction for bird watchers. The town has potential for further tourism growth and further employment in this sector.

Our client's lands are strategically situated between the town and the Kilcoole Railway Station and contiguous to existing developments to the west as well as the beach which is highly popular recreational amenity and public space for the town. Any proposed development would be an extension of the existing built up area situated close to the railway station, and between the station and the town.

Sea Road is a local road, connecting the town to the railway station. Sea Road can be split into two sections. The first section runs for 750m from the junction of R761 up to Sea Road cul-de-sac. This section has two lanes and footpaths on both sides. The second section is about 800m from the cul-de-sac road to the railway station, and passing in front of our client's lands, this section is a single-lane and has no footpaths. An objective in the 2013-2019 LAP is to provide such a pedestrian footpath and this is carried forward in the Draft LPF. That footpath would be provided to accommodate future development in this location and to the benefit of the town and for the pedestrian safety of station users. This objective is supportive of our client's lands with access onto Sea Road being rezoned in the short term and they will implement that local objective and provide that footpath.

It should also be pointed out that the road network especially along Holywell Avenue and Lott Lane are clearly built for the purpose of serving substantial development in this vicinity. The draft LPF identifies the eastern part of the town within the most development potential (refer to pages 33-35 of the LPF).

The Kilcoole Estuary lies to the east of the town and along the coast. The N11 lies further west of the town. There are no direct links to the N11 from the town. One needs to get to Knockroe Roundabout in Delgany and reach Junction 11 from there. The Junction 11 (N11) is about 4.5 kms from the town and about 8-10 mins drive. Accordingly, our client seeks inclusion of the roads objective set out below.

Access and Connectivity (Local and Strategic)

The station is 20 mins walk away from the town centre but extremely accessible to the lands in question to the east of the town and to the north (unzoned lands) and south (previously SLB) of Sea Road. The Pre-draft report and the LPF document acknowledges excellent public bus transport to all parts of the County and Dublin.

The M11, which is a national road network is 8 mins / 4 kms drive away from the town centre.

The Dublin Connolly - Rosslare Europort runs on the line. There are in total 14 stops including Dublin and Rosslare. In Wicklow, there are six towns serviced by this service. There are no DART services to Kilcoole currently.

As indicated above there are six towns with railway connectivity. The table below identifies the towns with railway connectivity and their place within the county's settlement hierarchy set out in the CDP:

- Level 1 Metropolitan Area and Key Town – Bray
- Level 2 Core Region and Key Town – Wicklow and Rathnew
- Level 3 Core Region and Self-Sustaining Growth Towns - Greystones and Arklow
- Level 4 Core Region and Self-Sustaining Towns – **Kilcoole** and Rathdrum

There is a long-term vision / plan for a future extension of DART to Wicklow town, serving Kilcoole and consequently serving our client's lands. There is currently substantial political pressure being brought to bear on that upgrading and extending the DART service to Wicklow town, including Kilcoole. Recent media coverage has indicated that this upgrade would include electrification of the line and the removal of diesel fuelled rail engines and that service would substantially be upgraded in terms of frequency and reliability of service.

Please see the links below regarding rail upgrade:

- <https://www.businesspost.ie/news/dart-services-to-wicklow-town-could-be-in-place-by-2026/#:~:text=It%20is%20intended%20to%20provide,be%20in%20place%20by%202026>
- <https://www.eastcoast.fm/news/wicklow-news/irish-rail-unveil-prototype-for-new-dart-carriages-that-will-serve-wicklow-town/>

Access to the town can be enhanced with the provision of a new pedestrian footpath between the station and the open part of Sea Road as for the Draft LPF local objective GDK59A. The provision of a footpath in this location benefits the whole town by providing safe pedestrian access to the beach and the railway station which both serve the town. Our client will provide that footpath to accommodate development of their lands either side of Sea Road.

Please see the attached Transport Assessment carried out by Transport Insights to support the requested rezoning.

3. Planning Context

3.1 National

3.1.1 Ministerial Letter

In a ministerial letter dated 16th May 2025, the Minister for Housing, James Browne is requesting councils to quickly identify and rezone additional land for residential development. This is part of a broader effort to meet the revised housing targets as set out in the Revised NPF. The letter also emphasises the importance of local authorities working with the government to identify suitable locations and facilitate the delivery of infrastructure projects. The key point from the Minister is that the housing crisis is a national and local problem that requires a collaborative approach between Government and local authorities. We take this and the letter to mean that additional lands should be zoned to ensure that sufficiently more onerous housing targets are met.

Review of Development Plans

Local authorities are being asked as an absolute priority to prepare a review of respective development plans, and that *"City and County Development Plans must be reshaped as quickly as possible to reflect the nation's updated housing requirements"* and to reopen their development plans and rezone significantly more land for housing by the end of 2025. The subject LPF should not fall outside this remit as regards the current draft proposed variation.

Housing Targets and Collaboration with the Housing Activation Office

The Minister's letter highlights the importance of meeting new housing targets as set out in the Revised NPF i.e., 50,000 new homes per year.

The letter indicates that the government will assist councils through the new Housing Activation Office in identifying suitable locations and overcoming barriers to development.

Importance of Infrastructure

The letter emphasises the need for local authorities to ensure that any newly zoned land has the necessary infrastructure to support residential development, and or plan and progress servicing of lands as soon as possible for housing development.

Zoning should be promoted where lands are clearly serviced or serviceable (Development Plan Guidelines for Local Authorities 2022). The infrastructure is there in Kilcoole – it just needs to be utilised and made sustainable from further development to the east of the town.

The Importance of Delivery

The thrust of the Directive is that housing must be delivered and delivered quickly. If our client's land is zoned they will proceed with development following the grant of planning permission.

3.1.2 National Development Plan 2021-2030

The National Development Plan 2021-2030 is prepared by the Department of Public Expenditure and Reform.

Major investments in this NDP of relevance include the following:

NSO 1 – Compact Growth • Deliver an average of 6,000 affordable homes each year • Urban Regeneration and Development Fund • Croí Cónaithe Fund

NSO3 - Strengthened Rural Economies and Communities • Rural Regeneration and Development Fund • National Broadband Plan • Supports for the remote working hub network • Better public transport through the Connecting Ireland bus programme

NSO 4 - Sustainable Mobility • BusConnects for Ireland's Cities • Commuter Rail – Regional Cities, MetroLink and Dart+ • Greener and Cleaner Bus Fleets

It is stated under Chapter 6: Compact Growth (NSO 1) that *"A transport-led housing development approach will allow for the emergence of sustainable and well-connected communities where active travel is feasible and attractive for many localised journeys and good quality public transport is available to facilitate longer journeys into the major urban centres."*

A transport led approach in this case would be to bring forward much needed residential zoned land especially at a time when it is needed most and make it available near the train station.

It is stated under Chapter 8: Strengthened Rural Economies and Communities (NSO 3) that *“This NDP will also support the expansion of sustainable mobility options, both in the context of improved public transport and expanded active travel infrastructure, with the aim of offering citizens in rural areas a sustainable alternative to the private car.”*

It is stated in Chapter 9: Sustainable Mobility (NSO 4) that *“aligning strategic land use planning with transport-led development can support the delivery of large-scale housing development at key strategic locations”*. This indicated that zoning should be informed by proximity and availability of public transport. This is particularly important in this case.

Investing on Dart+ is one of the strategic investment priorities identified in the NDP. Regarding DART+ it is stated that *“The programme comprises a number of infrastructural projects – DART+ West, DART+ South West, DART+ Coastal North to Drogheda via Balbriggan, and DART+ Coastal South – and also a significant expansion of fleet, both battery-electric (BEMUs) and electric multiple units (EMUs).”*

The accompanying Transport Insights Report sets out the existing Bus Connects public transport catchment and future upgrade of the rail station and services.

3.1.3 NPF First Revision

The National Planning Framework (NPF) is Ireland’s long-term strategic planning document, forming a key part of Project Ireland 2040. It sets out a vision for the country’s development up to the year 2040, aiming to guide public and private investment, land use, and infrastructure planning.

A First Revision of the NPF was approved and published in April 2025.

In the first edition of the NPF in 2018, Ireland’s population was expected to reach 5.7 million in 2040. This is now expected to be up to 6.1 million. Against the backdrop of the current housing crisis, this means there will be even more significant demand for new housing during this period. County Wicklow, including Kilcoole, should be expected to get its fairer share of that new allocation. It is stated in the Revised NPF that *“To meet projected population and economic growth as well as increased household formation, annual housing output will need to increase to approximately 50,000 homes per annum in the years to 2040 and will be subject to monitoring and review.”*

Relevant National Policy Objectives in the First Revision to the NPF:

National Policy Objective 3 - Eastern and Midland Region: *approximately 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million.*

National Policy Objective 7 - *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.*

National Policy Objective 9 - *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 and ensure compact and sequential patterns of growth.*

National Policy Objective 10 - *Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent*

to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth. (Underlining is our emphasise) This is particularly relevant to the subject site and this request for rezoning.

National Policy Objective 11 - *Planned growth at a settlement level shall be determined at development plan making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.*

National Policy Objective 43 - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

To achieve compact growth in the key towns and cities, the target is for at least 40% of all new housing to be delivered on infill and brownfield sites within existing built-up areas. The other 60% of new housing will continue to be delivered at the edge of settlements and in rural areas on a sequential pattern. This is particularly relevant to the subject site and this request for rezoning.

3.1.4 Population Projections, The Flow Of New Households And Structural Housing Demand (July 2024)

The "Population Projections, The Flow Of New Households And Structural Housing Demand" report, released by the ESRI in July 2024, estimates the future need for housing in Ireland based on projected population growth and household structure.

The report estimate that between 35,000 and 53,000 new dwellings will need to be built each year to meet future demand.

Table 1: Extract of Table A.1 Population Projections

	Population ('000) Baseline				Annual Growth in %, 2022–2040		
	2022	2027	2032	2040	Baseline	High Migration	Low Migration
State	5184.0	5532.1	5781.0	6106.1	1.0%	1.2%	0.8%
Wicklow	156.9	166.3	172.9	182.9	0.9%	1.1%	0.8%

As per Table 1 above, the County population is expected to grow by 26,000 in the period from 2022 to 2040 or by 9,400 people in the county to 2027 – a full year within the lifetime of the LPF or proposed variation to 2028 and it could reasonably be assumed that the population requirement for 2028 (end of the PPF or Variation) would be approximately 11,000.

As per Table 2 below an average of 1,141 housing units are required each year from 2023 to 2020 and it could be reasonably assumed that 6,846 units would be required in the 6 years of the proposed variation. That 6,846 has to be allocated to all tiers of the CDP. It is noted that the CDP allocates a growth of 20-25% between 2016 and 2031 for Level 4 towns. Kilcoole's population in 2016 was 4,244 and a population growth rate of 25% would result in a new population growth for Kilcoole of 1,061 persons on the basis that overall population growth is to be 20-25% and Kilcoole has a train station. According to the CDP Kilcoole is only receiving an

allocation of population growth of c600 persons in the period 2016 to 2031 (which works out at 40 persons per annum over a decade and a half) which is completely contrary to recorded population growth in the town over successive censuses. This allocation is instead of its fair share of 1,061 persons of the Level 4 towns of which only Rathdrum has a rail station and Newtownmountkennedy and Enniskerry do not. Both Newtownmountkennedy and Enniskerry have limited potential for expansion given topography and physical constraints as well as an absence of public transport (rail especially and public bus) that Kilcoole has.

The CDP states that Newtownmountkennedy starts in 2016 with a lesser population than Kilcoole by 700 people and increases its own population over Kilcoole by 400 persons by 2028. This is a net gain of 1,100 people for Newtownmountkennedy over Kilcoole which is unsupportable in our view. Newtownmountkennedy grows from 2016 to 2018 by 1,600 people and Kilcoole only grows by 534 people over the same period. This is unjustified for Kilcoole given that it has a rail station that will be expanded with a commuter service to be provided over the life span of the proposed variation i.e., by 2028 (see attached Transport Insights report).

Table 2: Extract of Table A.2 Structural Housing Demand Projections By Local Authority

	Average Across All Assumptions		Lowest		Highest	
			low migration, current trend headship & 0.25% obsolescence.		high migration, lower household size headship & 0.5% obsolescence.	
	2023–2030	2030–2040	2023–2030	2030–2040	2023–2030	2030–2040
State	44,047	39,654	35,018	27,805	53,294	52,445
Wicklow	1,141	1,129	912	816	1,374	1,465

3.1.5 Development Plan Guidelines

Development Plans Guidelines for Planning Authorities were prepared by the Department of Housing, Local Government and Heritage, and published in June 2022.

These national guidelines are a reference manual for the preparation of local authority development plans and aims to ensure Development Plans take into account the forecasted amount of housing in an area and that sufficient new homes can be built in key areas of housing demand.

Section 1.3 sets out a renewed focus on more sustainable growth through compact urban settlements, supported by accessibility to transport, jobs, services and amenities which is considered key to recuring greenhouse emissions, inefficient lands and natural resource consumptions and environmental degradation. It is recognised that the ‘translation of this compact growth agenda into the development plan is a key task for development plan preparation.

Section 1.6 (Planning from an Evidence Base and Monitoring the Outcomes) stipulates that the process of preparing a plan must be informed by local experience of planning over time. This means that the current plan-making exercise needs to be realistically informed by the delivery and outcome of previous plans and planning objectives for the area and we emphasise that support for plans and zoning must be based on up to date evidence and in this case 2022 Census and more up to date accurate population projections and housing allocations than the County Council has used up to this point. For example, there must be a serious question raised over sites in the town to actually deliver development where not so much as a planning application has

been lodged since the adoption of the previous LAP in 2013.

Section 4.4.2 (Lands / Sites Proposed to be Zoned) states that *“Estimating requirements for land and sites to be zoned for residential or a mixture of residential and other uses must follow on from an assessment of whether the amount of land already zoned is adequate to meet the housing needs of the area. The rate of take-up and build-out of such land over a preceding period of at least 6-10 years is an important consideration in this regard.”*

The LAP adopted as far back as 2013 identifies a mere 5 sites zoned for future residential development. One of these 5 no. sites was granted permission under 14/1212 for 62 units and they have been constructed. A further site zoned for residential development was granted planning permission for 14 units under planning permission 16/1419 and those units are also built. The status of the 3 no. remaining sites is that one was granted planning permission under ref: 24/60586 for 45 no. residential units, another site (SLO5) is under appeal, and there are no planning applications lodged on SLO6 site. At this stage it is clear that the population growth experienced in Kilcoole has not been met with any commensurate growth in lands zoned for housing.

The guidelines add further that:

“Such analysis must also consider trends and projections in respect of rural housing output and infill development/building refurbishment, as well as whether land already zoned may be serviced or serviceable within the six-year life of the plan.”

It is further noted that it is not the purpose of the planning system and the development plan process to facilitate the hoarding and speculation of serviced development plan. However, it is recognised that there is a need for some degree of competition and choice in the residential land market.

Crucially in the context of Kilcoole it is stated that:

“.....in considering whether to zone additional new land and sites for residential (or a mixture of residential and other uses) to meet housing need, planning authorities must ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the development plan, while also considering and factoring in the proportion of projected housing need to be met on unzoned land in rural areas.”

In regard to the future zoning of land from targets set out in Section 4.4.3 (Ensuring Sufficient Provision of Housing Lands/Sites) of the Guidelines, it is stated that:

“In making provision for housing within settlements in the core strategy of a development plan, in certain instances a planning authority may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. This means that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded.”

Given that Kilcoole is served by high quality public transport including public bus and is one of the relatively few towns in the county to have a railway station, we believe that Kilcoole has merit in receiving additional provision without affecting other towns in the County settlement hierarchy, and without damaging the county's settlement hierarchy especially if the undeliverable Fassaroe

3,000 units have to be allocated throughout the county which we know to be the case.

When considering the zoning plight for Kilcoole we would refer the local planning authority to the following as outlined in the Guidelines:

- (a) There is no automatic presumption of Additional Provision land or sites to meet housing supply targets in any development plan. The extent of any Additional Provision must be identified, quantified and explained in the core strategy and should not exceed 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole, for any six-year plan period;*
- (b) Housing supply and population targets for the relevant six-year development plan period, and the location and level of servicing of lands already zoned for development, in accordance with 4.4.1 and 4.4.2 above;*
- (c) The need to target a minimum of 30% of all new residential development in settlements outside cities and 50% in cities and their suburbs, as brownfield or infill development within the boundary/built footprint of the existing built-up area;*
- (d) Any parts of strategic and sustainable development sites that will be phased and built out over a longer period than the six-year development plan (such as large-scale urban regeneration areas, transport-led development sites or SDZs), which may be included over and above as Additional Provision lands (per section 4.4.4 below);*
- (e) Additional Provision must comprise land and sites that are serviced or serviceable within the six-year plan period;*
- (f) The location of zoned lands and sites within the settlement must have regard to the position of the settlement in the settlement hierarchy, access to employment and public transport, be consistent with sequential development patterns, Town Centre First principles, proximity to services and facilities and the need to reduce carbon emissions;*
- (g) Additional Provision of serviced lands where concentrated in a particular area or settlement, may be phased in a clear sequence of priority to facilitate development management decisions and development monitoring by the planning authority and An Bord Pleanála;*
- (h) Additional Provision must be compatible with the core strategy regarding the proportion of projected housing demand to be met on unzoned land in rural areas.*

We request that future consideration of land use zoning be conducted in accordance with the sequential approach outlined in Section 6.2.3 (Sequential Approach to Zoning for Residential Development) with regard to up to date population projections and housing allocations. This sequential approach should reflect the compact growth utilisation of existing infrastructure and town regeneration national policy objectives of the NPF, and especially the First Revision of the NPF which states that 60% of new zoning/development should be on greenfield edge of settlement consistent with the sequential approach and more recently the Minister's Direction to local planning authorities.

It is acknowledged that the spatial pattern of the growth of settlements, often along radial access, characterised by ribbon and low density development, had served to promote extremely high levels of car dependence and to spread out development, making them inaccessible. This is clearly not the case in this instance.

The Guidelines seek to assist in changing this historical unsustainable spatial growth pattern towards a more compact growth approach and transport-led growth planning. The rezoning of at least some of our client lands as RN1 meets both these requirements.

3.1.6 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)

The “*Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)*”, issued by the Department of Housing, Planning and Local Government, establish a framework for sustainable urban expansion, prioritising compact settlements, efficient land use, and transport-led development.

These Guidelines replace the “*Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009)*” and reinforce the requirement for directing new residential development towards well-serviced, strategically located sites within the built-up areas of settlements.

Compact Growth and Utilisation of Land

A core principle of these Guidelines is the promotion of compact and sustainable settlement patterns, ensuring that urban growth is directed towards areas with existing services and infrastructure.

These principles could not more directly support the case for additional zoning of residential zoning at our client’s lands. The site is strategically positioned, is fully serviced and presents an immediate opportunity for sustainable residential development, aligning with national and regional planning objectives.

For Small and Medium Sized Towns (1,500 – 5,000 population), such as Kilcoole, the guidelines set out a specific planning priority to ‘deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.’ (our emphasis underlined)

Table 3.6 Areas and Density Ranges Small to Medium Sized Town are specified as follows:

“The edge of small to medium sized towns are the lower density housing areas constructed around the centre, while urban extension refers to greenfield lands at the edge of the built-up area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that densities in the range 25 dph to 40 dph (net) shall generally be applied at the edge of small to medium sized towns.”

Proximity to Services and Transport

A key priority of the Guidelines is the alignment of residential development with sustainable transport infrastructure to reduce car dependency and encourage active travel and public transport use.

The Guidelines recommend:

- Locating new residential developments in proximity to schools, healthcare services, retail, and community amenities (in this case the beach and coastal walk).
- Prioritising sites that support active travel (walking and cycling) and are well-connected to public transport routes (in this case Ballydonarea Loop) .

- Encouraging higher-density housing in proximity to town centres and key transport nodes to create sustainable, vibrant communities (in this case the location of the subject lands is between the town and the rail station).

Zoning of our client's site directly aligns with these principles, is within walking and cycling distance of Kilcoole Town Centre, enabling future residents to access key services and amenities without reliance on private vehicles. The site is within 500m of the Kilcoole Train Station, additionally, the site is directly connected to public transport services, reinforcing its suitability for compact, transport-led development.

The site is also located between the existing built up fabric of the town and the town amenity (namely the beach and coastal walks).

3.1.7 Housing Policy and Guidance

On 8th April this year, the Minister for Housing indicated he will *'give a direction to all the local authorities to open up their development plans to rezone a very significant additional amount of land so that land is available for builders to build the homes that people need across the country.'*

Housing for All (2025) seeks to address Ireland's housing challenges by increasing supply, improving affordability, and supporting those experiencing homelessness. The need to raise housing completion targets each year all the way to 2040 is acknowledged. If in circumstances such as our client's lands, these lands are not included for residential zoning with an upgraded rail station and enhanced service planned in the next few years, by the end of the period of the proposed CDP variation, as a case in point, then there is no chance that this target will be met nationally.

3.2 Regional

3.2.1 Regional Spatial and Economic Strategy - Eastern and Midland Regional Assembly

The subject site is located within the area covered by the Eastern and Midland Regional Assembly (EMRA) - Regional Spatial and Economic Strategy (RSES) 2019.

Guiding Principles - Integration of Land Use and Transport

A key guiding principle for integration of land use and transportation that is relevant in this case is the following:

'Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.'

