

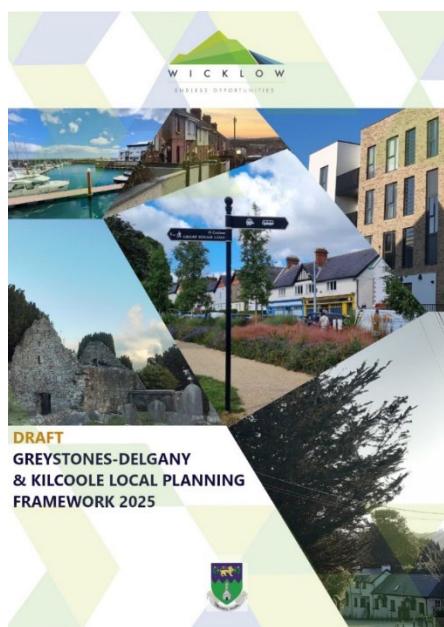


WICKLOW COUNTY COUNCIL

Proposed Variation No. 4 to the Wicklow County Development Plan 2022-2028

including the Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF)

Second report to the members of Wicklow County Council under Section 13 of the Planning and Development Act 2000 (as amended) on the submissions received during the public consultation of the Proposed Material Alterations to Proposed Variation No. 4 including the Draft Greystones-Delgany & Kilcoole Local Planning Framework



Issue date: 18 December 2025

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These documents should be read alongside Proposed Variation No. 4, including the Draft Greystones – Delgany & Kilcoole Local Planning Framework. It is available to view [HERE](#).

The Proposed Material Alteration documentation, as published for public display, is available [HERE](#).

PART I: INTRODUCTION

1.1 Introduction

Proposed Variation No. 4, including the draft Greystones-Delgany & Kilcoole Local Planning Framework (LPF), was published on the 9 May 2025 for public consultation and the 1st Chief Executive's Report was issued on 18 August 2025. By resolution at the Council meeting on 6 October 2025, the members of the planning authority decided to make alterations to the Proposed Variation-Draft LPF.

As said alterations constituted 'material' alterations to the Proposed Variation-Draft LPF, the planning authority was required to publish notice of the Proposed Material Alterations (PMAs) and any determination that required the carrying out of a Strategic Environmental Assessment or Appropriate Assessment for public consultation.

The Proposed Material Alterations (PMAs) and associated determinations went on public display for a period of not less than 4 weeks on **24 October 2025** with submissions invited until **21 November 2025**.

All valid submissions shall be taken into account before the Variation including the LPF is made.

This Chief Executive's (CE) Report relates to the submissions or observations received on the Proposed Material Alterations to Proposed Variation No. 4, including the Draft Greystones-Delgany & Kilcoole LPF. This Chief Executive's Report is submitted to the members under Section 13 of the Planning and Development Act 2000 (as amended). This report contains the following:

- (i) a list of the persons or bodies that made submissions,
- (ii) a summary of the issues raised by them,
- (iii) the opinion of the Chief Executive in relation to the issues raised, and her recommendations in relation to the Proposed Material Alterations to the Proposed Variation-Draft LPF, including any change to the Proposed Material Alterations as she considers appropriate, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

The members of the planning authority are required to consider the Proposed Material Alterations of the Proposed Variation-Draft LPF and the report of the Chief Executive.

It should be noted that some submissions (either in full or in part) raise issues that do not relate to any of the published Proposed Material Alterations. Such submissions / issues cannot be considered in this report or at this stage in the variation making process and therefore will not appear in this report.

1.2 Next steps

As set out in the Planning and Development Act 2000 (as amended), following consideration of this Chief Executive's Report, the Variation including the LPF shall be made by the planning authority by resolution, with all, some, some with further modifications or none of the material alterations.

Where the planning authority decides to make the Variation-LPF or further modify the material alterations of the Variation-LPF by resolution, the following shall apply in relation to any modifications to the material alteration proposed:

A further modification to the variation:

- i. may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,
- ii. shall not be made where it refers to
 - (I) an increase in the area of land zoned for any purpose, or
 - (II) an addition to or deletion from the record of protected structures.

When performing their functions under this subsection, the members of the planning authority shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

This report is being issued to the members in December 2025.

The consideration of this report and the making of the Variation including the LPF, is a matter that will be on the agenda for consideration at the County Council meeting on 09 February 2026.

The Variation to the Wicklow County Development Plan 2022-2028 shall have effect from the day that the variation is made.

1.3 Draft Consultation Process

The Proposed Material Alterations to Proposed Variation No. 4 including the Greystones-Delgany & Kilcoole LPF were placed on display during the period of 24 October 2025 to 21 November 2025 (4 weeks). The aim of the consultation process was to enable the public and interested parties to give their observations on the Proposed Material Alterations to the Proposed Variation-Draft LPF.

An online consultation portal was provided that allowed the submitter to identify that their submission related to a specific Proposed Material Alterations to the Proposed Variation-Draft LPF. Posted or hand delivered submission were also accepted. A total of **86** valid submissions were made in relation to the Proposed Material Alterations to the Proposed Variation-Draft LPF. All submissions are available to view online on Wicklow County Councils website [HERE](#).

1.4 Strategic Environmental Assessment, Appropriate Assessment & Strategic Flood Risk Assessment

In accordance with the relevant legislative requirements, the Proposed Variation-Draft LPF was accompanied by a Strategic Environmental Assessment - Environmental Report, an Appropriate Assessment Natura Impact Report and a Strategic Flood Risk Assessment; the Proposed Material Alterations to the Proposed Variation-Draft LPF were accompanied by an Addendum to the Environmental Report (including the Non-Technical Summary), an Addendum to the Appropriate Assessment Natura Impact Report and an Addendum to the Strategic Flood Risk Assessment. This Chief Executive's Report should be read in conjunction with all of these reports, with specific reference to the addenda as they assess the Proposed Material Alterations.

SEA - The Proposed Material Alterations to the Proposed Variation-Draft LPF have been evaluated in the manner set out in the SEA Regulations and the findings of that analysis was published with the Proposed Material Alterations.

AA - An Appropriate Assessment Natura Impact Report accompanied the Proposed Variation-Draft LPF. The Proposed Material Alterations to the Proposed Variation-Draft LPF have also been evaluated in this manner and it has been determined that the Proposed Material Alterations to the Proposed Variation-Draft LPF will not result in likely significant effects on any European site.

Following circulation of the CE's report to the Members, a final, consolidated Appropriate Assessment (AA) Natura Impact Report will be prepared, taking into account the original AA NIR for the Proposed Variation, the AA NIR for the Proposed Material Alterations and submissions received during the Variation-preparation/AA process.

SFRA - The Proposed Material Alterations have undergone Strategic Flood Risk Assessment, and the results of that assessment are presented in the SFRA addendum to the Proposed Material Alterations.

It is incumbent on the elected members to take account of the findings of the above assessments and to have regard to same in their decision whether to adopt or modify the variation / proposed material alterations. In all cases, it will be necessary for a full record to be made of any decision made and how the environmental considerations were taken account of in the decision-making process.

Following adoption of the Variation, a Strategic Environmental Assessment (SEA) Statement, summarising how environmental considerations have been integrated into the Variation, and an AA Conclusion Statement, summarising the findings of the AA process, will be prepared.

Submissions received on the SEA and AA have been addressed in Part 5 of this report. Submissions on the SFRA have been dealt with as part of any individual PMA relevant to flooding.

1.5 Considering the submissions

The written submissions have been analysed by the Executive of the County Council. The valid submissions are summarised, and the opinion and recommendations of the Chief Executive have been given in Part 4.

Wherever the **published proposed alteration** is referred to, changes are shown as follows: Altered / new text in **red**, deleted text in **blue strikethrough**.

Where a **submission** makes specific requests for **further modifications** to the wording of any Proposed Material Alteration, suggested changes are shown as follows: altered / new text in **orange**, deleted text in **green strikethrough**.

Any **further modification** proposed by the Chief Executive is shown in **purple text** for new text, and deleted text in **purple strikethrough**.

Each Proposed Material Alteration and any recommended further modification have been assessed for impacts on the environment and / or impacts on designated European sites. The associated SEA and AA processes have confirmed that, from an environmental perspective, the CE's recommendations for further modifications are minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site.

A summary table of each published Proposed Material Alteration (PMA), details of any valid submission on the PMA and the CE's recommendation is presented here in Part 4.

This Report is submitted to the Members for their consideration.

1.6 Summary of Proposed Material Alterations

In the table to follow, the following abbreviations apply:

CE This means the PMA was proposed by the Chief Executive

EM This means the PMA was proposed by the elected members

Proceed This means the CE is recommending that the member make the Proposed Material Amendments

Further Modify & Proceed This means the CE is recommending that the PMA be made with a modification.

Not proceed This means the CE is recommending that the members **do not** make the PMA

Not proceed* This means the CE is not recommending that the PMA be made, but where the members decide to proceed to make the PMA, the CE is recommending a modification.

No.	CE	EM	Brief description	Valid Submissions	CE recommendation
1	CE		Vary Section 3.5 of Volume 1, Chapter 3 of the Wicklow CDP	OPR	Proceed
2	CE	EM	Amend Table 1B Wicklow Core Strategy for Kilcoole		Proceed
3		EM	Amend Opportunity Site OP7 Kilcoole Centre	Brookhampton Ltd.	Proceed
4	CE	EM	Amend Opportunity Site OP8 'Kilcoole West – 'The Molly's'	UÉ, Brookhampton Ltd., Lidl Ireland GmbH	Proceed
5		EM	Amend Housing Targets & Extant Planning Permissions subsection	OPR, Cairn Homes Properties Ltd.	Proceed
6		EM	Amend HOUSING OBJECTIVE GDK16	Cairn Homes Properties Ltd.	Proceed
7		EM	Amend zoning of land at Bellevue Demesne measuring c. 0.65ha from unzoned outside the settlement/LPF boundary to R-Special 'Special Residential' and add additional objective to HOUSING OBJECTIVES	OPW, UÉ, Carmel McDonal,	Not Proceed*
8		EM	Amend zoning of land at Bellevue Demesne measuring c. 2.7ha from unzoned/outside the LPF boundary to RS 'Special	Jackie Durban, Alan & Isobel Constable, UÉ, Paul Hyland	Not Proceed

		Residential' and add additional objective to HOUSING OBJECTIVES			
9	CE	Add additional objective to HOUSING OBJECTIVES (LDA)		Proceed	
10	CE	Amend Objective GDK52 (Landscape Planting)		Proceed	
11	CE	Amend Objective GDK55 (Strawberry Lane)	Friends of the Cliff Walk	Proceed	
12	EM	Amend MAP NO. 5 'TRANSPORT STRATEGY' (omit GDK59b corridor) and amend INFRASTRUCTURE OBJECTIVES	NTA	Not Proceed	
13	CE	Amend MAP NO. 5 'TRANSPORT STRATEGY' and amend INFRASTRUCTURE OBJECTIVES - Objective GDK59 (g) & (t)		Proceed	
14		Amend MAP NO. 5 'TRANSPORT STRATEGY' and amend INFRASTRUCTURE OBJECTIVES (Objective GDK60)		Proceed	
15	EM	Amend INFRASTRUCTURE OBJECTIVES (Objective GDK64 Drainage Area Plan)		Proceed	
16	CE	Add INFRASTRUCTURE OBJECTIVE (Local Transport Plan)	TII, NTA, Brookhampton Ltd.	Proceed	
17	CE	Add INFRASTRUCTURE OBJECTIVE (LAWPRO)		Proceed	
18	CE	Amend INTRODUCTION (Specific Local Objectives)	Cairn Homes Properties Ltd., Brookhampton Ltd.	Proceed	
19	CE	EM	Amend MAP NO. 1 LAND USE ZONING (SLO Boundary) and amend Specific Local Area Objective SLO 4 - COOLAGAD	Temple Carrig Secondary School, UÉ, Cairn Homes Properties Ltd.	Further Modify & Proceed
20		EM	Amend zoning of land at Kilcoole measuring c. 6.1ha from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1' and SLO 5 - Bullford and boundary	Richard & David Fox, UÉ, OPR, NTA, Brookhampton Ltd., Lidl Ireland GmbH	(A) Not Proceed (Zoning) (B) Further Modify & Proceed (Text)
21		EM	Amend SLO 6 and zoning of land at Ballydonarea from c. 0.35ha zoned OS2 'Natural Areas' to c. 0.31ha zoned RE 'Existing Residential' and c. 0.04ha zoned RN2 'New Residential – Priority 2', and amend SLO 6 – BALLYDONAREA	UÉ	(A) Not Proceed (Zoning) (B) Further Modify & Proceed (Text)
22	CE		Amend zoning of land at Delgany 'Convent Lands' from c. 0.56ha zoned CE 'Community & Education' to MU 'Mixed Use', c. 0.18ha zoned OS1 'Open Space' to RE 'Existing Residential' and add new Specific Local Objective: SLO 8 – CONVENT LANDS	Alice O'Donnell, Delgany Community Council, Carina Holmes, Department of Education and Youth, UÉ	Proceed
23A		EM	Amend zoning of land at Kilcoole measuring c. 8ha from unzoned outside the settlement/LPF boundary to RN1 'New Residential –	Richard & David Fox, UÉ, OPR, NTA, Brookhampton Ltd., Department of	Not Proceed*

		Priority 1' (c. 5.69ha), OS1 'Open Space (c. 1.7ha) and OS2 'Natural Areas' (c. 0.6ha), and add new Specific Local Objective: SLO 9 – DARRAGHVILLE and SLO Map	Housing Local Government & Heritage,	
23B	CE	Amend zoning of land at Kilcoole measuring c. 1.5ha from AG 'Agriculture' to CE 'Community and Education', and c. 1.0ha of land from CE 'Community and Education' to RE 'Existing Residential'	Department of Education & Youth, UÉ	Proceed
24	EM	Amend zoning of land at Ballydonarea measuring c. 6.6ha from AOS 'Active Open Space' (c. 4.4ha) and unzoned outside the LPF boundary (c. 2.2ha) to RN1 'New Residential – Priority 1' (c. 4.4ha) and AOS 'Active Open Space' (c. 2.2ha). and add new Specific Local Objective: SLO 10 – LOTT LANE	Richard & David Fox, UÉ, OPR, NTA	Not Proceed
25	EM	Amend zoning of land at Ballycrone measuring c. 4.6ha from unzoned outside the settlement/LPF boundary to RE 'Existing Residential' (c. 0.3ha), RN1 'New Residential – Priority 1' (c. 2.3ha) and AOS 'Active Open Space' (c. 2ha), and add new Specific Local Objective: SLO 11 – BALLYCRONE	Richard & David Fox, Ballycrone Manor Residents, UÉ, OPR, NTA, Paul Brady	Not Proceed
26	EM	Amend zoning of lands at Bellevue Demesne measuring c. 12.5ha from unzoned/outside the LPF boundary to AOS 'Active Open Space', and add new Specific Local Objective: SLO 12 – BELLEVUE HILL	61 No. submissions, see submission summary for full list.	Not Proceed*
27	EM	Amend zoning of lands at Coolagad from RE 'Existing Residential' (c. 0.9ha) and RN2 'New Residential – Priority 2' (c. 0.4ha), to AOS 'Active Open Space' (c. 0.9ha) and RN1 'New Residential – Priority 1' (c. 0.4ha) and add new Specific Local Objective: SLO 13 – COOLAGAD EAST	O'Briain Architects, Temple Carrig Secondary School, UÉ	(A) Proceed (AOS Zoning only) (B) Not Proceed* (remainder)
28	EM	Amend zoning of land at Priestsnewtown measuring c. 0.14ha from unzoned outside the settlement/LPF boundary to RN1 'New Residential – Priority 1' (c. 0.14ha).	UÉ	Not Proceed
29	EM	Amend zoning of land at Farrankelly measuring c. 0.24ha from partially unzoned outside the settlement/LPF boundary and partially RE 'Existing Residential', to RN1 'New Residential – Priority 1'	UÉ	Not Proceed

30		EM	Amend zoning of land at Killincarrig measuring c. 0.5ha from AOS 'Active Open Space' to RS 'Special Residential'	UÉ	Not Proceed
31		EM	Amend zoning of land at Bellevue Demesne measuring c. 0.6ha from unzoned/outside the LPF boundary to RE 'Existing Residential'.	UÉ, Paul Hyland	Not Proceed
32		EM	Amend zoning of lands at Sea Road measuring c. 0.42ha from unzoned/outside the LPF boundary to New Residential – Priority 1 (RN 1).	Richard & David Fox, Hubi Kos, Des & Edith Battye, UÉ, OPR, Sandra Hayes, NTA	Not Proceed
33	CE		Amend MAP NO. 3 KEY GREEN INFRASTRUCTURE to add amenity routes listed in Objective GDK55		Proceed
34	CE		Update APPENDIX 3: STRATEGIC FLOOD RISK ASSESSMENT	OPW	Proceed
35	CE		Update APPENDIX 6: INFRASTRUCTURE ASSESSMENT AND IMPLEMENTATION PROGRAMME to include additional Delgany Footpaths map	TII	Proceed
36	CE		Update APPENDIX 6: INFRASTRUCTURE ASSESSMENT AND IMPLEMENTATION PROGRAMME to amend Implementation & Infrastructure Delivery Schedule Table	TII	Proceed
37	CE		Update APPENDIX 6: INFRASTRUCTURE ASSESSMENT AND IMPLEMENTATION PROGRAMME to amend INFRASTRUCTURE ASSESSMENT AND REQUIREMENTS FOR KEY DEVELOPMENT AREAS (IDENTIFIED AS SLOs)	TII	Proceed

1.8 Guidance for the Elected Members

Responsibility for approving a Variation-LPF, including the various policies and objectives contained within it, in accordance with the various provisions of the Planning and Development Act 2000 as amended, rests with the elected members of the planning authority, as a reserved function under Section 13 of the Act. In making the Variation-LPF, the elected representatives, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the "Code of Conduct for Councillors" prepared under the Local Government Act 2001, carry out their duties in this regard in a transparent manner, must follow due process and must make their decisions based on relevant considerations, while ignoring that which is irrelevant within the requirements of the statutory planning framework. The members, following consideration of the Proposed Variation-Draft LPF and this report, shall decide whether to make the Variation-LPF (with or without the agreed PMAs).

PART 2: FURTHER MODIFICATIONS

This part sets out the Chief Executive's recommended further modifications to the Proposed Material Alterations to Proposed Variation No.4 including the Greystones-Delgany & Kilcoole Local Planning Framework (LPF) 2025.

The published Proposed Material Alterations to the Proposed Variation-Draft LPF are indicated as follows: new text in **red**, deleted text in **blue strikethrough**. The proposed alterations are ordered in the sequence that they would appear in the Wicklow County Development Plan and should be read in conjunction with the Proposed Variation/Draft LPF.

3 No. 'further modifications' are proposed by the CE to the Proposed Material Alterations to the Proposed Variation-Draft LPF and the further modifications are indicated as follows: new text in **purple**, deleted text in **purple strikethrough**.

Note that in many cases the CE opposes a Proposed Material Alteration and recommends that it not be made. The further modifications to the PMA in question are therefore recommended should the Elected Members decide to proceed to make the alteration.

FURTHER MODIFICATION PROPOSED TO PROPOSED ALTERATION NO. 19

To further modify the written text of PMA No. 19

Amend text of SLO4 as follows:

SLO 4 – COOLAGAD

These SLO lands are located at Templecarrig Lower, Coolagad and Kindlestown Upper in north Greystones, on a site approximately 37.7 39ha in size. This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

- *The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to existing schools, community infrastructure, transport services, recreational amenity areas and retail in the north Greystones area;*
- *A total area of c. 31 27ha is zoned for new housing development which shall be divided into a number of distinct character areas / estates, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs. In designing the development of residential areas attention shall be paid to mitigating the visual impact of the development on the higher lands and maintaining views towards Kindlestown Hill, from the R761 and the Greystones coast. Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site. In this regard, building height and density shall reduce as landscape elevation increases.*
- *Open space shall be provided with each phase of development as follows:*
 - *A minimum of 1.6ha per 400 houses as fully serviced playing pitches, courts etc*

- A minimum of 0.6ha per 400 houses for casual recreation space, parks etc. A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
- 0.2ha per 400 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc
- The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts; ~~at a minimum a separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all weather 7-a-side pitch (60m x 40m)~~, which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.
- The lands identified as OS2 along a watercourse shall be reserved in as natural a condition as possible with appropriate undeveloped buffer zones. Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least 25m along each side free from development. Road / cycleway / footpath crossings over / through the OS2 corridor shall be minimised to that absolutely necessary for access; any such crossing shall be via a clean span bridge over the watercourse that maintains its natural character.
- Community facilities, *including a suitably sized multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 600sqm* shall be provided within the SLO ~~area in the first phase of development~~ to meet the needs of the new *and existing* resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out. *This community services audit should take into account and explicitly respond to the analysis and recommendations set out in the Social Infrastructure Audit accompanying the LPF.*
- Green links shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods
- *No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use.'*

FURTHER MODIFICATION PROPOSED TO PROPOSED ALTERATION NO. 20

To further modify the written text of PMA No. 20

Amend text of SLO5 as follows:

SLO 5 - Bullford

These SLO lands are located west of Kilcoole Main Street and measure c. 10ha and are zoned for 'TC – Town Centre', '**RN1 – New Residential Priority 1**', 'RN2 – New Residential Priority 2' and 'OS2 – Natural Areas'. This area may be developed for a mix of uses including residential, community, commercial, retail / retail services and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre, adjoining residential areas and existing transport services.
- These lands shall be accessed only via Main Street at the Main Street – Sea Road junction, which shall be redesigned as a crossroads with traffic lights. Land measuring c. 0.6ha immediately west of this new junction shall be developed in accordance with the criteria set out in this LPF as 'Opportunity Site 7'.
- **No dwelling units that may be permitted on foot of the RN1 RN2 zoning may be occupied until OP7 is fully developed and any community facilities provided therein are available for community use.**
- A total area of c. 7.5ha is zoned for new housing development which shall be divided into at least two distinct character areas / estates either side of a central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Community facilities shall be provided within the SLO area **in the first phase of development** to meet the needs of the new resident community of the area. In particular, the development shall include at a minimum a childcare facility **and a suitably sized community building of c. 600sqm**; in determining additional requirements for community facilities, a community services audit shall be carried out.
- Open space shall be provided with each phase of development as follows:
 - An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.
 - A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc.
 - A minimum of 0.15ha per 100 houses for casual recreation space, parks etc.
 - A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
 - 500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc.
 - The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include

playgrounds, MUGAs and playing pitches / courts which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.

FURTHER MODIFICATION PROPOSED TO PROPOSED ALTERATION NO. 21

To further modify the written text of PMA No. 21

Amend text of SLO6 as follows:

SLO 6 – BALLYDONAREA

These SLO lands are located east of Lott Lane, Kilcoole in the townlands of Kilcoole and Ballydonarea and measure c. 12.7ha and are zoned for 'RN1 – New Residential Priority 1', 'RN2 – New Residential Priority 2' and '~~OS1 – Open Space~~'. OS2 'Natural Areas'. The Ballydonarea Loop / Strawberry Lane walk forms part of the northern boundary of this area.

This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre and existing transport services.
- A total area of c. ~~8.8ha~~ ~~8.9ha~~ is zoned for new housing development which shall be divided into at least two distinct character areas / estates either side of the central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Lands zoned RN1 shall be accessed from Lott Lane only. Lands zoned RN2 shall be accessed from Sea Road only. Pedestrian and cycling connectivity shall be provided between the two RN zones across the green space, to Ballydonarea ~~Lane~~ Loop / Strawberry Lane walk to the north and Wellfield to the south;
- **New development within 25m of the Ballydonarea Loop / Strawberry Lane walk shall be so designed as to maintain and enhance the walk, preserving all natural features including watercourses, trees and mature hedgerows. No walls / fences will be permitted in this buffer zone, no structures shall back onto same and any structures shall be so designed to address and overlook the walk and provide passive surveillance of same.**
- **Existing hedgerows and mature trees shall be preserved in the SLO area to the maximum extent possible and in particular shall ensure that ecological corridors between the central OS2 zone and Ballydonarea Loop/Strawberry Lane walk are maintained and enhanced.**
- Open space shall be provided as follows
 - A central green area shall be provided along the watercourse and encompassing a natural wooded area to the north-west of same, of not less than 3.6ha in area.
 - Within this space, a 'natural' undisturbed area of not less than 10m shall be maintained either side of the stream and existing trees and hedgerows shall be maintained. Cycleway / footpath crossings over / through the watercourses, or tree / hedgerow lines, shall be minimised to that absolutely necessary for access; any such stream crossing shall be via a clean span bridge that maintains its natural character.
 - Where following ecological assessment, it is found that there are areas within this OS zone suitable for re- development, said lands shall be laid out for recreational purposes, including suitable play spaces, walks, seating area etc
 - The open space shall link fully through from Sea Road to Ballydonarea Lane.
- Community facilities shall be provided within the SLO area to meet the needs of the new resident community of the area **in the first phase of development**. In particular, the development shall include at a minimum a childcare facility; in determining additional requirements for community facilities, a community services audit shall be carried out.

3.1 List of submissions

The 'Proposed Alteration Number' refers to the published PMA that the submission relates to. Note this may differ from the PMA number that the submitter selected in the consultation portal i.e. if any error was made in the submission, this is rectified in this report. Each name is also a hyperlink to view the submission online.

No.	Portal Reference	Name	Proposed Alteration Number	Comment
1	180144	Keith Scanlon	26	
2	153859	Richard Hogan	26	
3	110651	Patricia Ryan	26	
4	154308	Padraig Smyth	26	
5	211258	Sarah Campbell	26	
6	071252	Ciara King	26	
7	113910	Sinead Brock	26	
8	141933	Glenna Timmons	26	
9	185023	Leonie Hogan	26	
10	232724	Ronan Brennan	26	
11	073333	Mark Kavanagh	26	
12	124525	MG O'Riordan	26	
13	130626	Graeme Romer	26	
14	200837	Anne Fagan	26	
15	215307	Dervla Murphy	26	
16	100420	Maurice Dodd	26	No content
17	183141	Shane Stokes	26	
18	210949	Alice O'Donnell	22	
19	211429	Alice O'Donnell	26	
20	170233	Debora Teixeira	26	
21	201041	Deb Davis	26	
22	210219	Jackie Durbin	8	
23	230717	Avril O'Farrell	26	
24	120544	Delgany Community Council	22	
25	215933	Delgany Community Council	26	
26	105516	Carina Holmes	22, 26	
27	113721	Sinead Moore	26	
28	134239	Richard and David Fox	20, 23A, 24, 25, 32	
29	143721	Alice McDonnell	26,	
30	163353	Transport Infrastructure Ireland (TII)	16, 35, 36, 37	
31	145220	Tessa Stewart	26	
32	151645	EPA	SEA	
33	100719	Zsolt Gercsi and Angela Quinlan	26	

34	153028	Yasmin Fortune	26	
35	154826	Caroline Henry	26	
36	173454	Hubi Kos	32	
37	175735	JC Durbin	26	
38	174659	Robert Henry	26	
39	083950	Mariella Kingsbury	26	
40	103313	Wicklow Planning Alliance	26	
41	131852	O' Broin Architects	27	
42	170600	Inland Fisheries Ireland	SEA	
43	172815	Board of Management, Temple Carrig Secondary School, Greystones	19, 27	
44	230831	Valerie Madigan	26	
45	074146	Nick Bradshaw	26	
46	122103	Barbara McMackin	26	
47	150724	Ballycrone Manor Residents	25	
48	185711	Imogen Thompson	26	No content
49	190452	Karl Stynes	26	
50	091320	Michael Martin	26	
51	095558	James Perkins	26	
52	113546	Catherine Clear	26	
53	114345	Department of Education and Youth	22, 23B	
54	122719	Office of Public Works	7, 34, SFRA	
55	145418	Debbie Jenkinson	26	
56	150413	Des and Edith Battye	32	
57	160610	Alan & Isobel Constable	8	
58	155914	Uisce Éireann	4, 7, 8, 19, 20, 21, 22, 23A, 23B, 24, 25, 26, 27, 28, 29, 30, 31, 32	
59	165056	Alan Constable	26	
60	195052	Greystones Tidy Towns	26	
61	203710	Rori Coleman	26	
62	215110	Louise Barry	26	
63	224334	Diane Sutton	26	
64	094528	Adam Calihman	26	
65	091618	Delgany Tidy Towns	26	
66	094940	Office of the Planning Regulator	1, 5, 20, 23A, 24, 25, 32, SFRA	
67	100003	Friends of the Cliff Walk	11	
68	103550	Catherine Capper	26	
69	132618	Sandra Hayes	32	
70	133811	Carmel McDonald	26	

71	142548	National Transport Authority	12, 16, 20, 23A, 24, 25, 32	
72	144544	Rosa Murray	26	
73	150912	Cairn Homes Properties Limited	5, 6, 18, 19, 26	
74	150616	Paul Brady	25	
75	154923	Maritime Area Regulatory Authority	N/A	
76	122336	Brookhampton Ltd.	3, 4, 16, 18, 20, 23A,	
77	161641	Paul Hyland	8, 26, 31	
78	163030	Hubi Kos	32	Duplicate of Submission No. 36
79	162527	Conor Donelan	26	
86	163829	Conor Donelan	26	No content
80	163807	Carmel McDonald	7	
81	164245	Conor Donelan	26	
82	151048	Lidl Ireland GmbH	4, 20	
83	164705	Department of Housing, Local Government and Heritage	23A, 26	
84	164617	Keith Scanlon	26	
85	Postal Submission	Cheryl Ball	26	

PART 4: SUMMARY OF ISSUES RAISED AND CHIEF EXECUTIVE'S OPINION AND RECOMMENDATIONS ON THE PROPOSED MATERIAL ALTERATIONS

The Proposed Material Alterations are presented in the same order as set out in the 'Proposed Material Alterations to Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028: Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF)' document published on 24 October 2025.