The subject lands can provide enhanced and safe pedestrian access to the beach and the rail station.

3.3 Local

3.3.1 Wicklow County Development Plan 2022-2028

Kilcoole is identified as 'Level 4 – Core Region – Self-sustaining Town' in the Wicklow Settlement Hierarchy, as listed under Table 3.3 of the CDP.

We would dispute the fact that Kilcoole has a weak employment base and the range of employment opportunities in the town is already relatively well developed as accepted in the existing LAP and is capable of supporting further residential development especially given actual 2022 population growth in the town and existing and enhanced rail transport.

Wicklow County Development Plan 2022 – 2028 Appendix 9 - Infrastructural Assessment Report

The following is an extract of Appendix 9 Infrastructural Assessment Report of the CDP.

Waste Water

“Serviced by both the Kilcoole and Greystones Waste Water Treatment Plants, both currently operating below design capacity (Kilcoole 4,000pe, operating at c. 2,000pe) and have capacity to accommodate the growth targeted by the Core Strategy.”

Water

“Supplied with potable water from the Vartry water supply and is well within operational capacity. Upgrade to increase capacity is due for completion in 2021.”

Population targets for Kilcoole confirmed in the CDP are dealt with elsewhere in this submission.

3.3.2 Draft Local Planning Framework / Proposed Variation No. 4 of the Wicklow County Development Plan 2022-2028

Settlement, Population and Housing Strategies

The following is an extract of Table 1B of the LPF, which states;

“Level 4 settlements are designated ‘Self Sustaining Towns’ described as ‘towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining’. These towns range in size (as per the Census of population in 2022) from c. 2,000 to 4,500 persons. Population growth in Level 4 towns overall is targeted to be in the 20%-25% range between 2016 and 2031, with variation in future growth rates between towns in the level due to developments already underway in some towns.”

As indicated above the employment base of the town is not weak.

Population and Housing

The target growth of population between 2016-2031 is 602 and the target growth of housing is 287 between the same period. As indicated above a population growth of c600 persons over 15 years equates to 40 persons per annum. This projected growth is very substantially less than growth actually experienced in Kilcoole from 2016 to 2022 which was 7.8%. The only thing that will slow down population growth, because the demand is there, is lack of available housing opportunities and for that to be addressed additional lands need to be zoned for residential.

Table 3: Population Growth in the State, County Wicklow and Kilcoole including 2022 Census

Year	Population of Ireland	Population Growth in Ireland	Population of Wicklow	Population Growth in Wicklow	Population of Kilcoole	Population Growth in Kilcoole
2011	4,581,269	-	136,640	-	4,049	-
2016	4,761,865	4%	142,425	4.2%	4,239	4.8%
2022	5,149,139	8.1%	155,851	9.4%	4,569	7.8%

The population targets (Table 3 above) and housing growth targets (Table 4 below) which bear no relationship to reality and actually recorded 2022 census population growth.

Table 4: Extract of Table 2.1 – Population growth targets Greystones-Delgany and Kilcoole 2028 and 2031

Town	2016 Census	Q2 2028 Target	2031 Target	Growth 2016-2031
Greystones-Delgany	18,140	21,727	22,081	3,941
Kilcoole	4,239	4,778	4,841	602

From the above it is clear that the 2028 target of 4,778 is essentially met at 4,569 in 2025 three years early. The target for 2031 is also unrealistically low at an increase of just 63 people or 20 residential units approximately to 2031. The quota of 63 people to 2031 from 2028 to 2031 would appear to be based on the 2016 census and effectively says no growth in Kilcoole. This is because it would appear from Table 2.1 of the LPF that the 2016 census is used rather than the 2022 census. From that 2016 based target in Table 2.1 of the Draft LPF there is an identified requirement to accommodate an additional 209 people up to the 2028 target but one should bear in mind that the 2022 census identified a growth of 330 persons from 2016 meaning that the population target for 2028 was already exceeded by 50% in 2022.

There is a current shortfall in population of 94 people following construction and occupation of ref: 23/60348 since the 2022 census. This leaves a requirement for only approximately 94 people or circa 38 houses over the remaining period until 2028 if one does use the 2016 census population for the town setting aside the actual recorded population growth not acknowledged in the Draft Variation. The remaining headroom within the target of 38 houses (over three years to 2028) is hopelessly out of touch with the population growth in the town over a sustained period and the minister's direction to zone more land for residential development, notwithstanding the untapped potential of the soon to be upgrade rail station and train services.

Table 5: Extract of Table 2.2 - Housing growth targets Greystones-Delgany and Kilcoole 2028 and 2031

Town	2016 Census	Q2 2028 Target	2031 Target	Growth 2016-2031
Greystones-Delgany	6,766	8,549	8,719	+1,953
Kilcoole	1,451	1,708	1,738	+287

An additional growth of units of 30 units for Kilcoole from 2028 to 2031 is conservative in the extreme and clearly unjustified. In other words, over half a plan period some 30 only are required. Table 5 above taken from the LPF should use the 2022 census and not the 2016 census.

We estimate there is a requirement to zone for 16 ha to 25ha, based on what we believe are flawed populations projections used by the Council based on the 2016 Census. If Kilcoole is to maintain its fair share of housing allocation in Level 4 towns it is important that the Draft LPF at least match growth forecast for Newtownmountkennedy even though it does not have a rail station. The gross developable area of clients lands is 43 ha and a net developable area of 60% equated to 25.8 ha.

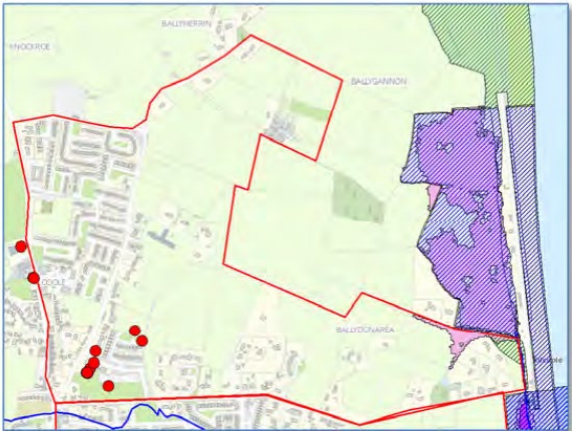
Regarding 'Population and Housing Development Strategy' the following extract is of relevance *"In order to ensure however that overall housing and population targets can be delivered, land may be zoned for new residential development outside of the existing built up envelope, subject to the amount of zoned land not exceeding 70% of the total housing target for that settlement."* This is a further unwarranted restriction that is unjustified in terms of take up rates, completion rates on existing zoned sites, population growth and the ongoing housing crisis and the directive from the Minister for Housing. This means that the national housing crisis will worsen if the picture in Kilcoole is replicated elsewhere.

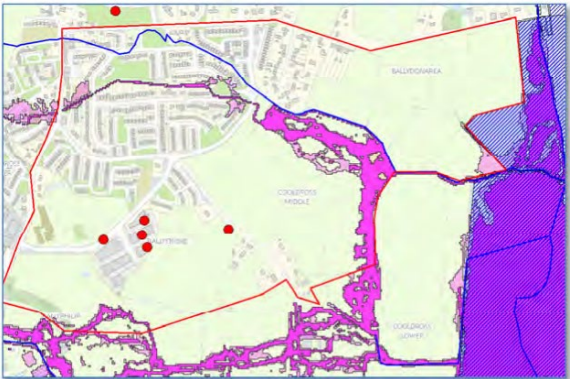
Regarding 'Housing occupancy controls', it is stated that *"As 'self-sustaining growth towns' and 'self-sustaining towns', the settlements of Greystones-Delgany and Kilcoole should provide for the housing demands generated from people from across the County and region."* These demands would justify additional lands being zoned residential rather than merely retaining the current 2 no. residentially zoned sites and the County Council's dispensing altogether with the SLB concept for the town and we can see no justification for its abandonment from the 2013 LAP when there was no housing crisis and population explosion that there is currently.

The opportunity for substantial residential development on TC zoned sites is limited and the SLO site (SLO6) has not experienced the benefit of a planning application since 2013.

Impact on Future Development Options

The Draft LPF states that based on different physical characteristics and environmental / heritage assets, Kilcoole is said to have three districts. The details, extents and the limiting factors as set out in the Draft LFP have been identified below. Our Client's lands fall within Area 1 and Area 2.

Areas / Districts as identified within the Draft LPF	Key Limiting Factors
<p>Area 1 - East of Main Street – incorporating some of our client's lands north of Sea Road</p> 	<p>While there are significant areas of relatively flat agricultural land in this area that may be suitable for future development, key limiting factors include:</p> <ul style="list-style-type: none"> - The need to avoid coalesce with Charlesland / south Greystones; - The archaeological sensitivity of the lands surrounding St. Comgall's Church with recent testing identifying numerous archaeological finds; - The proximity to the European Sites (the Murrough SPA and SAC) and the Murrough pNHA, which is sensitive to disturbance; - The land drainage characteristic of this area, whereby lands drain to the east and south-east, with all watercourses finding their way to the Murrough European Site, which is vulnerable to pollution and hydrological changes; - The distance of lands on the eastern part of this

	<p>block from the town centre and town services, and the lack of pedestrian and cycling connectivity to the town;</p> <ul style="list-style-type: none"> - The significant groups of mature trees in this area and areas of natural biodiversity, for example around Kilcoole
<p>Area 2 - East of Main Street – incorporating some of our client’s lands south of Sea Road</p> 	<ul style="list-style-type: none"> - The proximity to the European Sites (the Murrough SPA and SAC), which is sensitive to disturbance; - The land drainage characteristic of this area, whereby lands drain to the east and south-east, with all watercourses finding their way to the Murrough European Site, which is vulnerable to pollution and hydrological changes; - The distance of lands on the eastern part of this block from the town centre and town services, and the lack of pedestrian and cycling connectivity to the town; - The potential for the discovery of further archaeological remains – current records are associated with finds made during development.

The above synopsis does not preclude development within the control of our client on both sides of Sea Road. The attached transportation assessment, flood assessment and ecological assessment all indicate that development can and should be accommodated in this location. The proximity of the rail station, its upgrade and the upgrade of the line and rail services, along with the proximity to active travel routes indicate that development should be accommodated in this location rather than further to the north where there is green belt designation or to the west where services and public transport is not available to the same degree.

Residential Development Potential of TC and RE Sites

In Kilcoole, there are sites that are not zoned new residential but could accommodate some form of residential development. These are ‘Town Centre’ (TC) and ‘Existing Residential’ (RE). There are opportunity sites that are identified for mixed use development within the town centre.

The opportunity for substantial residential development within TC and RE sites is not substantial because there are to be developed as part of a mixed use scheme, some of the sites are likely constrained, densities are likely to be modest, and are located away from the main public transport hub of the town, which is the train station.

We estimate that the two 2 no. ‘OP’ sites within the town centre comprising a combined 1.5 ha lands will only yield 38 units in total over the two sites. The existing residential (RE) sites are relatively small and constrained with very limited development potential to contribute substantially to the housing stock.

Residential Development Potential of RN1 Lands

There are 2 no. RN1, immediate new residential development sites, out of which Sea Road / Lott Lane (identified as Site B) site has been granted planning permission for 45 units. The SLO6 site (RN1 and identified as Site C below) site can accommodate 23 units. In total only 68 units are deliverable on RN1 sites.

Location	Area (ha)	Status (Q2 2025)	Area Type	Zoning / Priority
Kilcoole – Lott Lane SLO6 (RN1)	1.5	No permissions	Urban Extension	RN1
Kilcoole – Sea Road / Lott Lane	1.2	<u>Development permitted</u>	Urban Neighbourhood	RN1

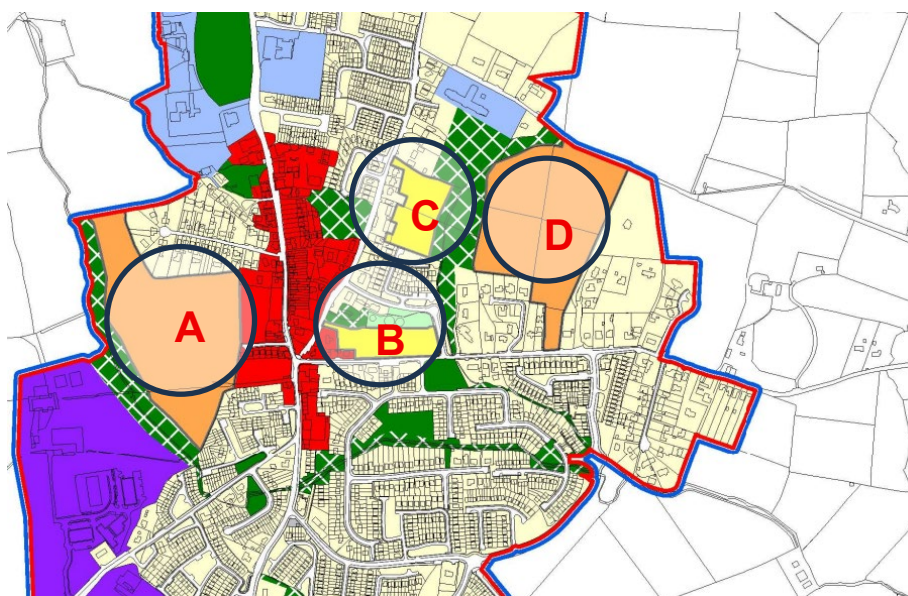
RN2 Zoned Sites in Kilcoole (Urban Extensions) / Future Development

The SLO 5 and SLO 6 are zoned as RN2, and these lands are urban extensions. SLO5 (identified as A below) and SLO6 (identified as B below) represent substantial sites both capable of providing residential development. The SLO5 has a gross area of 7.5ha, with a net developable area of 4.5ha. The SLO6 has a gross area of 7.3ha, with a net developable area of 4.4ha.

Site A / SLO5 is for 56 no. units and is currently with ABP for a decision. The application was refused by WCC.

Site D / SLO6 (RN2) has been zoned since 2013 LAP i.e. 12 years ago and two plan cycles, and has still not been a subject of any planning application. It is highly unlikely that this site will come forward for development in the remaining three years of the proposed variation and it is questionable whether this site should remain zoned as it is unlikely to be delivered in the 3 years following of the proposed variation nor has there been planning activity on it over the last 12 years. Our client is ready to proceed with a planning application if lands sought for RN1 zoning in this instance is achieved.

Figure 2: Location of Zoned Sites (RN1 and RN2)



Local Services Assessment (Section 3, Appendix 6 of the Draft LPF)

In terms of local services, our client lands can connect to the existing water distribution network along Sea Road, and to the Waste Water network which runs on our client's lands south of Sea Road. Therefore, connecting to services are achievable i.e., our clients lands are serviceable.

Impact on Future Development Options

In identifying new residential, employment or community /education development lands, a key consideration is whether they can accessed and services by sustainable and active transportation

modes and whether they are serviced or serviceable. Please see Figure 3 below regarding water supply.

A consolidated map from Appendix 6 of the LPF has been reproduced below in Figure 4 to show the extent of areas within the LPF area that are within an acceptable walking distance to public transport services.

Figure 3: Extract of Water Distribution Network, and (right) Sewer – Storm Network

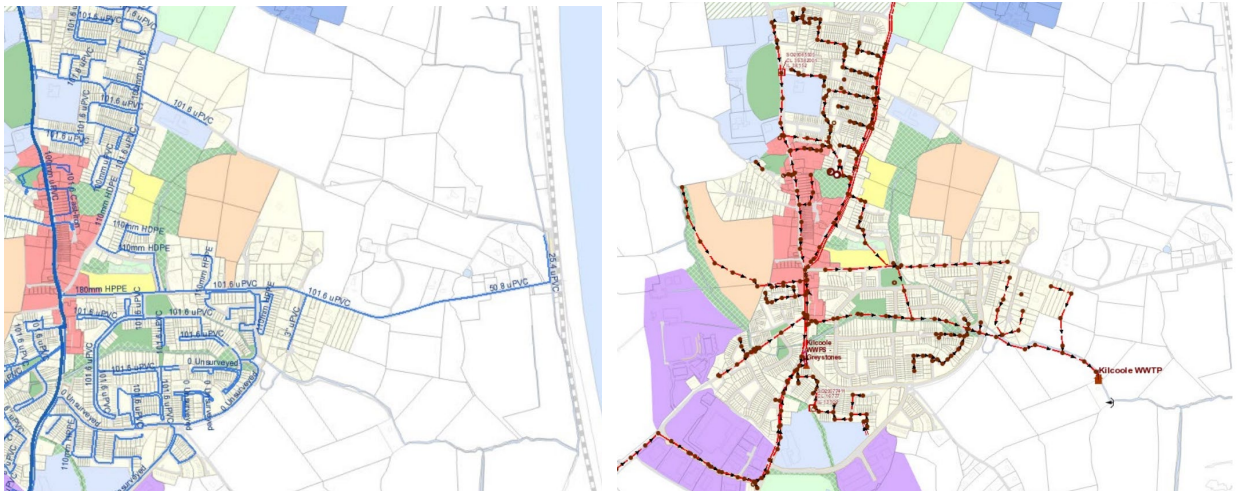


Figure 4: Extract from Appendix 6 of the LPF; (left) shows 15mins' walk to bus services and (right) and 30mins' walk to the Train Station

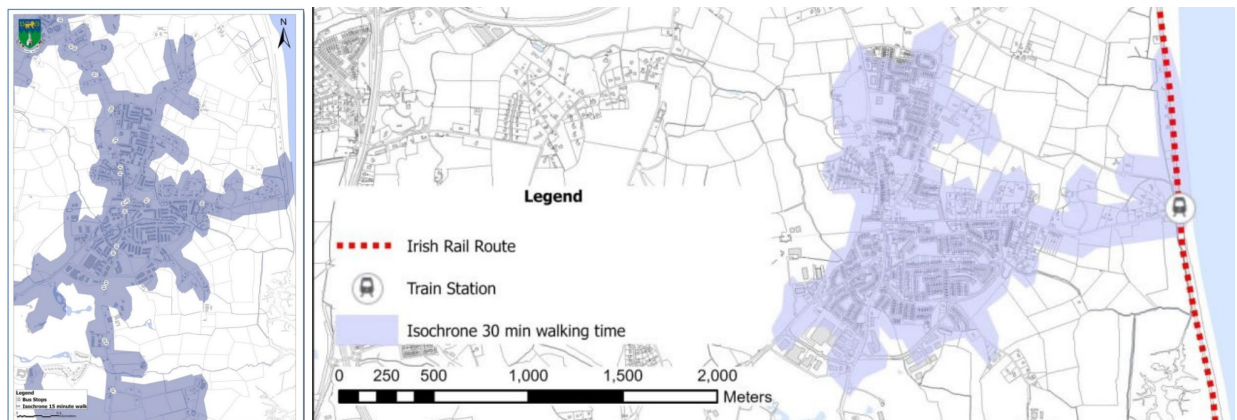


Figure 4 above clearly shows that parts of our client's lands are accessible from public roads (to the north and south of Sea Road), are within both '15 mins walking time from Bus Stops' and '30 mins walking time from Train Station'. The absence of public footpaths that connect to our clients lands will be resolved through implementation of local objective GDK59A which our client would be willing to undertake as a planning gain for the town and which would also serve his site.

Specifically in relation to the footpath connectivity, specific transport local objective 'GDK59A' of the Draft LPF improves access for pedestrians and cyclists to our client's lands, which states "To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes: a) Pedestrian and cycling infrastructure from Kilcoole Main Street to Kilcoole train station". The specific local objective is stated as an 'ongoing'

infrastructure project' as stated in the 'Implementation Programme' table within the Appendix 6 of the LPF.

Therefore, it is an objective of the Draft LPF to facilitate a footpath along Sea Road connecting the town to the train station, and it is noted that this is an ongoing infrastructure project. Therefore in the near future our clients lands will have footpath connectivity.

4. Transportation

A transport assessment has been undertaken by Transport Insights and they indicate that:

- 'Measure RAIL3 – DART Extension' advocates that the NTA and Irish Rail will extend the South-East DART corridor to deliver electrified rail services to Wicklow Town, via Kilcoole.
- The DART+ Coastal South Project will deliver an improved and more frequent electrified network, with additional passenger capacity and enhanced train services between the city centre and Greystones (begin planning in mid-2025).
- Wicklow town, and consequently Kilcoole is expected to get an hourly service by 2028 (within the lifetime of the Draft Variation).
- Kilcoole Rail Station platform is to be extended by 44m to cater for full length trains.
- The Greater Dublin Area Transport Strategy proposes the extension of the Luas Green Line from Brides Glen to Bray which would provide an onward connection to Kilcoole via the L2 bus route.
- Regional Policy Objective (RPO) 4.40 of the GDA Transport Strategy supports the development of the Bray Luas Line.
- Within the Wicklow CDP public transport objective CPO 12.21 seeks to enhance existing parking facilities at and improve bus links to the train station at Kilcoole.
- Objective CPO 12.3 of the CDP requires the local authority to prepare and/or update Area Based Transport Assessments and Local Transport Plans for all Level 1-4 towns and for these assessments to inform land use decisions.
- The subject area is located 400m from the rail station which is served by intercity services with 3 train services northbound during the weekday morning peak period.
- Recent Bus Connects services implemented since January 2025 provide the L2, X1 and X2 services.
- There are numerous active travel routes already in place servicing the subject lands including the Ballydonarea Loop Walk and the Ballygannon Loop south of the rail station.
- The occupancy of L2 buses has been observed to be low.
- The following amenities and key land uses are all located within a 30 minute walking catchment: primary and secondary schools; Tesco Express and Centra; and Kilcoole Industrial Estate – in addition to the beach, the looped walks, the rail station and coastal walk.
- There are dedicated cycle lanes along Hollywell Avenue and parts of Sea Road. Greystones; Newcastle; Delgany; and Newtownmountkennedy are all located within 30 minutes cycle.
- The Draft LPF identifies improvements to Kilcoole Road pedestrian facilities which are at Phase 5 (Detailed Design and Tender) and also seeks 2 no. junction improvements along Sea Road which will facilitate enhanced active travel to and from Kilcoole Rail Station.
- Use of public transport and active travel will be encouraged in this location reducing dependence on the car thereby reducing the carbon footprint and encouraging more healthy lifestyles.

- Forecast travel demand from both phases 1 and 2 can be accommodated within the existing road network.

5. Flooding

Langan Consulting Engineers (LCE) have carried out a site-specific Flood Risk Assessment (FRA). The following is a summary of their conclusions and recommendations.

Flood Risk

The subject development lands are located within and adjacent to an area noted as at risk of flooding based on present day and including climate change mapping as produced by the OPW. The primary source of flooding at the subject development lands is coastal with a minor contribution from fluvial flooding.

The primary access to the subject lands is from the west of the lands and is not at risk of flooding.

Draft Greystones-Delgany And Kilcoole LPF 2025

The Draft Greystones-Delgany and Kilcoole LPF 2025 appears to adopt the climate change scenarios from Map 4C/4D for new land-use rezoning. This assumes the combination of CFRAM's HEFS and the NCFHM's H++EFS. These scenarios include an increase in rainfall of 30% and a 2m SLR, along with an allowance of 0.5 mm/year for Glacial Isostatic Adjustment (GIA), which is relevant to the southeast coast of Ireland.

The adoption of 2m for SLR is considered a very conservative approach and not aligned with current reasonable estimates presented by the IPCC

National Guidance

The Guidelines on the Planning System and Flood Risk Management (DEHLG/OPW, 2009) provides a framework for forward planning and development management with due consideration of flood risk. The guidance on zoning in the 2009 guidelines recommends consideration of existing risk (i.e. present day scenarios).

As of writing, there is no clear national guidance advising on what climate change scenario should be considered when developing land use zoning in flood risk areas.

Suggested Recommendation

It is suggested that the Local Authority consider the following approach which is aligned with current national and international guidance with respect to SLR due to climate change:

1. *Land-use zoning be based on the current scenario as per OPW 2009 guidelines.*
2. *Coastal flooding should be based on the HEFS flooding extents provided by NCFHM which is deemed to be appropriate and sufficiently conservative in accordance with the relevant guidance from the IPCC.*
3. *As per the current draft GDK63 objective, climate change mapping using the HEFS be produced and areas of land zoned for development should be required through this planning objective to comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk*

Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA.

Figure 5: Kilcoole FRA – 1 in 1000 Present Day and HEFS Costal and Fluvial Map

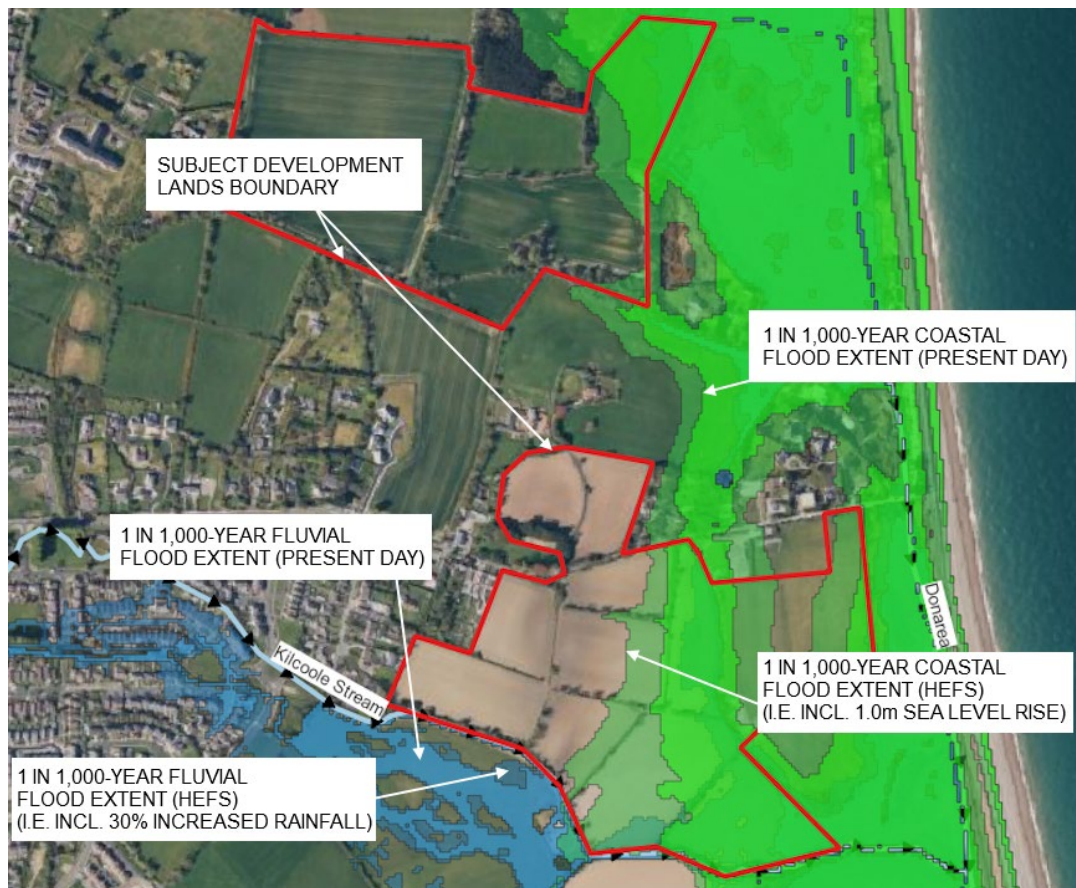


Figure 5 above shows the 'Present Day Scenario' for both Fluvial and Coastal Flooding. The light green areas above is one where development may be permitted subject to site specific flood risk assessment is undertaken. Please see attached Flood Assessment by LCE.

Figure 6: 2023 IPCC Climate Change Synthesis Report Graphic

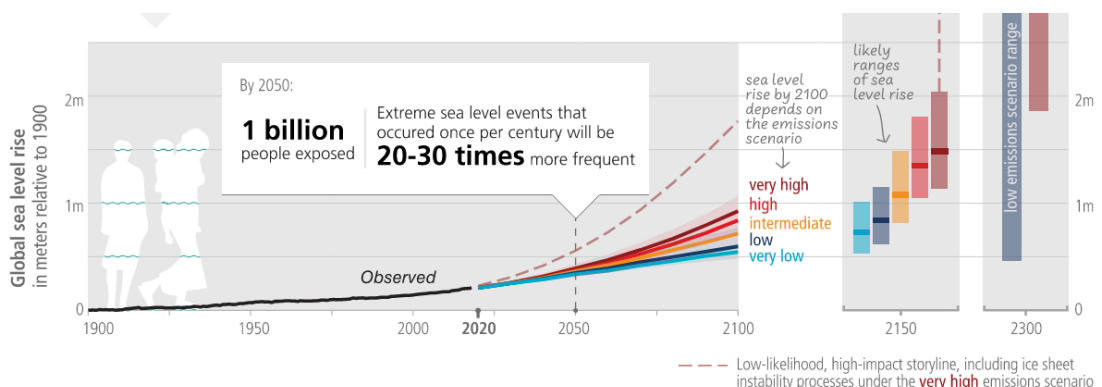


Figure 6 above shows the extreme position of HEFS++ against other potential future flooding scenarios. The IPCC concludes that 2m SLR, as adopted by the National Coastal Flood Hazard Maps (NCFHM) H++EFS is a 'low-likelihood, high-impact storyline, including ice sheet instability processes under the very high emissions scenario'.

6. Ecology

The eastern part of the subject lands are located close to the ecologically sensitive beach network, the coast and the SAC and SPA located therein. The eastern portion of lands directly abuts the Murrough Wetlands SAC and the Murrough SPA which are of European importance.

Our client's ecologist (Altamar Environmental Services) advise that the portion of subject lands that partly floods, may provide a location for wintering bird to feed. Areas of flooding are often ideal locations for protected species. In this case the retention of flooding areas within the site should be kept free from development, as recommended by Langan Consulting Engineers, not only for flooding purposes but will be required from an ecological perspective.

Appropriate Assessment

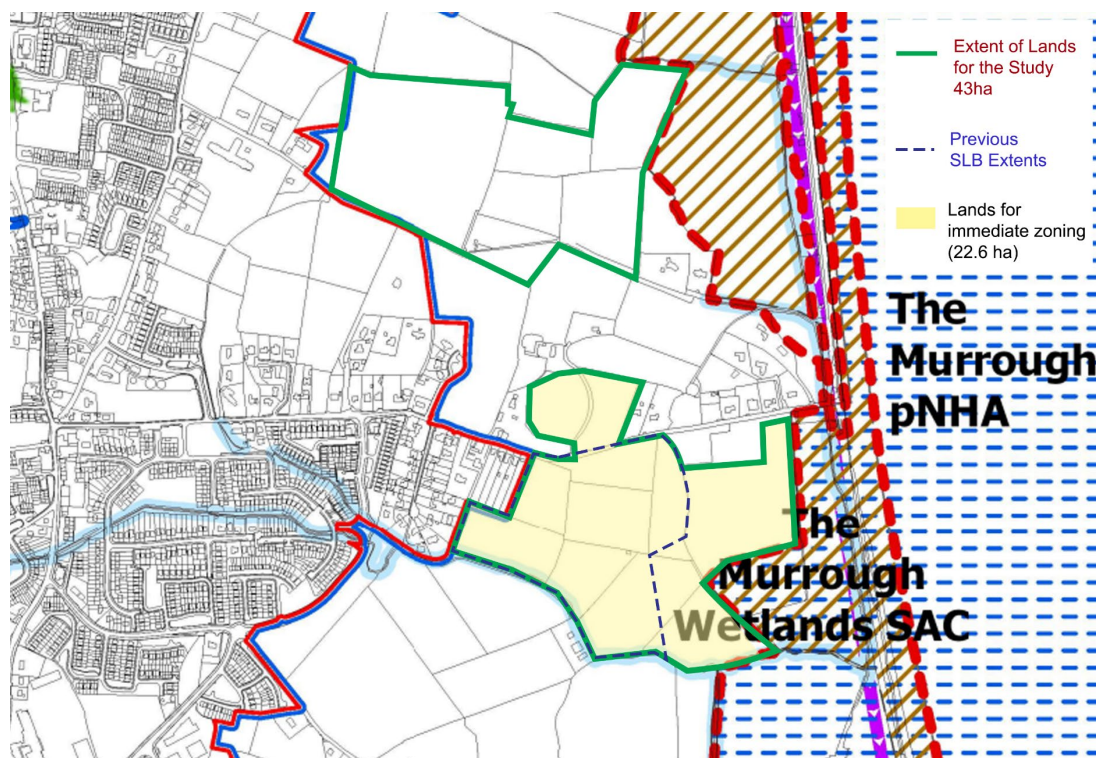
The subject site does not fall within a protected designated site, however it lies adjacent to:

- The Murrough Wetlands SAC,
- The Murrough SPA, and
- The Murrough (NPWS Site no. 730) pNHA.

From our engagement with an ecologist on behalf of our client the following are the key points. The subject site is located close to but not within the Murrough SPA and SAC.

It is noted from other, more recent, planning applications, in this locality that the local waste water treatment plant maybe reaching capacity with the result that outfall sewage is being released to the adjacent watercourse without treatment thereby potentially polluting the Designated Site. In response, local developers have included on site waste water treatment to treat their waste water before discharging treated waste water to the adjacent water courses to prevent pollution of the adjacent SPA and SAC. A similar waste water arrangement may be required in this instance also.

Figure 7: Lands in question overlaid on Draft Map 2B Natural Heritage of the LPP



Conclusion

The draft variation provides for next to no residential growth for Kilcoole in the period to 2028 by way of additional residential zoning and would appear to be based on outdated census material as Table 2.1 of the Draft LPF refers to the 2016 census and not the 2022 census when there was significant growth recorded between 2016 and 2022. The projections for Kilcoole would therefore appear to be flawed and not consistent with the Development Plan Guidelines that up to date data is used, with some scope for flexibility in terms of identifying the amount of land that may need to be zoned for future residential development.

Table 2.1 of the Draft LPF indicates that there is a population growth projection based on the outdated 2016 census of 60 people to 2028 which effectively sterilises the town for future development and a similarly miserly and flawed projection is presented to 2031 which is only a 6 year plan cycle away.

The Council's flawed position on current and future population growth has enabled the County Council to basically stick with the same zoning that was in place in the LAP adopted as far back as 2013 i.e. a decade and a half ago or two full plan cycles of 6 years each past. The removal entirely of the Strategic Land Bank from the LAP is also unjustified given accurate population projections for the State, the need for additional housing and the need to sweat in a positive sense rail station and rail service upgrades that are proposed and deliverable in the remaining period of the Draft Variation to 2028.

The Council's position to effectively bring forward no new residential zoned sites also does not take account of the fact that of the three zoned new residential sites (RN1) from 2013 two have been or are being built out with the third approved. Of the two RN2 sites, one has the benefit of planning permission and the other has not been the beneficiary of so much as a planning application since it was zoned in 2013. There must be serious questions about whether that site will ever be developed. Other sites, including town centre (TC) sites and existing residential (RE) will not add appreciably to the residential stock for a town that has experienced growth in population since 2016, since 2022, and which will be the subject of an enhanced rail facility and service, with no one to use it.

The County Council acknowledge (pp 33-35 of the LPF) that the east of the town, and presumably the proximity of the rail station, make it the logical place for the town to expand. The subject lands are contiguous to existing development and zoning and is consistent with the principle of compact development and encouragement to public transport led development. The subject lands will be better connected to the rail station and the existing built form with the implementation of local objective GDK59A and that could be provided by the applicant were their site to be zoned and development proceed.

Vehicular access can be provided off Sea Road and the site is well located to active travel routes which run through our client's lands namely the Ballyclonarea and Ballygannon Looped Walks respectively. It would not be necessary for vehicular traffic to access Lott Lane and any residential lanes in between.

The rezoning of the subject lands is supported with the proximity to not only the train station but also the proximity of the beach and coastal walk just a few hundred metres away which are recreational and leisure assets for the whole town. It would not make planning sense to upgrade the rail line to and station at Kilcoole without facilitating development in close proximity to it.

The subject area can be rezoned with avoidance of eastern areas that flood under the current flood scenario presented in the Draft LPF. The subject lands are located close to but not within the Murrough Wetlands SAC and the Murrough SPA. A development free cordon can be provided along the eastern boundary of the subject lands to protect the environmental and ecological heritage and qualifying interests of each European designation.

There is much to recommend the rezoning of the lands predominantly identified as SLB in the adopted LAP to RN1 for short term development and for the remainder to the north to be zoned as RN2 for longer term development, or as reinstated SLB, which would be needed more in current circumstances and to 2031 than was the case when instituted by the County Council in 2013.

A requirement for a Masterplan for the development of lands east of the town could be identified as a Strategic Local Objective (SLO).

We trust you will consider the above in your preparation of the LPF.

Yours sincerely,



Eamonn Prenter MIPI MRTPI

Director

CUNNANE STRATTON REYNOLDS

LAND PLANNING & DESIGN

www.csrlandplan.ie

FLOOD RISK ASSESSMENT

SUBMISSION REGARDING WCC LOCAL PLANNING FRAMEWORK (LPF) 2022-2028 FOR DEVELOPMENT LANDS, KILCOOLE, CO. WICKLOW

BEAKONSHAW LTD

25096-RP-2301-FL01 | JUNE 2025

QUALITY CHECK SHEET

DOCUMENT TITLE: FLOOD RISK ASSESSMENT

PROJECT TITLE: SUBMISSION REGARDING WCC LOCAL PLANNING FRAMEWORK (LPF) 2022-2028 FOR DEVELOPMENT LANDS, KILCOOLE, CO. WICKLOW

CLIENT: BEAKONSHAW LTD

DOCUMENT REF: 25096-RP-2301-FL01

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EXECUTIVE SUMMARY

INTRODUCTION

Wicklow County Council (WCC) is preparing a revised County Development Plan (2022-2028). A new Greystones – Delgany and Kilcoole Local Planning Framework (LPF) will be included in the new development plan. Cunnane Stratton Reynolds Land Planning & Design (CSR) is preparing a submission on behalf of Beakonshaw Ltd for development lands east of Kilcoole.

Langan Consulting Engineers (LCE) is appointed to carry out a site-specific Flood Risk Assessment (FRA) to support/justify a submission to amend the land use zoning at the subject development lands. The location of the subject development lands is shown in Figure A.

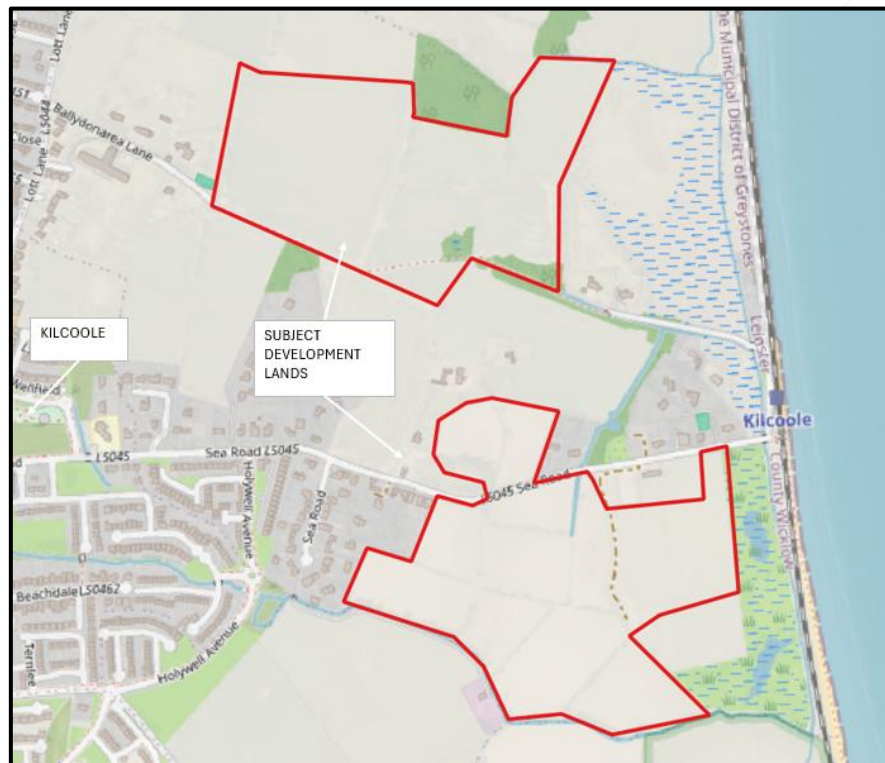


Figure A Location of the subject development lands

FLOOD RISK

The subject development lands are located within and adjacent to an area noted as at risk of flooding based on present day and including climate change mapping as produced by the OPW. The primary source of flooding at the subject development lands is coastal with a minor contribution from fluvial flooding. The primary access to the subject lands is from the west of the lands and is not at risk of flooding. Pertinent flood risk mapping is provided in Figure B and Figure C.



Figure B Present day flood risk mapping at the subject development lands



Figure C HEFS flood risk mapping at the subject development lands

NATIONAL CLIMATE CHANGE GUIDANCE

The **Guidelines on the Planning System and Flood Risk Management (DEHLG/OPW, 2009)** provides a framework for forward planning and development management with due consideration of flood risk. The guidance on zoning in the 2009 guidelines recommends consideration of **existing risk (i.e. present day scenarios)**. As of writing, there is no clear national guidance advising on what climate change scenario should be considered when developing land use zoning in flood risk areas.

INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE GUIDANCE

The Intergovernmental Panel on Climate Change (IPCC) was created to provide policymakers with regular scientific assessments on climate change, its implications and potential future risks, as well as to put forward adaptation and mitigation options. The IPCC is a leading global expert agency in advice for climate change relating to sea level rise (SLR).

The 2023 IPCC Climate Change Synthesis Report provides guidance on various scenarios for SLR, with predications based on two main variables, emissions and ice sheet processes. Both variables include a margin of uncertainty. The report includes an information infographic summarising estimated SLR for various scenarios (Figure D). The IPCC advises that considering a very high emissions scenario, SLR could reach 1m approximately by 2100. The IPCC concludes that 2m SLR, as adopted by the National Coastal Flood Hazard Maps (NCFHM) H++EFS is a *'low-likelihood, high-impact storyline, including ice sheet instability processes under the very high emissions scenario'*.