4.1 Proposed Material Alterations to Part A of Proposed Variation No. 4 – proposed changes to Volume 1 of the Wicklow County Development Plan 2022-2028

The changes to Volume 1 of the County Development Plan that were originally proposed under Proposed Variation No. 4 were presented as new text in **red**, and deleted text in **blue strikethrough**. These proposed changes are shown to follow.

In this PMA only, the published proposed alteration was shown in **green**.

Proposed Material Alteration No. 1

Volume 1, Chapter 3 of the Wicklow County Development Plan 2022-2028

Amend Part A:2: Local Area Plans (LAPs) & Local Planning Frameworks (LPFs)

Vary Section 3.5 as follows:

3.5 Zoning

This development plan provides the population and housing targets for all 21 settlements in the County up to 2031. However, Upon adoption in 2022, it only provides provided plans for 13 settlements, the remainder of the settlements having their own stand-alone 'Local Area Plans' at that time. which will be reviewed after the adoption of this County Development Plan. As part of the LAP adoption process for the settlements of Wicklow Town – Rathnew and Blessington, the land use zoning and key development objectives maps for these LAP settlements / areas are integrated into Volume 2 of this County Development Plan by way of variation.

For the remaining settlements (Bray, Enniskerry, Kilmacanogue, Greystones – Delgany, Kilcoole and Arklow), 'Local Planning Frameworks' (which will replace their previous LAPs) which set out settlement specific objectives including land use zoning and key development objectives maps are to be integrated into Volume 2 of this County Development Plan by way of variation.

Local Area Plans (LAPs) & Local Planning Frameworks (LPFs)

New Local Area Plans or Local Planning Frameworks will be made for the following settlements in the period 2022-2024 in the following order of priority:

1. Wicklow Town – Rathnew
2. Blessington
3. Greystones - Delgany – Kilcoole
4. Arklow and Environs
5. Bray Municipal District (including Enniskerry and Kilmacanogue)

~~While each LAP will cover a period of 6 years, zoning will be provided on the land needed to meet the 2031 population target, with clear objectives to ensure 2026 targets can be reached.~~

The Core Strategy Tables to follow shows the housing unit requirements for the LAP / LPF towns, up to the year 2031 and the housing unit capacity of lands zoned in ~~current~~ LAPs in effect at the time of the adoption of the County Development Plan in 2022.

~~This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA.~~

Upon adoption of this County Development Plan in 2022, the amount of zoned land in pre-existing LAPs exceeded the amount of land needed to meet the Core Strategy 2031 housing targets for each of the towns set out in this County Development Plan (as detailed in Table A of the Core Strategy).

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in 'Development Plans – Guidance for Planning Authorities' (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF.

In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LAP/ LPF, with flexibility in the zoning provisions to ensure that (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise and (b) the LAPs/ LPFs do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation with particular regard to the new housing targets for County Wicklow set out in the 'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities' issued by the Minister under Section 28 of the Planning & Development Act (July 2025).

Prior to the adoption of new LAPs / LPFs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan.

Submissions to Proposed Material Alteration No. 1

Some submissions (including those of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 1 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs.

In these circumstances, these submissions have therefore been considered under the relevant PMA and in order to avoid duplication, are not considered here.

66. Office of the Planning Regulator

The Office notes that the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) were issued by the Minister for Housing, Local Government and Heritage after the initial public consultation period for the proposed Variation.

The Housing Growth Guidelines require planning authorities to vary their development plans to reflect the housing growth requirements set out in the first appendix to the Housing Growth Guidelines, and to provide for additional provision in terms of residential zoned land.

The Office furthermore understands that a process to implement the Housing Growth Guidelines is currently being undertaken by the Planning Authority.

The recently published housing plan, Delivering Homes, Building Communities 2025-2030, also emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

'...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State'.

In this context, the Office notes that the proposed material alterations include additional Residential Phase 1 zonings in Kilcoole, which are less favourably located in terms of access to public transport, services, and amenities than Greystones. Furthermore, no additional lands are identified in Greystones itself. This approach risks pushing much-needed housing to more peripheral locations, which are farther from existing and future services and amenities, and are more car-dependent with consequent implications for carbon emission and targets under the Climate Action Plan 2025.

Accordingly, the Office strongly advises the Planning Authority to give urgent consideration to the supply of further zoned land in Greystones as part of the forthcoming variation to implement the Housing Growth Guidelines. At a minimum, this should include rezoning Residential Phase 2 lands as Phase 1 to provide flexibility in site delivery and maintain a strong pipeline for housing delivery.

Opinion of Chief Executive

While the OPR does not specifically identify that the points raised relate to PMA1, this is one of the few places in the published set of Proposed Material Alterations that refers to the new Ministerial Housing Growth Guidelines.

While points raised by the OPR are noted, they do not really relate to the Proposed Material Alterations of Proposed Variation No. 4, but to Proposed Variation No. 6 which has now been published (which was not published at the time they made this submission) and to a possible future variation / future County Development Plan which provides for more zoned land in the County.

Furthermore, no changes to the zoning provisions for Greystones – Delgany, as suggested can legally be considered / made at this stage of the variation making process, other than those which were the subject of published PMAs.

Therefore, no changes to PMA1 are recommended on foot of this submission.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 1

4.2 Proposed Material Alterations to Part B of Proposed Variation 4 – the Draft Greystones-Delgany and Kilcoole Local Planning Framework 2025

The following is a list of the Proposed Material Alterations (PMAs) to the Draft LPF.

Proposed new text is shown in **red**, proposed deleted text in **blue strikethrough**.

Maps include a pink line illustrating the area of land affected by the PMAs. These pink lines will be removed in the final adopted version of Variation 4 - LPF.

Section A:2 COUNTY DEVELOPMENT PLAN STRATEGY FOR GREYSTONES - DELGANY & KILCOOLE

Section A2.1 COUNTY DEVELOPMENT PLAN CORE STRATEGY

Proposed Material Alteration No. 2

Amend **Table 1B Wicklow Core Strategy for Kilcoole** as follows:

APPLICATION TO LEVEL 4	
Settlement, Population & Housing Strategies	Level 4 settlements are designated 'Self Sustaining Towns' described in the Regional Spatial and Economic Strategy 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' ⁷ . 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.
1. While Kilcoole does have a strong employment base, it is considered that it still generally fits in this category of town having regard to its scale and the need for targeted catch up investment to become more self-sustaining.	

Submissions to Proposed Material Alteration No. 2

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 2 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs.

In these circumstances, these submissions have therefore been considered under the relevant PMA and in order to avoid duplication, are not considered here.

Opinion of Chief Executive

The majority of this proposed alteration was recommended by the Chief Executive in her previous report and is still recommended. The Chief Executive does not oppose additional wording included in this alteration by the elected members at the Council Meeting of 6th October 2025.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 2

Section B1: TOWN CENTRE REGENERATION

Section B1.4 KILCOOLE TOWN CENTRE

Proposed Material Alteration No. 3

Amend Opportunity Site **OP7 Kilcoole Centre** as follows:

Objectives GDK OP7

- To support the development and delivery of a comprehensive project for this area, which provides for the reconfiguration of this junction to remove the staggered junction and provides for access to the lands to the west, and which delivers significant public realm improvements such that pedestrian / cyclist and public transport uses are prioritised, and the creation of a public park / plaza **of at least 1,600sqm** in this area;
- To support the development of sites for mixed use development including commercial, retail, retail services, residential, community and cultural uses;
- Higher density development that makes the best use of this serviced urban land, will be expected;
- High quality frontage onto all streets will be required, that provides for passive supervision and connectivity to the street.
- Access to lands on the west side of the Main Street shall make provision to service future development lands to the west (zoned RN2).
- Any development to the west of the Main Street in the OP shall make provision for a town centre public car park of a size to be determined in consultation with the Local Authority.

Submissions to Proposed Material Alteration No. 3

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 3 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs.

In these circumstances, these submissions have therefore been considered under the relevant PMA and in order to avoid duplication, are not considered here.

76. Brookhampton Ltd.

The submission requests, in relation to PMA3, the following:

- That the specific area of the proposed plaza set out under Proposed Material Amendment No. 3 (1,600sqm) be omitted from the text of Objectives GDK OP7 so that the Draft LPF is aligned with the current Phase 1 proposal and the overarching masterplan under Reg. Ref.: 25/60623 as it relates to the provision of a plaza. The current proposal provides for a flexible multi-functional space at an appropriate scale, which is overlooked by residential and commercial / community floorspace, connected to the proposed adjoining open space to the west, which has regard to the surrounding streetscape, future use and maintenance;
- The scale of plaza proposed (1,600 sqm) is excessive having regard to the surrounding context of Kilcoole Main Street.
- If the above is not acceptable to the Planning Authority, then at a minimum the text of OP7 should confirm that the 1,600sqm plaza area relates to the total area of the plaza provided when all improvements to the public realm, the area at the existing 'The Brook' plaza, Monteith Park green space and the Farm Lane to be closed are included, to a total area of town square and public park of 2,302 sqm (of which 1,325sqm of Farm Lane to be closed).
- Best practice in placemaking supports the creation of flexible, multi-functional public spaces rather than large, underutilised areas.
- That Proposed Material Amendment No. 3 be amended to confirm that the removal of staggered junction means the closure of Farm Lane to Main Street;

- That the Draft LPF incorporate greater flexibility overall in respect to the development of OP7, given that the lands are appropriately located, serviceable, and sequential to existing development, and proposes a minor alteration of the text of GDK7 to provide for same:

'Objectives GDK OP7

[Option 1]

- *To support the development and delivery of a comprehensive project for this area, which provides for the reconfiguration of this junction to remove the staggered junction and provides for access to the lands to the west, and which delivers significant public realm improvements such that pedestrian / cyclist and public transport uses are prioritised, and the creation of a public park / plaza of at least 1,600sqm in this area;*

[Option 2]

- *To support the development and delivery of a comprehensive project for this area, which provides for the reconfiguration of this junction to remove the staggered junction, the closure of Farm Lane and provides for access to the lands to the west, and which delivers significant public realm improvements such that pedestrian / cyclist and public transport uses are prioritised, and the creation of a public park / plaza of at least 1,600sqm in this area, when all improvements to the public realm, the area at the existing 'The Brook' plaza, Monteith Park green space and the closed section of Farm Lane are included.*

- [the submission further requests text changes to Objective GDK 7, however this objective is not subject to a Proposed Material Alteration and therefore this cannot be considered at this stage of the variation process.]
- It is also requested that the boundary of OP7 be increased southward. However as the boundaries of OP7 were not subject to a Proposed Material Alteration this request cannot be further considered at this stage of the variation process.]

Opinion of Chief Executive

Brookhampton Ltd. – The request for alignment with the current Phase 1 proposal and the overarching masterplan under PRR 25/60623 is not possible, as that application remains live and with no grant of permission.

Furthermore, the stated areas of the town plaza and the drawing excerpt (Fig. 3.2) within the submission do not match the details of such submitted under PRR 25/60623 (See Figure 1 below), which shows a commercial unit ('Unit 1') occupying the northern part of the plaza illustrated in the submission.

Item 1 of the Request for Further Information issued on 2nd October 2025 under PRR 25/60623 includes concerns on behalf of the Planning Authority that the town square proposed in that application is of insufficient size. This proposed alteration would provide certainty in that regard.

The 1,600 sqm, as set out in the alteration, was measured from the Concept Sketch for OP7 as set out in Proposed Variation No.4/the Draft Greystones-Delgany & Kilcoole Local Planning Framework, as published. For clarity, this refers to the approximate area outlined in Figure 2 below and does **not** include the green area in Monteith Park (other than a very small area on the very eastern extent) and includes only a small section of Farm Lane. As Monteith Park is not included, the requested southward extension to OP7 is not necessary.

With respect Farm Lane, it is not considered necessary to specify in the LPF that it will be closed as part of any ultimate proposal for the plaza, as that is a design matter that is more appropriately dealt with through the Development Management process.



Figure 1: Excerpt from Proposed Site Plan Dwg No. PA-001 as submitted under PRR 25/60623, showing Unit 1 occupying much of the northern part of the town square in comparison to drawing excerpts within the submission.



Figure 2: Excerpt from Concept Sketch for OP7 in the Draft LPF, with the approximate 1,600 sqm area outline in red.

This proposed material alteration was proposed by the Elected Members at the Council Meeting of 6th October 2025. The CE did not oppose this element of the alteration raised at that meeting and does not oppose this Proposed Material Alteration as published.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 3

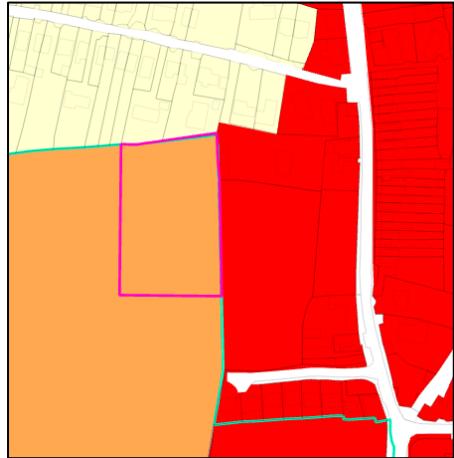
Proposed Material Alteration No. 4

Amend Opportunity Site **OP8 'Kilcoole West – 'The Molly's'** as follows:

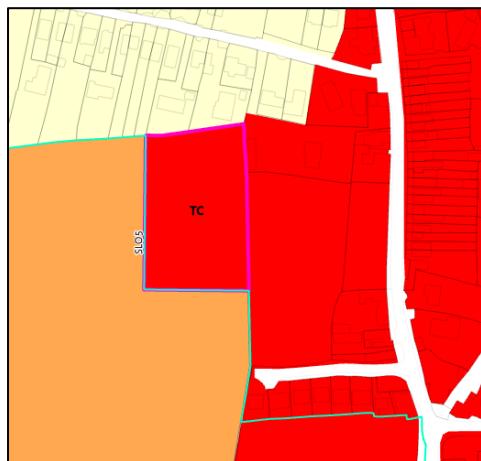
Amend **MAP NO.1 LAND USE ZONING** and amend the boundary map and the written text of Opportunity Site **OP8 Kilcoole West – 'The Molly's'**

Amend zoning of land measuring c. 0.65ha from RN2 'New Residential Priority 2' to TC 'Town Centre'.

Change from:

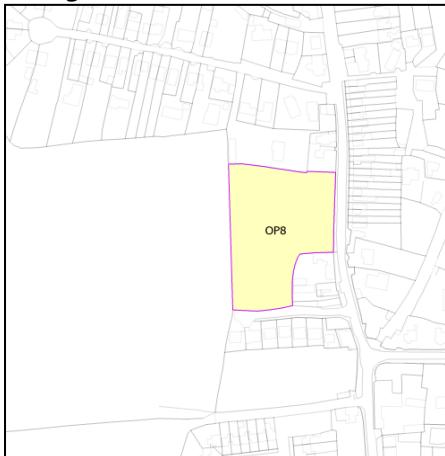


Change to:

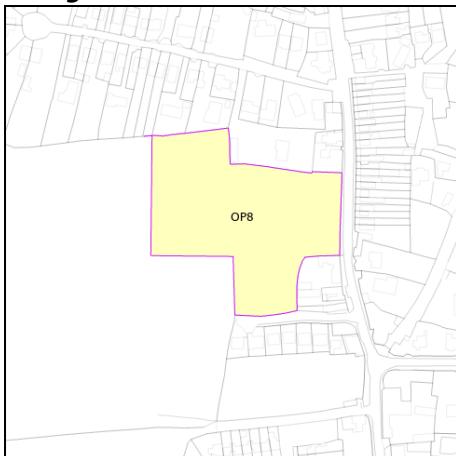


Amend the Opportunity Site boundary as follows:

Change from:



Change to:



Amend written objectives as follows:

Objectives GDK OP8

- To support the development of these lands for mixed use development including commercial, retail, retail services, residential, community and cultural uses; **in this regard, a 'single' use e.g. retail only or residential only will not be permitted and any commercial uses shall be accompanied by both residential and community / cultural uses;**
- Higher density development with no or limited car parking, that makes the best use of this serviced urban land, will be **expected required on these lands. In particular, any ground level commercial or retail development proposed shall include upper floors of residential use.**
- High quality frontage onto all streets **and open spaces** will be required, that provides for passive supervision and connectivity to the street. **Any development of these lands shall include the development of an outdoor community meeting space / pocket park and the highest quality and design, including appropriate park furniture and seating;**
- While access into these lands may be via a direct access onto Main Street (R761) any such access point shall not provide a through route to lands beyond this site, in particular lands to the west of this site.

Submissions to Proposed Material Alteration No. 4

Some submissions (including that of the Department of Housing, Local Government, and Heritage, and the Maritime Area Regulatory Authority) have ticked PMA No. 4 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

58. Uisce Eireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

76. Brookhampton Ltd.

In relation to Proposed Material Alteration No. 4, the submission requests that:

- That Proposed Material Alteration No. 4 be removed, and that the text of Objectives GDK OP8 revert to the original wording as set out under the Draft LPF, which it is considered provides a balanced and appropriate framework for guiding development within the TC zoned lands [note the body of the submission makes it clear that the zoning change proposed in PMA No. 4 is welcomed by the submitter].
- It is put forward that the restriction on standalone retail or residential blocks within TC-zoned lands proposed under Proposed Material Alteration MA No. 4 is unnecessary, overly prescriptive and onerous and its implementation would significantly constrain the development potential of the TC-zoned lands and is likely to result in avoidable delays in delivering urgently needed housing and supporting retail and community infrastructure within the proposed TC zoned lands;
- Furthermore, it is put forward that the introduction of additional requirements under Proposed Material Alteration No. 4, requiring the inclusion of additional outdoor community spaces, including a furnished pocket park is overly onerous and disproportionate. It is submitted that the proposed introduction of additional outdoor space / pocket park would reduce achievable residential density, and would be an inefficient use of serviced TC zoned lands, contrary to the principles of compact growth and efficient land use;
- If the requirement for residential use above all ground level commercial or retail development is retained in the Draft LPF, this submission requests that Proposed Material Alteration No. 4 be amended to include a building height range of up to 6 storeys. This would cater for a more viable development format within the TC zoned lands, which would accommodate both the requirements of a foodstore operator in terms of building height and the requirement for residential accommodation overhead.
- It is put forward that the text of the alteration should be modified to provide for car parking adjacent to retail uses, as the majority of residents and visitors rely on private vehicles for access to shops/services/community facilities; that the inclusion of a public car park is essential to support the functionality and vitality of Kilcoole.
- The submission requests the following text changes:
 - 'To support the development of these lands for mixed use development including commercial, retail, retail services, residential, community and cultural uses; ~~in this regard, a 'single' use e.g. retail only or residential only will not be permitted and any commercial uses shall be accompanied by both residential and community / cultural uses;~~
 - Higher density development ~~with no or limited car parking~~, that makes the best use of this serviced urban land, will be ~~expected required on these lands. In particular, any ground level commercial or retail development proposed shall include upper floors of residential use.~~
 - High quality frontage onto all streets ~~and open spaces~~ will be required, that provides for passive supervision and connectivity to the street. ~~Any development of these lands shall include the development of an outdoor~~

~~community meeting space / pocket park and the highest quality and design, including appropriate park furniture and seating;~~

- While access into these lands may be via a direct access onto Main Street (R761) any such access point shall not provide a through route to lands beyond this site, in particular lands to the west of this site.'

82. Lidl Ireland GmbH

The submitter indicates that they support the following alterations

- The alteration of the zoning of land from RN2 'New Residential – Priority 2' to TC 'Town Centre'.
- The alteration to the boundary of OP8.
- The alteration to the boundary of SLO5.
- The submitter indicates that they do **not** support the proposed text changes within PMA 4, with the following further alterations requested:

'Objectives GDK OP8

- ~~To support the development of these lands for retail-led (medium scale Supermarket) mixed use with associated facilities and services. mixed use development including commercial, retail, retail services, residential, community and cultural uses; in this regard, a 'single' use e.g. retail only or residential only will not be permitted and any commercial uses shall be accompanied by both residential and community / cultural uses;~~
- ~~Higher density development with no or limited car parking, that makes the best use of this serviced urban land, will be expected required on these lands. In particular, any ground level commercial or retail development proposed shall include upper floors of residential use. Appropriate density and land utilisation will be expected, whilst providing for a proportionate provision of car parking (which would be of wider benefit to the town centre).~~
- ~~High quality frontage / materiality onto all streets and open spaces will be required, that provides for passive supervision / animation and connectivity to the street. Opportunities for areas of public realm amenity should also be considered. Any development of these lands shall include the development of an outdoor community meeting space / pocket park and the highest quality and design, including appropriate park furniture and seating;~~
- ~~While access into these lands may be via a direct access onto Main Street (R761) any such access point shall not provide a substantial or uncontrolled through vehicular route to lands to the west of beyond this site, in particular lands to the west of this site.'~~

The submitter is of the opinion that the requested further alterations would not be material.

- Rationale for the requested further alterations are as follows:
 - The Development Plan Guidelines emphasise that plans should not be overly prescriptive to ensure that plans actively promote rather than inhibit regeneration.
 - The Draft LPF states that 'The role of a land use plan or framework is to put in place a policy framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development...'
 - The wording suggested in the PMA is overly specific and ambitious, would not serve any planning objective other than density and mix for its own sake, the wider town centre by its nature provides a mix.
 - The text does not take account of the physical capacity of the site for height (considering the topography and roofscape within Kilcoole), living over the shop should not be promoted to the detriment of proper planning, residential development does not have to be 'over' the shop (and was included in a different format in the live proposed development).
 - An outdoor community meeting space/pocket park is problematic from a delivery perspective, as it suggests that a portion of the site may be sterilised from beneficial development. It is a significant burden on a site of small footprint. Any residential element to the south would necessarily include its own public open space.

- The submitter has no intentions with respect to 'through traffic', the alternative wording is suggested to avoid an overly prescriptive approach.
- A list of Lidl locations is provided where a balance between viability and design, mix and scale can be found.
- An Coimisiún Pleanála permitted a single story with surface car park Lidl store in Baltinglass under ABP 319363, currently under construction.
- The submission includes an appendix of excerpts from their appeal to ACP under 323073.

Opinion of Chief Executive

Uisce Éireann – The CE notes the submission from Uisce Éireann, which does not object to the proposed alteration.

Brookhampton Ltd. – The CE notes the support of the submission for the expansion of the TC 'Town Centre' zoning in PMA No. 4.

The CE does not agree that the text changes included in PMA No. 4 are overly prescriptive. The text changes recommended by the CE, in her first report were directly the result of the CE recommendation to increase the quantum of land to be zoned TC 'Town Centre'. The rationale for including these text changes was set out in the first report, as follows:

'The CE is amenable to the extension of the TC 'Town Centre' zone as indicated if this would allow for more flexibility and support for the provision of needed additional commercial development (including retail) in Kilcoole centre to address spending leakages to other towns. However, this raises concerns that acceding to such a change would infer that the CE is supportive of the development of a large floorplate, single storey discount foodstore type development (with associated car parking) at this location, which is not the case. Permission has been refused for this format of development in June 2025 primarily on the basis that this format would not represent an efficient and sustainable use of zoned lands in a town centre, would not accord with national and local planning policy objectives to achieve compact growth, which seek to revitalise towns and direct development into Core Areas at suitable intensity to ensure sustainable development.'

The stance of the CE on this matter is consistent with both decisions on planning applications on this/other sites, and responses to similar submissions in other recently adopted plans in other areas.

The CE does not agree that the inclusion of other requirements, such as an outdoor community space, is onerous or disproportionate. This additional wording was proposed by the Elected Members at the Council Meeting of 6th October 2025 and was not opposed by the CE. The CE wishes to draw attention to the concept plan for OP8 as published in Proposed Variation No. 4 and the Draft Greystones-Delgany & Kilcoole LPF 2025. The OP8 concept sketch already includes a community open space/pocket park within OP8, and it is considered appropriate that there be alignment between concept sketch and text objectives, and hence certainty on the expectations of the Planning Authority. The CE does not agree that a pocket park represents an inefficient use of town centre land at this location, noting the lack of meeting/lingering outdoor areas within Kilcoole Main Street.

In relation to building heights, such matters are subject to development management/performance criteria as set out in the *Urban Development and Building Height Guidelines 2018*, in which SPPR1 states that plans shall not provide for blanket numerical limitations on building height.

In relation to car parking, a town centre public car park is provided for in the objectives of OP7 immediately to the south, which will be accessible immediately off a reconfigured four arm junction. The CE does not consider it appropriate to provide for another such facility a short distance to the north, which may incentivise the use of private vehicles and attract such movement to Kilcoole Main Street.

On the basis of the above, the requested further modifications to the text objectives of PMA No. 4 are not considered necessary or appropriate.

Lidl Ireland GmbH – The CE notes the support of the submission for the expansion of the TC ‘Town Centre’ zoning in PMA No. 4.

In relation to the Development Plan Guidelines 2022 and statement within the Draft LPF, the CE does not agree that the statement from the Guidelines prevents the inclusion of a strong policy framework or elements of community gain within OP8. It is the opinion of the CE that setting out the clear expectations of the Planning Authority in relation to town centre infill/regeneration sites provides the certainty that may catalyse and accelerate regeneration, as opposed to a potential protracted application/appeals processes under a more ambiguous framework. Similarly, statements in relation to the role of a land use plan within the Draft LPF are rather in relation to the timeframe/agent of delivery of development, not a statement that objectives should be ambiguous/ineffective.

In relation to the mixture of uses required on the site, additional text in this regard was included concurrently with the expansion of the TC ‘Town Centre’ zoning on this site, which the CE is satisfied is of a size that can and should accommodate more than a single use. [Refer to the above response to Brookhampton Ltd. for additional context.]

Issues in relation to building height have been addressed in the response to Brookhampton Ltd. above. CPO 5.3 of the Wicklow County Development Plan 2022-2028 (as varied) ‘in particular’ promotes the concept of living over the shop in centres.

In relation to the requirement for a pocket park, the CE does not agree that the development of such would be a ‘sterilisation’ of the lands or would not constitute ‘beneficial development’. The CE is satisfied that this requirement is not an onerous request for a site of this size and location, noting the lack of meeting/lingering outdoor areas within Kilcoole Main Street.

As the CE does not agree with many of the issues raised, it is not considered necessary to make most of the requested further text modifications. Noting that the submitter has no intentions in relation to providing through traffic through the site, it is not considered necessary to further modify the text of PMA No. 4 to reduce certainty in this regard.

In summary - part of this proposed material alteration was recommended by the Chief Executive in her previous report, and this is still recommended. The remainder of this proposed alteration was proposed by the Elected Members at the Council Meeting of 6th October 2025. The CE did not oppose this element of the alteration as raised at that meeting and does not oppose this Proposed Material Alteration as published.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 4.

Section B.2 RESIDENTIAL DEVELOPMENT

Proposed Material Alteration No. 5

Amend **Housing Targets & Extant Planning Permissions** subsection as follows:

Housing Targets & Extant Planning Permissions

Having regard to the Core Strategy and population / housing targets provided therein for Greystones – Delgany and Kilcoole, there is capacity within the lands zoned TC, VC, RE (all located in the serviced, built up envelope) and lands zoned RN1 to meet current targets.

In order to ensure a long term supply of zoned land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this LPF, with particular regard to the new housing targets for County Wicklow set out in the 'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities' issued by the Minister under Section 28 of the Planning & Development Act (July 2025), this LPF also provides for additional zoned serviced / serviceable residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Permission will ~~not~~ only be considered during the lifetime of this LPF for RN2 lands ~~unless~~ where the following conditions are satisfied:

- At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.

Submissions to Proposed Material Alteration No. 5

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 5 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

66. Office of the Planning Regulator

The Office notes that the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) were issued by the Minister for Housing, Local Government and Heritage after the initial public consultation period for the proposed Variation.

The Housing Growth Guidelines require planning authorities to vary their development plans to reflect the housing growth requirements set out in the first appendix to the Housing Growth Guidelines, and to provide for additional provision in terms of residential zoned land.

The Office furthermore understands that a process to implement the Housing Growth Guidelines is currently being undertaken by the Planning Authority.

The recently published housing plan, Delivering Homes, Building Communities 2025-2030, also emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

'...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State'.

In this context, the Office notes that the proposed material alterations include additional Residential Phase 1 zonings in Kilcoole, which are less favourably located in terms of access to public transport, services, and amenities than Greystones. Furthermore, no additional lands are identified in Greystones itself. This approach risks pushing much-needed housing

to more peripheral locations, which are farther from existing and future services and amenities, and are more car-dependent with consequent implications for carbon emission and targets under the Climate Action Plan 2025.

Accordingly, the Office strongly advises the Planning Authority to give urgent consideration to the supply of further zoned land in Greystones as part of the forthcoming variation to implement the Housing Growth Guidelines. At a minimum, this should include rezoning Residential Phase 2 lands as Phase 1 to provide flexibility in site delivery and maintain a strong pipeline for housing delivery.