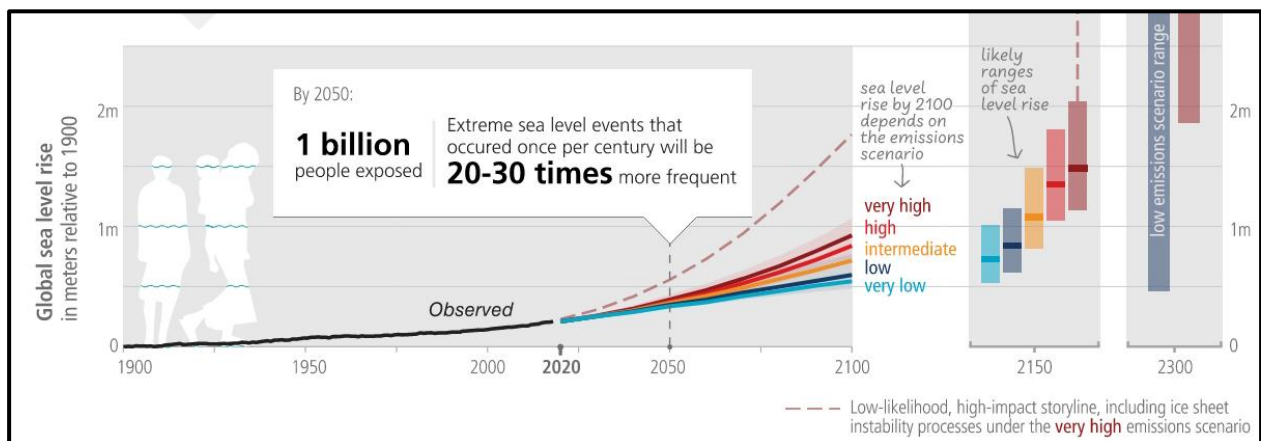


Figure D IPCC SLR estimation summary

DRAFT GREYSTONES-DELGANY AND KILCOOLE LPF 2025

The Draft Greystones-Delgany and Kilcoole LPF 2025 appears to adopt the climate change scenarios from Map 4C/4D for new land-use rezoning. This assumes the combination of CFRAM's HEFS and the NCFHM's H++EFS. These scenarios include an increase in rainfall of 30% and a 2m SLR, along with an allowance of 0.5 mm/year for Glacial Isostatic Adjustment (GIA), which is relevant to the southeast coast of Ireland.

The adoption of 2m for SLR is considered a very conservative approach and not aligned with current reasonable estimates presented by the IPCC.

SUGGESTED RECOMMENDATION

It is suggested that the Local Authority consider the following approach which is aligned with current national and international guidance with respect to SLR due to climate change:

1. Land-use zoning be based on the current scenario as per OPW 2009 guidelines.
2. Coastal flooding should be based on the HEFS flooding extents provided by NCFHM which is deemed to be appropriate and sufficiently conservative in accordance with the relevant guidance from the IPCC.
3. As per the current draft GDK63 objective, climate change mapping using the HEFS be produced and areas of land zoned for development should be required through this planning objective to comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA.

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1 PROJECT DETAILS

1.1 INTRODUCTION

Wicklow County Council (WCC) is preparing a revised County Development Plan (2022-2028). A new Greystones – Delgany and Kilcoole Local Planning Framework (LPF) will be included in the new development plan. Cunnane Stratton Reynolds Land Planning & Design is preparing a submission on behalf of Beakonshaw Ltd for development lands east of Kilcoole.

Langan Consulting Engineers (LCE) is appointed to carry out a site-specific Stage 1 Flood Risk Assessment (FRA) to support/justify a submission to amend the land use zoning at the subject development lands.

This FRA comprises of:

1. Desk study
2. Site walkover
3. Detailed assessment based on the Office of Public Works (OPW) “Planning System and Flood Risk Management Guidelines” as published in November 2009 by the Department of the Environment, Heritage and Local Government¹

The location of the subject development lands is shown in Figure 1-1. An aerial view of the subject development lands is shown in Figure 1-2.

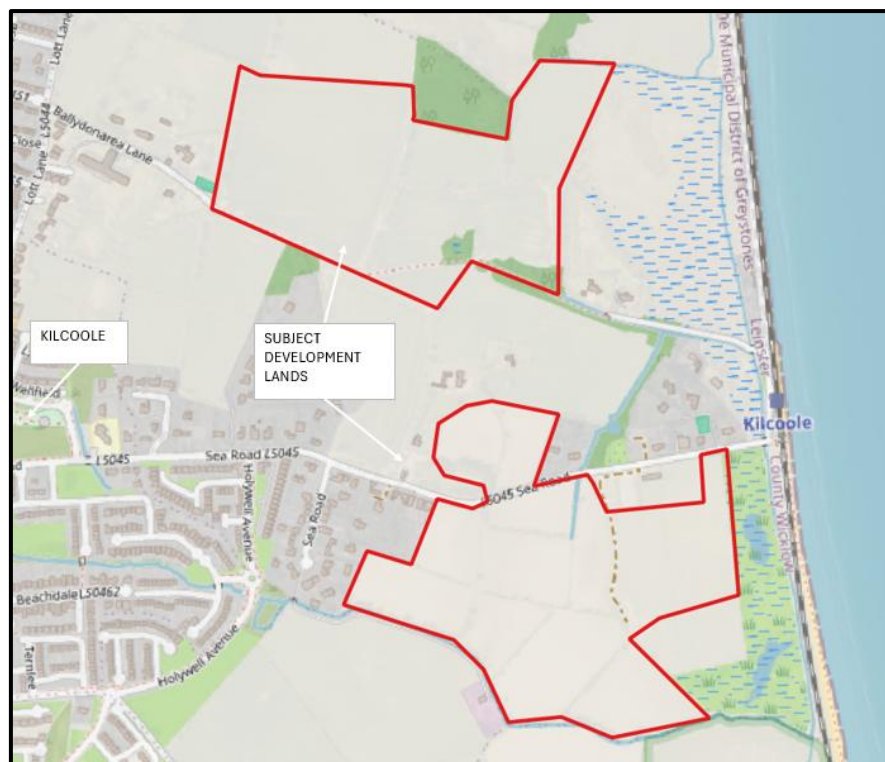


Figure 1-1 Location of the subject development lands

¹ “Planning System and Flood Risk Management Guidelines” published in November 2009 by the Department of the Environment, Heritage and Local Government, including the Technical Appendices.



Figure 1-2 Aerial image of the subject development lands

1.2 STUDY AREA

The study area considered for this report focuses on the subject development lands within the red line boundary (lands for immediate zoning).

1.3 ASSUMPTIONS

This report is based on the following assumptions:

4. All development information is based on data provided by the Client
5. It is assumed all 3rd party information is current and accurate
6. Prediction of future flood levels is based on available historical records
7. The impact climate change will have on future trends is accounted for, however there remains a residual uncertainty in the prediction of the impact of climate change on flooding
8. The findings are subject to adequate design and maintenance of drainage networks and flood defences
9. It is assumed that CFRAM Ordnance Datum levels are provided based on the OSGM02 Geoid
10. All datums in this report is to OSGM15 Geoid unless otherwise noted

1.4 SITE SURVEY

No topographic survey data was available at the time of writing.

1.5 ABBREVIATIONS AND DEFINITIONS

1.5.1 ABBREVIATIONS

AEP	Annual Exceedance Probability
-----	-------------------------------

AFA	Area for Further Assessment
CFRAM	Catchment Flood Risk Assessment and Management
EPA	Environmental Protection Agency
FRA	Flood Risk Assessment
GSI	Geological Survey of Ireland
ha	hectares
ITM	Irish Transverse Mercator
LCE	Langan Consulting Engineers Ltd
WCC	Wicklow County Council
LPF	Local Planning Framework
OPW	Office of Public Works
PFRA	Preliminary Flood Risk Assessment
SFRA	Strategic Flood Risk Assessment
NCFHM	National Coastal Flood Hazard Maps
SLR	SLR
DEHLG	Department of Housing, Local Government and Heritage
IPCC	Intergovernmental Panel on Climate Change

1.5.2 KEY DEFINITIONS

<i>Fluvial flooding</i>	<i>Riverine flooding, where excessive flooding over an extended period of time causes a river to exceed its capacity. The CFRAM maps represent fluvial and coastal flooding for a range of AEPs for the 'Current Day Scenario' as well as for projected future scenarios (MRFS, HEFS)</i>
<i>Pluvial flooding</i>	<i>Surface water flooding caused directly from heavy rainfall events (rather than over-flowing rivers)</i>
<i>Groundwater flooding</i>	<i>Where groundwater levels rise above ground level, it can pond at local points/depressions and cause periods of groundwater flooding</i>
<i>Coastal flooding</i>	<i>Risk of flooding from tidal surge events from the sea and/or estuarine levels. Low atmospheric pressure, wind, tide, and storm surges can result in higher or lower tides and can cause wave over-topping in exposed areas. The NCFHM have been produced for a range of AEPs for the 'Present Day Scenario' as well as for projected future scenarios (MRFS, HEFS, H+EFS, H++EFS) for the end of the century (2100)</i>
<i>Present/Current Scenario</i>	<i>Day Represents the current conditions (no climate change considered)</i>
<i>MRFS</i>	<i>Mid-Range Future Scenario accounting for a 20% increase in rainfall and a 0.5m SLR</i>
<i>HEFS</i>	<i>High-End Future Scenario accounting for a 30% increase in rainfall and a 1m SLR</i>
<i>H+EFS</i>	<i>High+ End Future Scenario which is a 1.5m SLR (doesn't include fluvial flooding)</i>
<i>H++EFS</i>	<i>High++ End Future Scenario which is a 2m SLR (doesn't include fluvial flooding)</i>

2 SITE CHARACTERISTICS

2.1 SITE TOPOGRAPHY

The subject development lands are a green-field site in an urban location. The subject site has an area of 24 hectares. The site is bounded by agricultural lands and private dwellings to north, east and south. The southwest of the site is bounded by a housing estate.

A local road 'The Sea Road' traverses the subject development lands centrally, with an alignment from west to east. It links the Kilcoole town to Kilcoole train station.

2.2 SITE DRAINAGE CHARACTERISTICS

The Kilcoole stream runs along the south perimeter of the subject development lands. There is a minor drainage channel running along the eastern boundary which discharges to the Kilcoole stream. The Kilcoole stream discharges to the Donarea stream 500m downstream of the site.

The Donarea stream runs parallel with the railway embankment. The local drainage network is illustrated in Figure 2-1. Photos of the Donarea stream are shown in Figure 2-2 and Figure 2-3. A photo of the Donarea stream marine outfall is shown in Figure 2-3.



Figure 2-1 Local drainage network overview²

² gis.epa.ie/EPAMaps/



Figure 2-2 Road culvert on Donerea stream at Sea Road



Figure 2-3 Photo of Donerea Stream facing south

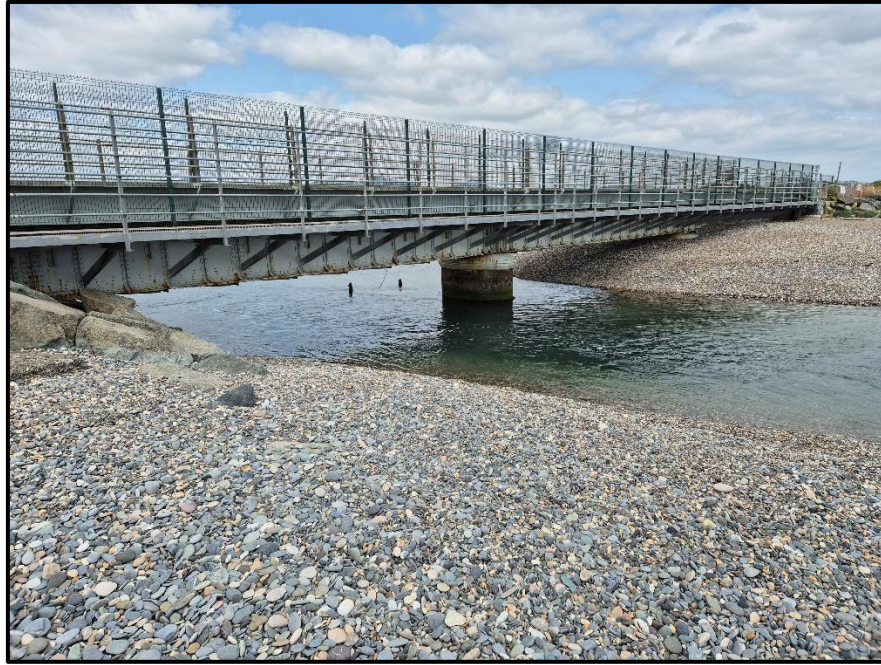


Figure 2-4 Photos of Donerea stream marine outfall facing west

3 FLOOD RISK ASSESSMENT MAPPING

The primary flood sources at the subject development lands are fluvial and coastal.

3.1 OPW PFRA INDICATIVE FLOOD MAPS

The OPW Preliminary Flood Risk Assessment (PFRA) maps were developed as part of the Catchment Flood Risk Assessment and Management (CFRAM) programme. These maps highlight areas of potential flood risk.

Available 2011 CFRAM PFRA flood maps were consulted. The PFRA mapping relevant to the subject site lands is shown in Figure 3-1.

The subject development lands contain two areas prone to fluvial and coastal flooding. The southeast of the site is noted as flooding locally during the 1 in 100-year fluvial event. The east of the site is noted as flooding locally during the 1 in 200-year coastal event. The fluvial flooding is influenced by the downstream tide levels at the marine outfall.

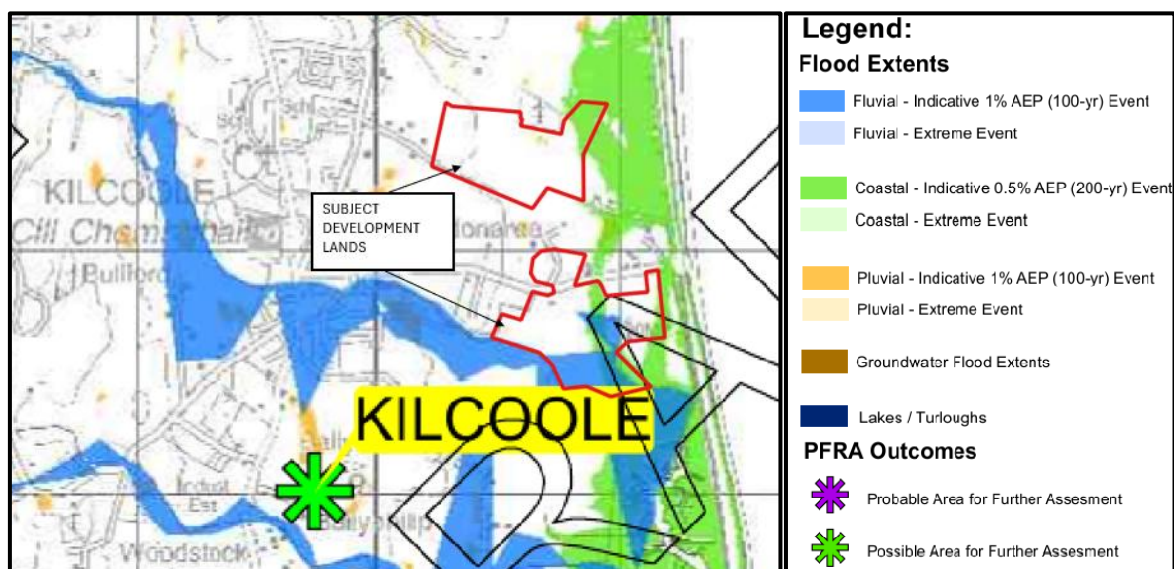


Figure 3-1 OPW-PFRA Study

3.2 OPW CFRAM AFA STUDIES

Predictive flood extent maps have been produced by the OPW as part of the CFRAM³ programme. These maps highlight areas of potential flood risk, excluding and including an allowance for climate change.

3.2.1 CFRAM FLUVIAL MAPPING

The Eastern CFRAM mapping included this area of Kilcoole. CFRAM AFA maps illustrate the fluvial flood extent for the present condition under the 1 in 10, 1 in 100 and 1 in 1000-year conditions.

The mapping estimates that there is a 1 in 100-year risk of fluvial flooding in the southeast and northeast parts of the subject development lands. Figure 3-2 below shows subject development lands overlaid on CFRAM fluvial mapping.

³ OPW CFRAM data 2016

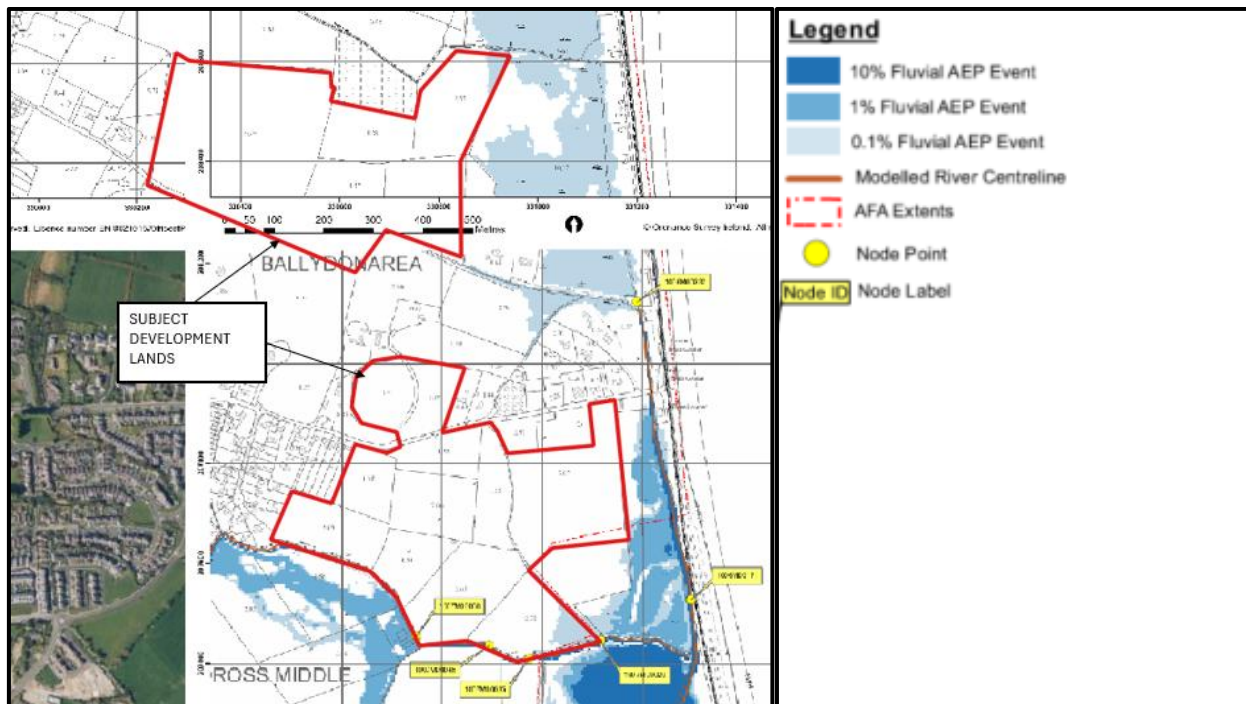


Figure 3-2 CFRAM Fluvial mapping present day scenario

3.2.2 CFRAM COASTAL MAPPING

LCE were unable to source CFRAM AFA maps illustrating the tidal extent for the present-day scenario under the 1 in 10, 1 in 200 and 1 in 1000-year condition.

3.3 NATIONAL COASTAL FLOOD HAZARD MAPPING 2021

The National Coastal Flood Hazard Mapping (NCFHM) 2021 project by the OPW has provided coastal flood hazard maps for flood extent for a range of annual exceedance probabilities for the present day as well as for multiple future scenarios. The maps show the worst case scenario as any flood defences potentially protecting the coastal floodplain are not taken into account.

The 'Present Day Scenario' and 'High-End Future Scenario (HEFS)' coastal flooding by the NCFHM are provided in Figure 3-3 and Figure 3-4. A portion of the subject development lands along the eastern boundary is at risk to flooding as denoted by the 1 in 200-year and 1 in 1000-year flooding extent, with and without climate change.



Figure 3-3 NCFHM Present Day scenario coastal flooding map



Figure 3-4 NCFHM HEFS coastal flooding map (1m SLR)

3.4 STRATEGIC FLOOD RISK ASSESSMENT FOR WICKLOW

A Strategic Flood Risk Assessment (SFRA) was completed by JBA in 2021 to inform the Wicklow County Development Plan 2022-2028 (CDP). The purpose of the SFRA is to provide flood risk data to inform land-use planning decisions in the CDP.

The SFRA presents four maps showing two flood risk scenarios:

- 1) 4A and 4B mapping shows the **present day scenario** for the estimated coastal and fluvial flooding extents (with and without proposed land use zoning).
- 2) 4C and 4D mapping shows the **potential future scenario** for the estimated coastal and fluvial flooding extents (with and without proposed land use zoning). Development in the flood risk areas on these maps is not explicitly ruled out by the SFRA, although it notes that *“in some cases, zonings have been changed to more appropriate uses.”*

Maps 4A and 4C are shown in Figure 3-5 and Figure 3-6. The future scenario mapping (4C and 4D) considers the H++EFS which includes for 2m of SLR. The use of 2m of SLR is discussed further in the following sections.