73. Cairn Homes Properties

The submission raised the following issues:

- In Cairn's submission to the Draft LFP in June, it was highlighted that the phasing strategy of lands for RN1 and RN2 was overly restrictive and the 'hard transition' of 75% (development initiated) was an inoperable constraint.
- They note the Office of Planning Regulator's (OPR) submission to the Arklow Draft LPF and Variation No. 5 of the CDP dated 12/11/2025. It is suggested that the OPR has come around to agree with Cairn's position that a Tiered phasing strategy is not necessary at this point in the Development Plan's life up to 2028.
- The Greystones-Delgany & Kilcoole LPF operates within the same time framework as the Arklow LPF (i.e. within the life of the CDP 2022-28). It is put forward therefore that the same logic outlined by the OPR above, applies equally to Variation No.4.
- The submitters note from the transcript of Wicklow County Council's meeting of 6th October 2025, that many members were of the view that there should no RN2 in Greystones, and were only reluctant to adopt this measure as they were concerned the OPR would seek to discipline such a zoning strategy.
- It is submitted that the Council should rezone RN2 lands as RN1.
- If the Council considers that the complete nullification of the RN2 zoning is not practical, then the following text changes are requested:

Housing Targets & Extant Planning Permissions

Having regard to the Core Strategy and population / housing targets provided therein for Greystones – Delgany and Kilcoole, there is capacity within the lands zoned TC, VC, RE (all located in the serviced, built up envelope) and lands zoned RN1 to meet current targets.

In order to ensure a long term supply of zoned land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this LPF, with particular regard to the new housing targets for County Wicklow set out in the 'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities' issued by the Minister under Section 28 of the Planning & Development Act (July 2025), this LPF also provides for additional zoned serviced / serviceable residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Permission will ~~not only~~ be considered during the lifetime of this LPF for RN2 lands ~~unless where the following conditions are satisfied: where it can be demonstrated that the lands are serviceable and capable of delivering housing within the lifetime of the plan in accordance with the sequential test.~~

- ~~At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);~~
- ~~It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.~~

Opinion of Chief Executive

OPR - While the OPR does not specifically identify that the points raised relate to PMA5, this one of the few places in the published set of Proposed Material Alterations that refers to the new Ministerial Housing Growth Guidelines.

While points raised by the OPR are noted, they do not really relate to the Proposed Material Alterations of Proposed Variation No. 4, but to Proposed Variation No. 6 which has now been published (which was not published at the time they made this submission) and to a possible future variation / future County Development Plan which provides for more zoned land in the County.

Furthermore, no changes to the zoning provisions for Greystones – Delgany, as suggested can legally be considered / made at this stage of the variation making process, other than those which were the subject of published PMAs.

Therefore, no changes to PMA5 are recommended on foot of this submission.

Cairn Homes Properties Ltd. – Section 13(6)(c)(ii)(l) of the Planning and Development Act 2000 (as amended) sets out that a further modification to a variation may only be made where it is minor in nature and shall not be made where it refers to an increase in the area of land zoned for any purpose. It is not considered that these changes requested accord with these legislative requirements. Furthermore, the requested text changes constitute entirely new sentences and the removal of several sentences that were not directly subject to a proposed material alteration. Therefore, the requested text changes constitute an alternative or different alteration to the Proposed Variation/Draft LPF, rather than a minor modification of a proposed material alteration as was put on public display. On this basis, the Planning Authority is precluded from considering the merits of either request in this submission.

This proposed alteration was proposed by the Elected Members at the Council Meeting of the 6th of October 2025. The CE is supportive of the proposed alteration. It may be noted by the elected members that Proposed Variation No. 6 to the Wicklow County Development Plan, published on 05 December 2025 may address this matter.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 5

Proposed Material Alteration No. 6

Amend **HOUSING OBJECTIVE GDK16** as follows:

Objective GDK16

Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will ~~not~~ **only** be considered for RN2 Priority 2 lands ~~unless where~~ the following conditions are satisfied:

- At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.

Submissions to Proposed Material Alteration No. 6

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 6 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

73. Cairn Homes Properties

The submission raised the following issues:

- It is requested that the phasing strategy set out under Housing Objective GDK 16 is simplified to provide for an RN1 zoning only, or to require that applications on RN2 lands address the Sequential Test only with the omission of qualifying criteria. It is put forward that the increase of Priority 1 lands in Kilcoole, whilst simultaneously not making any changes to Greystones is contrary to the Wicklow County Development Plan 2022-2028 Settlement Hierarchy, where Greystones is identified as a higher order 'Self-Sustaining Growth Town' in contrast to Kilcoole which is a 'Self-Sustaining Town'
- It is put forward that in Greystones there is only one site at Charlesland zoned RN1 that could be considered housing lands of scale and that there is no logic in tying the development of Coolagad to the implementation of a single land bank in public sector ownership.
- Cairn's position on GDK 16 is consistent with the submission on [PMA No. 5 above].
- If the Council considers that the complete nullification of the RN2 zoning is not practical, then the following text changes are requested:

Objective GDK16

Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will ~~not~~ **only** be considered for RN2 Priority 2 lands ~~unless where~~ **the following conditions are satisfied: it can be demonstrated that the lands are serviceable and capable of delivering housing within the lifetime of the plan.**

- ~~At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);~~
- ~~It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.~~

Opinion of Chief Executive

Cairn Homes Properties Ltd. – Section 13(6)(c)(ii)(l) of the Planning and Development Act 2000 (as amended) sets out that a further modification to a variation may only be made where it is minor in nature and shall not be made where it

refers to an increase in the area of land zoned for any purpose. It is not considered that these changes requested accord with these legislative requirements. Furthermore, the requested text changes constitute entirely new sentences and the removal of several sentences that were not directly subject to a proposed material alteration. Therefore, the requested text changes constitute an alternative or different alteration to the Proposed Variation/Draft LPF, rather than a minor modification of a proposed material alteration as was put on public display. On this basis, the Planning Authority is precluded from considering the merits of either request in this submission.

This proposed alteration was proposed by the Elected Members at the Council Meeting of the 6th of October 2025. The CE is supportive of the proposed alteration. It may be noted by the elected members that Proposed Variation No. 6 to the Wicklow County Development Plan, published on 05 December 2025 may address this matter.

Recommendation of Chief Executive

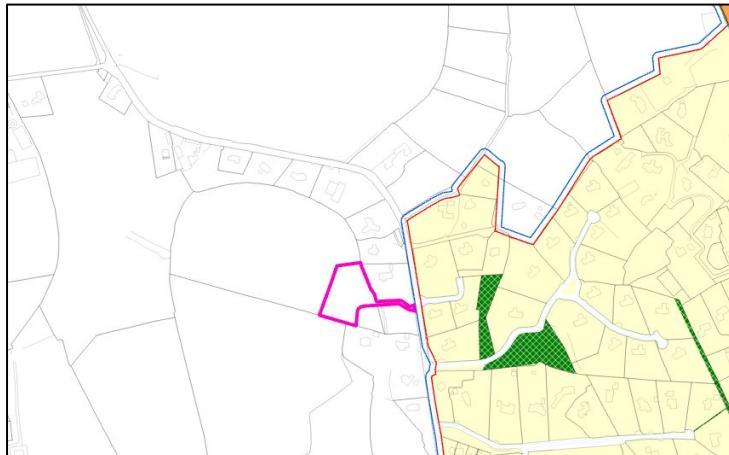
To proceed to make Proposed Material Alteration No. 6

Proposed Material Alteration No. 7

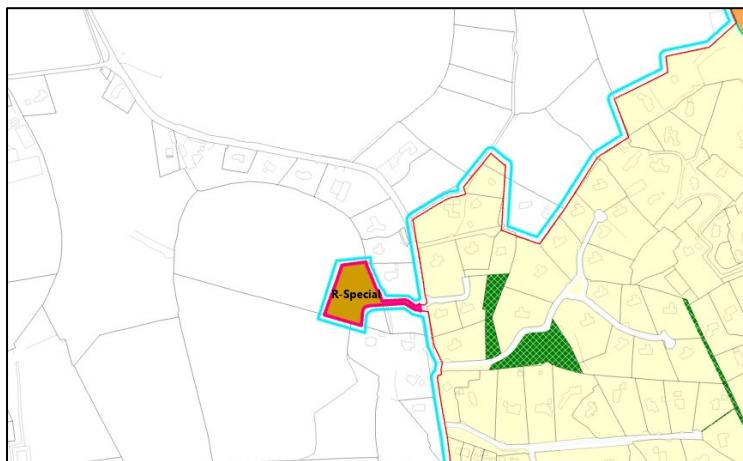
Amend **MAP NO.1 LAND USE ZONING** and add additional objective to **HOUSING OBJECTIVES** as follows:

Amend zoning of land at Bellevue Demesne measuring c. 0.65ha from unzoned outside the settlement/LPF boundary to R-Special 'Special Residential'.

Change from:



Change to:



GDK XX:

To provide for residential development for a maximum of 1 No. unit, with no restrictions on purchasing and occupation at Bellevue Demesne (as zoned 'Special R-X' on Map No. 1), subject to all matters pertaining to the proper planning and sustainable development of the site/area being satisfied.

Submissions to Proposed Material Alteration No. 7

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 7 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

54. Office of Public Works

In material alteration No. 7, it could be noted in Objective GDK XX that planning on the site is to be limited to the recommendation of the unsatisfied plan-making justification test.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

80. Carmel McDonald

The submitter agrees with the Chief Executive's preliminary response to this proposal for a site rezoning in Bellevue Demesne. It is put forward that this would comprise haphazard and piecemeal extension and sprawl into the unzoned countryside surrounding the settlement.

Opinion of Chief Executive

OPW – The CE notes the submission of the OPW and is amenable to including additional text in this regard, should the Elected Members decide to proceed.

Uisce Éireann – The CE notes the submission from Uisce Éireann, which does not object to the proposed alteration.

Carmel McDonald – The CE notes the agreement expressed by the submitter with the CE's preliminary response to PMA No. 7.

This Proposed Material Alteration was proposed by the Elected Members at the Council meeting of 6th October 2025. The CE does not support the Proposed Material Alteration for the reasons already set out in the 1st CE Report, namely:

'The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- *The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- *Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- *Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).*

- Comprise the haphazard and piecemeal extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

To zone these lands would not align with the analysis of this area, and subsequent impact on development options, as discussed in Section A3.3 of the Draft LPF.

On this basis, it is not recommended to zone the subject lands.'

Recommendation of Chief Executive

Do **not** proceed to make Proposed Material Alteration No. 7.

Should the Elected Members decide to proceed with Proposed Material Alteration No. 21, the following modifications are recommended:

GDK XX:

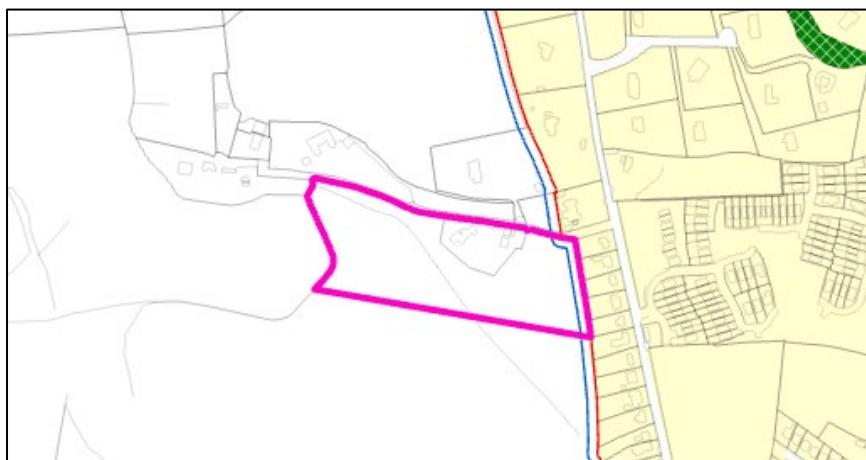
To provide for residential development for a maximum of 1 No. unit, with no restrictions on purchasing and occupation at Bellevue Demesne (as zoned 'Special R-X' on Map No. 1), subject to all matters pertaining to the proper planning and sustainable development of the site/area being satisfied (including addressing the risk of flooding on the lands via the carrying out of a site specific flood risk assessment).

Proposed Material Alteration No. 8

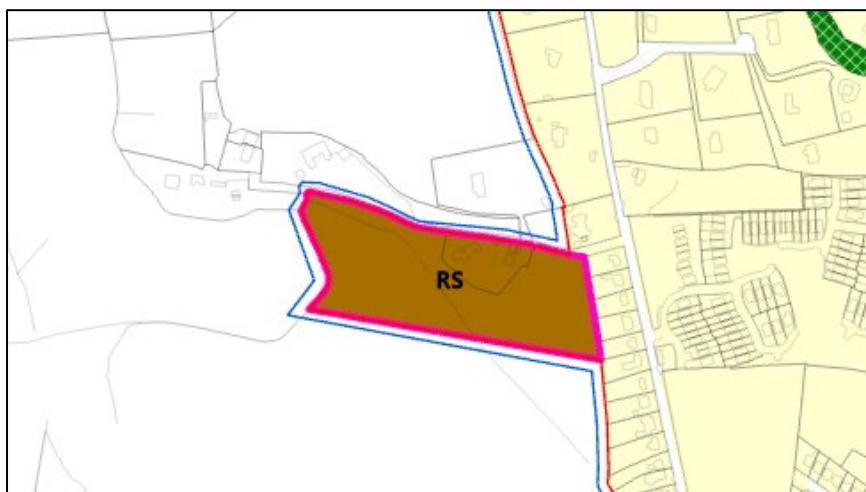
Amend **MAP NO.1 LAND USE ZONING** and add additional objective to **HOUSING OBJECTIVES** as follows:

Amend zoning of land at Bellevue Demesne measuring c. 2.7ha from unzoned/outside the LPF boundary to RS 'Special Residential'.

Change from:



Change to:



GDK XX:

To provide for residential development for a maximum of 4 No. additional units, with no restrictions on purchasing and occupation at the grounds of Delgany Golf Club, Bellevue Demesne (as zoned 'Special R-X' on Map No. 1), subject to all matters pertaining to the proper planning and sustainable development of the site / area being satisfied.

Submission to Proposed Material Alteration No. 8

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 8 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

22. Jackie Durbin

57. Alan and Isobel Constable

These 2 No. submissions (Nos. 22 & 57) contained very similar content and raise the following issues:

- The PMA is contrary to sustainable settlement strategy. The LPF already provides for sufficient residentially zoned land. The OPR's submission warned against additional housing growth until infrastructure catches up. The PMA represents ad-hoc expansion contrary to the NPF and RSES.
- The site is accessed via a private laneway not suitable for further development contrary to Section 4.3.4 of the Wicklow County Development Plan 2022-2028.
- The laneway is not a public road; intensification would require upgrading/right of way.
- There is no identified local housing need in this specific area.
- The PMA would conflict with green infrastructure/landscape objectives. The site forms part of the Bellevue Demesne buffer zone and would erode visual/ecological connectivity as per LPF Green Infrastructure Audit.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

77. Paul Hyland

The submitter puts forward that

- Proposal 8 is a very specific change in zoning for the construction of four houses which can only be approached via a private lane on land designated RS.
- Developments under an RS designation are intended to have minimal impact on existing neighbourhoods.
- Allowing this change would negatively impact several houses on Bellevue Hill, households which have also been directly impacted by now, four years of intensive development which has turned what was once a rural road into a densely populated urban landscape with no extra infrastructure to cope with it.

Opinion of Chief Executive

Jackie Durbin – The CE notes Submission No 22, opposing the Proposed Material Alteration.

Alan and Isobel Constable - The CE notes Submission No 22, opposing the proposed material alteration.

Uisce Éireann – The CE notes the submission from Uisce Éireann, which does not object to the proposed alteration.

Paul Hyland - The CE notes Submission No 22, opposing the proposed material alteration.

This proposed material alteration was proposed by the Elected Members at the Council Meeting of 6th October 2025. The CE does not support the proposed material alteration for the reasons already set out in the 1st CE Report, namely:

'.... the residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement.

To zone these lands would not align with the analysis of this area, and subsequent impact on development options, as discussed in Section A3.3 of the Draft LPF.

It should be noted that the previous residential zonings of these lands was not taken up at any time and no applications for residential development have been made. In addition, given the location of the lands, particularly the northern parcel, only lower density housing would be possible in accordance with the objectives of the LPF and it was not considered appropriate therefore to maintain these zonings in the new LPF, but rather to allocate other lands for new residential development that have the potential for more intensive housing. It is not considered proper planning and sustainable development to zone lands not for the purpose intended i.e. the delivery of needed housing but to manage bank loans.

On this basis, it is not recommended to zone the subject lands.'

Recommendation of Chief Executive

Do **not** proceed to make Proposed Material Alteration No. 8

Proposed Material Alteration No. 9

Add additional objective to **HOUSING OBJECTIVES** as follows:

GDK XX

To promote and facilitate the development of a range of residential development types, tenures and sizes, including affordable and cost-rental properties, in order to cater for the varying housing needs and economic circumstances of the area's population. In particular, Wicklow County Council shall work with the Land Development Agency, and other relevant stakeholders, to deliver a range of residential tenures to meet the requirements of the population including (but not limited to) affordable and cost-rental housing types on appropriate lands, subject to compliance with the policies and objectives of the LPF, the County Development Plan and other relevant national and regional policies and guidelines.

Submissions to Proposed Material Alteration No. 9

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 9 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

No other submissions received related to PMA9

Opinion of Chief Executive

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 9

Section B6: HERITAGE, BIODIVERSITY AND GREEN INFRASTRUCTURE

Proposed Material Alteration No. 10

Amend **HERITAGE, BIODIVERSITY & GREEN INFRASTRUCTURE OBJECTIVES** as follows:

GDK52

To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting **and designed landscape planting**, whether subject to TPO or not, where considered to be viable, safe and in line with sound arboricultural management principles. To require and ensure the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments.

Submissions to Proposed Material Alteration No. 10

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 10 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration. In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

No other submissions received related to PMA10

Opinion of Chief Executive

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 10

Proposed Material Alteration No. 11

Amend **HERITAGE, BIODIVERSITY & GREEN INFRASTRUCTURE OBJECTIVES** as follows:

GDK55

To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, European sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.

In particular, to promote the maintenance of existing and the development of new open spaces and recreational areas linked by green corridors as follows:

- a) Along the full coastal area from Greystones to Kilcoole as follows:
Bray Head – Bray to Greystones cliff walk and the coastal zone to the east of same including new marina park – Greystones north beach, marina, harbour – Greystones coastal route and beaches (the Cove, south beach) – Ballygannon – the Murrough European Site at Kilcoole.
- b) Linking Delgany to Kilquade and Kilcoole along St. Patrick's river route and the Mass Path
- c) Along Three Trout Stream from Glen Road, Delgany to the sea
- d) From the R761 at Three Trout Bridge to Mill Road
- e) Linking Coolagad to Kindlestown Woods
- f) Ballydonarea Loop / Strawberry Lane walk in Kilcoole from Lott Lane to the coast

Submissions to Proposed Material Alteration No. 11

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 11 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

67. Friends of the Cliff Walk

The submission requests that the following text be inserted after point (f) of this objective:

'In order to achieve this objective, the Council will use its best endeavours, in conjunction with national government, relevant agencies, community groups and local landowners to secure the reopening of the Bray to Greystones cliff walk in the soonest possible period within the lifespan of this Plan.'

Opinion of Chief Executive

Friends of the Cliff Walk – The CE notes the submission of Friends of the Cliff Walk. As set out in Part B of Proposed Variation No. 4 (varying Volume 2 of the Wicklow County Development Plan 2022-2028): *'The role of a land use plan or framework is to put in place a policy framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan or framework.'* On this basis, considering that the Proposed Variation-Draft LPF is not an 'action plan' but a land use framework, the requested text is not considered appropriate to include in the objective.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 11

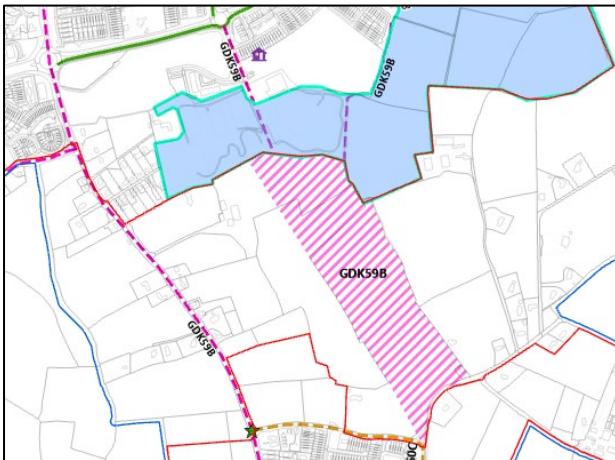
Section B.7: INFRASTRUCTURE AND SERVICES

Proposed Material Alteration No. 12

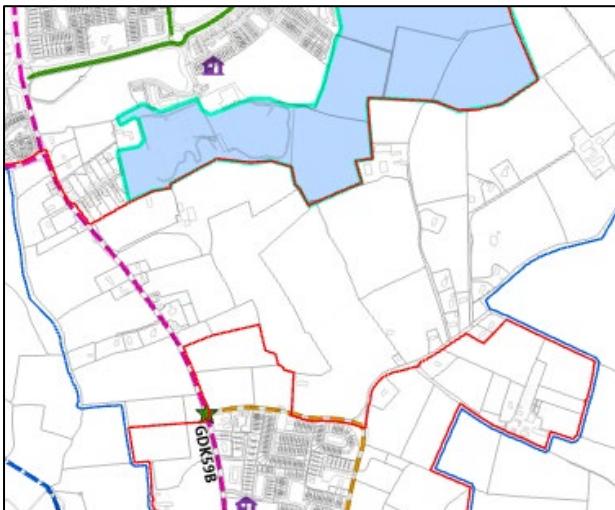
Amend **MAP NO. 5 'TRANSPORT STRATEGY'** and amend **INFRASTRUCTURE OBJECTIVES** as follows:

Amend Map No. 5 'Transport Strategy' to omit off road GDK59b corridor to the east of the Regional Road, as follows:

Change from:



Change to:



GDK59

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:

b) Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of **improvements to the existing Regional Road R761 or, where the existing road configuration does not allow for this, a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road'. The location and layout of any**

such route shall be determined following a comprehensive route selection process and consultation with affected landowners, and in particular shall ensure no adverse impacts on working farms in the area.

Submissions to Proposed Material Alteration No. 12

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 12 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

Please note that while the submission from TII indicates that it relates to PMA12, none of the content of their submission relates to the alteration proposed under PMA12 (the alteration only relates to Objective GDK 59 (b); whereas the objective of concern to the TII is Objective GDK59(c) and therefore is not considered here. The CE in her first report did recommend an alteration that would address concerns raised by the TII in relation to GDK59(c), but this was not supported by the elected members and therefore did not form a Proposed Material Alteration.

71. National Transport Authority

Whilst the NTA note that further feasibility works are required to identify an exact routing for an active travel link to connect Charlesland and Kilcoole, it is submitted that Objective GDK59(b) should be retained along with the potential corridor on Map No. 5. The route is identified as part of the GDA Cycle Network Plan, an important component of the Transport Strategy, with a 'Greenway – Utility' designation.

NTA Recommendation: *Maintain Objective GDK59(b) as part of the LPF and Map No. 5, in line with the GDA Cycle Network Plan that is part of the Transport Strategy.*

Opinion of Chief Executive

National Transport Authority – The CE notes the submission of the NTA, opposing this PMA.

In her first report, the CE recommended a proposed material alteration in response to the original submissions to the Proposed Variation/Draft LPF, to the effect of widening the corridor associated with GDK59B to allow for more options in the development of such a route. This recommendation was **not** accepted by the Elected Members at the Council meeting of 6th October 2025.

This proposed material alteration was then proposed by the Elected Members at the same Council Meeting of 6th October 2025. The CE does not support the proposed material alteration for the reasons already set out in her first report, namely:

'GDK59 (b) – a potential walking / cycling link from Ballygannon to Charlesland

This is an objective in support of the possible future development of a link route for pedestrians and cyclists between the two closest parts of north Kilcoole and south Greystones (Charlesland). Such a link would allow for direct access from Kilcoole to the wide range of community, sports and education facilities in Charlesland, thereby supporting more uptake in walking and cycling, as the existing regional road linking these two areas does not have adequate high quality, safe walking and cycling infrastructure and constrained potential to provide for same within its current remit.

No route for this link has been determined at this time, and the objective shown on the maps is a wide corridor within which a potential route might be determined following further analysis and consultation with landowners. There is no funded programme at this time to develop such route on the submitters' lands, nor is there any plan at this time to CPO any lands. In order to address the concerns raised, it is recommended that the corridor within which such a route might be located is

widened in order to allow for more options for its route to be examined, taking into account the concerns raised by the submitters.

With respect to the imminent need for improved connections between Kilcoole and Charlesland having regard to the development of a new secondary school in Charlesland, it is agreed that either improvements to the regional road or the development of a new route should be a short term priority.'

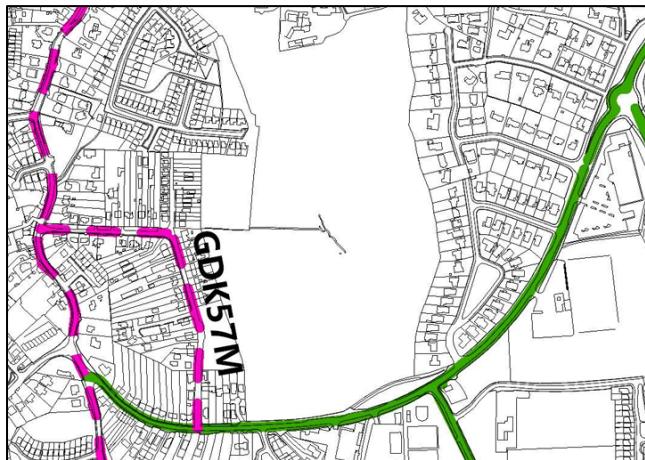
Recommendation of Chief Executive

Do not proceed to make Proposed Material Alteration No. 12

Proposed Material Alteration No. 13

Amend **MAP NO. 5 'TRANSPORT STRATEGY'** and amend **INFRASTRUCTURE OBJECTIVES** as follows:

Change from:



Change to:



GDK59

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:

- g) pedestrian and cycling safety improvements from Killincarrig crossroads to Greystones station (**from Burnaby Lawns east** being part of Pathfinder Programme)
- t) Enhanced pedestrian and cycling infrastructure along R761 from Killincarrig to Templecarrig

Submissions to Proposed Material Alteration No. 13

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 13 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

Please note that while the submission from TII indicates that it relates to PMA13, none of the content of their submission relates to the alteration proposed under PMA13 (the alteration only relates to Objective GDK 59 (g) and (t); whereas the objective of concern to the TII is Objective GDK59(c) and therefore is not considered here. The CE in her first report did recommend an alteration that would address concerns raised by the TII in relation to GDK59(c), but this was not supported by the elected members and therefore did not form a Proposed Material Alteration.

No other submissions received related to PMA13

Opinion of Chief Executive

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

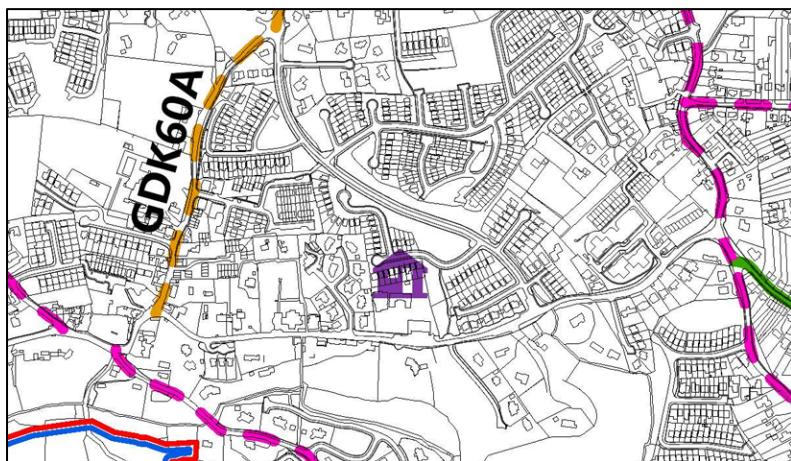
Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 13

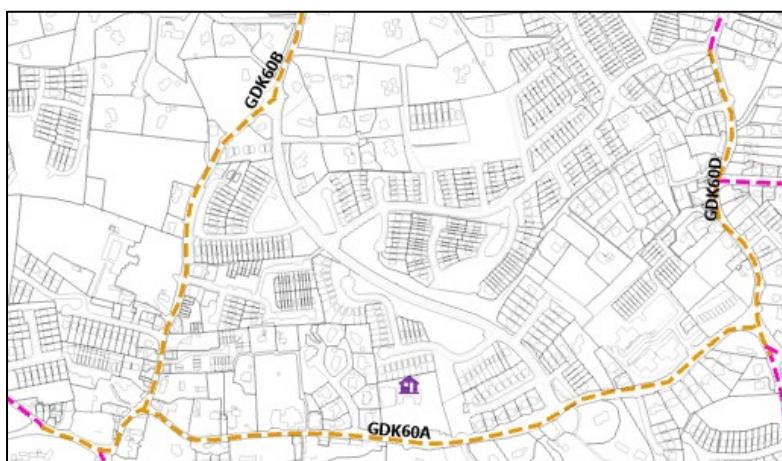
Proposed Material Alteration No. 14

Amend **MAP NO. 5 'TRANSPORT STRATEGY'** and amend **INFRASTRUCTURE OBJECTIVES** as follows:

Change from:



Change to:



GDK60

In order to facilitate the delivery of improved pedestrian / cyclists safety, public realm enhancement programmes and vehicular movement improvements in the LPF area, to support and facilitate the delivery of the following schemes:

- In order to improve pedestrian and cyclist safety and to allow for future improvements to the public realm in Delgany village: the 'Delgany Village Accessibility Scheme' ([Convent Road Phase](#)) project;
- In order to improve pedestrian and cyclist safety between Delgany and Blacklion: the [Chapel Road Pedestrian and Cyclist Infrastructure Improvement Scheme](#); 'Convent Road Active Travel Scheme';
- In order to improve pedestrian and cyclist safety in Kilcoole town centre and to allow for future improvements to the public realm on Kilcoole Main Street particularly in the area between 'Upper Green' and 'Sylvan Lawns': the improvement of the alternative route to the east of Kilcoole to 'bypass' the core town centre. This route commences at the R761 junction with Lott Lane at Kilcoole Community Centre, continues along Lott Lane to Sea Road and onto 'Holywell Avenue' to the south of Sea Road, as far as the regional road at CCA. Improvement shall include the re-design of various existing junctions in order to give priority to this route as shown on Map No. 5 as Objective GDK60

d) The Killincarrig Improvement Scheme

Where such improvements are located on designated development land, the development shall be so delivered to provide for those elements of the scheme within that site.