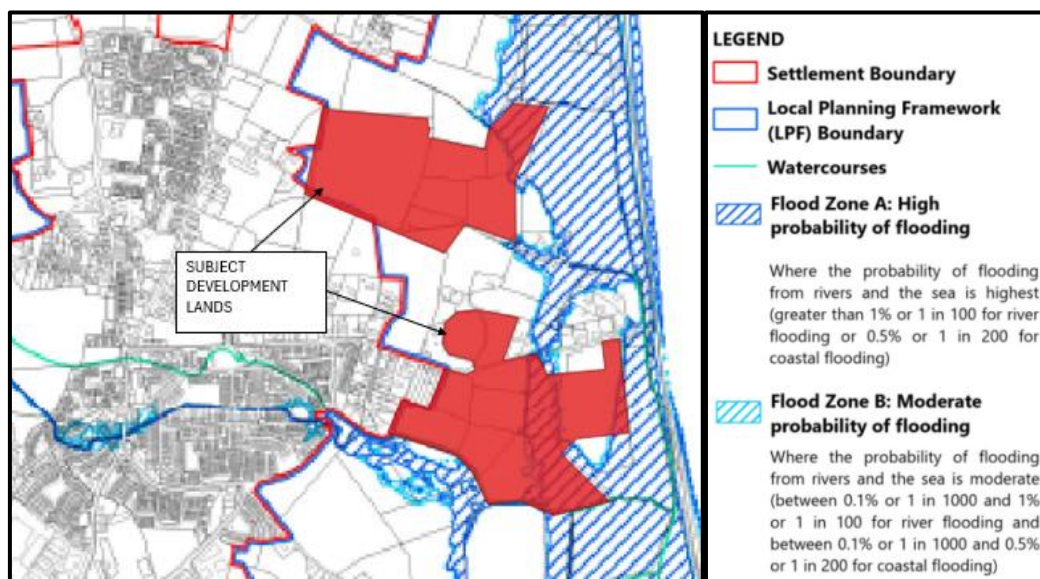


Figure 3-5 4A Present Day Scenario

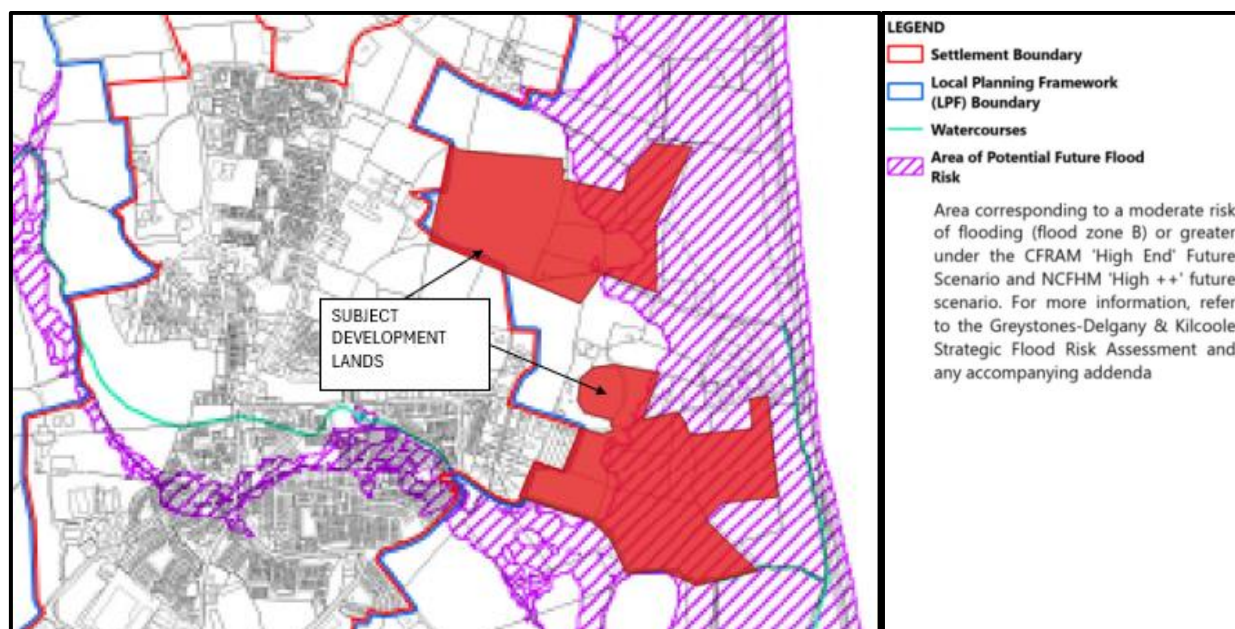


Figure 3-6 4C Potential Future Scenario

3.5 ACCOUNTING FOR SLR DUE TO CLIMATE CHANGE

3.5.1 NATIONAL POLICY AND GUIDANCE

The **Guidelines on the Planning System and Flood Risk Management (DEHLG/OPW, 2009)** provides a framework for forward planning and development management with due consideration of flood risk. The guidance on zoning is based on existing risk, but with a recommendation that a precautionary approach be taken to potential future risk including the potential impacts of climate change, stating that “*A Precautionary approach should be applied, where necessary, to reflect uncertainties in flooding datasets ... and the ability to predict the future climate*”. The previous development plan zoning (2013-2019) appears to be based on the present day scenario flood risk. This is a common approach in development plans nationally. It would be deemed reasonable for a Local Authority to require any development lands located within an area impacted by climate change to provide a site-specific flood risk assessment and justification test. The 2009 OPW Flood Guidelines does not advise on what climate change scenario should be considered when developing land use zoning in flood risk areas.

The **Flood Risk Management Climate Change Sectoral Adaption Plan (OPW, 2019)** was published with an aim to outline the potential impacts of climate change on flooding and flood risk management in Ireland; and identify the objectives for an effective and sustainable approach to adaptation as part of flood risk management for the future. This Adaption Plan reinforces the use of the precautionary approach and gives public agencies options for dealing with climate change. The 2019 OPW Adaption Plan does not advise on what climate change scenario should be considered when developing land use zoning in flood risk areas.

The **Report of the Inter-Departmental Group on National Coastal Change Management Strategy** was published in 2023 was published jointly by the Department of Housing, Local Government and Heritage & the Office of Public Works. A key objective of this report is to put in place a road map for responding to challenges in a structured and planned way to provide the basis for a long-term strategy for integrated coastal change management. The report summarises that “*The current evidence points to a gradual SLR of up to 1 metre to the year 2100 due to climate change.*” The 2023 Strategy does not advise on what climate change scenario should be considered when developing land use zoning in flood risk areas.

3.5.2 INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE (IPCC) GUIDANCE

The IPCC was created to provide policymakers with regular scientific assessments on climate change, its implications and potential future risks, as well as to put forward adaptation and mitigation options. The IPCC is a leading global expert agency in advice for climate change relating to SLR.

The 2023 IPCC Climate Change Synthesis Report provides guidance on various scenarios for SLR, with predications based on two main variables, emissions and ice sheet processes. Both variables include a margin of uncertainty. The report includes an information infographic summarising estimated SLR for various scenarios (Figure C). The IPCC advises that considering a very high emissions scenario, SLR could reach 1m approximately by 2100. The IPCC concludes that 2m SLR, as adopted by the National Coastal Flood Hazard Maps (NCFHM) H++EFS is a *'low-likelihood, high-impact storyline, including ice sheet instability processes under the very high emissions scenario'*.

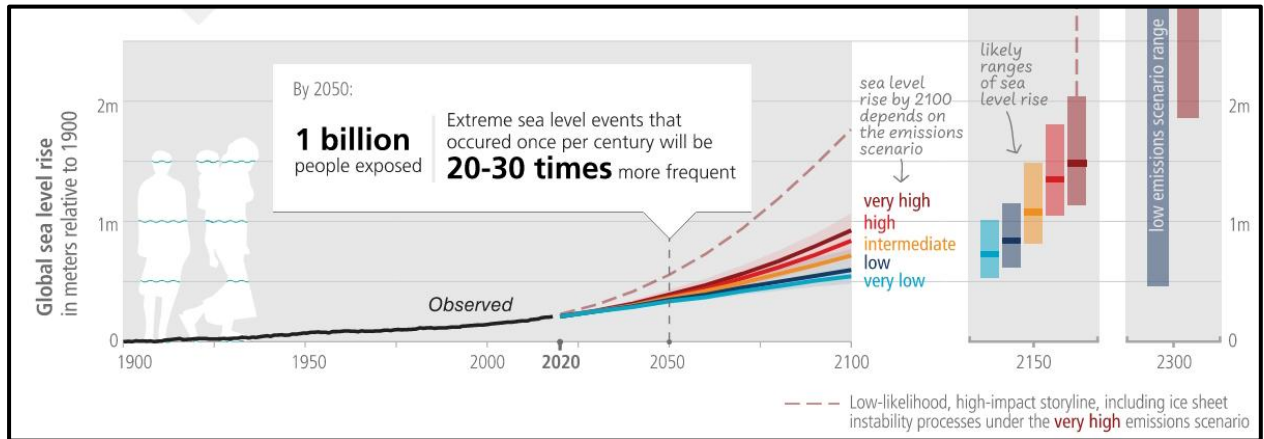


Figure 3-7 IPCC SLR estimation summary

4 FLOOD ZONES

4.1.1 ZONE DEFINITIONS

The “Planning System and Flood Risk Management Guidelines” as published in November 2009 by the Department of the Environment, Heritage and Local Government use three different flood zones to define areas of flood risk¹. Flood zones are geographical areas within which the likelihood of flooding is in a particular range, and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning.

There are three types or levels of flood zones defined for the purposes of these guidelines:

Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1 in 100-year for river flooding and 1 in 200-year for coastal flooding). Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports, and recreation, would be considered appropriate in this zone.

Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 1 in 1000-year and 1 in 100-year for river flooding and between 1 in 1000-year and 200-year for coastal flooding). Less vulnerable development, such as retail, commercial and industrial uses, sites used for short-let for caravans and camping and secondary strategic transport and utilities infrastructure, and water-compatible development might be considered appropriate in this zone.

Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 1 in 1000-year for both river and coastal flooding). Development in this zone is appropriate from a flood risk perspective (subject to assessment of flood hazard from sources other than rivers and the coast).

The definition of these zones does not take account of potential flooding from other sources such as groundwater or artificial drainage systems.

Table 4.1 below summarises available flood mapping sources.

4.1.2 FLOOD ZONE SUMMARY

Table 4.1 Summary of LPF Flood Zone Mapping

LPF Year	Local Authority Map	Scenario Adopted	Climate Change	LCE Comment
2013-2019	Greystones – Delgany and Kilcoole Local Area Plan (LAP) 2013-2019	1:1000-year flood event	Not included	<p>Areas above this flood level are suitable for all development as per OPW 2009 Guidance (Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, 2009))</p> <p><i>Note: OPW guidance is commonly adopted by considering that climate change is then used when defining the design levels for the development.</i></p>
2025	DRAFT Greystones - Delgany & Kilcoole Local Planning Framework 2025 Map No.4A and 4B	1:1000-year flood event	Not included	This mapping would be considered as illustrating Flood Zones A and B (i.e. all lands not indicated at risk of flooding are Flood Zone C)
2025	DRAFT Greystones-Delgany & Kilcoole Local Planning Framework 2025 Map No. 4C and 4D	1:1000-year flood event	H++EFS incl. 2m SLR	<p>2025 SFRA proposes an objective (GDK63) that if a development is located in a flood risk area as defined by this mapping, it requires a Site-Specific Flood Risk Assessment and a Justification Test.</p> <p><i>Note: Development in the flood risk areas on this map is not explicitly ruled out.</i></p>

5 CONCLUSIONS AND GENERAL RECOMMENDATIONS

5.1 FLOOD RISK

The subject development lands are located within and adjacent to an area noted as at risk of flooding based on present day and including climate change mapping as produced by the OPW. The primary source of flooding at the subject development lands is coastal with a minor contribution from fluvial flooding.

The primary access to the subject lands is from the west of the lands and is not at risk of flooding.

5.2 DRAFT GREYSTONES-DELGANY AND KILCOOLE LPF 2025

The Draft Greystones-Delgany and Kilcoole LPF 2025 appears to adopt the climate change scenarios from Map 4C/4D for new land-use rezoning. This assumes the combination of CFRAM's HEFS and the NCFHM's H++EFS. These scenarios include an increase in rainfall of 30% and a 2m SLR, along with an allowance of 0.5 mm/year for Glacial Isostatic Adjustment (GIA), which is relevant to the southeast coast of Ireland.

The adoption of 2m for SLR is considered a very conservative approach and not aligned with current reasonable estimates presented by the IPCC

5.3 NATIONAL GUIDANCE

The **Guidelines on the Planning System and Flood Risk Management (DEHLG/OPW, 2009)** provides a framework for forward planning and development management with due consideration of flood risk. The guidance on zoning in the 2009 guidelines recommends consideration of **existing risk (i.e. present day scenarios)**.

As of writing, there is no clear national guidance advising on what climate change scenario should be considered when developing land use zoning in flood risk areas.

5.4 SUGGESTED RECOMMENDATION

It is suggested that the Local Authority consider the following approach which is aligned with current national and international guidance with respect to SLR due to climate change:

1. Land-use zoning be based on the current scenario as per OPW 2009 guidelines.
2. Coastal flooding should be based on the HEFS flooding extents provided by NCFHM which is deemed to be appropriate and sufficiently conservative in accordance with the relevant guidance from the IPCC.
3. As per the current draft GDK63 objective, climate change mapping using the HEFS be produced and areas of land zoned for development should be required through this planning objective to comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA.

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Analysis contains inherent uncertainty. LCE recommends the application of the upper bound flood level estimate from all analysis, and the inclusion of a min. of 300mm freeboard. Selection of mid-range estimates and lesser freeboard is at the risk of the client and the planning authority. All information relating to drainage and water networks assumes ongoing maintenance of the network and removal of obstructions to flow.

This report is based on available CFRAM and FSU data at the time of appointment. The client is responsible for the cost of any additional services resulting from any CFRAM and FSU updates after this date.

LCE accepts no liability for any matters arising if any recommendations contained in this document are not carried out, or are partially carried out, without further advice being obtained.

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Draft Kilcoole Local Planning Framework: Transport Strategy Report

For Beakonshaw Ltd, June 2025



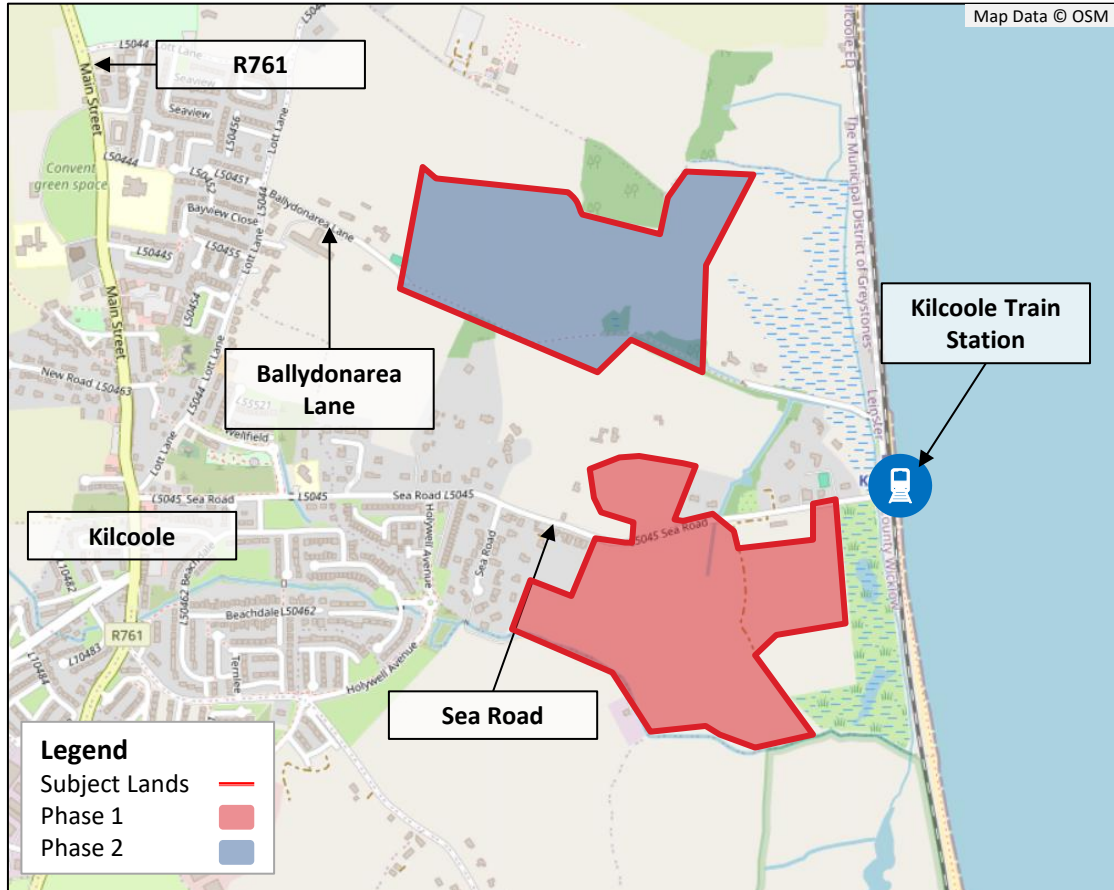
Version 1.6



1. Introduction

- – Report Overview
- Report Structure

Report Overview



- ▶ Transport Insights has been commissioned by Beakonshaw Ltd to prepare a Transport Strategy in relation to the requested rezoning of lands in Kilcoole, Co. Wicklow.
- ▶ This Transport Strategy builds upon Draft Greystones/Delgany & Kilcoole Local Planning Framework (LPF), and supports the lands sustainable future development.
- ▶ Development of the subject lands is envisaged to be delivered in two phases:
 - **Phase 1** comprises ca. 22.6 ha. of lands to the south and north of Sea Road, to be advanced within the LPF's planning horizon; and
 - **Phase 2** comprises the remaining ca. 20.4 ha. of lands to the north of Sea Road, to be advanced in the longer-term.

Report Structure

1. Introduction
2. Transport Planning Policy Overview
3. Draft Local Planning Framework (LPF)
4. Existing Transport Context
5. Future Transport Context
6. Subject Lands Development Potential
7. Development Travel Demand
8. Proposed Outline Transport Strategy

2. Transport Planning Policy Overview

- – Climate Action Plan 2025
- GDA Transport Strategy
- Wicklow County Development Plan 2022-2028

Transport Planning Policy Overview



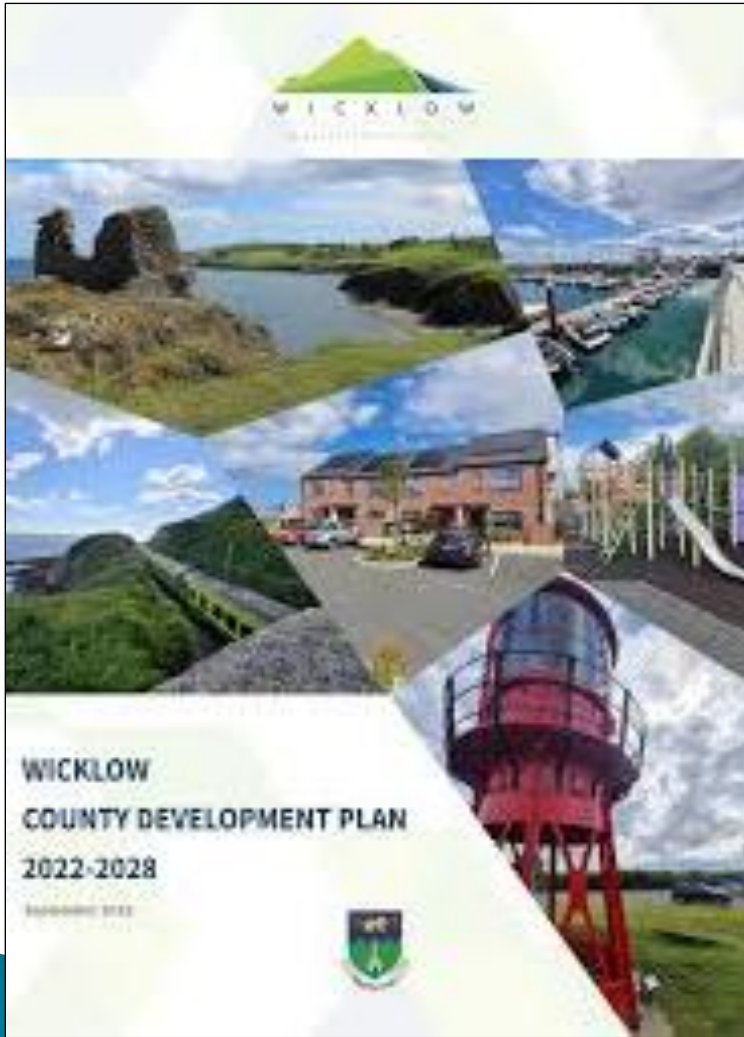
- ▶ **Climate Action Plan 2025** – key targets include: 20% reduction in total vehicle kilometres travelled relative to business-as usual, 50% reduction in fuel usage, and significant increases to sustainable transport trips and modal share.
- ▶ **Sustainable Residential Development and Compact Settlement Guidelines** states that densities in the range of 35 to 50 dwellings per hectare be applied to suburban and edge of town locations of regional growth centres. Provides guidelines on recommended public transport accessibility attributes.
- ▶ **Greater Dublin Area (GDA) Transport Strategy 2022-2042** sets out planned investment in:
 - Active travel (walking and cycling) infrastructure via the GDA Cycle Network Plan; and
 - Public transport infrastructure including delivery of Wicklow Core Bus Corridor (L2) and DART+ South Projects.

Transport Planning Policy Overview Ctd.



- ▶ ‘Measure RAIL3 – DART Extension’ of the current GDA Transport Strategy states that the NTA and Irish Rail will, as part of the **DART+ Programme**, extend South-East DART corridor to deliver electrified rail services to Wicklow Town, via Kilcoole.
- ▶ The **DART+ Coastal South** Project includes the elimination of level crossings, provision of new grade-separated pedestrian, cycle and vehicle crossings, and station modifications to enhance train service capacity.
- ▶ The GDA Transport Strategy also proposes the extension of the Luas Green Line from Brides Glen to Bray, which would provide an onward connection to Kilcoole via the L2 bus route. Regional Policy Objective (RPO) 4.40 of the Strategy supports the development of the Bray Luas Line.

Transport Planning Policy Overview Ctd.

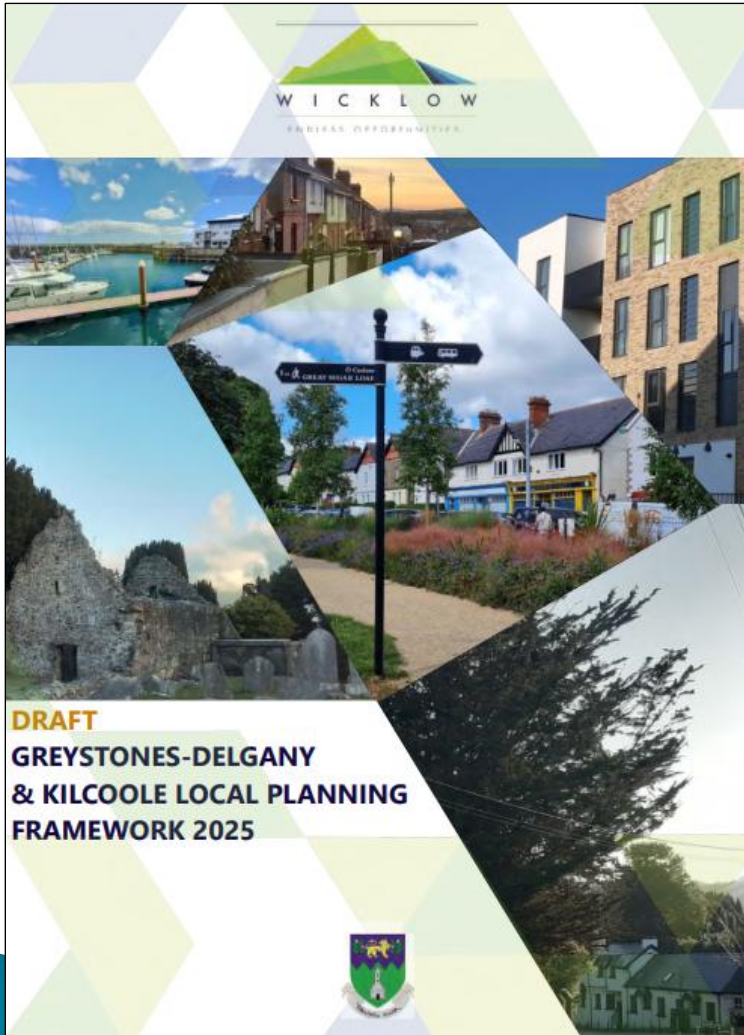


- ▶ **Wicklow County Development Plan 2022-2028** sets out local policies and infrastructure objectives within local authority area.
- ▶ Aims to facilitate modal shift by supporting investment programmes and associated infrastructure, in particular upgrading the Dublin to Rosslare train line, improved DART services and improved bus services throughout the County.
- ▶ In relation to public transport objectives, CPO 12.21 promotes *“the development of transport interchanges and ‘nodes’ where a number of transport types can interchange with ease. In particular... to enhance existing parking facilities at/ near and the improvement of bus links to the train stations in.. Kilcoole.”*
- ▶ Objective CPO 12.3: *“...to prepare and/ or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy (namely... Kilcoole... and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plans”.*

3. Draft Local Planning Framework

- – Draft Greystones/ Delgany & Kilcoole LPF 2025

Draft Greystones/ Delgany & Kilcoole LPF 2025



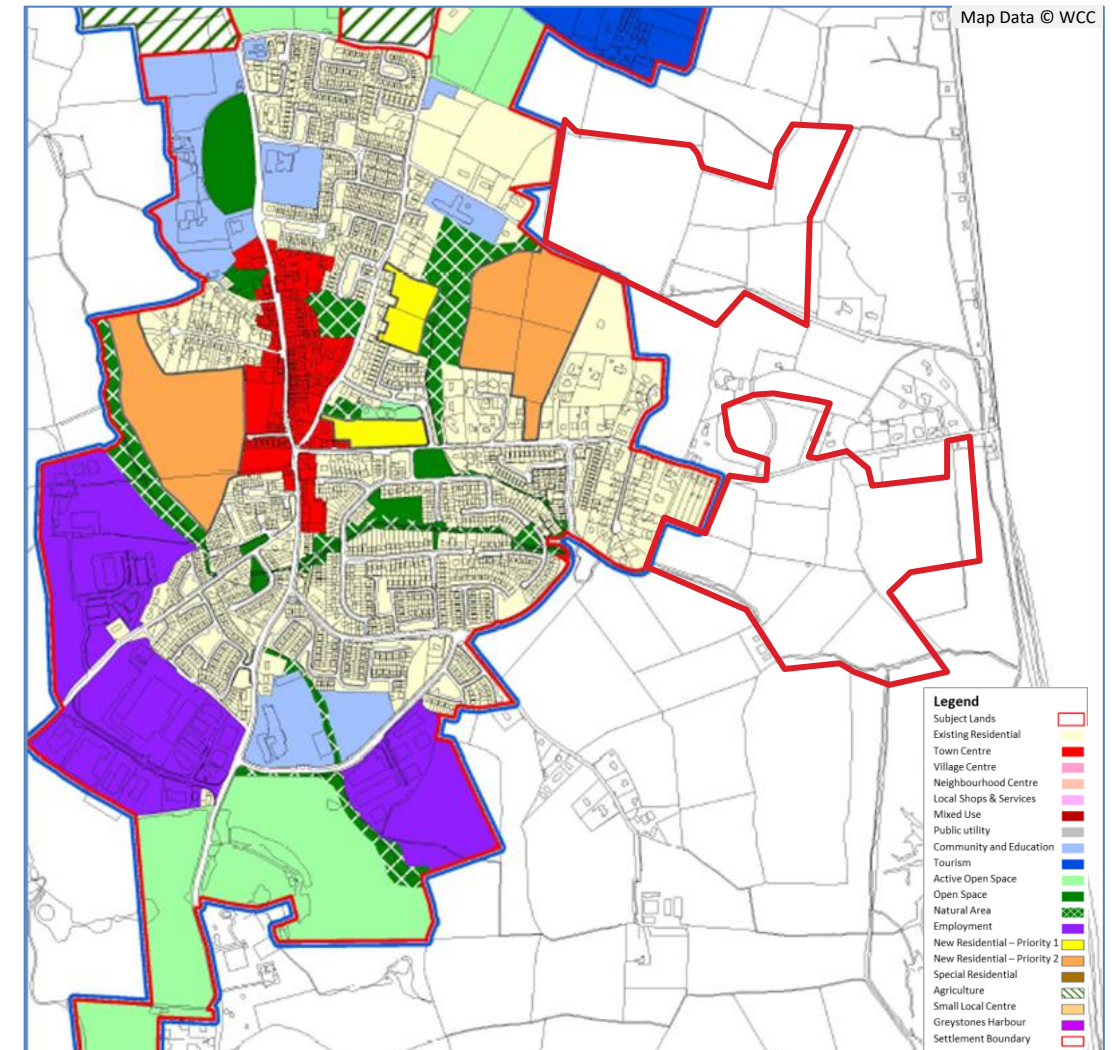
- ▶ **Draft Greystones/ Delgany & Kilcoole Local Planning Framework (LPF) 2025** is currently being prepared, after which it will be integrated into the Wicklow County Development plan 2022-2028.
- ▶ The Draft LPF states in section A3.3 (*Page 33-35 directly relating to lands*) that the area to the east of Kilcoole Town Centre, which include parts of subject lands, may be suitable for future development notwithstanding a few identified constraints:
 - Avoidance of coalesce with Charlesland;
 - Sensitive lands surrounding St Comgall's Church;
 - Proximity to European Sites and Murrough pNHA;
 - Land drainage characteristics;
 - Distance to town centre and lack of pedestrian and cycling connectivity;
 - Significant groups of mature trees in the area, for example Kilcoole Rock; and
 - Potential discovery of further archaeological remains.

4. Existing Transport Context

- – Kilcoole Lands Overview
- Public Transport Services
- Public Transport Catchment
- Site Assessment
- Walking Catchment
- Cycling Catchment

Kilcoole Lands Overview

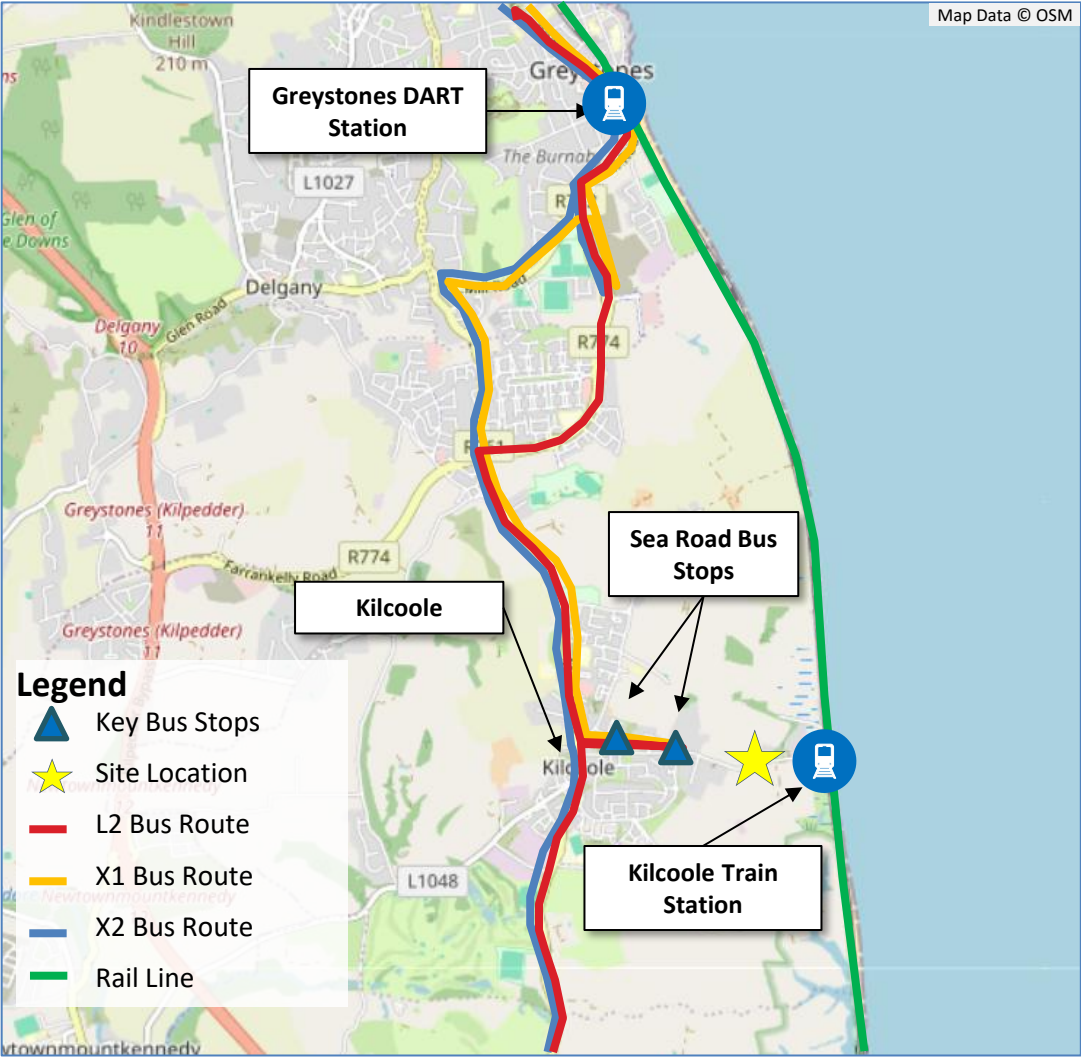
- ▶ Overall subject lands area: ca. 43 ha., with Sea Road (L5045) intersecting them, and agricultural lands to the north, south and east, and Kilcoole being located to the west.
- ▶ Areas to the south of Ballydonarea Lane are currently zoned for residential (Priority 2) with the lands north of the lane zoned for tourism. All other bordering zones to the west are existing residential. The north, east and south of the subject lands are primarily unzoned.
- ▶ Other residential zoned lands are located on the west side of Kilcoole which is sub-optimally located with respect to Kilcoole Train Station and coastal walking routes.



Public Transport Services

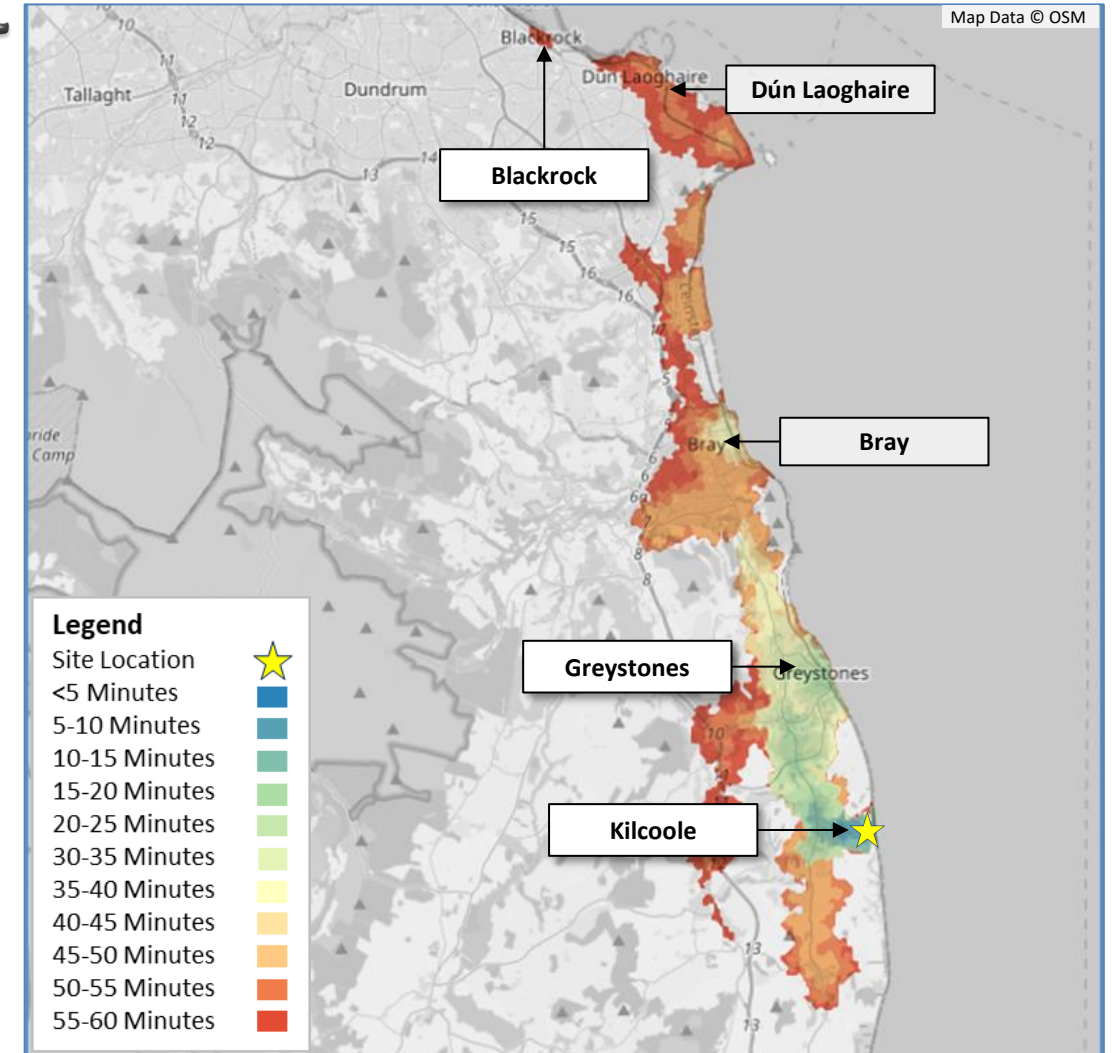
- ▶ Kilcoole Rail Station is located ca. 125 metres to the east of the subject lands and is served by intercity services, with 3 train services northbound in the weekday morning peak period (07:00hrs to 10:00hrs).
- ▶ Recent BusConnects services implemented in Kilcoole since January 2025 with the town served by 3 no. bus routes - the L2, X1 & X2, as follows:

Route No.	Route	Average Weekday Off-Peak Frequency	Average Weekday Peak Frequency
L2	Sea Road/Newcastle – Bray Station	Ca. 30 Minutes	Ca. 30 Minutes
X1*	Kilcoole – Hawkins Street	Peak Service Only	Ca. 10 Minutes
X2*	Newcastle – Hawkins Street	Peak Service Only	Ca. 20 Minutes



Public Transport Catchment

- ▶ Kilcoole is served by both bus (L2, X1 and X2) and rail (intercity) services, which predominantly run along the coast in a north-south alignment.
- ▶ The north-south alignment of public transport services influences the catchment served, with major urban areas in North Wicklow/ South Dublin accessible within 60 minutes including:
 - Greystones;
 - Bray;
 - Dún Laoghaire; and
 - Blackrock.



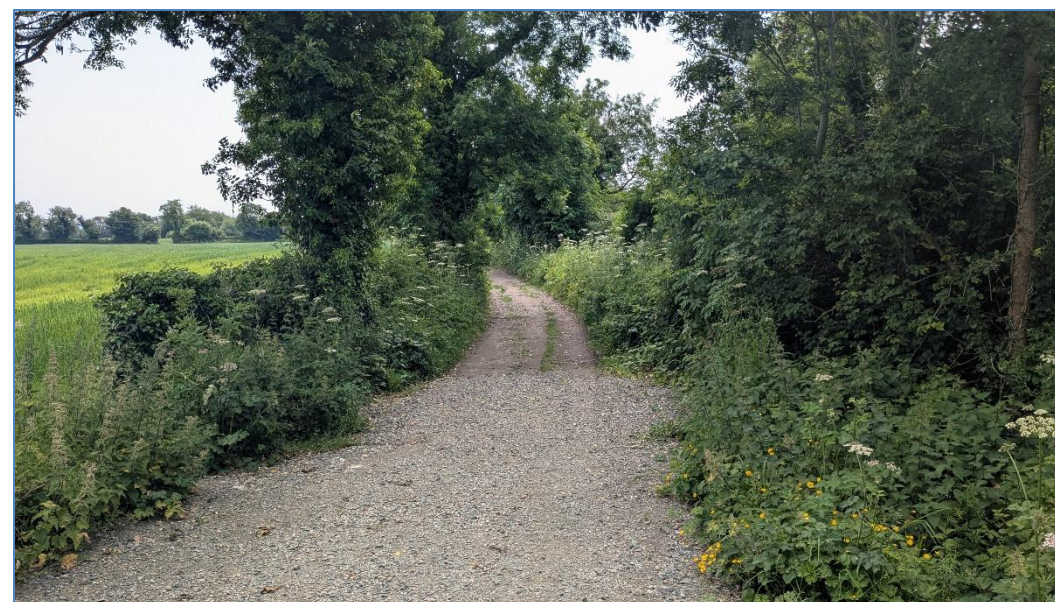
Site Assessment

- ▶ A site assessment was undertaken on Tuesday 10 June 2025 (between ca. 09:30hrs and 11:30hrs) to confirm facilities and conditions for all road users.
- ▶ Kilcoole Train Station is a single platform/track station that accommodates both northbound and southbound services.
- ▶ The platform is uncovered with a small number of seats for commuters.



Site Assessment Ctd.

- ▶ In the surrounding area of the subject lands, there are a number of walking routes.
- ▶ Moderate activity was observed on these routes throughout the site assessment period.
- ▶ The Ballydonarea Loop Walk travels from Kilcoole Train Station, through the subject lands to Ballydonarea Lane to the northeast of Kilcoole Town Centre.
- ▶ The Coastal Walk route connects Kilcoole Train Station to Newcastle and Wicklow, and also travels north to Greystones and Bray.