Proposed Material Alteration No. 14

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 14 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

No other submissions received related to PMA14

Opinion of Chief Executive

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 14

Proposed Material Alteration No. 15

Amend **INFRASTRUCTURE OBJECTIVES** as follows:

GDK64

With respect to localised drainage issues present in the LPF area:

- a) new significant development ~~in the area between Sea Road and Lott Lane~~ in Kilcoole will only be considered where the development's wastewater drainage arrangements accord with an overall Drainage Area Plan (DAP) which removes / limits need for new pumping and maximises coordination of drainage networks between sites;
- b) new significant development in the Coolagad – Templecarrig area in north Greystones will only be considered where the development's surface water drainage arrangements accord with Wicklow County Council's Sustainable Urban Drainage (SUDs) Policy **and** an overall Surface Water Management Plan for the area which addresses the capacity of the area network and obviates flood risk on downstream lands.

Submissions to Proposed Material Alteration No. 15

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 15 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

No other submissions received related to PMA10

Opinion of Chief Executive

This Proposed Material Alteration was proposed by the Elected Members at the meeting of 6th October 2025. The CE is not opposed to this alteration.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 15

Proposed Material Alteration No. 16

Add **INFRASTRUCTURE OBJECTIVE** as follows:

GDK XX

In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Greystones-Delgany and Kilcoole LPF and integrate its provisions into the LPF as appropriate.

Submissions to Proposed Material Alteration No. 16

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 16 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

30. Transport Infrastructure Ireland

TII's original submission to the Draft LAP highlighted the prescribed necessity for a Local Transport Plan (LTP) to be prepared for Greystones-Delgany and Kilcoole and made recommendation to like effect, TII endorses proposed material alteration no. 16.

TII notes that the "Transport Strategy" of the draft LPF is fundamentally linked to Appendix 6 Infrastructure Assessment & Implementation Programme of the draft LPF. TII is a named stakeholder at section 2 Key Stakeholders, subsection 2.2 Roads & Transportation Infrastructure. Subsection 3.3 Transportation & Movement opens with a description of the progression of the "Greystones-Delgany & Kilcoole Transport Study (WCC / NTA)" stating that the Study is to become the Local Transport Strategy which is "still in development".

TII observes the intention of the additional proposed transportation development objective the subject of proposed Material Alteration no. 16, to incorporate the Local Transport Plan (LTP) "provisions" into the Local Planning Framework. TII reiterates the recommendation that the LTP be undertaken in accordance with established Area Based Transport Assessment (ABTA) methodology set out in Joint NTA/TII Guidance.

Having regard to joint TII / ABTA Guidance, the potential for the future LTP provisions to interact with the national roads network and TII's Draft LPF status as a transportation "key stakeholder", TII requests that it be formally engaged in any Local Transport Plan (LTP) to be undertaken.

71. National Transport Authority

The NTA welcomes the inclusion of Material Alteration 16 which includes an objective that seeks the preparation of a Local Transport Plan (LTP) for Greystones and are ready to support Wicklow County Council to finalise such a plan, in line with the Area Based Transport Assessment (ABTA) guidance.

76. Brookhampton Ltd.

In relation to PMA No. 16, the submission requests the following:

That Proposed Material Alteration No. 16, which introduces a new requirement for a Local Transport Plan (LPT) for Greystones Delgany and Kilcoole, be updated to confirm that in advance of the adoption of the LTP, planning applications will be assessed on their merits, having regard to the overall objectives of the LPF, and accompanying transport

assessments, and development will not be considered premature pending agreement of the Greystones-Delgany and Kilcoole LTP.

Opinion of Chief Executive

Transport Infrastructure Ireland – The CE notes the submission from TII, endorsing PMA No. 16. TII will be consulted as part of any future Local Transport Plan.

National Transport Authority – The CE notes the submission of the NTA, welcoming the proposed material alteration.

Brookhampton Ltd. – In advance of the preparation of a Local Transport Plan (LTP), a range of transportation and infrastructure objectives have been included within Proposed Variation No. 4-the Draft LPF, alongside existing objectives in the Wicklow County Development Plan 2022-2028. These objectives will be used to assess applications in advance of the preparation of an LTP, and as such no further modification is required.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 16

Proposed Material Alteration No. 17

Add **INFRASTRUCTURE OBJECTIVE** as follows:

GDK XX

Developments, including new/expanded developments and any planned improvements to existing urban spaces, shall be designed in accordance with the guidance document "*Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents*" LAWPRO 2024.

Submission to Proposed Material Alteration No. 17

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 17 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

No other submissions received related to PMA17

Opinion of Chief Executive

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 17

Section B.9: SPECIFIC LOCAL OBJECTIVES (SLOs)

Proposed Material Alteration No. 18

Amend **INTRODUCTION** as follows:

The purpose of an SLO is to guide developers as to the aspirations of the LPF regarding the development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where the lands are zoned for 'mixed use' to give more detail on the development objective of these lands. A masterplan for the entire SLO area may be required to be submitted as part of the first application within the SLO. **In particular, both masterplans and individual applications within SLOs shall show the proposed overall roads and infrastructure layout for the entire SLO area to ensure that all land parcels within the SLO are serviceable and no development prejudices or unduly constrains the development on another parcel.**

For a number of the SLOs concept sketches are shown in this LPF. These are conceptual only, did not include complete site surveys/analysis, and should not be taken as a definitive guide as to the acceptability or otherwise of any access points, road layouts or building positions/designs. Any application for permission on said lands must conform to all standards and requirements of the Planning Authority, as set out in this LPF and the Wicklow County Development Plan.

Submissions to Proposed Material Alteration No. 18

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 18 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration. In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

73. Cairn Homes Properties Ltd.

The submission raises the following issues:

- The LPF 'Introduction' to Special Local Objectives (SLOs) has been amended to ensure that masterplans are serviceable and no development prejudices or unduly constrains another parcel. It should be clarified that masterplan details should be 'agreed prior to submission of a planning application' to allow sufficient flexibility at detailed design stage.

76. Brookhampton Ltd.

The submitter notes that Proposed MA No. 18 introduces additional text requiring that masterplans and individual planning applications within SLOs demonstrate the proposed overall layout of roads and infrastructure across the entire SLO area. This requirement highlights the importance of ensuring that development on any one parcel does not prejudice or unduly constrain the future development potential of adjoining lands.

Opinion of Chief Executive

Cairn Homes Properties Ltd. – There is no formal process by which a masterplan can be 'agreed' ahead of a planning application. On this basis, the CE is satisfied that the text of PMA No. 18 is appropriate. Any masterplan/action area plan previously agreed is non-statutory and non-binding.

Brookhampton Ltd. – The CE notes the submission of Brookhampton Ltd.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

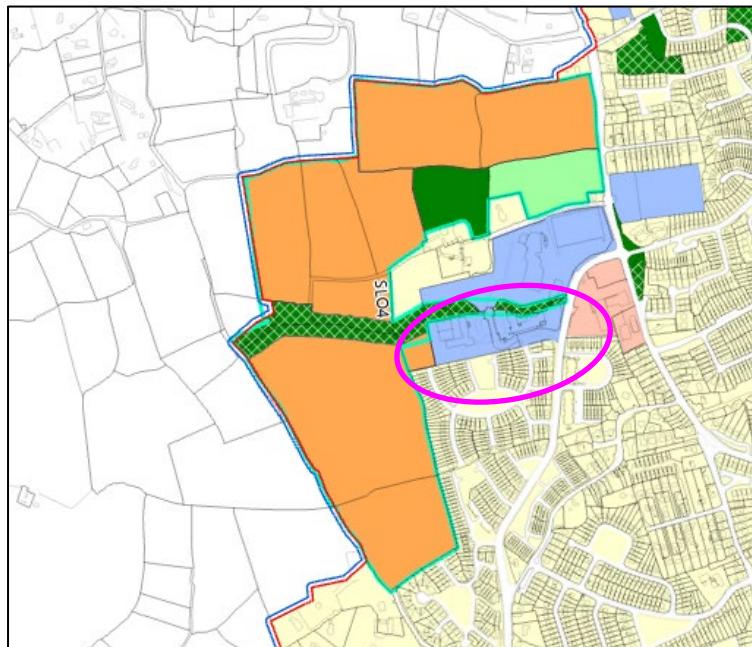
To proceed to make Proposed Material Alteration No. 18

Proposed Material Alteration No. 19

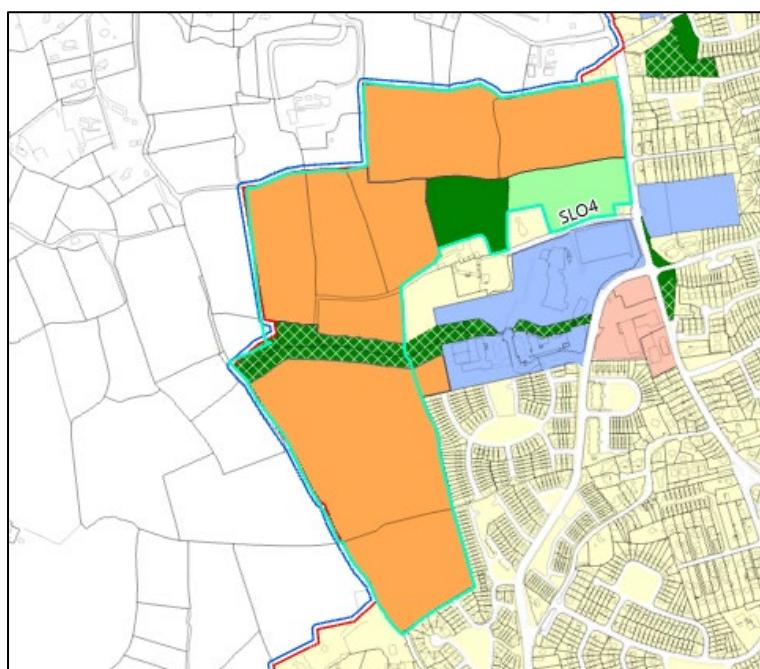
Amend **MAP NO. 1 LAND USE ZONING** and amend Specific Local Area Objective **SLO 4 - COOLAGAD** and SLO area map as follows.

Amend **SLO 4** area to remove the lands zoned OS1: Open Space and CE: Community and Education that will form part of SLO 12 – COOLAGAD EAST.

Change from:



Change to:



Amend SLO4 text as follows:

SLO 4 - COOLAGAD

These SLO lands are located at Templecarrig Lower, Coolagad and Kindlestown Upper in north Greystones, on a site approximately ~~37.7~~ ~~39~~ha in size. This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to existing schools, community infrastructure, transport services, recreational amenity areas and retail in the north Greystones area;
- A total area of c. ~~31~~ ~~27~~ha is zoned for new housing development which shall be divided into a number of distinct character areas / estates, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs. In designing the development of residential areas attention shall be paid to mitigating the visual impact of the development on the higher lands and maintaining views towards Kindlestown Hill, from the R761 and the Greystones coast. Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site. In this regard, building height and density shall reduce as landscape elevation increases.
- Open space shall be provided with each phase of development as follows:
 - A minimum of 1.6ha per 400 houses as fully serviced playing pitches, courts etc
 - A minimum of 0.6ha per 400 houses for casual recreation space, parks etc. A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
 - 0.2ha per 400 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc
 - The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts; **at a minimum a separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m)**, which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.
- The lands identified as OS2 along a watercourse shall be reserved in as natural a condition as possible with appropriate undeveloped buffer zones. Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least 25m along each side free from development. Road / cycleway / footpath crossings over / through the OS2 corridor shall be minimised to that absolutely necessary for access; any such crossing shall be via a clean span bridge over the watercourse that maintains its natural character.
- Community facilities, **including a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 600sqm** shall be provided within the SLO area in the first phase of development to meet the needs of the new and existing resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out. **This community services audit should take into account and explicitly respond to the analysis and recommendations set out in the Social Infrastructure Audit accompanying the LPF.**
- Green links shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods
- **No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use.**

Submissions to Proposed Material Alteration No. 19

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 19 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

43. Temple Carrig Secondary School

The submission raises the following issues:

- Temple Carrig School would be deeply concerned at any proposals to reduce the potential for development of the lands current zoned Active Open Space in SLO4.
- The lands zoned OS1 represent an important community resource, part of which are expected to be developed as a pitch for local community use.
- Temple Carrig would welcome the development of an all-weather pitch on those lands, would welcome access to the pitch, and encourage the construction of a pitch at the earliest possible stage in the development.
- The pitch should have a surface which can accommodate a range of sports (incl. hockey), i.e. sand dressed artificial surface like the original pitch at Temple Carrig School.
- There is a real potential to add to sports facilities in the area, support sport in local schools and to complement the Temple Carrig's Olympic standard pitch to make Greystones a major regional location for hockey.
- The following text changes are requested:

'Amend SLO4 text as follows:

SLO 4 - COOLAGAD

These SLO lands are located at Templecarrig Lower, Coolagad and Kindlestown Upper in north Greystones, on a site approximately 37.7 39ha in size. This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

- *The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to existing schools, community infrastructure, transport services, recreational amenity areas and retail in the north Greystones area;*
- *A total area of c. 31 27ha is zoned for new housing development which shall be divided into a number of distinct character areas / estates, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs. In designing the development of residential areas attention shall be paid to mitigating the visual impact of the development on the higher lands and maintaining views towards Kindlestown Hill, from the R761 and the Greystones coast. Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site. In this regard, building height and density shall reduce as landscape elevation increases.*
- *Open space shall be provided with each phase of development as follows:*
 - *A minimum of 1.6ha per 400 houses as fully serviced playing pitches, courts etc*
 - *A minimum of 0.6ha per 400 houses for casual recreation space, parks etc. A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.*
 - *0.2ha per 400 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc*
 - *The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts; at a minimum a separate full size (i.e. 90m x 145m) multi-sport (including hockey – 92m x 55m) all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m), which shall be devoted to the use by local schools, clubs and have public access (including a pedestrian connection to the adjacent school campus) by the*

public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.

- The lands identified as OS2 along a watercourse shall be reserved in as natural a condition as possible with appropriate undeveloped buffer zones. Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least 25m along each side free from development. Road / cycleway / footpath crossings over / through the OS2 corridor shall be minimised to that absolutely necessary for access; any such crossing shall be via a clean span bridge over the watercourse that maintains its natural character.
- Community facilities, including a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 600sqm and a full size (90 x 145m) multisport (including hockey at 92m x 55m) all weather pitch shall be provided within the SLO area in the first phase of development to meet the needs of the new and existing residential community and schools/sports clubs in the area; of the area; in determining requirements for community facilities, a community services audit shall be carried out. This community services audit should take into account and explicitly respond to the analysis and recommendations set out in the Social Infrastructure Audit accompanying the LPF and also address the needs of local schools seeking sports facilities to respond to curricular and extra curricular activities on public lands.
- Green links shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods
- No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use.'

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

73. Cairn Homes Properties Ltd.

[This is a lengthy submission, the full details of which is not possible to be included in the below summary. Attention is drawn to the full submission, which is available [here](#).]

The submission raises the following issues:

- The submitter is committed to providing high quality amenities and community facilities at Coolagad. The Masterplan for the site includes a creche and community buildings, a sports pitch and neighbourhood park. However, the Material Amendments to the SL04 text seeks the provision of specific pitches and facilities which would compromise the masterplan and significantly affect the potential to implement residential development in this location.
- The proposed change to the boundary of SLO4 is relatively minor and no further comment is made.
- The technical analysis prepared by MCORM architects as part of this submission illustrates that the SLO's proposed text changes to require a "separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m)" cannot be accommodated within the Active Open Space or Amenity zoned land within SL04.
- No other AOS area in the LPF has been burdened with such impractical playing pitch requirements. The policy is arguably discriminatory through its application to the submitter's lands only. Whilst the submitter has a proven track record of delivering high quality social and community amenities (including soccer pitch at Archers Wood, Greystones), the revised SLO objective needs to be reconfigured.

- This submission raises PMA No. 26 for comparative purposes. In particular, they note that PMA26 adds a further 12.5ha to the proposed AOS provision in Greystones, with specific design requirements reserved for the detailed design stage; they suggest that this is fair and reasonable and should be applied equally to all lands.
- To inform Officials and Members of the Council, the submission includes illustrations of what a playing pitch of 90m x 145m in size looks like on a plan and the impact it would have on the Masterplan for SL04 which is primarily to deliver new residential development.
- The SLO's proposed text changes also require a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 600sqm. Whilst Cairn do not oppose the principle of this use, the scale of it is considered disproportionate to the size of the development. Cairn suggest that smaller figure is used in the objective, and the detailed design and size of the facility is agreed at the pre-planning application stage with the planning authority and other key stakeholders.
- The Social Infrastructure Audit accompanying the draft LPF it does not stipulate specific pitches or hall size for Coolagad. Accounting for the PMAs, there is AOS land almost three times the deficit identified in the SIA.
- Community Facilities Hierarchy Model of the Wicklow CDP 2022-2028 set out the different types of facilities expected in a Level 2 – Settlement such as Greystones. The floorspace of facilities are not quantified. A review of benchmarking standards [the submission includes reference to CDP standards of other planning authorities, Landcom Community Centre Guidelines, and CoPilot AI] indicates that 600 sq.m. is more aligned with district and town level facilities rather than a neighbourhood scale.
- The SLO's proposed text change to require that '*No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use*', is overly restrictive, compromises the efficient phasing of development and is counter to the proper planning and sustainable development of the area.
- It is submitted all proposed Material Amendments to the Draft LPF for SL04 should be rejected and redrafted to omit reference to a separate full size (i.e. 90m x 145m) multi-sport all weather pitch and to require a community facility of minimum 300 sq.m. instead of 600 sq.m.
- The following modified wording is suggested:

'Amend SLO4 text as follows:

SLO 4 - COOLAGAD

These SLO lands are located at Templecarrig Lower, Coolagad and Kindlestown Upper in north Greystones, on a site approximately 37.7 39ha in size. This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

- *The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to existing schools, community infrastructure, transport services, recreational amenity areas and retail in the north Greystones area;*
- *A total area of c. 31 27ha is zoned for new housing development which shall be divided into a number of distinct character areas / estates, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs. In designing the development of residential areas attention shall be paid to mitigating the visual impact of the development on the higher lands and maintaining views towards Kindlestown Hill, from the R761 and the Greystones coast. Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site. In this regard, building height and density shall reduce as landscape elevation increases.*
- *Open space shall be provided with each phase of development as follows:*
 - *A minimum of 1.6ha per 400 houses as fully serviced playing pitches, courts etc*
 - *A minimum of 0.6ha per 400 houses for casual recreation space, parks etc. A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.*
 - *0.2ha per 400 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc*

- The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts; **at a minimum a separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m)**, which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.
- The lands identified as OS2 along a watercourse shall be reserved in as natural a condition as possible with appropriate undeveloped buffer zones. Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least 25m along each side free from development. Road / cycleway / footpath crossings over / through the OS2 corridor shall be minimised to that absolutely necessary for access; any such crossing shall be via a clean span bridge over the watercourse that maintains its natural character.
- Community facilities, **including a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 300sqm 600sqm** shall be provided within the SLO area in the first phase of development to meet the needs of the new and existing resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out. **This community services audit should take into account and explicitly respond to the analysis and recommendations set out in the Social Infrastructure Audit accompanying the LPF.**
- Green links shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods
- **No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use.'**

Opinion of Chief Executive

Temple Carrig School – The CE considers that existing text providing for the use of facilities by the public within SLO4 includes the use of such facilities by local schools on an equal standing with any other community groups/clubs/private individuals. The text requested in this regard is therefore considered unnecessary. The CE further considers that there are strong phasing provisions within SLO4 that require the delivery of community facilities concurrently with housing. Noting the different landowners within the SLO, it is not appropriate to dedicate a particular facility to a 1st phase, when it cannot be guaranteed that lands containing AOS 'Active Open Space' lands, or large enough to accommodate certain facilities, will come forward for development first. The provision of such facilities will be on a pro-rata basis as outlined in the response to Cairn Homes Properties Ltd. below.

With respect to the request that the provided all weather pitch be suitably designed to accommodate hockey use, as per the response to submissions to follow, the CE is not recommending that the LPF specifies exactly the dimensions of the pitches to be delivered as part of the overall SLO, as the CE considers that such specificity may be too restrictive in relation to the pro-rata delivery of facilities, the irregular shape of AOS zonings within the SLO, and the sloping nature on the site. Therefore the CE does not recommend the addition of text as requested in relation to hockey pitch use.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration (noting too that PMA No. 19 does not include any changes in zoning).

Cairn Homes Properties Ltd. – Acceptance of the boundary changes to SLO4 are noted.

The rates of open space provision within SLO4 are in accordance with WCC's Active Open Space Policy, the details of which are stated in the Social Infrastructure Audit accompanying the draft LPF. These rates of provision were the source of the text of SLO4, which re-stated the requirements in per unit terms rather than per 1,000 population.

Having regard to the *Sustainable Residential Development and Compact Settlement Guidelines*, sites within SLO4 would be considered urban extensions for a Metropolitan Town of greater than 1,500 population. On this basis, the minimum

density would be within the range of 35-50 dwellings per ha. Accounting for the sloping nature of the lands and taking an estimate towards the lower end of the density range, the c. 31ha of lands zoned for residential development could provide for c. 1,000 dwellings. This would require c. 4ha of playing pitches, 1.5ha of parks, etc. (of which 0.75ha must be in addition to the usual provision of residential open space), and 0.5ha of MUGAs/playgrounds, to a total of 5.25ha within SLO4 not accounting for residential open spaces.

In writing the text of the SLO4 as per the **draft** LPF, the CE was cognisant that the requirements for community facilities (incl. active open space) were not going to fit entirely within the area of land specifically zoned AOS 'Active Open Space' or 'Open Space', with those locations zoned specifically being zoned given their particular utility in terms of proximity to a school and existing housing areas to the east and south of SLO4. It was clear that any shortfall would have to be made up for on lands zoned RN within the SLO area.

The Draft LPF and SLO4 wording does not prescribe that all of the required open space and community facilities must be located on one particular landowner's holding, in this case in the landholding of Cairn, which seems to be assumed and forms the basis for much of the submission. SLO4 is currently held in three parcels with residential zoning apportioned as follows:

- Cairn c. 19ha zoned RN2
- Landowner 2 c. 8.4ha zoned RN2
- Landowner 3 c. 3.7ha zoned RN2

On the basis of the rates of AOS and OS specific in the draft LPF, they would each be responsible on a pro rata basis for the following rates of AOS and OS:

- Cairn: 2.45ha AOS, 0.9ha OS of which 0.46ha in one larger park, and 0.3ha PG / MUGA
- Landowner 2: 1.1ha AOS, 0.4ha OS of which 0.2ha in one larger park, and 0.14ha PG / MUGA
- Landowner 3: 0.48ha AOS, 0.18ha OS of which 0.9ha in one larger park, and 0.06ha PG / MUGA

The AOS and OS zones that are located within the Cairn holding measure 2.3ha (AOS) and 2ha (OS) which would appear adequate to meet their full OS requirement of c. 3.2ha, with enough room if deemed a suitable location, for the indoor community facility. In purely quantitative/area terms, the 2.3ha of AOS would appear to be sufficient in area to accommodate the c. 1.3ha full size (i.e. 90m x 145m) multi-sport all weather pitch and the 0.24ha 7-a-side pitch, but it is not clear that this would be sufficient to allow for embankments, viewings areas, car parking etc.

The text of the SLO does not require that the additional playing pitches / sporting facilities required to be delivered in the overall SLO must be located on the zoned AOS lands, but it would be desirable that all of the community facilities are located in proximity to each other so that services such as car parking could be shared. For example, the pro rata share of the landowner to the north, of AOS and OS of c. 1.3ha, could be located directly north of the zoned AOS area on the Cairn holding.

The CE therefore does not agree that the quantum of AOS facilities specified in this PMA is onerous, in purely quantitative/area terms. However, the CE does agree that it would be extremely difficult to deliver the requirements set out in the proposed alteration having regard to the irregular shape of AOS zonings, the sloping nature on the site and the landownership structure, with each landowner only required to deliver their pro rata share, within the SLO.

Similarly, with respect to the indoor community facilities described in the proposed alteration, it is not clear how this could be delivered to the scale described when the burden is to be shared on a pro rata basis. It is considered more reasonable and practical that the scale of any such facilities be determined at the masterplan / planning application stage, based on the quantum of development proposed on each landholding or in each phase.

Part of this proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

The remainder of this alteration was proposed by the Elected Members at the Council Meeting of 6th October 2025 and was not opposed by the CE at that time.

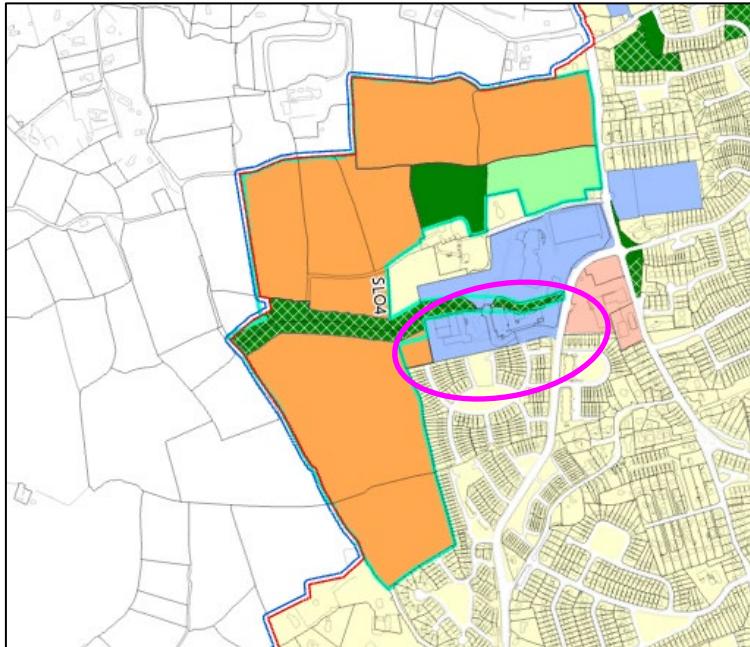
In light of the submission received, the CE recommends that further modifications be made to this PMA.