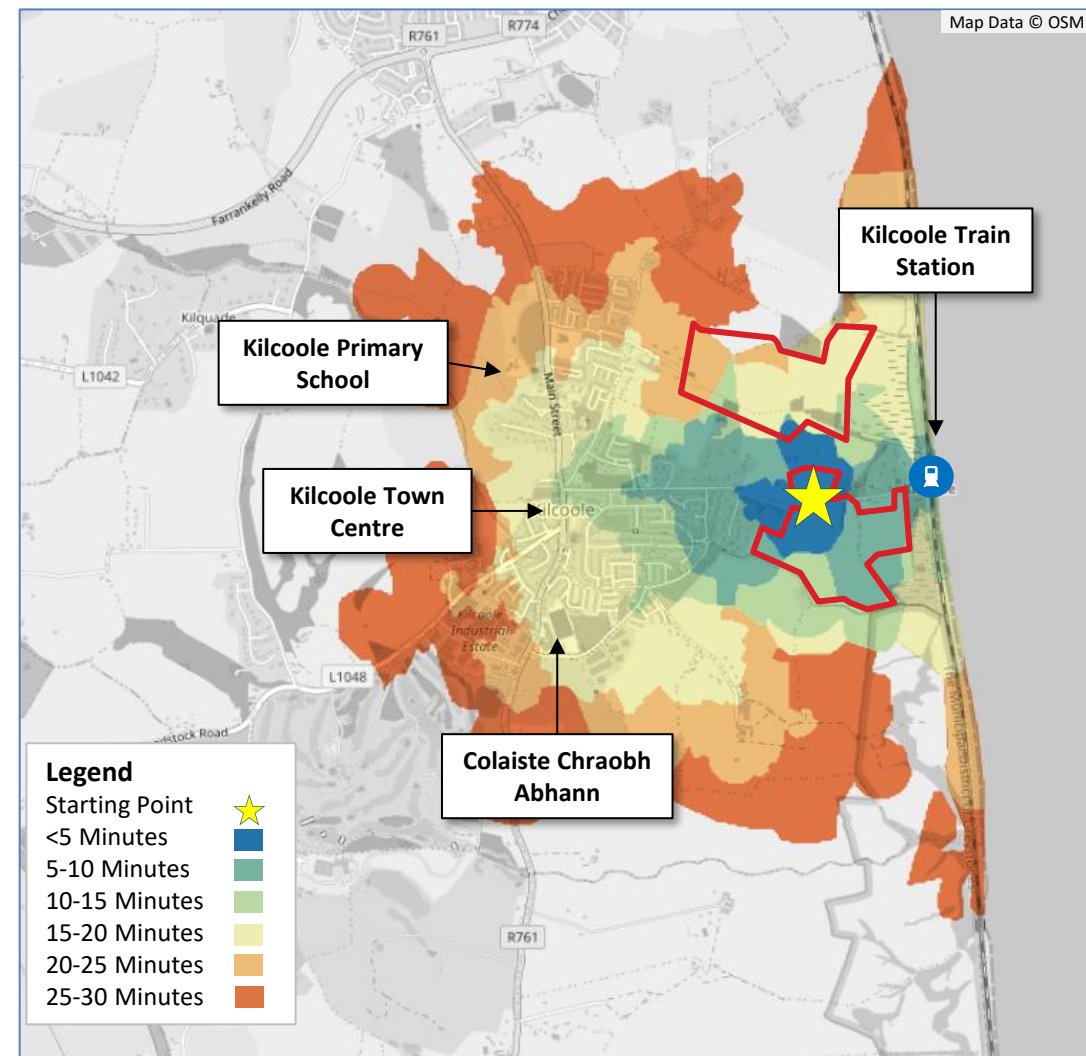
Site Assessment Ctd.

- ▶ Sea Road is a ca. 1.5-kilometre-long two-way local road that links Kilcoole Train Station to Kilcoole Town Centre.
- ▶ The road passes by the vehicular site accesses.
- ▶ The width of Sea Road varies with the western section being ca. 6.5 metres in width and the eastern section being ca. 4.5 metres wide.
- ▶ No footpath on the eastern 750 metres section of Sea Road, however Draft LPF proposes improved active travel infrastructure.
- ▶ The L2 and X1 bus stop on Sea Road ca. 400 metres to the west of the subject lands, with the occupancy of L2 buses observed to be low.



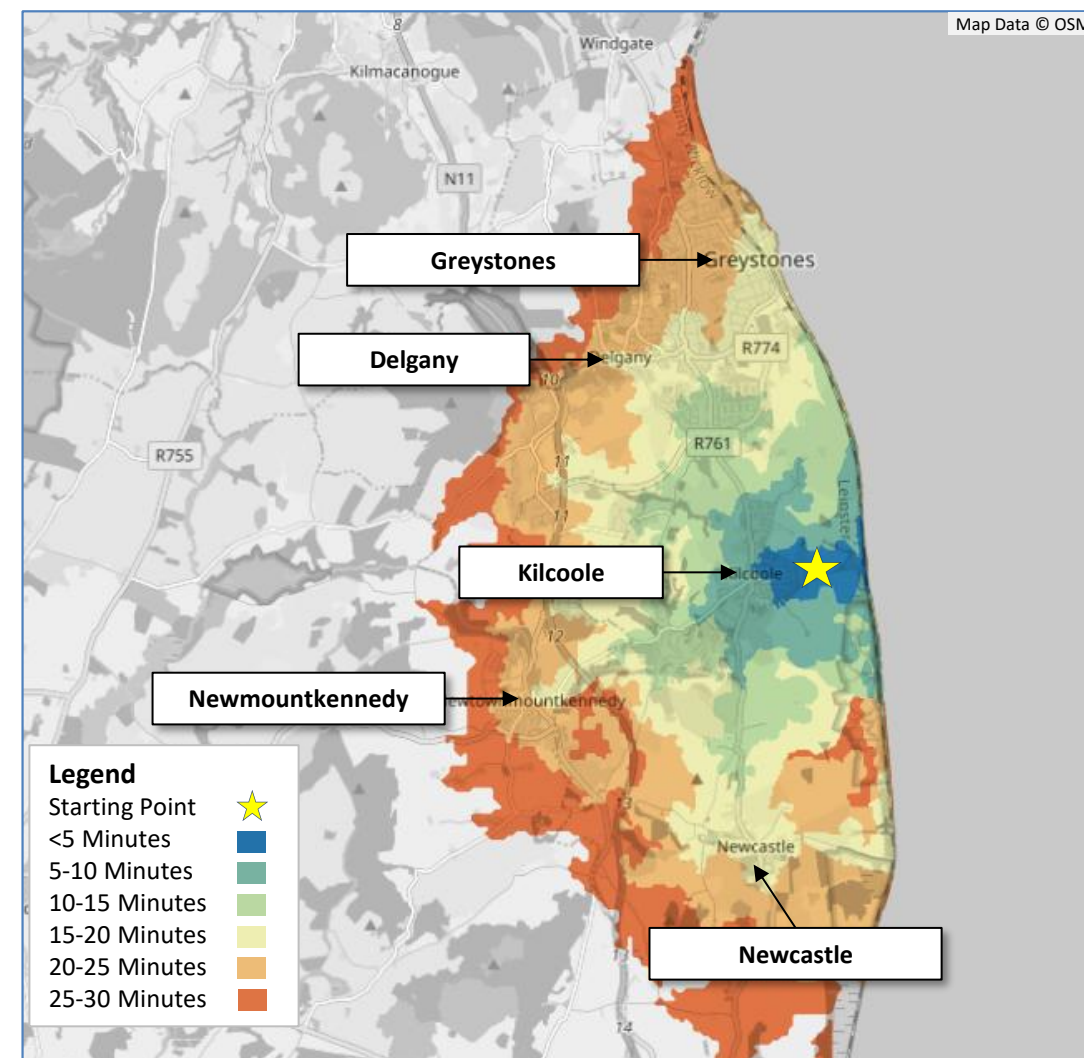
Walking Catchment

- ▶ The chosen starting point was selected on Sea Road, within the subject lands.
- ▶ The entirety of Kilcoole Town is within the 30 minute catchment area.
- ▶ Amenities accessible within a 30 minute's walk:
 - Primary and secondary schools;
 - Tesco Express & Centra;
 - Kilcoole Industrial Estate; and
 - Kilcoole Train Station.



Cycling Catchment

- ▶ There is a limited segregated cycle infrastructure within Kilcoole, with cyclists generally accommodated in a mixed traffic environment. There are dedicated cycle lanes along Hollywood Avenue and parts of Sea Road.
- ▶ Areas accessible within a 30 minutes cycle:
 - Greystones;
 - Newcastle;
 - Delgany; and
 - Newmountkennedy.

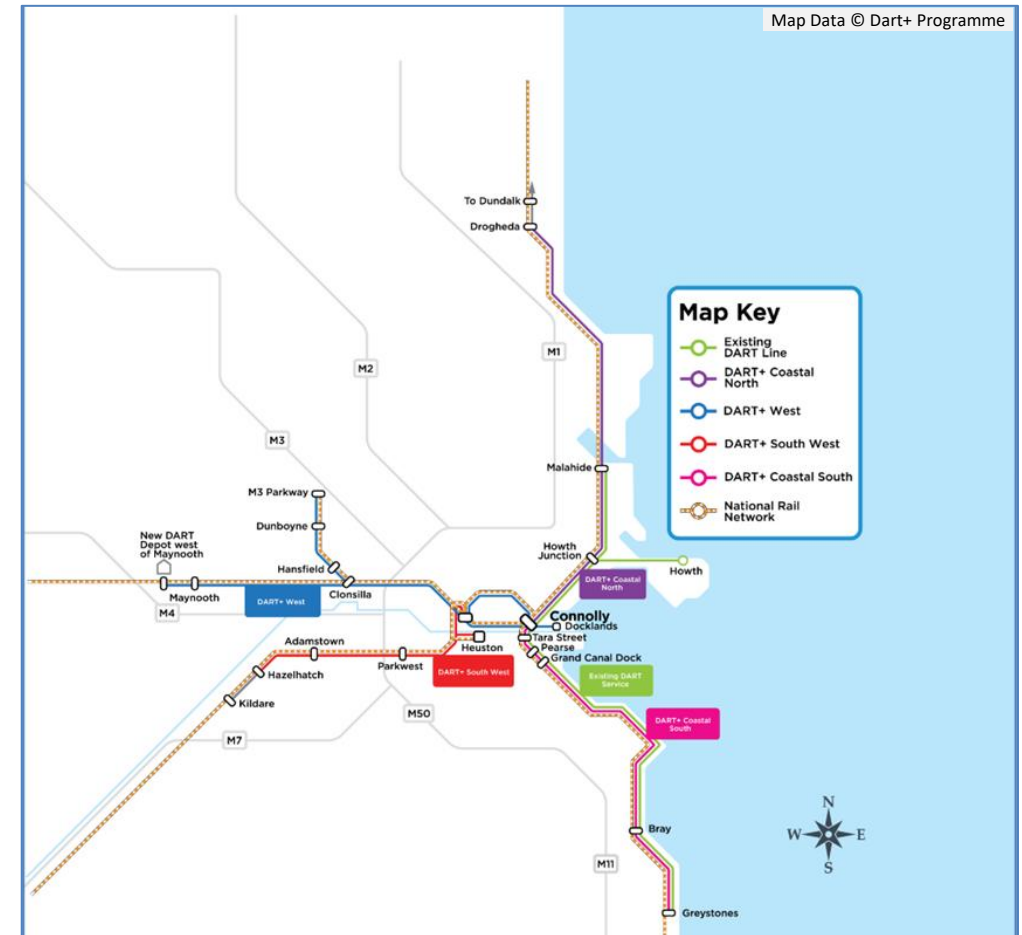


5. Future Transport Context

- – Future Rail Network
- Future Active Travel Network (GDA Cycle Network Plan and
- Draft Greystones/ Delgany & Kilcoole LPF)

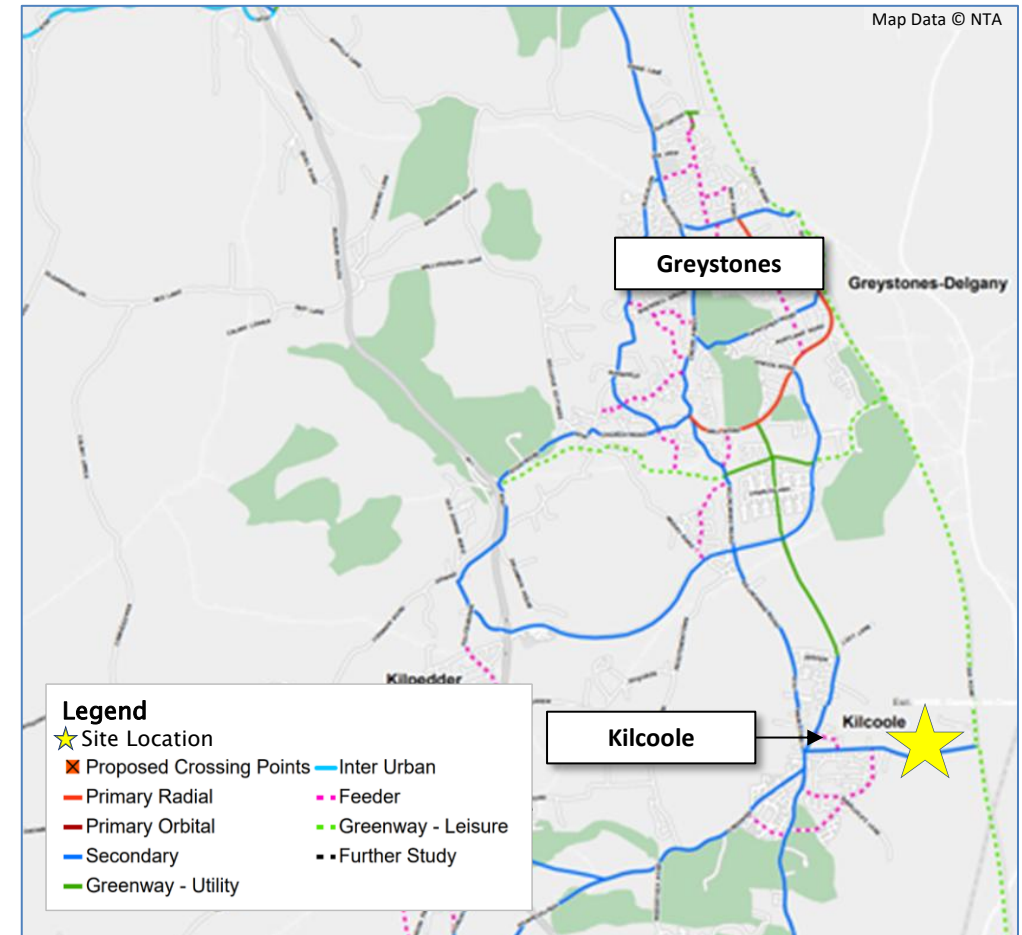
Future Rail Network

- ▶ The DART+ Coastal South Project, as part of the DART+ Programme, will deliver an improved and more frequent electrified network, with additional passenger capacity and enhanced train services between the City Centre and Greystones.
- ▶ The project status is currently '*Preferred option developed*' with the next steps to begin planning in mid-2025.
- ▶ Will increase the capacity from two to three DART Services per hour each direction between Bray and Greystones.
- ▶ Wicklow Town is expected to get an hourly service by 2028, which is within the lifetime of the LPF.
- ▶ The Kilcoole Train Station platform is expected to be extended by 44 metres to cater for full length trains.



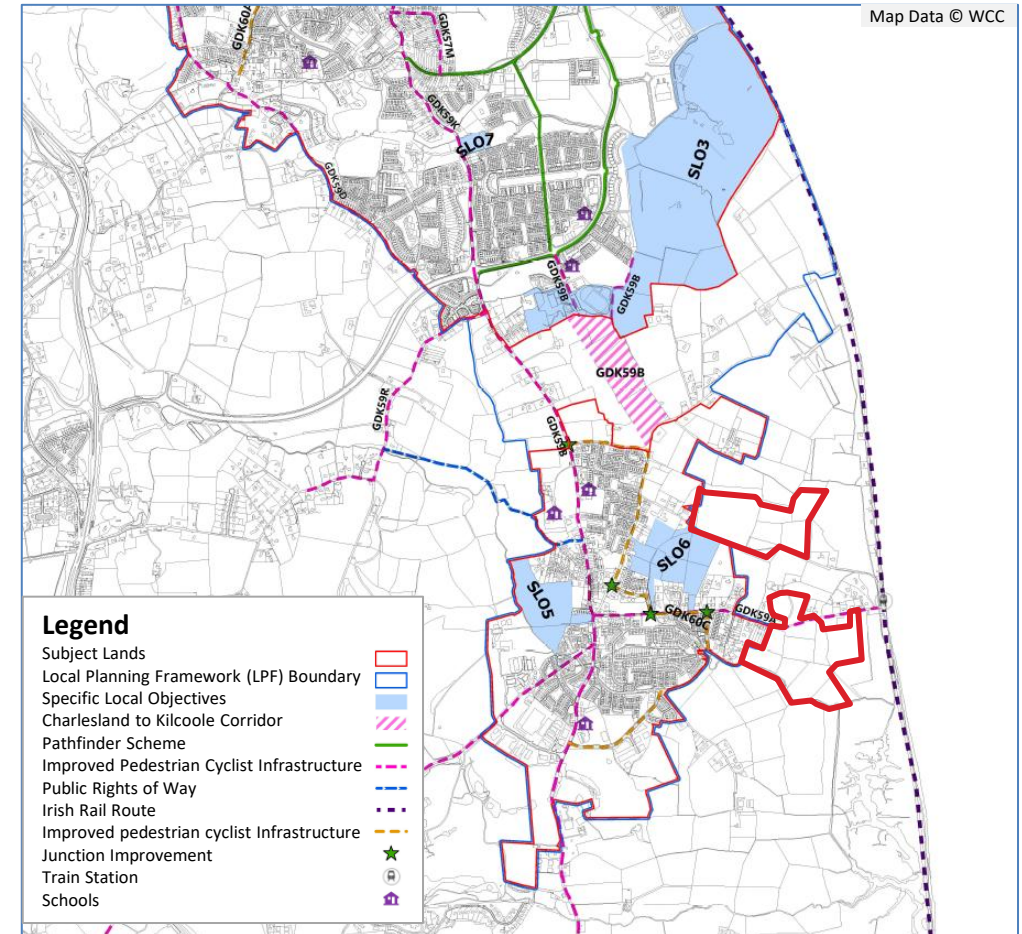
GDA Cycle Network Plan

- ▶ The 2022 Greater Dublin Area Cycle Network Plan was adopted as part of the GDA Transport Strategy 2022-2042 in January 2023.
- ▶ A comprehensive and integrated network of infrastructure comprising of primary, secondary, greenway and inter-urban links.
- ▶ A secondary route travels through Kilcoole and past the subject lands to Kilcoole train station.
- ▶ The plan shows a secondary and Greenway - Utility route connecting Kilcoole to Greystones.



Draft Greystones/ Delgany & Kilcoole LPF 2025

- ▶ Planned improvements to the Kilcoole Road pedestrian facilities are in Phase 5 (Detailed Design & Tender).
- ▶ Improved pedestrian and cyclist infrastructure, plus 2 no. junction improvements along Sea Road – would facilitate enhanced active travel to/ from Kilcoole Train Station.
- ▶ Improved pedestrian and cyclist infrastructure between south of Kilcoole to north of Greystones.
- ▶ Charlesland to Kilcoole Corridor is highlighted pink, which together with wider network improvements, will enhance active travel facilities between Kilcoole and Greystones – opportunities to link into subject lands (development phase 2).

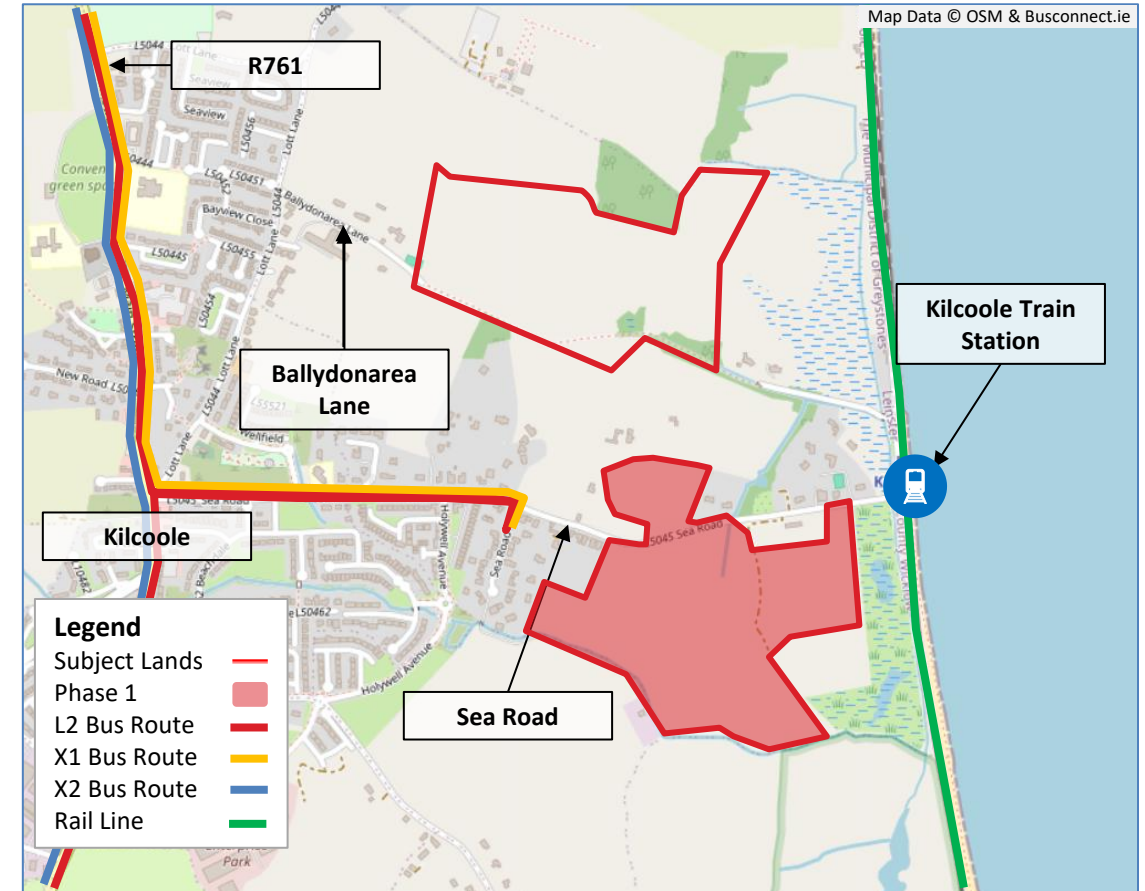


6. Subject Lands Development Potential

- – Development Potential Phase 1
- Development Potential Phase 1 & 2

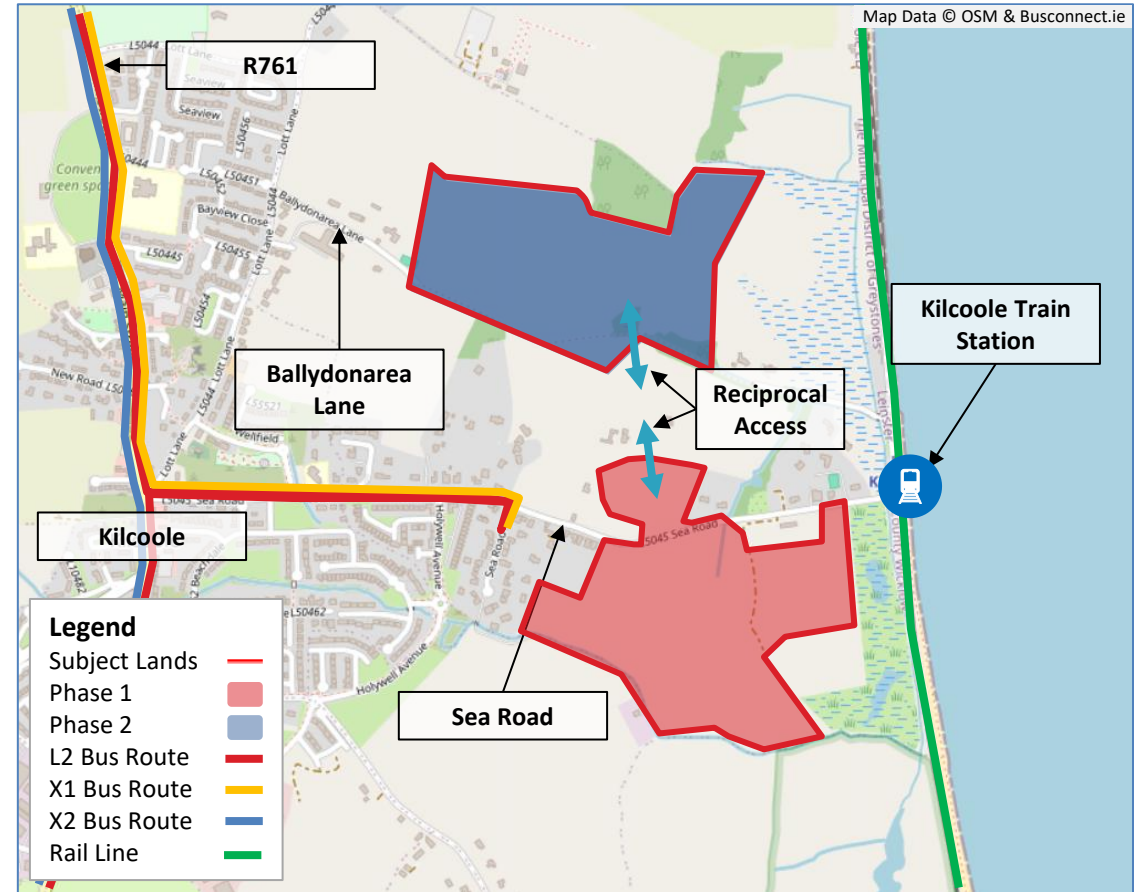
Kilcoole Development Potential Phase 1

- ▶ A medium to high-density residential quarter with ancillary retail, community and employment uses currently envisaged.
- ▶ Of the total land area, 60% has been deemed to be developable for residential units, 20% open space, 10% roads and parking, and 10% utilities and services.
- ▶ Phase 1 land area is ca. 22.6 ha. and a developable area of ca. 13.6 ha. which, based on an assumed 35 dwellings per ha., would be expected to accommodate ca. 474 dwellings.
- ▶ At 2.5 occupants per dwelling, the estimated future population of phase 1 is estimated at ca. 1,187 residents.



Kilcoole Development Potential Phase 1 & 2

- ▶ Phase 2 has a land area of ca. 20.4 ha. and a net developable area of 12.2 ha. which, based on an assumed 35 dwellings per ha., could deliver up to 428 additional residential units, accommodating ca. 1,071 residents.
- ▶ Consider both phases, the subject lands have the capacity to accommodate ca. 903 residential units, with an overall future population of ca. 2,258 residents.
- ▶ Scale of development supported by the subject lands proximity to Kilcoole Train Station, and recently enhanced BusConnects bus services (L2, X1 and X2).
- ▶ Transport and mobility key considerations:
 - ▶ Low-capacity road accesses (Sea Road); and
 - ▶ Lack of immediate public transport options (within 400 metres).

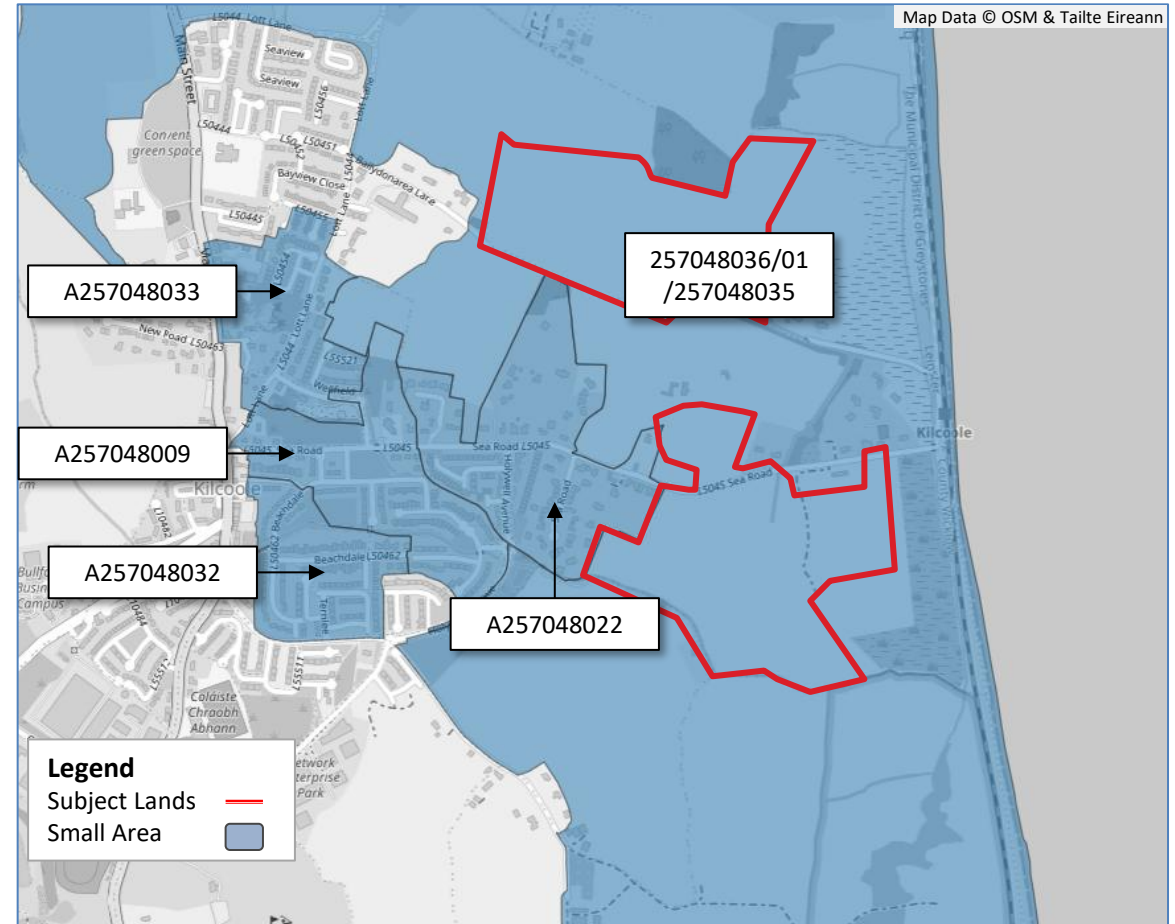


7. Development Travel Demand

- – Development Modal Split
- Forecast Travel Demand

Development Modal Split

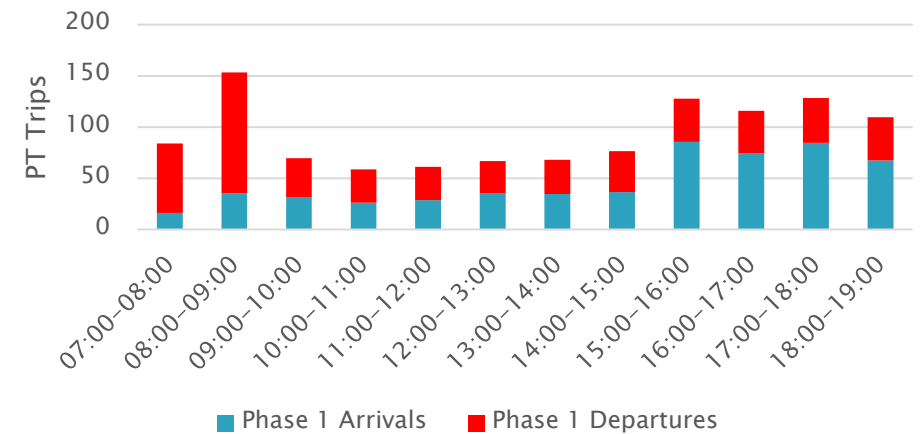
- ▶ Reflecting the subject lands favourable location with respect to rail and bus, and to ensure alignment with current transport policy, maximising the use of public transport and active travel is an imperative. Targets have been informed by the Climate Action Plan 2025.
- ▶ Existing resident travel mode split, based on CSO Census 2022 data for Small Areas within subject lands vicinity is:
 - Public transport: 12%;
 - Walking: 15%;
 - Cycling: 2%; and
 - Car: 71%.
- ▶ Development target resident travel mode split is:
 - Public transport: 30%;
 - Walking: 15%;
 - Cycling: 5%; and
 - Car: 50%.



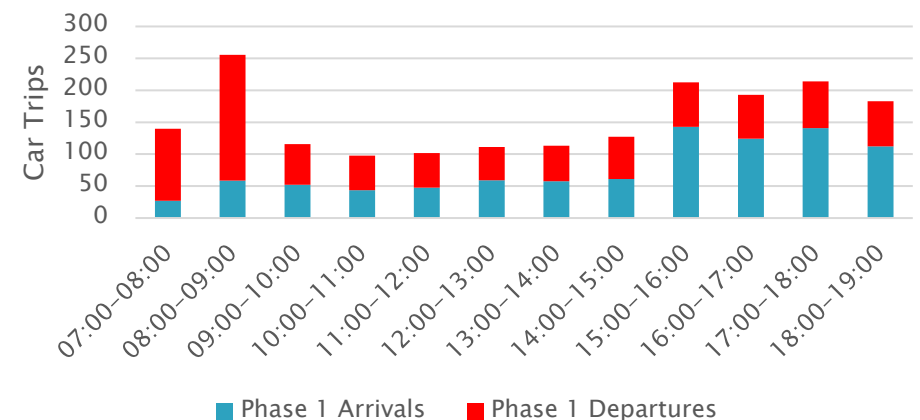
Forecast Travel Demand – Phase 1

- ▶ Data from the industry standard Trip Rate Information Computer System (TRICS) database has been utilised to calculate the quantum of trips likely to be generated based on the development scale and type, and target modal splits applied.
- ▶ Total people trips rates per unit were found to be:
 - AM Peak – arrivals 0.248 & departures 0.829; and
 - PM Peak – arrivals 0.594 & departures 0.308.
- ▶ The predicted overall peak times of phase 1 of the development was found to be 08:00-08:59hrs (ca. 511 total trips) and 17:00-17:59hrs (ca. 428 total trips).
- ▶ Public transport is expected to accommodate a total of 153 trips during the AM peak hour and 128 trips during the PM peak hour.
- ▶ The development is forecast to generate 256 car trips during the AM peak hour and 214 car trips during the PM peak hour.

Phase 1 Public Transport Trips

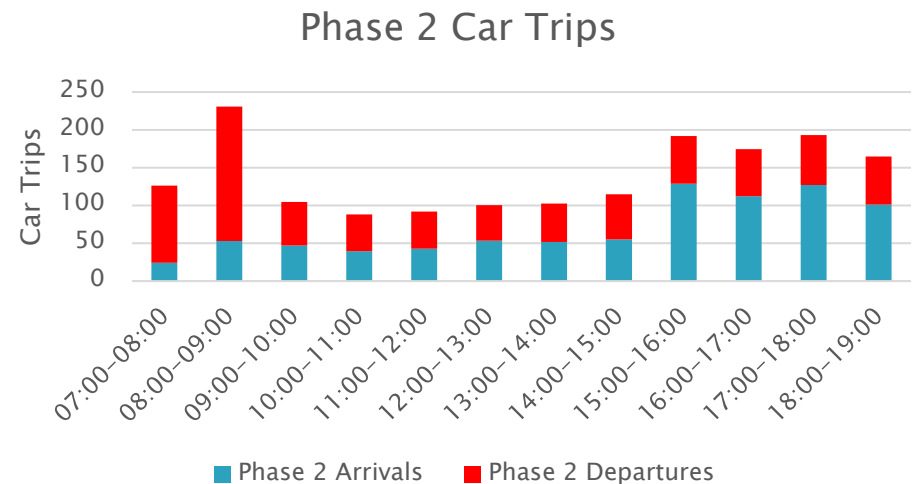
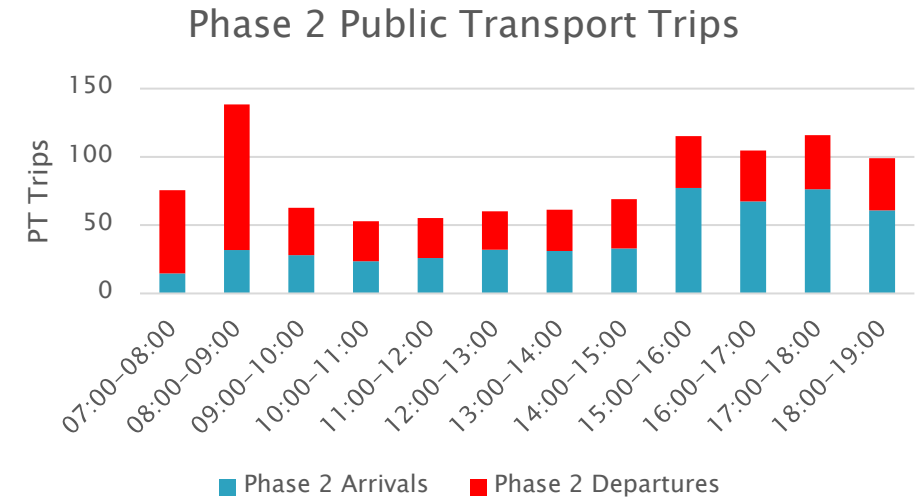


Phase 1 Car Trips



Forecast Travel Demand – Phase 2

- ▶ The predicted overall peak times of phase 2 of the development was found to be 08:00-08:59hrs (ca. 461 total trips) and 17:00-17:59hrs (ca. 386 total trips).
- ▶ Public transport is expected to accommodate a total of 138 trips during the AM peak hour and 116 trips during the PM peak hour.
- ▶ The development is forecast to generate 231 car trips during the AM peak hour and 193 car trips during the PM peak hour.
- ▶ The combined total from phase 1 and phase 2 for the peak hours are:
 - AM Peak (08:00-08:59hrs) 973 total trips and
 - PM Peak (17:00-17:59hrs) 815 total trips.

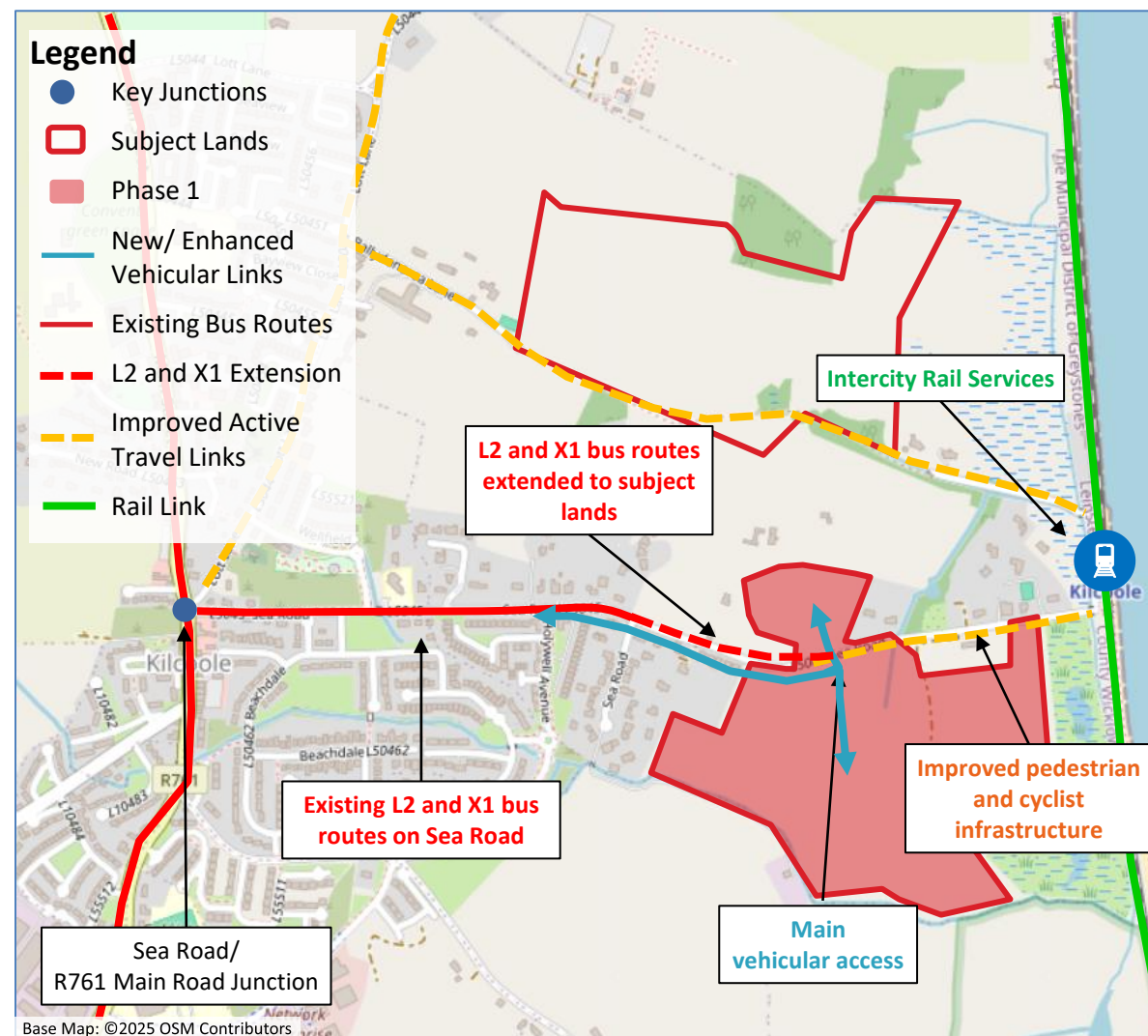


8. Proposed Outline Transport Strategy

- – Outline Medium-Term Transport Strategy
- Outline Long-Term Transport Strategy

Proposed Outline Medium-Term Transport Strategy

- ▶ Proposed medium-term strategy seeks to support the proposed rezoning of Phase 1 lands within the emerging Greystones/ Delgany & Kilcoole LPF 2025.
- ▶ Proposed strategy seeks to capitalise upon the lands location with respect to:
 - Kilcoole Train Station;
 - Existing bus services (L2 and X1); and
 - Planned LPF active travel infrastructure.
- ▶ Also seeks to minimise interdependency between development of the subject lands and major new infrastructure provision.
- ▶ In addition to enhanced active travel facilities, a short extension of existing L2 and X1 bus services is proposed along enhanced Sea Road.



Proposed Outline Long-Term Transport Strategy

- ▶ Proposed long-term strategy seeks to support the future development of Phase 2 lands beyond the lifetime of the emerging Greystones/ Delgany & Kilcoole LPF 2025.
- ▶ Development will benefit from longer-term enhancements to the rail corridor. Delivered as part of the DART+ Coastal South Project.
- ▶ Longer-term delivery of development within the entirety of the subject lands supported by a new sustainable access link from regional road network and introduction of a new bus route from Kilcoole Train Station (as per Objective CPO 12.21 of the Current Wicklow County Development Plan).
- ▶ Sea Road predominantly accommodating active travel and public transport movements.