Recommendation of Chief Executive

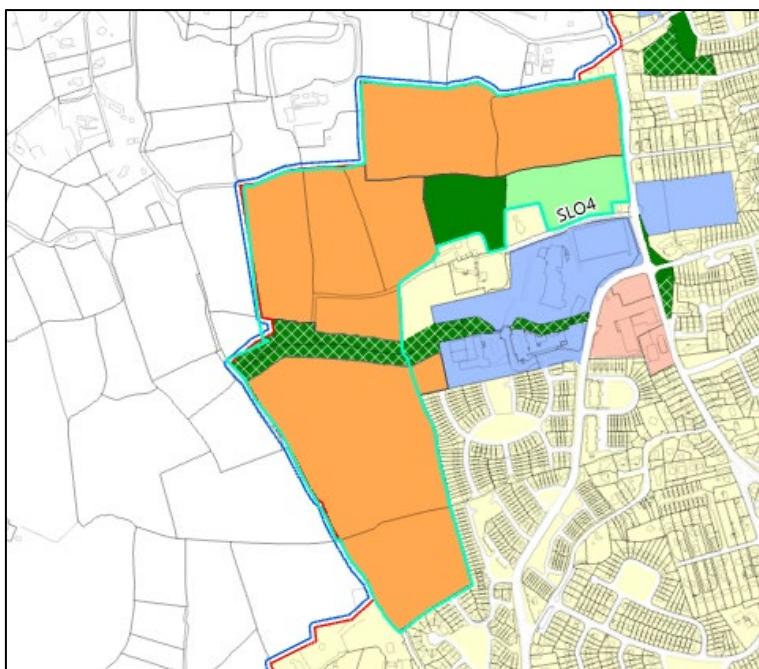
To further modify and proceed to make Proposed Material Alteration No. 19, as follows:

*'Amend **SLO 4** area to remove the lands zoned OS1: Open Space and CE: Community and Education that will form part of SLO 12 – COOLAGAD EAST.*

Change from:



Change to:



Amend SLO4 text as follows:

SLO 4 - COOLAGAD

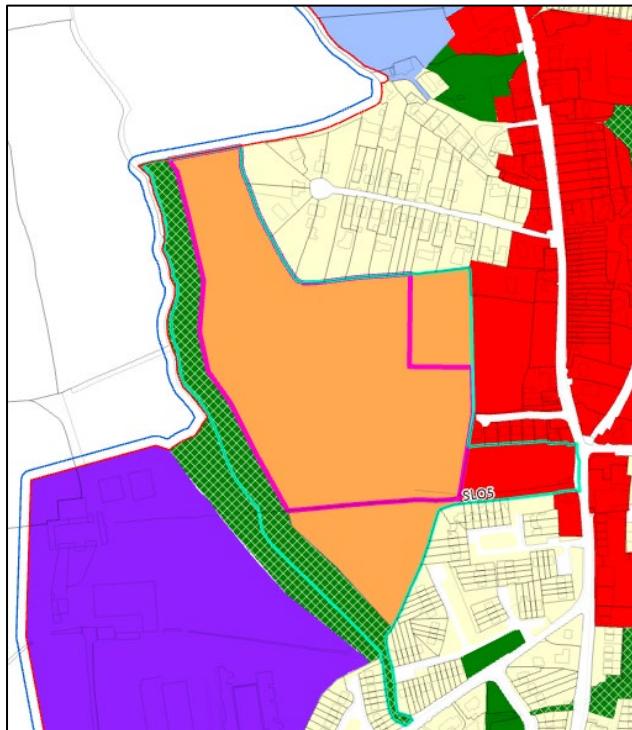
These SLO lands are located at Templecarrig Lower, Coolagad and Kindlestown Upper in north Greystones, on a site approximately 37.7 39ha in size. This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to existing schools, community infrastructure, transport services, recreational amenity areas and retail in the north Greystones area;
- A total area of c. 31 27ha is zoned for new housing development which shall be divided into a number of distinct character areas / estates, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs. In designing the development of residential areas attention shall be paid to mitigating the visual impact of the development on the higher lands and maintaining views towards Kindlestown Hill, from the R761 and the Greystones coast. Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site. In this regard, building height and density shall reduce as landscape elevation increases.
- Open space shall be provided with each phase of development as follows:
 - A minimum of 1.6ha per 400 houses as fully serviced playing pitches, courts etc
 - A minimum of 0.6ha per 400 houses for casual recreation space, parks etc. A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
 - 0.2ha per 400 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc
 - The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts; ~~at a minimum a separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all weather 7-a-side pitch (60m x 40m)~~, which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.
- The lands identified as OS2 along a watercourse shall be reserved in as natural a condition as possible with appropriate undeveloped buffer zones. Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least 25m along each side free from development. Road / cycleway / footpath crossings over / through the OS2 corridor shall be minimised to that absolutely necessary for access; any such crossing shall be via a clean span bridge over the watercourse that maintains its natural character.
- Community facilities, *including a suitably sized multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 600sqm* shall be provided within the SLO ~~area in the first phase of development~~ to meet the needs of the new and existing resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out. *This community services audit should take into account and explicitly respond to the analysis and recommendations set out in the Social Infrastructure Audit accompanying the LPF.*
- Green links shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods
- *No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use.'*

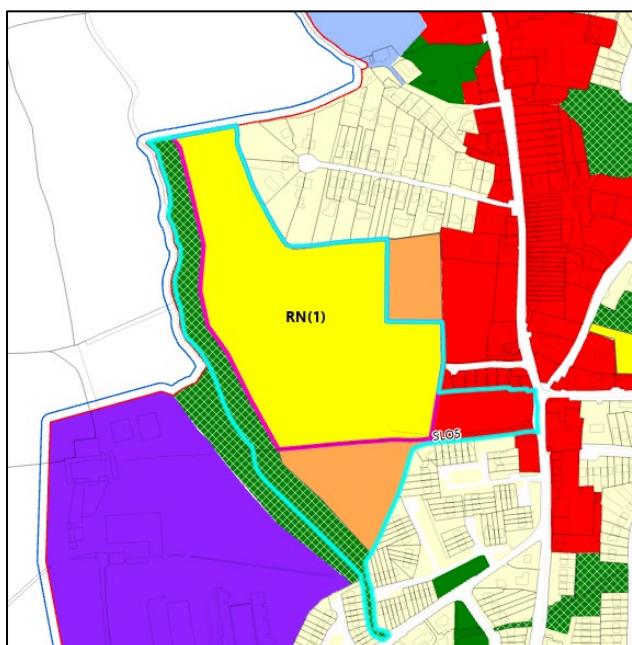
Amend **MAP No. 1 (Land Use Zoning)** and **SLO 5 - Bullford** and boundary as follows:

Amend zoning of land at Kilcoole measuring c. 6.1ha from RN2 'New Residential – Priority 2' to RN1 'New Residential – Priority 1'.

Change from:



Change to:



Amend SLO5 text as follows:

SLO 5 - Bullford

These SLO lands are located west of Kilcoole Main Street and measure c. 10ha and are zoned for 'TC – Town Centre', 'RN1 – New Residential Priority 1', 'RN2 – New Residential Priority 2' and 'OS2 – Natural Areas'. This area may be developed for a mix of uses including residential, community, commercial, retail / retail services and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre, adjoining residential areas and existing transport services.
- These lands shall be accessed only via Main Street at the Main Street – Sea Road junction, which shall be redesigned as a crossroads with traffic lights. Land measuring c. 0.6ha immediately west of this new junction shall be developed in accordance with the criteria set out in this LPF as 'Opportunity Site 7'.
- **No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until OP7 is fully developed and any community facilities provided therein are available for community use.**
- A total area of c. 7.5ha is zoned for new housing development which shall be divided into at least two distinct character areas / estates either side of a central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Community facilities shall be provided within the SLO area **in the first phase of development** to meet the needs of the new resident community of the area. In particular, the development shall include at a minimum a childcare facility **and a community building of c. 600sqm**; in determining additional requirements for community facilities, a community services audit shall be carried out.
- Open space shall be provided with each phase of development as follows:
 - An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.
 - A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc.
 - A minimum of 0.15ha per 100 houses for casual recreation space, parks etc.
 - A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
 - 500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc.
 - The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.

Submissions to Proposed Material Alteration No. 20

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 20 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

28. Richard and David Fox

The submission raises the following issues:

- It is requested that the Councillors do not adopt any of the proposed alterations involving residential zoning in Kilcoole.
- It was highlighted at all stages that there was enough residentially zoned land in Kilcoole.
- The submitters question why has land that was zoned Strategic Land Bank (SLB) in the 2013 Local Area Plan been de-zoned and different New Residential - priority 1 (RN1) sites been added in (only one of which was previously SLB)?
- The submitters query whether the Council now intending on not complying with the County Development Plan population projections
- They draw attention to the fact that it has been widely reported in the media that the Council is under pressure to zone more land for residential development. If this is the case, it is put forward that amendments should be done initially in conjunction with the planners.
- The submitters question how is it in the interest of housing needs that a site in Kilcoole (SLO 5 PMA No. 20 proposed to be zoned RN1), which has historic access issues has to be developed before zoned land in Greystones can be developed (e.g. SLO 4 zoned RN2). **SLO 4** would provide much needed sporting facilities for the adjoining over-subscribed schools. In this proposal, these sporting facilities will be held up for the foreseeable future.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

66. Office of the Planning Regulator

The Office notes that the proposed material alterations include additional Residential Phase 1 zonings in Kilcoole, which are less favourably located in terms of access to public transport, services, and amenities than Greystones. This approach risks pushing much needed housing to more peripheral locations, which are farther from existing and future services and amenities, and are more car-dependent with consequent implications for carbon emission and targets under the Climate Action Plan 2025.

71. National Transport Authority

Material Alterations 20, 23A, 24, 25 & 32

The above-mentioned alterations propose the application of the 'New Residential Priority 1' zoning objective to various greenfield sites on the edge of the established built-up-area of Kilcoole, on land either zoned for other purposes, primarily 'New Residential Priority 2', or on land not zoned and beyond the current town boundary. It is noted, as per the Chief Executives Report on the Draft LPF, that the zoning of land for residential purposes under the Draft LPF has followed a robust assessment of the Core Strategy requirements and that additional zoned land beyond that in the Draft would be surplus to requirements at this time. Based on the above and the location of the subject lands, the NTA is concerned that these proposed changes would not be aligned with local, regional and national objectives that seek to provide for sequential and compact forms of development, including Measure Plan 4 of the Transport Strategy which states the following:

"the NTA will support and prioritise development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services."

It is considered that the application of the 'New Residential Priority 1' zoning to an abundance of lands on the edge of the established built-up area, could facilitate an unsustainable form of development and lead to high levels of car dependency in the subject areas, particularly in advance of the LTP being prepared. Given that there are more sequentially appropriate residentially zoned lands already identified as part of the Draft LPF, it is submitted that these lands, that are largely unserved by active travel infrastructure, should remain under their current zoning designations at this time.

NTA Recommendation: The NTA recommend that the proposed zonings under MAs 20, 23A, 24, 25 & 32 not be brought forward at this time.

76. Brookhampton Ltd.

The submission raises the following issues:

- The zoning changes under proposed material alteration No. 20 are welcomed.
- The proposed text under Proposed Material Alteration No. 20 which restricts occupancy of residential units pending activation of the community facility within SLO 5 should be omitted. It is put forward that the Draft LPF should incorporate greater flexibility in the phasing approach within the proposed SLO5 lands, to facilitate timely and efficient housing delivery, and that the provision of housing should not be contingent upon the prior delivery of community infrastructure; that financial viability may be effected without an identified end user, and service providers may not be able to provide timely connections (e.g. ESB); and that demand generated by a first phase of development would not justify the early delivery of a childcare facility.
- The proposed text under Proposed Material Alteration No. 20 which requires an excessively large community facility should be omitted (or reduced from 600sqm to 200sqm; or that 600sqm refers to both community and childcare facility). It is put forward that the scale of the community facility envisaged in the Draft LPF is excessive, unjustified and disproportionate having regard to likely demand based on existing and future population and typical usage patterns. It is submitted that, in the absence of a specific Social Infrastructure Audit for Kilcoole, the level of community floorspace is not evidence based and overly onerous on a single developer, and will impact on the viability of housing, which runs contrary to Government initiatives and recent guidance; that existing community facilities in Kilcoole are between 180 – 400 sqm. Attention is drawn to the SIA accompanying the Wicklow Town-Rathnew LAP 2025 stated the following: *'As a guideline, the Council will in future aim to make provision for an average of 200m² multi-use community space per 1000 population, or where an identified need exists, which includes provision for sports and recreation activity.'*
- It is requested that Proposed Material Alteration No. 20 should be further altered to provide for greater flexibility, particularly in respect to the provision of open space. It is put forward that the open space requirements under SLO 5 are overly aspirational and have not had regard to the natural constraints on the lands, including steep topography and the ecological buffer, which make it impractical to provide the required playing fields without compromising the environmental and spatial functionality of the developable lands; Studio Glasu Landscape review assessed the feasibility of providing fully serviced playing pitches within the public open space in accordance with the Draft LPF objectives under SLO5. The study revealed that, due to the site's steep topography and the presence of the 25m riparian buffer zone along the southeast boundary, there is not enough flat areas within the lands to accommodate full-size, fully serviced pitches.
- It is requested that the text of SLO 5 should be altered as follows:

'SLO 5 - Bullford'

These SLO lands are located west of Kilcoole Main Street and measure c. 10ha and are zoned for 'TC – Town Centre', 'RN1 – New Residential Priority 1', 'RN2 – New Residential Priority 2' and 'OS2 – Natural Areas'. This area may be developed for a mix of uses including residential, community, commercial, retail / retail services and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre, adjoining residential areas and existing transport services.
- These lands shall be accessed only via Main Street at the Main Street – Sea Road junction, which shall be redesigned as a crossroads with traffic lights. Land measuring c. 0.6ha immediately west of this new junction shall be developed in accordance with the criteria set out in this LPF as 'Opportunity Site 7'.
- ~~No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until OP7 is fully developed and any community facilities provided therein are available for community use.~~
- A total area of c. 7.5ha is zoned for new housing development which shall be divided into at least two distinct character areas ~~estates either side of a central green area~~, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Community facilities shall be provided within the SLO area ~~in the first phase of development as and when required~~ to meet the needs of the new resident community of the area. In particular, the development shall include at a minimum a childcare facility ~~and an appropriate size community building determined by a Community Services Audit of c. 600sqm~~; in determining additional requirements for community facilities, a community services audit shall be carried out.
- Open space shall ~~generally~~ be provided ~~with each phase of development~~ as follows:
 - An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.
 - ~~A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc.~~
 - A minimum of 0.15ha per 100 houses for casual recreation space, parks etc.
 - A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
 - 500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc.
 - ~~The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, and MUGAs and playing pitches / courts which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.~~

82. Lidl Ireland GmbH

The submission supports Proposed Material Alteration No. 20 in respect of the proposal to amend SLO5 - Bullford boundary.

Opinion of Chief Executive

Richard and David Fox – The CE notes the submission, opposing the proposed material alteration. The CE does not support the proposed material alteration.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration.

Office of the Planning Regulator – The CE notes the submission of the OPR.

National Transport Authority – The CE notes the submission of the NTA, opposing the proposed material alteration.

Brookhampton Ltd. – Noting that the CE does not support the proposed material alteration, the CE is of the opinion that the requirement for infrastructure to be available for use upon the occupation of the first dwelling is entirely appropriate and crucial for the proper and sustainable planning of the lands in question and the wider settlement. It is entirely within the gift of the landowner to deliver housing (on part or all of the residential lands) 'in tandem' with the required infrastructure, noting that construction can commence alongside infrastructure, only occupation is restricted. In relation to commentary on the provision of sports facilities within SLO5, no material alteration has been made to this section and the submission states that this issue was previously raised in a submission to the draft LPF. As the CE has addressed this issue in her first report, it will not be considered again here. In relation to the size of community building required in the SLO, this figure was proposed by the Elected Members at the Council meeting of 6th October 2025. The CE does not support prescribing the exact size of the community building in advance of more detailed analysis of community space needs arising and considers that it would be more reasonable that the scale of any such community building be determined at the masterplan / planning application stage.

Lidl Ireland GmbH – The CE notes this submission, supporting the alteration of the SLO5 boundary.

This proposed alteration was proposed by the Elected Members at the Council meeting of 6th October 2025. The CE does not support the proposed residential element of this alteration (change from RN2 to RN1) as set out in her 1st Report, namely:

"...the residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- *The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- *Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

"In these regards, the request forthe alteration of phasing provisions as detailed in this submission would:

- *Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).*

"On the basis of the above, it is not recommended that changes be made to the Draft LPF."

The CE is not opposed to the additional alterations proposed with respect to the specification and phasing of community facilities and the public plaza.

Recommendation of Chief Executive

(A) Do **not** proceed to make **zoning change** under Proposed Material Alteration No. 20 (change from RN2 to RN1)

(B) Proceed to make **text changes** under Proposed Material Alteration No. 20 with the following **modifications**:

SLO 5 - Bullford

These SLO lands are located west of Kilcoole Main Street and measure c. 10ha and are zoned for 'TC – Town Centre', '**RN1 – New Residential Priority 1**', 'RN2 – New Residential Priority 2' and 'OS2 – Natural Areas'. This area may be developed for a mix of uses including residential, community, commercial, retail / retail services and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre, adjoining residential areas and existing transport services.

- These lands shall be accessed only via Main Street at the Main Street – Sea Road junction, which shall be redesigned as a crossroads with traffic lights. Land measuring c. 0.6ha immediately west of this new junction shall be developed in accordance with the criteria set out in this LPF as 'Opportunity Site 7'.
- **No dwelling units that may be permitted on foot of the RN1 RN2 zoning may be occupied until OP7 is fully developed and any community facilities provided therein are available for community use.**
- A total area of c. 7.5ha is zoned for new housing development which shall be divided into at least two distinct character areas / estates either side of a central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Community facilities shall be provided within the SLO area **in the first phase of development** to meet the needs of the new resident community of the area. In particular, the development shall include at a minimum a childcare facility **and a suitably sized community building of c. 600sqm**; in determining additional requirements for community facilities, a community services audit shall be carried out.
- Open space shall be provided with each phase of development as follows:
 - An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.
 - A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc.
 - A minimum of 0.15ha per 100 houses for casual recreation space, parks etc.
 - A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
 - 500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc.
 - The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.

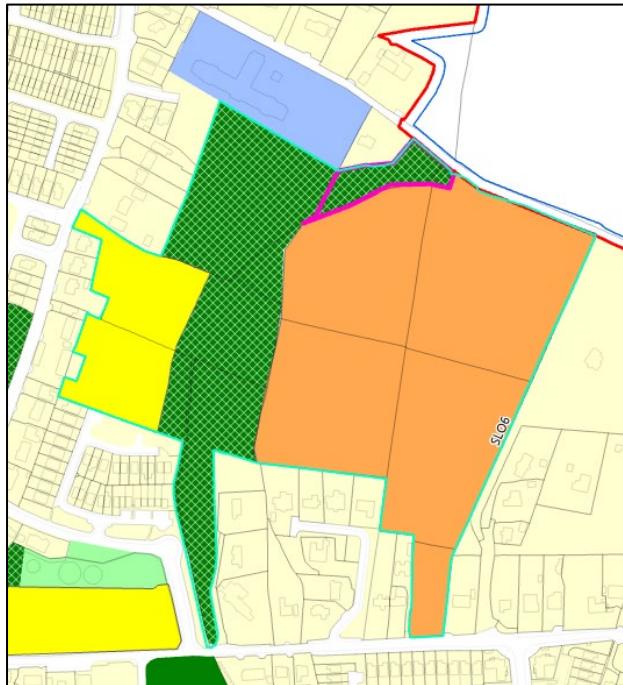
Proposed Material Alteration No. 21

Amend **MAP No. 1 (Land Use Zoning)** and **SLO 6 – BALLYDONAREA** as follows:

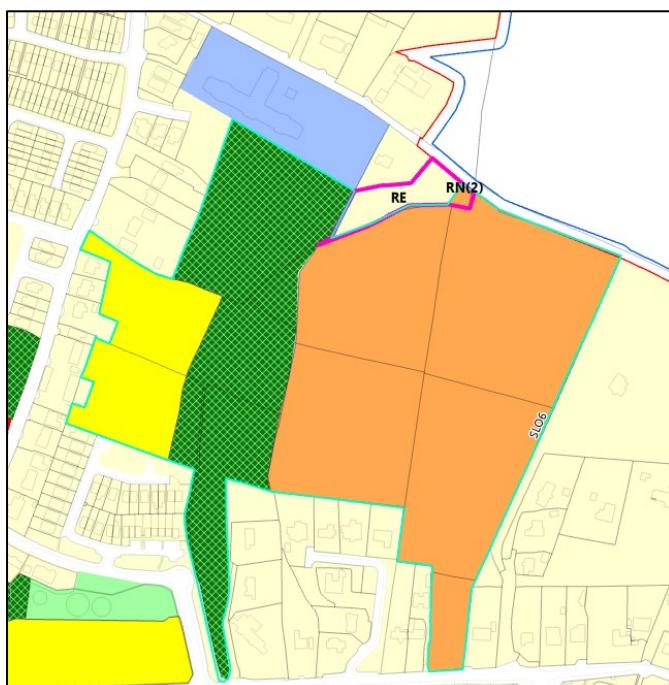
Amend SLO 6 and zoning of land at Ballydonarea as follows:

- From c. 0.35ha zoned OS2 'Natural Areas'
- To c. 0.31ha zoned RE 'Existing Residential' and c. 0.04ha zoned RN2 'New Residential – Priority 2'.

Change from:



Change to:



Amend text of SLO6 as follows:

SLO 6 – BALLYDONAREA

These SLO lands are located east of Lott Lane, Kilcoole in the townlands of Kilcoole and Ballydonarea and measure c. 12.7ha and are zoned for 'RN1 – New Residential Priority 1', 'RN2 – New Residential Priority 2' and '~~OS1 – Open Space~~'. OS2 'Natural Areas'. The Ballydonarea Loop / Strawberry Lane walk forms part of the northern boundary of this area.

This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre and existing transport services.
- A total area of c. ~~8.8ha~~ 8.9ha is zoned for new housing development which shall be divided into at least two distinct character areas / estates either side of the central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Lands zoned RN1 shall be accessed from Lott Lane only. Lands zoned RN2 shall be accessed from Sea Road only. Pedestrian and cycling connectivity shall be provided between the two RN zones across the green space, to Ballydonarea ~~Lane~~ Loop / Strawberry Lane walk to the north and Wellfield to the south;
- ~~New development within 25m of the Ballydonarea Loop / Strawberry Lane walk shall be so designed as to maintain and enhance the walk, preserving all natural features including watercourses, trees and mature hedgerows. No walls / fences will be permitted in this buffer zone, no structures shall back onto same and any structures shall be so designed to address and overlook the walk, and provide passive surveillance of same.~~
- Open space shall be provided as follows
 - A central green area shall be provided along the watercourse and encompassing a natural wooded area to the north-west of same, of not less than 3.6ha in area.
 - Within this space, a 'natural' undisturbed area of not less than 10m shall be maintained either side of the stream and existing trees and hedgerows shall be maintained. Cycleway / footpath crossings over / through the watercourses, or tree / hedgerow lines, shall be minimised to that absolutely necessary for access; any such stream crossing shall be via a clean span bridge that maintains its natural character.
 - Where following ecological assessment, it is found that there are areas within this OS zone suitable for re- development, said lands shall be laid out for recreational purposes, including suitable play spaces, walks, seating area etc
 - The open space shall link fully through from Sea Road to Ballydonarea Lane.
- Community facilities shall be provided within the SLO area to meet the needs of the new resident community of the area ~~in the first phase of development~~. In particular, the development shall include at a minimum a childcare facility; in determining additional requirements for community facilities, a community services audit shall be carried out.

Submissions to Proposed Material Alteration No. 21

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 21 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration. Submission No. 28 referred to PMA 21 however it is rather referring to PMA24.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

Opinion of Chief Executive

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration.

This proposed material alteration was proposed by the Elected Members at the Council Meeting of 6th October 2025. The CE does not support the proposed alteration for the reasons already set out in the 1st CE Report, namely:

"The condition and ecological value of the lands in SLO6, particularly the lands identified as OS have been carefully surveyed and evaluated as part of the LPF crafting process and it is clear that the OS areas proposed not only contain a natural watercourse corridor, but also a much wider area of high biodiversity value.

Significant dense hedgerows and trees lines cross through the area, including on the proposed residentially zoned lands. Where development is taking place rapidly in what was a peri-urban agricultural landscape, the relative ecological and amenity value of retained green areas is high. Not only are they important in the context green infrastructure but they can also contribute to flood management, and enable future restoration in line with the EU Nature Restoration Law, National Biodiversity Action Plan, and County Wicklow Development Plan policies. This aligns with the precautionary principle and national planning objectives promoting resilient, nature-positive development.

As urbanisation progresses, remaining semi-natural land parcels gain disproportionate value as stepping stones, buffers, and green infrastructure for biodiversity (National Biodiversity Action Plan 2023–2030). Even degraded areas (e.g., invasive species present) can serve as important reservoirs for future restoration and contribute to habitat connectivity under Article 10 of the Habitats Directive Existing hedgerows and watercourses serve as crucial ecological corridors, linking fragmented habitats across the wider landscape—functions explicitly recognised under Article 10 of the Habitats Directive (Ireland must maintain ecological connectivity). Protection of these features aligns with national pollinator strategies, climate resilience planning, and SuDS-integrated design policies. The OS2 zone as proposed in the draft LPF is therefore considered fully justified in the interest of protection and maintenance of habitats and biodiversity".

In particular, the lands in question would form a green corridor between the natural areas to the south and Ballydonarea Loop / Strawberry Lane walk, allowing for good ecological connectivity and the passage of fauna between these two natural areas. This corridor would likely be lost and become a barrier where the lands are zoned for residential development."

In the CE's preliminary response to this proposed material alteration at the Council meeting of 6th October 2025, a further modification was recommended. This further recommendation is still recommended by the CE, should the members proceed to make Proposed Material Alteration No. 21

Recommendation of Chief Executive

- (A) Do **not** proceed to make the zoning changes set out in Proposed Material Alteration No. 21
- (B) Proceed to make the text changes set out in Proposed Material Alteration No. 21 and further modify

Amend text of SLO6 as follows:

SLO 6 – BALLYDONAREA

These SLO lands are located east of Lott Lane, Kilcoole in the townlands of Kilcoole and Ballydonarea and measure c. 12.7ha and are zoned for 'RN1 – New Residential Priority 1', 'RN2 – New Residential Priority 2' and '~~OS1 – Open Space~~'. OS2 'Natural Areas'. The Ballydonarea Loop / Strawberry Lane walk forms part of the northern boundary of this area.

This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

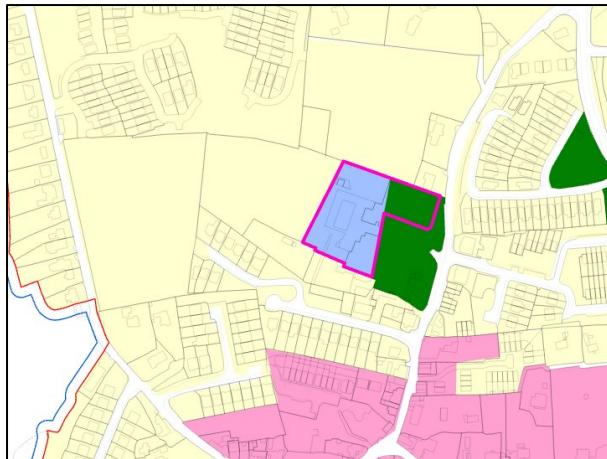
- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre and existing transport services.
- A total area of c. ~~8.8ha~~ **8.9ha** is zoned for new housing development which shall be divided into a least two distinct character areas / estates either side of the central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Lands zoned RN1 shall be accessed from Lott Lane only. Lands zoned RN2 shall be accessed from Sea Road only. Pedestrian and cycling connectivity shall be provided between the two RN zones across the green space, to Ballydonarea ~~Lane~~ Loop / Strawberry Lane walk to the north and Wellfield to the south;
- **New development within 25m of the Ballydonarea Loop / Strawberry Lane walk shall be so designed as to maintain and enhance the walk, preserving all natural features including watercourses, trees and mature hedgerows. No walls / fences will be permitted in this buffer zone, no structures shall back onto same and any structures shall be so designed to address and overlook the walk, and provide passive surveillance of same.**
- **Existing hedgerows and mature trees shall be preserved in the SLO area to the maximum extent possible and in particular shall ensure that ecological corridors between the central OS2 zone and Ballydonarea Loop/Strawberry Lane walk are maintained and enhanced.**
- Open space shall be provided as follows
 - A central green area shall be provided along the watercourse and encompassing a natural wooded area to the north-west of same, of not less than 3.6ha in area.
 - Within this space, a 'natural' undisturbed area of not less than 10m shall be maintained either side of the stream and existing trees and hedgerows shall be maintained. Cycleway / footpath crossings over / through the watercourses, or tree / hedgerow lines, shall be minimised to that absolutely necessary for access; any such stream crossing shall be via a clean span bridge that maintains its natural character.
 - Where following ecological assessment, it is found that there are areas within this OS zone suitable for re- development, said lands shall be laid out for recreational purposes, including suitable play spaces, walks, seating area etc
 - The open space shall link fully through from Sea Road to Ballydonarea Lane.
- Community facilities shall be provided within the SLO area to meet the needs of the new resident community of the area **in the first phase of development**. In particular, the development shall include at a minimum a childcare facility; in determining additional requirements for community facilities, a community services audit shall be carried out.

Amend **MAP NO. 1 LAND USE ZONING** and add new Specific Local Objective: **SLO 8 – CONVENT LANDS** and boundary as follows:

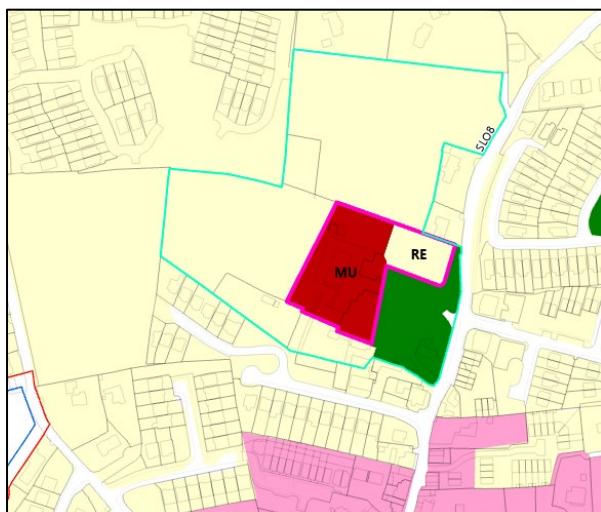
Amend zoning of land at Delgany 'Convent Lands' as follows:

- From c. 0.56ha zoned CE 'Community & Education' to MU 'Mixed Use'.
- To c. 0.18ha zoned OS1 'Open Space' to RE 'Existing Residential'.

Change from:



Change to:



Add new text for SLO8 as follows:

SLO 8 – Convent Lands

These SLO lands comprise the grounds and buildings of the former Delgany Carmelite Convent. The lands measure c. 3.9ha and are zoned RE 'Existing Residential', OS1 'Open Space' and MU 'Mixed Use'. Permission has been granted for a significant housing, open space, employment and community development on these lands, which commenced construction in 2024. In the event that this permitted development is not completed in accordance with this permission or changes are sought to the permitted development, any future development on these lands shall accord with the following requirements:

- *The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to Delgany / to existing transport services and to other new developments to the west;*
- *The protection of the setting and character of the former Convent (a protected structure) shall be upmost in any design approach;*
- *There may be no reduction in the quantum of internal community and employment space provided for in the redevelopment of the Convent buildings from that permitted under PRR 21/959;*
- *Any development shall provide for the highest quality public open space that shall relate to, and be open and accessible from Delgany village.*

Submissions to Proposed Material Alteration No. 22

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 22 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

18. Alice O'Donnell

The submission raises the following issues:

- The submission is in favour of PMA No. 22, as a means to ensure that the development on the former Carmelite convent site is in keeping with planning permission granted.
- It is put forward that the site is the only opportunity to create a heart for Delgany Village with some open space and it is crucial to safeguard community gain.
- The submitter indicates that the Paul Hogarth company public realm plan provides an excellent blueprint for Delgany Village.
-

24. Delgany Community Council

The submission raises the following issues:

- Delgany Community Council supports PMA No. 22.
- It is put forward that the PMA is in line with a submission made by Delgany Community Council as part of the plan consultation process.
- It is flagged in the submission that there is no playground in Delgany, which the granted planning permission provides for.
- It is put forward that the PMA is in line with National Objective 1 of the Children and Young Peoples Services Committee (active and healthy with positive physical and mental wellbeing).
- It is suggested that the Council should provide community infrastructure within its remit and work closely with other stakeholders and that there is a requirement for good quality indoor and outdoor community facilities to also boost the attractiveness of Delgany for those of us who live, work or invest here.

26. Carina Holmes

The submitter welcomes Amendment 22, which safeguards the community gain associated with Planning Permission 21/959. It is put forward that if completed as approved, this development will deliver a much-needed community centre, playground, open space, and retail units—essential elements to foster a village identity for Delgany and meet local needs .

53. Department of Education and Youth

The Department notes that the material alteration proposes to amend the zoning map for SLO 8 Convent Lands to amend 0.56ha zoned CE 'Community & Education' to MU 'Mixed Use'.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

Opinion of Chief Executive

Alice O'Donnell – The CE notes this submission, which supports PMA No. 22

Delgany Community Council – The CE notes this submission, which supports PMA No. 22

Carina Holmes – The CE notes this submission, which supports PMA No. 22

Department of Education and Youth – The CE notes that the submission notes proposed zoning changes under PMA 22.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

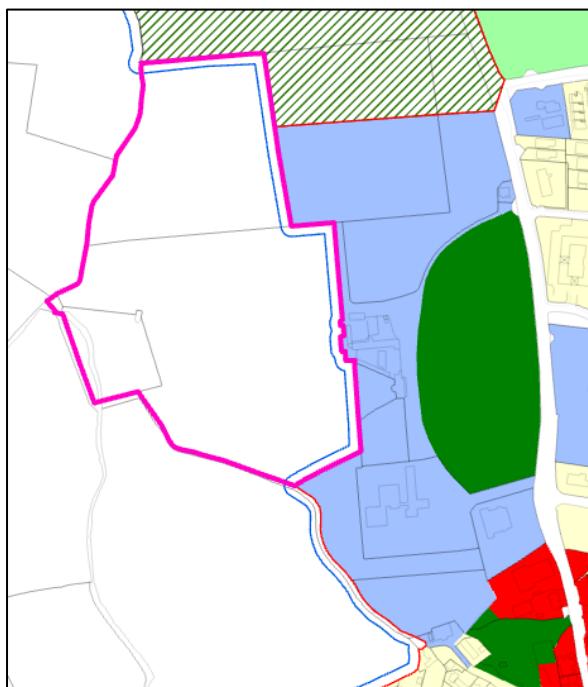
To proceed to make Proposed Material Alteration No. 22

Proposed Material Alteration No. 23A

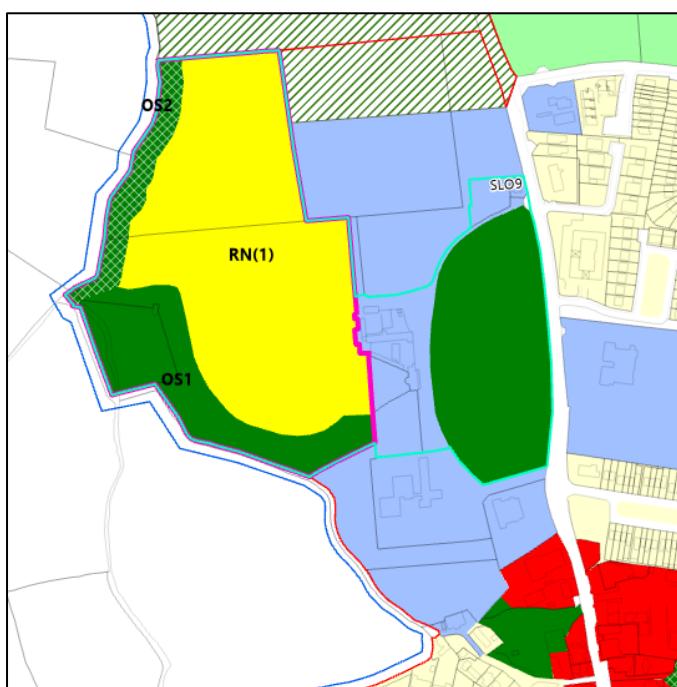
Amend **MAP NO. 1 LAND USE ZONING** and add new Specific Local Objective: **SLO 9 – DARRAGHVILLE** and SLO Map as follows:

Amend zoning of land at Kilcoole measuring c. 8ha from unzoned outside the settlement/LPF boundary to RN1 'New Residential – Priority 1' (c. 5.69ha), OS1 'Open Space (c. 1.7ha) and OS2 'Natural Areas' (c. 0.6ha).

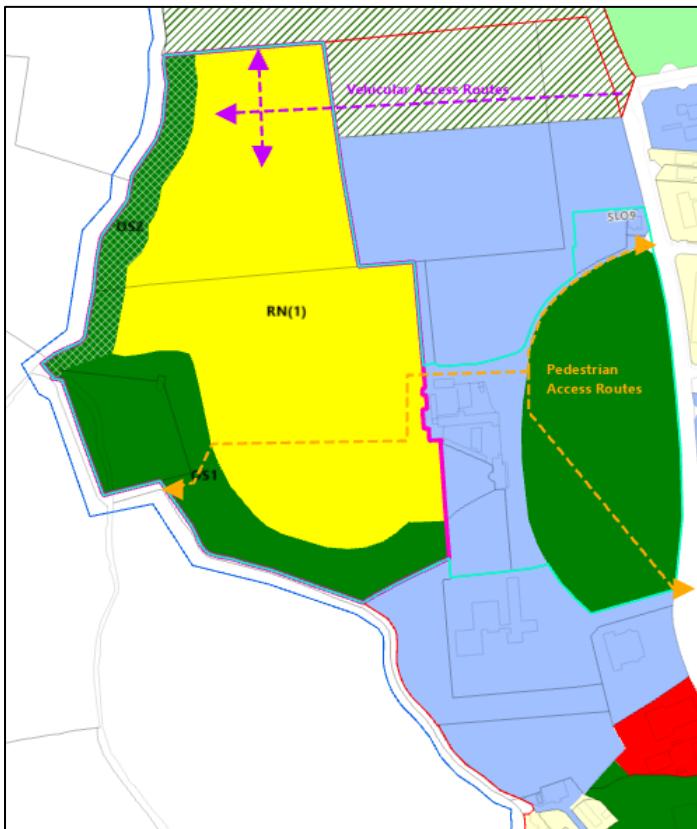
Change from:



Change to:



Add new SLO map showing the lands at SLO9 – Darraghville:



Add new text for SLO9 as follows:

SLO 9 – Darraghville

This SLO is located in the townland of Kilcoole and measures c. 11.8ha. This SLO is comprised of:

- c. 4.6ha zoned RN1 'New Residential – Priority 1'.
- c. 5.5ha zoned OS1 'Open Space'.
- c. 0.6ha zoned OS2 'Natural Areas'.
- c. 1ha zoned RE 'Existing Residential'.
- c. 0.2ha zoned CE 'Community & Education'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Vehicular Access to this SLO shall be via the under-construction roadway servicing the future location of St. Catherine's School. This vehicular access should serve new residential development in the SLO area and existing agricultural uses to the north.
- Primary pedestrian and cyclist **only** access shall be provided from Kilcoole Main Street/R761 through lands zoned OS1 'Open Space' to the east of Darraghville House, leading past the house through lands zoned RN1 'New Residential – Priority 1' and connecting to the mass path, alongside a range of other pedestrian and cyclist routes through the lands.

- Lands zoned OS1 'Open Space' to the east of Darraghville House should be laid out as a public park of a design and layout and including such facilities and support buildings to be agreed with the Planning Authority, but which shall include at a minimum:
 - A skatepark;
 - A playground suitable for a variety of ages of children;
 - A number of pedestrian access points along the public road.
 Further to heritage assessment, the existing roadside solid wall along this new park shall be lowered and appropriately designed railings installed reflecting the heritage of the Darraghville House.
- No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until the public park to the east of Darraghville House is fully developed suitable for community use (including necessary landscaping, layout, drainage, surfacing, lighting, access) and is available for community use;
- Lands zoned OS1 'Open Space' to the west of Darraghville House should be laid as for public amenity use, including the provision of walks and trails down to the walled garden. Within this zone all significant trees and hedgerows shall be retained and enhanced, and the walled garden shall be reused (and repaired if necessary) for community garden purposes;
- Lands zoned CE 'Community & Education' adjacent to and surrounding the gate lodge (which shall be retained and re-used) shall be developed for community uses to include at a minimum a childcare facility to service this SLO and wider area as deemed appropriate following the carrying out of a social infrastructure audit;
- A maximum of 50% of any dwelling units that may be permitted on foot of the RN1 zoning may be occupied before the full range of open space and community facilities set out within this SLO is fully developed and available for community use.
- A 25m buffer from the mass path shall be provided, and its rural character maintained.
- Insofar as is possible, hedgerows should be retained within the lands, with minimum openings for necessary vehicular/active travel crossings.
- The curtilage and setting of Darraghville House (a protected structure) shall be protected, including any features within the wider lands associated with the previous Demesne.

Submissions to Proposed Material Alteration No. 23A

28. Richard and David Fox

The submission raises the following issues:

- It is requested that the Councillors do not adopt any of the proposed alterations involving residential zoning in Kilcoole.
- It was highlighted at all stages that there was enough residentially zoned land in Kilcoole.
- The submitters question why has land that was zoned Strategic Land Bank (SLB) in the 2013 Local Area Plan been dezoned and different New Residential - priority 1 (RN1) sites been added in (only one of which was previously SLB)? PMA23A was never previously identified as suitable land in this plan or any other previous plan.
- The submitters query whether the Council now intending on not complying with the County Development Plan population projections
- They draw attention to the fact that it has been widely reported in the media that the Council is under pressure to zone more land for residential development. If this is the case, amendments should be done initially in conjunction with the planners.

- The submitters ask if the Council conducted a suitability assessment of the newly selected RN1 sites (SLO9, SLO10, SLO11) over existing zoned SLB sites.
- It is put forward that the site of PMA No. 23A is further from the town centre than the submitter's lands at Cooldross Middle, as indicated on a map included in the submission, and has historically not been part of previous Local Area Plans, or indeed has not been zoned SLB, as it was outside of the town boundary.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

66. Office of the Planning Regulator

The Office notes that the proposed material alterations include additional Residential Phase 1 zonings in Kilcoole, which are less favourably located in terms of access to public transport, services, and amenities than Greystones. This approach risks pushing much needed housing to more peripheral locations, which are farther from existing and future services and amenities and are more car-dependent with consequent implications for carbon emission and targets under the Climate Action Plan 2025.

71. National Transport Authority

Material Alterations 20, 23A, 24, 25 & 32

The NTA put forward that the above-mentioned alterations propose the application of the 'New Residential Priority 1' zoning objective to various greenfield sites on the edge of the established built-up-area of Kilcoole, on land either zoned for other purposes, primarily 'New Residential Priority 2', or on land not zoned and beyond the current town boundary. It notes, as per the Chief Executives Report on the Draft LPF, that the zoning of land for residential purposes under the Draft LPF has followed a robust assessment of the Core Strategy requirements and that additional zoned land beyond that in the Draft would be surplus to requirements at this time. Based on the above and the location of the subject lands, the NTA is concerned that these proposed changes would not be aligned with local, regional and national objectives that seek to provide for sequential and compact forms of development, including Measure Plan 4 of the Transport Strategy which states the following:

"the NTA will support and prioritise development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services."

The NTA considers that the application of the 'New Residential Priority 1' zoning to an abundance of lands on the edge of the established built-up area, could facilitate an unsustainable form of development and lead to high levels of car dependency in the subject areas, particularly in advance of the LTP being prepared. Given that there are more sequentially appropriate residentially zoned lands already identified as part of the Draft LPF, it is submitted that these lands, that are largely unserved by active travel infrastructure, should remain under their current zoning designations at this time.

NTA Recommendation: The NTA recommend that the proposed zonings under MAs 20, 23A, 24, 25 & 32 not be brought forward at this time.

76. Brookhampton Ltd.

The submission raises the following issues:

- The submission supports PMA No. 23A.
- It is requested that Proposed Material Alteration No. 23A, which introduces a new SLO (proposed SLO 9 – Darraghville) on lands immediately contiguous to the northern portion of [the submitter's] lands which were designated as SLB under the 2013 LAP, be amended to provide for connections southward from proposed SLO 9 to the previous SLB lands, and SLO 5. It is put forward that this would ensure the coordinated delivery of residential development across the sequential lands to the west of Kilcoole Main Street.
- In this regard, it is suggested that establishing southward vehicular, pedestrian and cyclist connections would enhance active travel opportunities and strengthen connectivity to the proposed linear park located on lands zoned for open space to the west.
- It is requested that the text of SLO9 be further modified as follows:

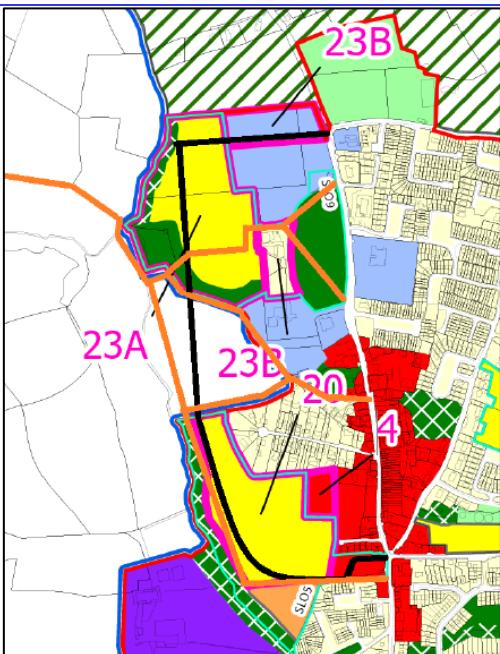
'SLO 9 – Darraghville'

This SLO is located in the townland of Kilcoole and measures c. 11.8ha. This SLO is comprised of:

- *c. 4.6ha zoned RN1 'New Residential – Priority 1'.*
- *c. 5.5ha zoned OS1 'Open Space'.*
- *c. 0.6ha zoned OS2 'Natural Areas'.*
- *c. 1ha zoned RE 'Existing Residential'.*
- *c. 0.2ha zoned CE 'Community & Education'.*

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- *Vehicular Access to this SLO shall be via the under-construction roadway servicing the future location of St. Catherine's School. This vehicular access should serve new residential development in the SLO area and existing agricultural uses to the north. **Pedestrian, cycling & vehicular connections to the adjoining lands to the south should be provided.***
- *Primary pedestrian and cyclist **only** access shall be provided from Kilcoole Main Street/R761 through lands zoned OS1 'Open Space' to the east of Darraghville House, leading past the house through lands zoned RN1 'New Residential – Priority 1' and connecting to the mass path, alongside a range of other pedestrian and cyclist routes through the lands.*
- The submission maps indicative connections as follows (proposed road network in black and pedestrian/cycle network in orange):



83. Department of Housing, Local Government and Heritage

The Department has no objection to the proposed re-zoning but has the following observations and recommendations;

1. The zoning text refers to Darraghville (that being the original name of the property), however in the Record of Protected Structures (RPS) this property and associated lands are referred to as Kilcoole Holy Faith Convent County House, RPS ID: 13-08. To avoid confusion it is recommended that SLO 9 contains a brief explanation clarifying that Darraghville/Darraghville House and Kilcoole Holy Faith Convent County House, RPS Reference Number 13-08 are in fact the same property.
2. The Department recommends that the following text is inserted at the beginning of SLO 9:

'The subject lands are located within and adjacent to the curtilage of a Protected Structure, RPS Reference Number 13-08, Kilcoole Holy Faith Convent County House (originally named Darraghville) in Wicklow County Development Plan 2022-2028. In responding to the land use zonings set out in SLO 9, regard will be had to the following:

- Policies COP 8.13 – 8.17, CPO 8.25 and 8.26, Chapter 8 and Development Design Standards 9.9.3 in Chapter 12 of Wicklow County Development Plan 2022-2028.
- Ministerial Guidelines, Architectural Heritage Protection: Guidelines for Planning Authorities, in particular Chapter 13, Curtilage and Attendant Grounds.

A Historic Landscape Assessment shall be prepared in advance of any proposed redevelopment of the subject lands. This will facilitate a detailed assessment of the significance of the historic demesne, the protection of any associated features and which will enable the formulation of high quality responsive design solutions in relation to the residential and amenity land uses set out.

The Department recommends that the following text is removed from SLO 9 as it is catered for in the above and will avoid unnecessary repetition:

~~The curtilage and setting of Darraghville House (a protected structure) shall be protected, including any features within the wider lands associated with the previous Demesne.~~

3. The Department has no objection to the proposed residential zoning but does however recommend a buffer/set back from the shared rear masonry boundary wall with Darraghville House. This can be established either through the extension of the open space designation along this boundary or by including the requirement for a landscaped buffer/set back from the shared boundary within the SLO 9 text.
4. The Department supports the zoning of c 5.5ha of land as OS1 Open Space as this corresponds with the presence of important demesne landscape features including perimeter belt planting, a walled garden and an expansive garden to the front of Darraghville House. However, it is noted that the current proposed use for the land to the east (front) of Darraghville House, is for a public park which is to include at a minimum; a skatepark, playground, access points to the main road, reduction of demesne walls and introduction of fencing, railings and associated works.

The open space to the front of Darraghville House is an integral demesne feature that survives intact and is intrinsically linked to the character and appreciation of the Protected Structure. The 1st Edition Ordnance Survey map clearly indicates by the presence of a shaded area, that feature forms part of the demesne of Darraghville House. This feature was specifically designed and landscaped in such a way that the front elevation of the house has an expansive view over a wide green open space intercepted by strategic planting to provide a sense of a 'naturalistic' landscape.

The approach avenues curve along the edges of the greenspace which provides a sweeping approach to and incorporates planned views and vistas of the principal residence. The introduction of a public park, with playgrounds, skateparks and all the necessary infrastructure to support and secure these amenities in a public space would significantly alter the setting of the Protected Structure and be contrary to Ministerial guidelines and the Local Authority's own policies and objectives relating to architectural heritage.

The Department does however consider that a reconfiguration of the proposed uses specified within the open space zoning to the east and west of Darraghville House would generate a far more optimal solution in meeting the Local Authority's policies and Ministerial guidelines in respect of protected structures and their curtilage while still providing all the desired amenities for these spaces.

It is recommended that consideration is given to relocating the proposed playground and skatepark from the east (front) of Darraghville House to the walled garden to the west of Darraghville House. This would have a number of positive benefits;

- The walled garden provides a natural designated safe and defined space for such activities, particularly ones that are facilitating children and adolescents.
- It is located in closer proximity to the land that is zoned for residential development, which has the added benefits of convenience and passive security.
- It ties in with the current proposal to provide walks and trails to the designated open space to the west of Darraghville House, combining compatible actives in a manageable geographical area thereby improving the overall amenity benefits for the public.
- The walled garden can be secured in the evenings or times designated by the Local Authority addressing any potential issues of anti-social behaviour which could have a potential negative impact on existing and future residents.
- For what pertains to the skatepark, the traditional concrete model of a skatepark is quite impactful on any landscape. Many Authorities have moved to an alternative model of a multi-functional open space that integrates skateable elements (sometimes referred to as skate plazas or skateable amenities), which are a more favoured approach in sensitive settings. The Planning Authority may alternatively at their own discretion remove this specific element from SLO 9.

In relation to the land to the east (front) of Darraghville House, it is considered that this can still provide a very attractive public open space. However, given that this is an integral part of the curtilage of the Protected Structure,

a low impact design approach should be adopted at this location. The following design parameters should be considered;

- The introduction of paths with a suitable surface finish
- Recessed and/or low level lighting.
- Clustered seating areas.
- A community garden can be considered in this area. The location, positioning and form would need careful consideration. Such a garden would be restricted to raised beds/boxes/planter. Polytunnels/sheds or similar such structures would not be suited to this location.
- The historic treeline to the front elevation of the site should be retained. Modern planting could be considered for removal to enable views into the green area and enable a level of passive observation.

In reconfiguring the uses within the open space zoning (OS1) as outlined in the foregoing this will enable the delivery of high-quality public amenities that successfully integrate and respect the historic character of the Protected Structure and its curtilage.

Opinion of Chief Executive

Richard and David Fox – The CE notes the submission of Richard and David Fox, opposing PMA No. 23A. The CE does not support this PMA.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration.

Office of the Planning Regulator – The CE notes the submission of the OPR.

NTA - The CE notes the submission of the NTA, opposing PMA No. 23A. The CE does not support this PMA.

Brookhampton Ltd. – The CE notes the submission of Brookhampton Ltd., which is in favour of PMA No. 23A. The submission requests the further modification of SLO9 to service lands to the south, including SLO5 and intervening unzoned lands in the same ownership. The servicing of the unzoned lands, were they to be zoned in the future, would be within the gift of the submitter through SLO5 in the same ownership. Furthermore, the indicative vehicular route provided in the submission is considered to be highly injurious to the setting of the Darraghville demesne and the setting of Darraghville House (a protected structure), noting the following: the scale of road that would be required at this location, the severance of the walled garden from Darraghville House, the crossing of the Kilcoole mass path at a particularly sensitive location in terms of topography and landscape, and the submission from the Department of Housing, Local Government, and Heritage. Active travel links could be provided via the mass path in any future development of the intervening lands.

DHLGH – The CE notes the submission of the DHLGH, which in general does not oppose the zoning changes included in PMA No. 23A. The requests and commentary provided by the Department will be addressed using the numbering provided in the submission, as follows:

1. Noting that the CE does not support PMA No. 23A, the CE is amenable to recommending further modification in relation to clarification of the name of Darraghville House/Kilcoole Holy Faith Convent Country House should the members decide to proceed to make this alteration.
2. The CE is amenable to recommending further modification in relation to Historic Landscape Assessment. While the CE agrees with the intent of other suggested wording in this section, all objectives of the Wicklow County Development Plan 2022-2028 apply in the LPF area, and it is not considered necessary to restate these objectives here. Furthermore, Chapter 8 of the Wicklow County Development Plan makes multiple references to the Architectural Heritage Protection Guidelines mentioned in the submission.
3. It is not possible to alter the boundary of additional zonings for any use as a further modification. However, the CE is amenable to including text reference to the rear masonry wall in this regard.

4. The CE accepts the submission of the DHLGH in relation to the uses of different areas of open space within the SLO. On this basis, the CE is amenable to swapping the locations of community gardens with the skatepark and playground. Some design considerations provided in this section are considered too specific for the text of an SLO; however, these can be addressed at development management stage.

Overall assessment

The CE does not support the proposed residential element of the proposed alteration for the reasons already set out in the CE Report, namely:

"The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- *The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- *Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

"The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- *Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)*
- *Conflict with the assessment of Kilcoole 'Area 3' and the resultant impact on future development options as set out in Section A.3.2 of the draft LPF Written Statement.*
- *Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.*

"As the additional residential zonings are not supported, the requested additional OS1 'Open Space' zonings are not considered necessary".

The CE is not however opposed to the additional OS zoning proposed or the additional text with regard to the delivery of additional open spaces and community facilities.

Recommendation of Chief Executive

Do **not** proceed to make Proposed Material Alteration No. 23A

Should the Elected Members decide to proceed with Proposed Material Alteration No. 23A, the following modifications are recommended:

SLO 9 – Darraghville

This SLO is located in the townland of Kilcoole and measures c. 11.8ha. This SLO is comprised of:

- c. 4.6ha zoned RN1 'New Residential – Priority 1'.
- c. 5.5ha zoned OS1 'Open Space'.
- c. 0.6ha zoned OS2 'Natural Areas'.
- c. 1ha zoned RE 'Existing Residential'.
- c. 0.2ha zoned CE 'Community & Education'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Vehicular Access to this SLO shall be via the under-construction roadway servicing the future location of St. Catherine's School. This vehicular access should serve new residential development in the SLO area and existing agricultural uses to the north,
- Primary pedestrian and cyclist **only** access shall be provided from Kilcoole Main Street/R761 through lands zoned OS1 'Open Space' to the east of Darraghville House, leading past the house through lands zoned RN1 'New Residential – Priority 1' and connecting to the mass path, alongside a range of other pedestrian and cyclist routes through the lands.
- Lands zoned OS1 'Open Space' to the east of Darraghville House should be laid out as a public park of a design and layout and including such facilities and support buildings to be agreed with the Planning Authority, but which shall include at a minimum:
 - **A skatepark;**
 - **A playground suitable for a variety of ages of children;**
 - A number of pedestrian access points along the public road.
 - **Clustered seating areas.**
 - **A sensitively located community garden (that shall not include polytunnels/sheds).**
 - **The retention of the historic tree line to the front elevation of the house.**

Further to heritage assessment, the existing roadside solid wall along this new park shall be lowered and appropriately designed railings installed reflecting the heritage of the Darraghville House.

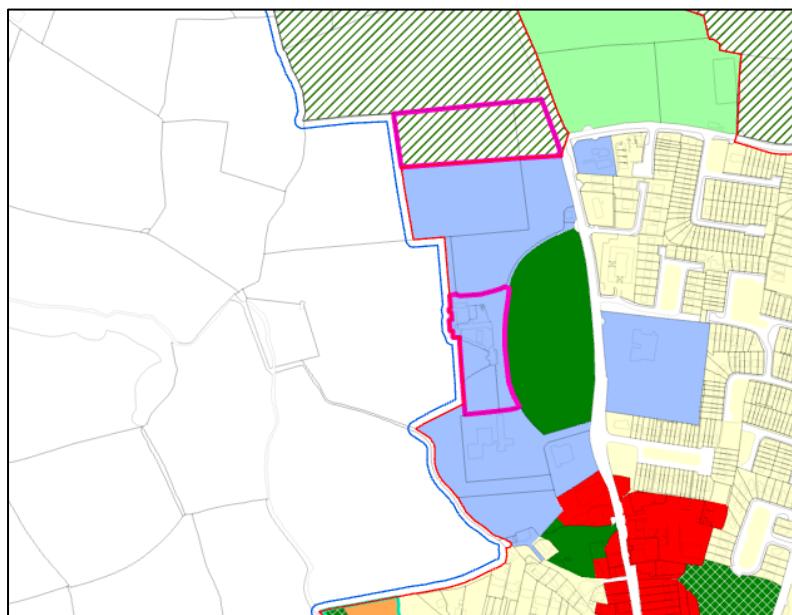
- No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until the public park to the east of Darraghville House is fully developed suitable for community use (including necessary landscaping, layout, drainage, surfacing, lighting, access) and is available for community use;
- Lands zoned OS1 'Open Space' to the west of Darraghville House should be laid as for public amenity use, including the provision of walks and trails down to the walled garden. Within this zone all significant trees and hedgerows shall be retained and enhanced, and the walled garden shall be reused (and repaired if necessary) **for the following: community garden purposes;**
 - **A skatepark;**
 - **A playground suitable for a variety of ages of children;**
- Lands zoned CE 'Community & Education' adjacent to and surrounding the gate lodge (which shall be retained and re-used) shall be developed for community uses to include at a minimum a childcare facility to service this SLO and wider area as deemed appropriate following the carrying out of a social infrastructure audit;
- A maximum of 50% of any dwelling units that may be permitted on foot of the RN1 zoning may be occupied before the full range of open space and community facilities set out within this SLO is fully developed and available for community use.
- A 25m buffer from the mass path shall be provided, and its rural character maintained.
- Insofar as is possible, hedgerows should be retained within the lands, with minimum openings for necessary vehicular/active travel crossings.
- The curtilage and setting of Darraghville House/**Kilcoole Holy Faith Convent Country House** (a protected structure, **RPS Reference Number 13-08**) shall be protected, including any features within the wider lands associated with the previous Demesne, **with an appropriate buffer provided to the shared rear masonry wall of the house. In this regard, a Historic Landscape Assessment shall be prepared in advance of any proposed redevelopment of the subject lands.**

Proposed Material Alteration No. 23B

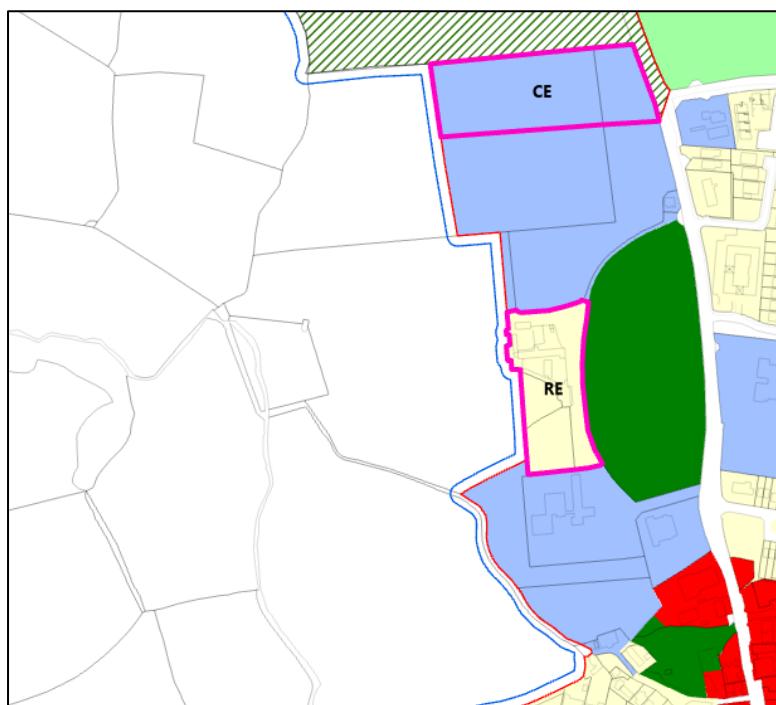
Amend **MAP NO. 1 LAND USE ZONING** at **Darraghville North** as follows:

Amend zoning of land at Kilcoole measuring c. 1.5ha from AG 'Agriculture' to CE 'Community and Education', and c. 1.0ha of land from CE 'Community and Education' to RE 'Existing Residential'.

Change from:



Change to:



Submissions to Proposed Material Alteration No. 23B

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 23B on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

53. Department of Education & Youth

The department notes that the material alteration proposes to amend the zoning map for Darraghville North to amend c. 1.5ha from AG 'Agriculture' to CE 'Community and Education', and c. 1.0ha of land from CE 'Community and Education' to RE 'Existing Residential'. This site is the future location for St. Catherine's Special School.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

Opinion of Chief Executive

Department of Education & Youth – The CE notes the submission of the Department, which does not object to the proposed alteration.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 23B

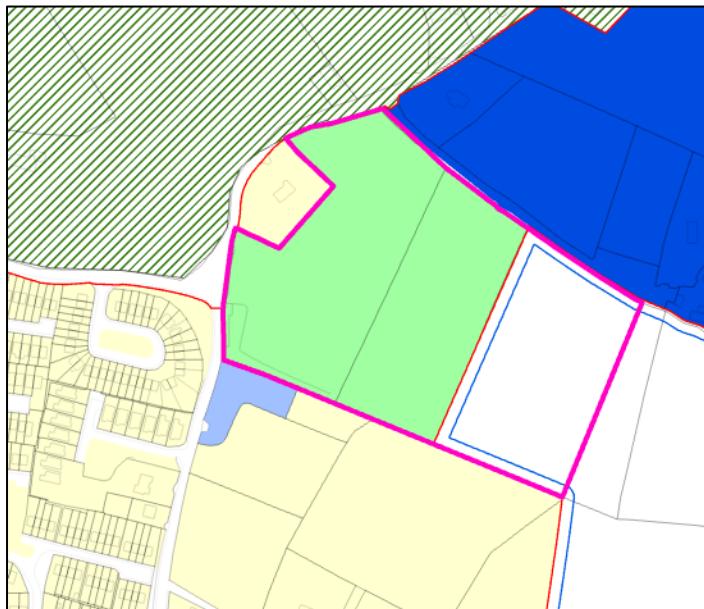
Proposed Material Alteration No. 24

Amend **MAP NO. 1 LAND USE ZONING** and add new Specific Local Objective: **SLO 10 – LOTT LANE** and boundary as follows:

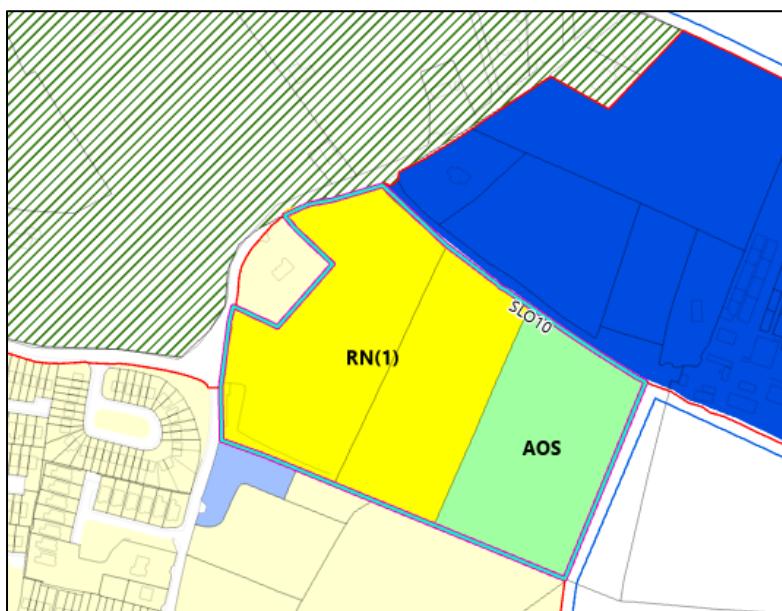
Amend zoning of land at Ballydonarea measuring c. 6.6ha

- From AOS 'Active Open Space' (c. 4.4ha) and unzoned outside the LPF boundary (c. 2.2ha)
- To RN1 'New Residential – Priority 1' (c. 4.4ha) and AOS 'Active Open Space' (c. 2.2ha).

Change from:



Change to:



Add new text for SLO10 as follows:

SLO 10 – Lott Lane

This SLO is located in the townland of Ballydonarea and measures c. 6.6ha. This SLO is comprised of:

- c. 4.4ha zoned 'RN1 New Residential – Priority 1'.
- c. 2.2ha zoned AOS 'Active Open Space'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Vehicular Access to this SLO shall be via Lott Lane. A link street should be provided to allow access to AOS lands within the SLO for vehicular traffic, without the need to traverse residential local streets.
- Development should allow for pedestrian and cyclist only access from the Lott Lane housing development to the immediate south, to allow for ease of access to Active Open Space facilities within the SLO.
- Any new residential development proposals for the RN1 lands shall be accompanied by proposals for the concurrent development of community sports facility on lands zoned AOS measuring not less than 2.2ha, of a design and layout and including such facilities and support buildings to be agreed with the Planning Authority, but which shall include at a minimum:
 - Fully equipped playing pitches of a layout to be agreed with the Planning Authority.
 - A clubhouse/changing facility.
 - Adequate lighting and drainage to serve the facility.
- No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until this community sports facility is fully developed suitable for community sports use (including necessary buildings/structures, layout, drainage, surfacing, lighting, access and car parking) and is available for community use.

Submissions to Proposed Material Alteration No. 24

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 24 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

28. Richard and David Fox

The submission raises the following issues:

- It is requested that the Councillors do not adopt any of the proposed alterations involving residential zoning in Kilcoole.
- It was highlighted at all stages that there was enough residentially zoned land in Kilcoole.
- The submitters question why has land that was zoned Strategic Land Bank (SLB) in the 2013 Local Area Plan been de-zoned and different New Residential - priority 1 (RN1) sites been added in (only one of which was previously SLB)?
- The submitters query whether the Council now intending on not complying with the County Development Plan population projections
- They draw attention to the fact that it has been widely reported in the media that the Council is under pressure to zone more land for residential development. If this is the case, amendments should be done initially in conjunction with the planners.
- It is put forward that this site is further from the town centre than the submitter's lands in Cooldross Middle, as indicated on a map provided in the submission, and has historically not been part of previous Local Area Plans, or indeed has not been zoned SLB as it was outside of the town boundary.

- The submitters ask if the Council conducted a suitability assessment of the newly selected RN1 sites (SLO9, SLO10, SLO11) over existing zoned SLB sites.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

66. Office of the Planning Regulator

The Office notes that the proposed material alterations include additional Residential Phase 1 zonings in Kilcoole, which are less favourably located in terms of access to public transport, services, and amenities than Greystones. This approach risks pushing much needed housing to more peripheral locations, which are farther from existing and future services and amenities, and are more car-dependent with consequent implications for carbon emission and targets under the Climate Action Plan 2025.

71. National Transport Authority

Material Alterations 20, 23A, 24, 25 & 32

The NTA points out that the above-mentioned alterations propose the application of the 'New Residential Priority 1' zoning objective to various greenfield sites on the edge of the established built-up-area of Kilcoole, on land either zoned for other purposes, primarily 'New Residential Priority 2', or on land not zoned and beyond the current town boundary. It notes, as per the Chief Executives Report on the Draft LPF, that the zoning of land for residential purposes under the Draft LPF has followed a robust assessment of the Core Strategy requirements and that additional zoned land beyond that in the Draft would be surplus to requirements at this time. Based on the above and the location of the subject lands, the NTA is concerned that these proposed changes would not be aligned with local, regional and national objectives that seek to provide for sequential and compact forms of development, including Measure Plan 4 of the Transport Strategy which states the following:

"the NTA will support and prioritise development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services."

The NTA considers that the application of the 'New Residential Priority 1' zoning to an abundance of lands on the edge of the established built-up area, could facilitate an unsustainable form of development and lead to high levels of car dependency in the subject areas, particularly in advance of the LTP being prepared. Given that there are more sequentially appropriate residentially zoned lands already identified as part of the Draft LPF, it is submitted that these lands, that are largely unserved by active travel infrastructure, should remain under their current zoning designations at this time.

NTA Recommendation: The NTA recommend that the proposed zonings under MAs 20, 23A, 24, 25 & 32 not be brought forward at this time.

Opinion of Chief Executive

Richard and David Fox – The CE notes the submission of Richard and David Fox, opposing PMA No. 24. The CE does not support this PMA.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration.

Office of the Planning Regulator – The CE notes the submission of the OPR.

NTA - The CE notes the submission of the NTA, opposing PMA No. 24. The CE does not support this PMA.

This proposed alteration was proposed by the Elected Members at the council meeting of 6th October 2025. The CE does not support the proposed alteration for the reasons already set out in the CE Report, namely:

'The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- *The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- *Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

The settlement/ LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- *Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).*
- *Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.*
- *The requested rezoning would result in a reduction in AOS zoning. These are essential zonings that are necessary to support the sustainable development of the LPF area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.*

It is noted that there is a dwelling currently under construction on the lands, to the immediate south and adjoining the existing dwelling on the lands. However, this is already located within the lands zoned RE 'Existing Residential' in the draft LPF.'

Recommendation of Chief Executive

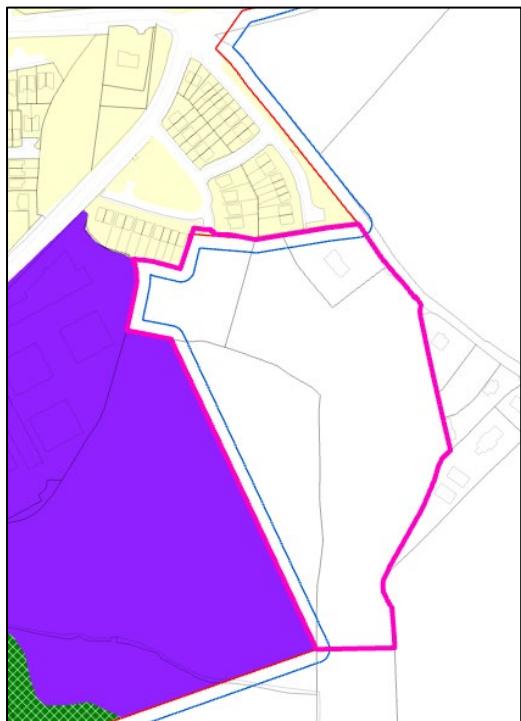
Do **not** proceed to make Proposed Material Alteration No. 24

Proposed Material Alteration No. 25

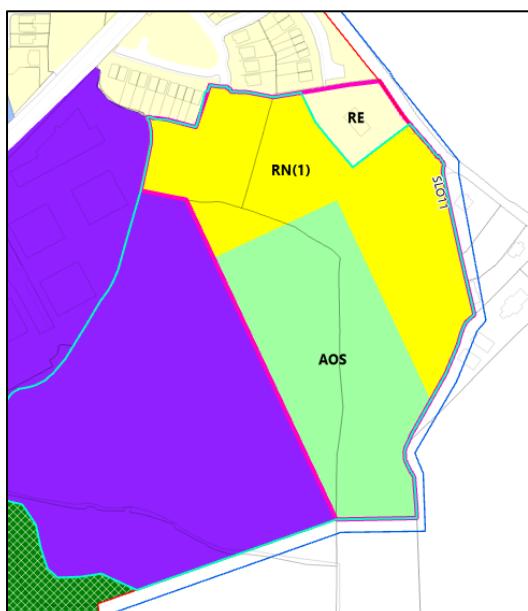
Amend **MAP NO. 1 LAND USE ZONING** and add new Specific Local Objective: **SLO 11 – BALLYCRONE** and boundary as follows:

Amend zoning of land at Ballycrone measuring c. 4.6ha from unzoned outside the settlement/LPF boundary to RE 'Existing Residential' (c. 0.3ha), RN1 'New Residential – Priority 1' (c. 2.3ha) and AOS 'Active Open Space' (c. 2ha).

Change from:



Change to:



Add new text for SLO11 as follows:

SLO 11 – Ballycrone

This SLO is located in the townland of Ballycrone and measures c. 8.5ha. This SLO is comprised of:

- c. 2.3ha zoned RN1 'New Residential – Priority 1'.
- c. 2ha zoned AOS 'Active Open Space'.
- c. 4.2ha zoned E 'Employment'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Vehicular Access to the AOS 'Active Open Space' lands shall be via employment lands to the west. Vehicular access to these AOS 'Active Open Space' lands shall strictly not be via residential zones. Design measures shall be integrated in the development of RN1 'New Residential – Priority 1' lands to ensure no access, including drop offs or temporary parking, for the AOS lands. Any access via Sherlock's Lane shall be for pedestrians/cyclists only and development shall maintain the rural character of the lane.
- Any new residential development proposals for the RN1 lands shall be accompanied by proposals for the concurrent development of community sports facility on lands zoned AOS measuring not less than 2ha, of a design and layout and including such facilities and support buildings to be agreed with the Planning Authority, but which shall include at a minimum:
 - 1 No. dog park of at least 0.2ha,
 - 1 No. full-size Gaelic football pitch,
 - 2 No. fully equipped full size outdoor Basketball Courts of porous asphalt surface (28m x 15m).
 - 2 No. fully equipped 3v3 outdoor Basketball Courts of porous asphalt surface (15m x 11m).
 - 1 No. building suitable for use by a boxing club.

No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until this community sports facility is fully developed suitable for community sports use (including necessary buildings/structures, layout, drainage, surfacing, lighting, access and car parking) and is available for community use.

Submissions to Proposed Material Alteration No. 25

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 25 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

28. Richard and David Fox

The submission raises the following issues:

- It is requested that the Councillors do not adopt any of the proposed alterations involving residential zoning in Kilcoole.
- It was highlighted at all stages that there was enough residentially zoned land in Kilcoole.
- The submitters question why has land that was zoned Strategic Land Bank (SLB) in the 2013 Local Area Plan been de-zoned and different New Residential - priority 1 (RN1) sites been added in (only one of which was previously SLB)?
- The submitters query whether the Council now intending on not complying with the County Development Plan population projections
- They draw attention to the fact that it has been widely reported in the media that the Council is under pressure to zone more land for residential development. If this is the case, amendments should be done initially in conjunction with the planners.

- The submitters query whether the Council has conducted a suitability assessment of the newly selected RN1 sites (SLO9, SLO10, SLO11) over existing zoned SLB sites?
- They put forward that there are serious access issues with relation to SLO11 and it cannot be deemed suitable for development; it is suggested that the lands require 3 points of access to complete:
- They point out that Sherlock's lane is a private lane, the vast majority of which is in the submitter's ownership. It is indicated that the increased use of this land has not been agreed with the landholder and would require significant safety improvements.

47. Ballycrone Manor Residents

The submission raises the following issues:

- The submitters put forward that PMA 25 is inconsistent with the Core Strategy and Statutory Guidance, as concluded by the Chief Executive in her 1st report;
- That PMA25 is a departure from sequential, compact growth and sustainable movement: extends the settlement boundary into currently unzoned countryside instead of serviced and serviceable infill/brownfield lands that integrate with high capacity public transport. The location risks car-dependant growth, undermining climate and modal shift targets.
- **With respect to Infrastructure and Social Facilities**, it is put forward that frontloading high-cost community infrastructure can stall or fragment delivery; long term maintenance and management is not evidenced; routing through employment facilities may constrain practical use and inclusivity of the facilities.
- **With respect to Education, Healthcare, and Childcare capacity**, it is put forward that no up-to-date evidence-based assessment demonstrating that local schools, GP practises and childcare can absorb the additional population.
- **With respect to Environmental and Rural Character Impacts**, it is put forward that PMA 25 erodes a long-standing rural interface, diminishing local biodiversity corridors. New hard standing, car parks, lighting, etc. must be considered cumulatively. Risk of run-off impacts downstream without site specific flood risk assessment and SuDS strategy. Light/noise impacts can affect residential amenity/pollinators/wildlife. CE Report previously cited environmental protection/sustainable movement principles as reasons not to rezone.
- **With respect to Internal Layout and Access Concerns**, it is put forward that construction impacts, rat-running and safety concerns through Ballycrone Manor with a larger residential extension and that prohibition of vehicular Access to AOS may push parking demand and drop-offs into surrounding streets.
- **With respect to Employment Zoning Ambiguity and Land Use Conflicts** it is put forward that the proposed rezoning does not list employment zoning, but SLO11 lists 4.2ha employment, that if employment is not actually included, the sports facility access strategy becomes speculative. The CE has concluded that there was no necessity to expand E lands given undeveloped capacity.
- **With respect to Process Integrity and Transparency**, it is put forward that the CE recommended against the rezoning, PMA 25 introduces RN1 at this location without evidence-based rationale.
- It is suggested that reasonable alternatives exist; that there should be a focus on compact serviced infill/brownfield sites, phased residential delivery where social/physical infrastructure demonstrably exists or have funding to deliver; application of sequential and publish core strategy alignment test if additional housing is essential.
- The submission specifically requests that a masterplan be submitted before any planning application with phased delivery with infrastructure first, a detailed mobility plan, comprehensive environmental assessments/FRA, buffer zones. Tie any residential occupation to completion of AOS facilities **and** demonstrable capacity in schools, healthcare, and childcare.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

66. Office of the Planning Regulator

The Office notes that the proposed material alterations include additional Residential Phase 1 zonings in Kilcoole, which are less favourably located in terms of access to public transport, services, and amenities than Greystones. This approach risks pushing much needed housing to more peripheral locations, which are farther from existing and future services and amenities, and are more car-dependent with consequent implications for carbon emission and targets under the Climate Action Plan 2025.

71. National Transport Authority

Material Alterations 20, 23A, 24, 25 & 32

The NTA points out that these alterations propose the application of the 'New Residential Priority 1' zoning objective to various greenfield sites on the edge of the established built-up-area of Kilcoole, on land either zoned for other purposes, primarily 'New Residential Priority 2', or on land not zoned and beyond the current town boundary. The NTA notes, as per the Chief Executives Report on the Draft LPF, that the zoning of land for residential purposes under the Draft LPF has followed a robust assessment of the Core Strategy requirements and that additional zoned land beyond that in the Draft would be surplus to requirements at this time. Based on the above and the location of the subject lands, the NTA is concerned that these proposed changes would not be aligned with local, regional and national objectives that seek to provide for sequential and compact forms of development, including Measure Plan 4 of the Transport Strategy which states the following:

"the NTA will support and prioritise development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services."

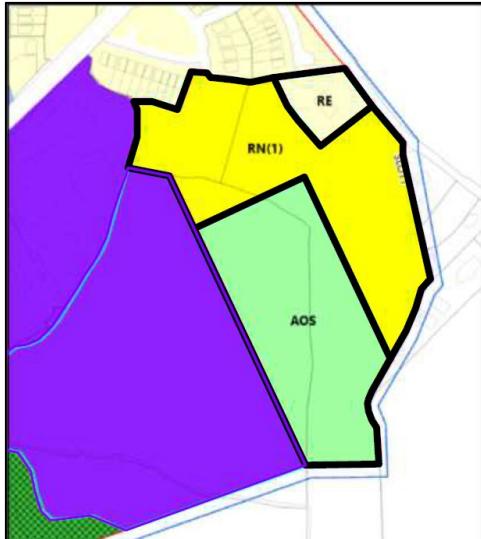
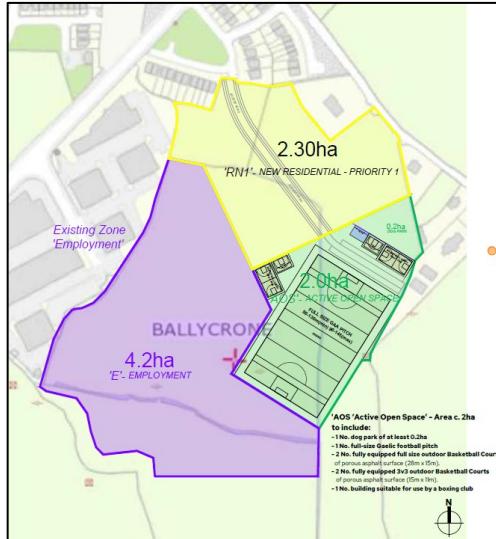
The NTA considers that the application of the 'New Residential Priority 1' zoning to an abundance of lands on the edge of the established built-up area, could facilitate an unsustainable form of development and lead to high levels of car dependency in the subject areas, particularly in advance of the LTP being prepared. Given that there are more sequentially appropriate residentially zoned lands already identified as part of the Draft LPF, it is submitted that these lands, that are largely unserved by active travel infrastructure, should remain under their current zoning designations at this time.

NTA Recommendation: The NTA recommend that the proposed zonings under MAs 20, 23A, 24, 25 & 32 not be brought forward at this time.

74. Paul Brady

The submission raises the following issues:

- The submission welcomes the zoning changes set out in PMA25, but further modification is requested.
- With respect to access to Active Open Space, it is submitted that: Network Enterprise Park is not taken in charge and the roads are private and gated, with restricted hours of access; that the business park roads do not reach to the boundary and the intervening lands are in 3rd party ownership. Therefore, the AOS would have to be accessed across an undeveloped employment zone, which would not be sustainable to build on its own and this would be unrealistic as the industrial lands have been zoned since 2008 with no demand to develop them.
- It is suggested that it is logical for access to the AOS through the new residential development, as the development of the AOS is conditioned on the development of the RN1 lands and that there is no conflict between residential use and access to a sports facility, it will enhance both the residential development and give passive surveillance to the amenity facility.
- It is requested that zoning be reconfigured in this area because a full-size GAA pitch cannot fit at the southern end, at the northern end it would cut off circulation to the northern end, and the current configuration creates a pinch point in the RN1 lands. It is suggested that areas seem to be less than given in the written text, with AOS as 1.93ha rather than 2ha, and RN1 of 2.17ha rather than 2.3ha.

Change from:**Change to:****Opinion of Chief Executive**

Richard and David Fox – The CE notes the submission of Richard and David Fox, opposing PMA No. 24. The CE does not support this PMA.

Ballycrone Manor Residents – The CE notes the submission of the Ballycrone Manor Residents, opposing PMA No. 25. The CE does not support this submission.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration.

Office of the Planning Regulator – The CE notes the submission of the OPR.

NTA – The CE notes the submission of the NTA, opposing PMA No. 24. The CE does not support this PMA.

Paul Brady – The CE notes the submission of Paul Brady, welcoming PMA No. 25. In relation to the access to the Active Open Space lands, the CE has similar concerns as outlined below (and as expressed in a preliminary CE response to this alteration at the Council meeting of 6th October). In relation to the suggested reconfiguration of land use zonings in the area, Section 13(6)(c)(ii)(l) of the Planning and Development Act 2000 (as amended) sets out that a further modification to a variation shall not be made where it refers to an increase in the area of land zoned for any purpose. On this basis, the suggested reconfiguration and expansion of zonings cannot be considered at this time.

This proposed material alteration was proposed by the Elected Members at the council meeting of 6th October 2025. The CE does not support the proposed **residential element** of the alteration for the reasons already set out in the CE Report, namely:

'The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- *The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- *Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement. In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)

Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

On this basis, it is not recommended to rezone the subject lands as requested.'

The CE does not oppose the proposal to zone additional land for '**Active Open Space**' but has serious concerns about the location of this space, in terms of accessibility.

The access arrangements set out in the proposed text would require access over third-party land via an established industrial estate. The CE would have concerns regarding the ability of the landowner to deliver the access route specified and with the movement of pedestrians, cyclists and other vulnerable road users through an employment zone used by HGVs, in order to access the sports ground.

Recommendation of Chief Executive

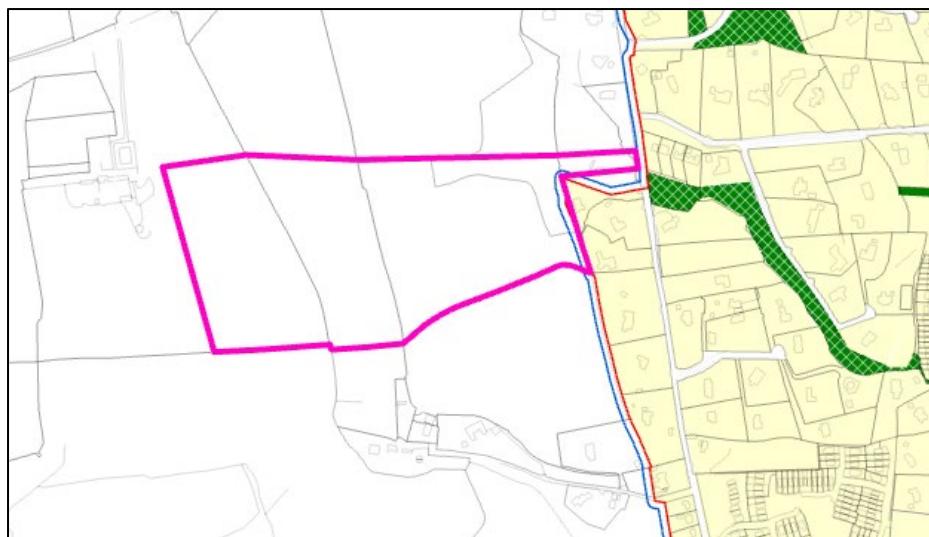
Do not proceed to make Proposed Material Alteration No. 25

Proposed Material Alteration No. 26

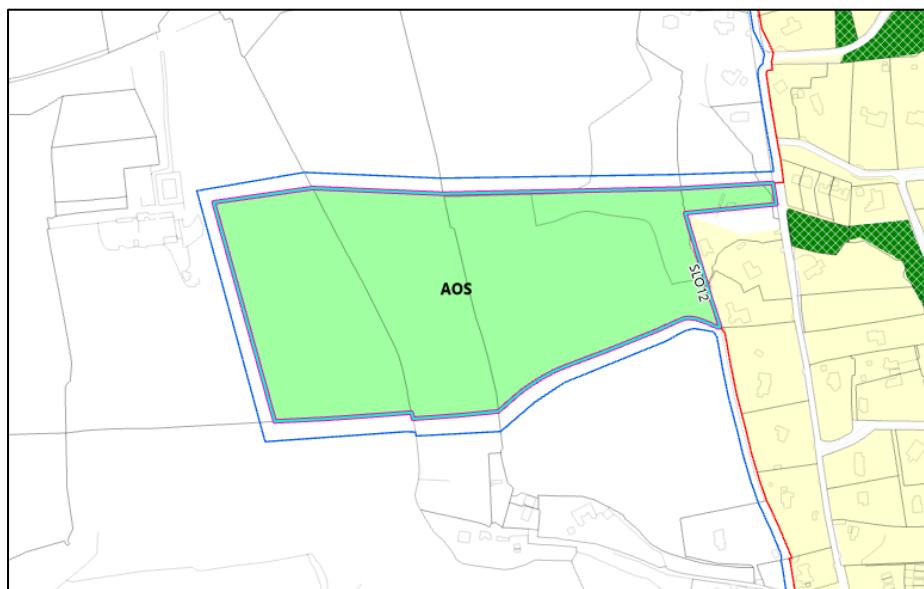
Amend **MAP NO. 1 LAND USE ZONING** and add new Specific Local Objective: **SLO 12 – BELLEVUE HILL** and boundary as follows:

Amend zoning of lands at Bellevue Demesne measuring c. 12.5ha from unzoned/outside the LPF boundary to AOS 'Active Open Space'.

Change from:



Change to:



Add new text for SLO12 as follows:

SLO 12 – Bellevue Hill

This SLO is located in the townland of Bellevue Demesne and comprises c. 12.5ha zoned AOS 'Active Open Space'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Any development for AOS 'Active Open Space' uses on these lands must include a surfaced walking/running looped trail around the periphery of the lands, which should be open to the public at all times.
- Development on these lands should include adequate landscaping and tree screening to preserve landscape amenity and the rural character of the immediately surrounding area.
- Insofar as is possible, existing hedgerows and wooded areas should be maintained in the development of this area, with minimal breaks to allow access through hedgerows.
- At the entrance to the lands, a crossing point for pedestrians/cyclists shall be provided as part of the development to connect to the footpath on the eastern side of Bellevue Hill.

No use of these lands may commence until the footpath on the eastern side of Bellevue Hill is completed as far as Delgany Village.

Proposed Material Alteration No. 26

1. Keith Scanlon	A large number of submissions were received opposing Proposed Material Alteration No. 26. These submissions in many cases contain very similar content. The individual submissions are listed in the column to the left, and issues raised in these submissions are summarised together here. Submissions by prescribed bodies on this PMA are set out separately below for completeness.
2. Richard Hogan	
3. Patricia Ryan	
4. Padraig Smyth	
6. Ciara King	
5. Sarah Campbell	
7. Sinead Brock	
8. Glenna Timmons	
9. Leonie Hogan	Issues raised in these submissions include the following:
10. Ronan Brennan	
11. Mark Kavanagh	
12. MG O'Riordan	
13. Graeme Romer	
14. Anne Fagan	
15. Dervla Murphy	
16. Maurice Dodd	
17. Shane Stokes	
19. Alice O'Donnell	
20. Debora Teixeira	
21. Deb Davis	
23. Avril O'Farrell	
25. Delgany Community Council	
26. Carina Holmes	

Zoning, Urbanisation & Risk of Precedent for Development:

- The Bellevue Hill site should not be made part of the urban area/LPF boundary/settlement boundary and should not be zoned AOS 'Active Open Space' and made an SLO. It is a rural area that would be negatively affected by urbanisation. The land should remain unzoned so that it can be protected.
- There is no requirement for GAA facilities to be inside an urban area nor zoned AOS. Most GAA pitches in Co. Wicklow are not.
- The ownership of the lands may change with the zoning still in place. Once the land is zoned, its designated zoning could change again. There could be 'Zoning Creep'. This zoning is a precedent/gateway for further change and development on Bellevue Hill, with PMA Nos. 31 and 30 also showing precedent for rezoning from AOS to residential. Other [Planning Authorities] allow limited residential/retail on active open space zoning.
- There is overdevelopment and overcrowding of the village of Delgany.

27. Sinead Moore	<ul style="list-style-type: none"> The alteration would break up the farmland and make it less appealing to continue as a farm and result in the eventual parcelling off of the farmland.
29. Alice McDonnell	
31. Tessa Stewart	
33. Zsolt Gercsi and Angela Quinlan	Impacts on Watercourses, Ecological Networks, Designated Sites, Climate, Natural Heritage & Biodiversity:
34. Yasmin Fortune	<ul style="list-style-type: none"> There may be damage to the Brown Trout Stream. Development would increase surface run-off, sedimentation, and pollution, with downstream effects. Water in the site meets the Three Trout River and adjoining lands, described in the 2021 Greystones Biodiversity Report and Action Plan as the most important area of natural habitat remaining in the Delgany/Greystones area.
35. Caroline Henry	<ul style="list-style-type: none"> Sensitive sites are not well mapped in this area. The ecological network should be mapped to update the Green Infrastructure plan, as a pilot project of the Climate/Biodiversity Office.
37. JC Durbin	<ul style="list-style-type: none"> There may be damage to native wet woodland habitat on the site. Wet woodland in this site is within the buffer zone of, and a key ecological stepping stone in the wildlife corridor between Glen of the Downs Nature Reserve/proposed Natural Heritage Area/Special Area of Conservation, Kindlestown Woods, Coolagad Hill, Downs Hill and ancient hedgerow/soil networks.
38. Robert Henry	<ul style="list-style-type: none"> The site forms part of an interdependent system supporting wetland, marsh, and scrubland habitats that are increasingly rare in North Wicklow. The land arguably supports greater species diversity/density than the adjacent ancient woodland (due to deer overgrazing and regeneration failure) and is therefore essential to the resilience of the broader ecosystem.
39. Majella Kingsbury	<ul style="list-style-type: none"> The area is important for carbon capture, water filtration and flood mitigation.
40. Wicklow Planning Alliance	<ul style="list-style-type: none"> Sensitive areas should be zoned OS2 'Natural Areas' should the site be zoned, with additional conditions against hard surfaces, chemical treatment, nighttime use, light pollution (effects on SAC/bats), noise pollution, and other pollution. The area should be kept green to compensate for the green space lost to development in the wider area in recent years.
44. Valerie Madigan	<ul style="list-style-type: none"> No amount of landscaping and new hedging will replace the richness of what has been there for thousands of years.
45. Nick Bradshaw	<ul style="list-style-type: none"> A petition of 5,450 signatures supported extending the nature reserve, with land to be purchased by the state [including the lands relevant to PMA 26].
46. Barbara McMackin	<ul style="list-style-type: none"> The proposal goes against heritage, biodiversity, and green infrastructure objectives [in the draft LPF], the current WCC strategy to protect biodiversity, commitments in the Wicklow County Development Plan to consider and protect watercourses and biodiversity, the National Biodiversity Action Plan 2023-2030, the Aarhus Convention, the EU Nature Restoration Law 2024, the Water Framework Directive, SEA/EIA Directives, the Birds Directive, and the EU Habitats Directive (fragmentation near designated sites). Rezoning may trigger Appropriate Assessment Screening.
48. Imogen Thompson	<ul style="list-style-type: none"> Independent ecological assessment should be commissioned before zoning is considered. Strategic Environmental Assessment is essential. The local authority should come up with a holistic plan for development.
49. Karl Stynes	<ul style="list-style-type: none"> Recent development has already impacted wildlife/deer/bats. The corridor also supports pollinators, amphibians, owls, badgers, pine marten, Irish stoat, mountain hare, old Irish goat, hedgehog, red squirrel, mistle thrush, great spotted woodpecker, red kite, sparrowhawk, buzzards and other birds. Marsh Fritillary butterflies were reported in the area last summer.
50. Michael Martin	
51. James Perkins	
52. Catherine Clear	
55. Debbie Jenkinson	
59. Alan Constable	
60. Greystones Tidy Towns	
61. Rori Coleman	
62. Louise Barry	
63. Dianne Sutton	
64. Adam Calihman	
65. Delgany Tidy Towns	
68. Catherine Capper	
70. Carmel McDonald	
72. Rosa Murray	
73. Cairn Home Properties	
77. Paul Hyland	
79. Conor Donelan	
86. Conor Donelan	
81. Conor Donelan	
84. Keith Scanlon	
85. Cheryl Ball	

- The text of SLO12, requiring public access at all times, would create a need for extensive lighting, increased public activity, hedgerow breaks, and habitat fragmentation incompatible with EU law. It is incompatible with equine welfare.
- The text of SLO12 '*insofar as possible*' renders useless text in SLO12 about keeping hedgerows/wooded areas.
- There has been unauthorised tree-felling on the site and damage to the wet woodland.

Impacts on Heritage & Archaeology:

- The site was part of the LaTouche Bellevue Woods, a key centre of Irish demesne planting (native and exotic), including nurseries supplying to many of the demesnes of Wicklow and Ireland.
- There are potential archaeological concerns, including Viking and LaTouche remains, and wider Bronze Age and early medieval heritage (the Kingdom of Cualu). There have been finds nearby including the 10th century Viking Coin Hoard, with associations with the 1022 battle of Delgany.

Physical Constraints, Servicing Issues & Access:

- The land is at a gradient and is completely unsuited to an AOS zoning, would require earthworks.
- Access already exists via Ballydonagh Lane, through Delgany Golf Club, or through the old right of way to the golf club. Cutting across the Brown Trout Stream/wet woodland is not necessary.
- There are constrained roads and transport capacity/public transport services to this site, making it unsuitable for AOS zoning. Traffic calming is required on Bellevue Hill, with regular speeding. Concern over equality of access to families who need to rely on walking or public transport. Lack of infrastructure for safe access (noting plan to finish pedestrian path to Delgany).
- There are no sewage, services or other utilities. The immediate area relies on springs, a shared groundwater table and limited supply capacity, which may require the extension of mains water up Bellevue Hill. An additional well may impact on water supply further up the hill. Fertilisers, oil run off, etc. may pose a contamination pathway to local groundwater supplying multiple homes. Groundwater systems also feed the SAC/glacial valley. Hydrogeological assessments and longitudinal groundwater monitoring should be required.

Sustainable Development:

- Planning must be guided by the full spectrum of Sustainable Development Goals (SDGs).
- Many submissions are in favour of developing sports facilities for the community, but it must be done responsibly and sustainably. If sports facilities are developed on the site, it should be as a national showcase eco-sports facility.

Landscape & Visual Impacts:

- Impacts on landscape and visual character: The land forms the rural buffer to Delgany, the natural dark-sky backdrop and part of the glacial valley setting, incompatible with urbanisation, lighting/floodlighting and infrastructure. Surrounding areas is an area of outstanding natural beauty.

Residential Amenity of Adjacent Areas:

	<ul style="list-style-type: none"> The residential amenity and privacy of adjoining landowners may be impacted arising from persistent noise spill, light pollution/floodlighting, evening and weekend use of facilities. Enforceable no-intensification clauses should be required. <p>Other Issues:</p> <ul style="list-style-type: none"> Several submissions state agreement with the reasons for opposing this alteration set out in the 1st CE report and Addendum 1 to SEA Environmental Report. Submissions Nos. 16, 48 and 86 have no content but indicated that they were in relation to PMA No. 26. Submission No. 73 discusses PMA 26 in making a comparison between it and other proposed material alterations. This will be addressed under the compared proposed material alterations (primarily PMA 19).
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58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

83. Department of Housing, Local Government and Heritage

The Department is concerned at the proposed zoning of lands at Bellevue Demesne from unzoned/outside the LPF boundary to AOS 'Active Space'. The Department puts forward that

- This proposed material amendment and extension of the urban environment is into an area where sensitive and rare habitats are known to be present; such as wet woodland, semi-natural grassland, and watercourses, and is located less than 500m from the Glen of the Downs Special Area of Conservation (SAC). These habitats form part of the ecological corridor network that connects the Three Trouts River and the Glen of the Downs SAC, which includes internationally and nationally important woodland habitats and protected species such as bats, otter, red squirrel, pine marten and badger.
- The PMA for this site would require the felling of wet woodland habitat as access would only be possible via Bellevue Hill, and whilst the following specific objective is noted in relation to the PMA:

Insofar as is possible, existing hedgerows and wooded areas should be maintained in the development of this area, with minimal breaks to allow access through hedgerows,

This is a very weak objective that could be easily interpreted to allow the removal of woodland and hedgerow habitat within the site.

- The development of these lands as AOS would likely have significant impacts on the local biodiversity, such as; habitat loss/fragmentation, changes to the hydrological and hydrogeological regime of the area, negative effects on water quality and aquatic fauna, and disturbance to protected species from lighting, increased human presence and machinery. The habitats in this area also provide a vital ecological corridor between the Glen of the Downs SAC and nature reserve, Bellevue Woods, the Three Trouts Stream and Kindlestown Woods. This PMA would directly contravene CPO 17.13, CPO 17.18, and CPO 17.21 of the Wicklow Development Plan 2022 – 2028.

- Whilst the Department welcomes the provision of local amenities, Local Authorities must comply with Regulation 27 whereby Local Authorities must exercise their functions in a way that is compatible with the requirements of the Birds Directive and Habitats Directives. The Department considers that this PMA to amend the zoning at Bellevue Hill is not an appropriate use of the area, and the specific objectives proposed for SLO 12 do not sufficiently address the sensitivity of the site.

The Department recommends that any change of zoning takes this into account and ensures protection of biodiversity, ecological corridors and protected species.

Opinion of Chief Executive

This proposed alteration was proposed by the Elected Members at the County Council meeting in October 2025.

It should be noted that the CE **does not support** the proposed alteration for the reasons already set out in the 1st CE Report, namely:

'The accompanying Greystones-Delgany & Kilcoole Social Infrastructure Audit sets out the rationale for the quantum of AOS lands within the draft LPF. In accordance with the analysis set out in same, the LPF already makes considerable provision for new AOS lands, close to the centres of population of the settlement and identified area of new housing growth. Therefore there are no strong grounds for the zoning of these lands for AOS on the basis of inadequacy of existing and proposed AOS in the area.'

Furthermore, the subject lands are very peripheral in nature, largely beyond a 2.5km radius from Greystones centre. As such, the zoning of the subject lands would conflict with the statement in Section A.3.2 of the draft LPF Written Statement, as follows: 'It is therefore the strategy of this LPF that no further development outside this 2.5km radius should be facilitated during this LPF period'.

Though it is recognised that pedestrian connections may be possible to Delgany village and through Kindlestown Castle/Dromont onto the route of the L3 bus, there are no cycle way connections present or likely possible and the CE would have a serious concern in relation to increased volumes of private vehicles accessing the subject lands via Bellevue Hill or Templecarrig, which is constrained in width and alignment, and the resultant impact on junctions leading to the area, e.g. the junction of the R762 and L1030 at Delgany.

In addition, the development of these lands for sports uses, including associated land / topography alterations, land drainage, construction of roads, car parks, clubhouses, equipment stores etc and installation of flooding lighting, netting etc would undoubtedly have a serious impact on the protection of the landscape in this highly scenic and elevated area, on local drainage including an area susceptible to flooding to the east of the lands, on ecology and biodiversity (given that playing pitch development would require substantial land clearance including mature trees) and on the build heritage of the area given the location of the lands within the historic Bellevue Demesne and directly adjacent to the protected Bellevue House remains.

On this basis, it is not recommended that the subject lands be zoned AOS 'Active Open Space' and brought within the LPF/settlement boundary.'

In addition to the above reasons, the CE would also draw attention to difficulties that have become evident since the PMA was proposed with accessing the site in the manner indicated in the PMA. Having carried out further survey, it appears that such an access point / route would need to cross a stream, a wetland area and likely required the demolition on an historic Mill complex, which are features that were not evident at the time of the initial response of the CE.

In response to requests that environmental assessment be carried out, several environmental assessment processes occur alongside the plan-making process, including in relation to PMA No. 26:

- The proposed material alteration has undergone Strategic Environmental Assessment, after an SEA Screening determined that SEA was required for PMA No. 26. Addendum 1 to the SEA Environmental Report found that PMA No. 26 would not provide the most evidence-based framework for development and has the potential to undermine

sustainable development and proper planning - with potential for associated unnecessary adverse environmental effects on various environmental components. This was set out in the document published alongside the proposed material alterations.

- PMA No. 26 underwent screening for Appropriate Assessment, in which a determination was made that the proposed material alterations to proposed variation No. 4 do not have any likelihood for any significant effect on any European site, as outlined in the documents published alongside the proposed material alterations.

Uisce Éireann – The CE notes the submission from Uisce Éireann, which does not object to the proposed alteration.

DHLGH – The CE notes the submission from the Department of Housing, Local Government and Heritage.

Taking into account the Department having concerns, it is suggested that the SLO text could be modified to add reference to the need for any proposed development to comply with the other related provisions the LPF as detailed below.

Should the members decide to proceed, the CE recommends that PMA26 be modified to account for some of the specific issues raised where it is considered appropriate (taking particular note of the submission from the Department of Housing, Local Government, and Heritage), as follows:

- Additional text to preserve ecological connectivity and protect sensitive areas within the site, including a requirement for ecological impact assessment.
- Strengthening wording in relation to the retention of existing trees/hedgerows.
- Additional text in relation to the use of lighting/floodlighting.
- Additional text in relation to the preservation of heritage assets (including features of the Bellevue estate).
- Additional text in relation to the protection of drinking water/water quality.

The CE does not agree that text in SLO12 in relation to public access should be removed. It is understood that intention of this text is to allow for access to any walking/running trail as a public facility, without being a member of any private club.

Were the members to proceed, the CE is of the opinion that issues in relation to residential amenity and hours of operation are best addressed at development management/planning application stage.

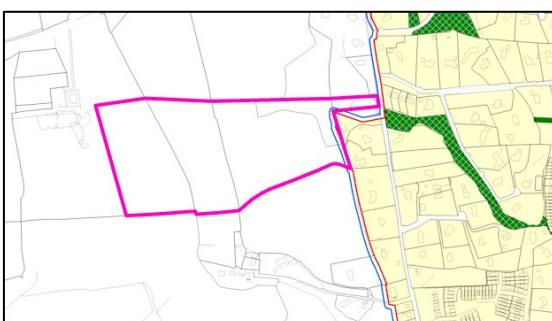
Recommendation of Chief Executive

To **not proceed** to make Proposed Material Alteration No. 26

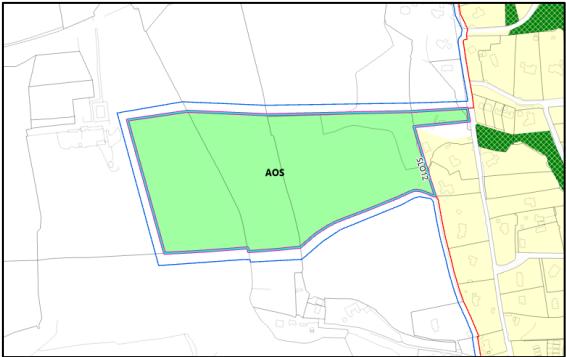
Should the Elected Members decide to proceed with Proposed Material Alteration No. 26, the following modifications are recommended:

Amend zoning of lands at Bellevue Demesne measuring c. 12.5ha from unzoned/outside the LPF boundary to AOS 'Active Open Space'.

Change from:



Change to:



Add new text for SLO12 as follows:

SLO 12 – Bellevue Hill

This SLO is located in the townland of Bellevue Demesne and comprises c. 12.5ha zoned AOS 'Active Open Space'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Any development for AOS 'Active Open Space' uses on these lands must include a surfaced walking/running looped trail around the periphery of the lands, which should be open to the public at all times.
- Development on these lands should include adequate landscaping and tree screening to preserve landscape amenity and the rural character of the immediately surrounding area.
- **Insofar as is possible**, existing hedgerows and wooded areas **shall should** be maintained in the development of this area, unless robust justification for removal is provided. ~~with minimal breaks to allow access through hedgerows~~. Wet woodland habitat and other sensitive areas within the site should be preserved, and ecological connectivity between the site and habitats/designated sites in the wider area, shall be maintained.
- Lighting (including floodlighting) should be bat friendly as per Dark Sky guidelines and any relevant best practise guidance.
- Any proposal for development shall be accompanied by an Ecological Impact Assessment that fully demonstrates compliance of the proposed development with:
 - The overarching Zoning Objective and Description,
 - Various County Development Plan and Local Planning Framework provisions relation to the protection of biodiversity, habitats, species, ecological connectivity, water, lighting, and ecological connectivity.
- Development should have regard to, and protect, existing groundwater water supplies in the area.
- Development should have regard to heritage assets and demesne features associated with the Bellevue Estate, and any other historical features or archaeological remains, in particular the former mill and millrace associated with the Bellevue estate.
- At the entrance to the lands, a crossing point for pedestrians/cyclists shall be provided as part of the development to connect to the footpath on the eastern side of Bellevue Hill.

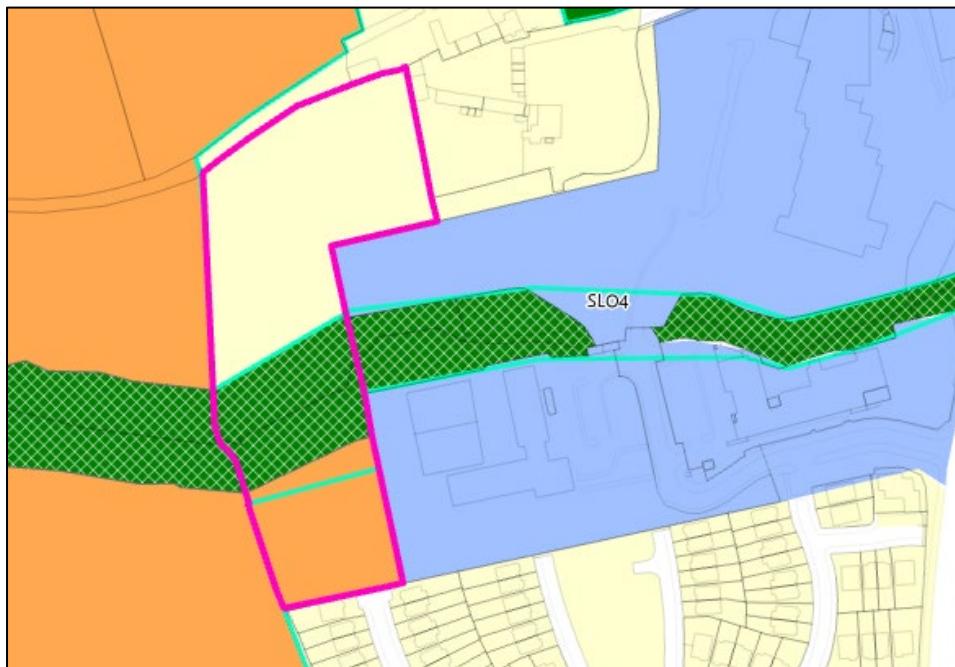
No use of these lands may commence until the footpath on the eastern side of Bellevue Hill is completed as far as Delgany Village.

Proposed Material Alteration No. 27

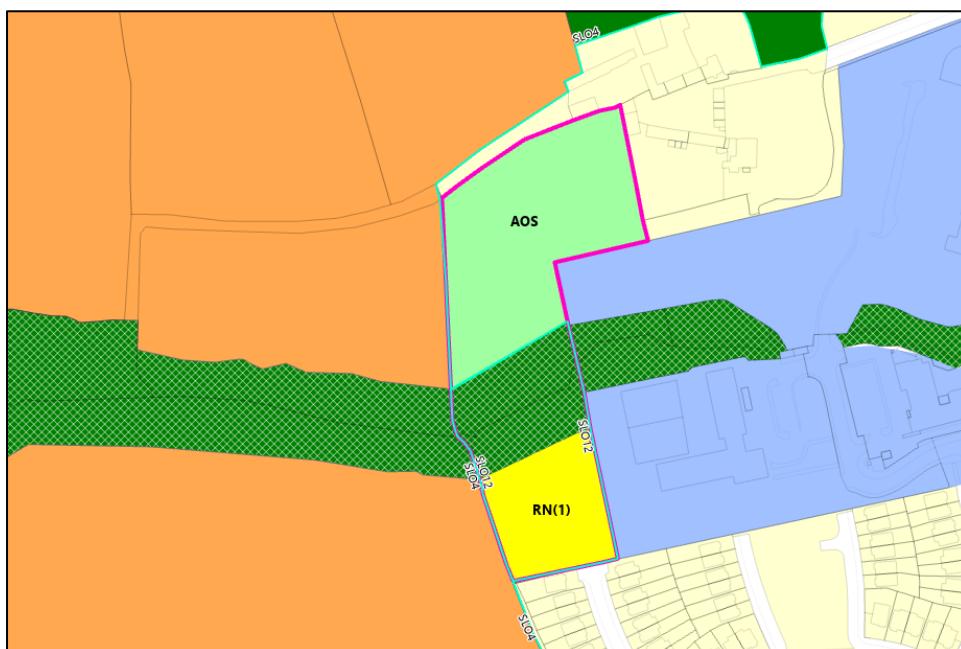
Amend **MAP NO. 1 LAND USE ZONING** and add new Specific Local Objective: **SLO 13 – COOLAGAD EAST** and boundary as follows:

Amend zoning of lands at Coolagad from RE 'Existing Residential' (c. 0.9ha) and RN2 'New Residential – Priority 2' (c. 0.4ha), to AOS 'Active Open Space' (c. 0.9ha) and RN1 'New Residential – Priority 1' (c. 0.4ha).

Change from:



Change to:



Add new text for SLO13 as follows:

SLO 13 – Coolagad East

This SLO is located in the townland of Coolagad and measures c. 0.8ha. This SLO is comprised of:

- c. 0.4ha zoned RN1 'New Residential – Priority 1'.
- c. 0.4ha zoned OS2 'Natural Areas'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Vehicular Access to this SLO shall be via Waverly Avenue.
- Access for pedestrians and cyclists **only** shall be provided through the RN1 lands into SLO4 Coolagad.
- A Mixed Use Games Area (MUGA) of c. 600sqm shall be delivered on lands zoned RN1 'New Residential – Priority 1' as part of the development of these lands. No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until this MUGA is fully developed and available for public use.

Submissions to Proposed Material Alteration No. 27

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 27 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

41. O'Briain Architects

The submission raises the following issues:

- It is requested that the MUGA pitch requirement pertaining to this SLO13 be removed.
- It is pointed out that the site's owner has ceded land (c. 0.9ha) to Temple Carrig School for Active Open Space so the requirement to provide a MUGA pitch on the small remaining RN(1) lands adjacent seems like an unfair burden in the circumstances.
- Furthermore, it is put forward that it is the intention of Temple Carrig School to provide a MUGA pitch, subject to planning approval when seeking planning permission for a new rugby pitch on the proposed AOS lands, which will be available for community use outside of school requirements.
- In addition, it is put forward that extensive amenity facilities, including MUGA pitches will be required as the SLO4 lands surrounding the subject site become developed in due course, and it would seem therefore, that a requirement to provide and maintain a MUGA pitch on a small site within a cluster of houses, given the above points, is unreasonable.
- Related to the above, Temple Carrig School will need access for the servicing of their proposed rugby pitch which, due to the site's topography will be extremely difficult to facilitate within their own grounds. On that basis an access point will be required from the interface of the RN(1) lands and the AOS lands through Waverly for service vehicles at certain times.

43. Temple Carrig Secondary School

The submission raises the following issues:

- Temple Carrig School operates in a constrained elevated site at Coolagad, and will shortly be applying for a new extension.

- The school has limited sports facilities on campus and has to bus students to facilities on Mill Road.
- The proposal to amend the existing RE Zoning to Active Open Space as part of the creation of SLO 13 arises from the very kind and generous willingness of the land owner to make this land available for use by the School for sports purposes on a long term philanthropic basis, which will be accessible to adjacent schools by arrangement and made available to community groups. It is put forward that it is important to recognise that the nature of this provision for Active Open Space within the SLO 13 Area, is the largest portion of the land within the area which is a very generous allocation for AOS within the area covered by the SLO.
- It is pointed out that the area of the stream in its current condition is unusable and represents a significant loss of amenity to the School, it is suggested that the current SLO 4 designation of this part of the site and the blanket inhibition on development directly adjacent to the watercourse has the real potential to further seriously inhibit the provision of much needed educational and sporting facilities (incl. extensions) at the School. It is requested that the SLO 13 remove the OS2 designation and instead allow consideration of the site and any proposed development of the site covered by the SLO 13 to be addressed in the context of any specific planning applications.
- New text for SLO13 is suggest as follows:

SLO 13 – Coolagad East

This SLO is located in the townland of Coolagad and measures c. 1.3 0.8 ha. This SLO is comprised of:

- c. 0.4ha zoned RN1 'New Residential – Priority 1'.
- c. 0.9 0.4 ha zoned OS2 'Natural Areas'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Vehicular Access to the RN1 lands ~~this SLO~~ shall be via Waverly Avenue.
- Access for pedestrians and cyclists to the RN1 lands in the SLO only shall be provided through the RN1 lands into SLO4 Coolagad.
- ~~A Mixed Use Games Area (MUGA) of c. 600sqm shall be delivered on lands zoned RN1 'New Residential Priority 1' as part of the development of these lands. No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until this MUGA is fully developed and available for public use.~~
- Sports and recreation facilities will be delivered on lands zoned AOS Active Open Space by the adjacent school and these facilities shall be used by the School and accessible by other schools and community groups, subject to arrangements made by the School (taking account of health and safety, safeguarding and maintenance/insurance issues).
- Individual applications for development within SLO13 or the adjacent lands zoned Community and Education shall directly address the relationship of such developments with the adjacent stream and watercourse, mindful of biodiversity, natural heritage, maximising limited land use and health and safety concerns given the proximity of schools and nearby residential areas.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

Opinion of Chief Executive

O'Broin Architects – The CE notes the submission, opposing the requirements of SLO13. The CE does not support the residential component of this proposed material alteration (and hence the requirements on that land) for the reasons set out below. The requirement for the provision of a Mixed Use Games Area (MUGA) of c. 600sqm was specified by the Elected Members in proposing this alteration; the CE would agree that this is somewhat onerous requirement given the small area of land proposed for residential development.

Temple Carrig Secondary School – the CE notes the submission, which sets out the potential use of land on a long-term basis by a relevant landowner and requests alterations to the text of SLO13. The CE is of the opinion that the requested text change in relation to watercourses would conflict with the OS2 'Natural Areas' zoning of adjoining lands and is therefore not appropriate. Section 13(6)(c)(ii)(l) of the Planning and Development Act 2000 (as amended) sets out that a further modification to a variation shall not be made where it refers to an increase in the area of land zoned for any purpose. The CE does not support the residential component of this proposed material alteration (and hence the requirements on that land) for the reasons set out below but does not oppose the rezoning of lands for AOS 'Active Open Space' as part of this alteration.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not object to the proposed alteration.

This proposed material alteration was proposed by the Elected Members at the Council meeting of 6th October 2025. The CE does not support the residential component of the proposed alteration for the reasons already set out in the CE Report, namely:

'The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

In these regards, the request for a change in the 'prioritisation designation' as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).*

The requirement for the provision of a Mixed Use Games Area (MUGA) of c. 600sqm was specified by the Elected Members in proposing this alteration; the CE would agree that this is somewhat onerous requirement given the small area of land proposed for residential development and therefore recommends this requirement be omitted from the SLO.

The CE does not oppose the rezoning of lands to AOS 'Active Open Space' as part of this alteration.

Recommendation of Chief Executive

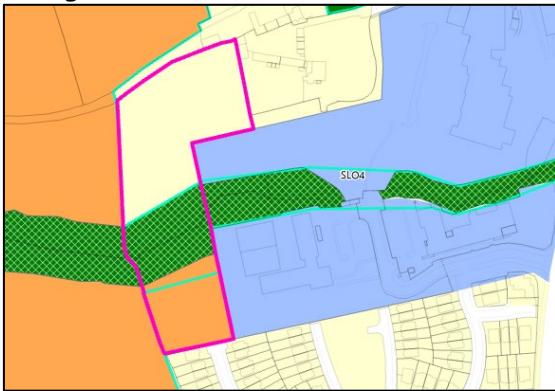
Split Recommendation:

1. To proceed to make Proposed Material Alteration No. 27 **only as it relates to the rezoning of lands from RE to AOS 'Active Open Space'.**
2. Do **not** proceed to make Proposed Material Alteration No. 27 in relation to any other component i.e. do **not** insert new SLO13 and do not change RN2 to RN1.

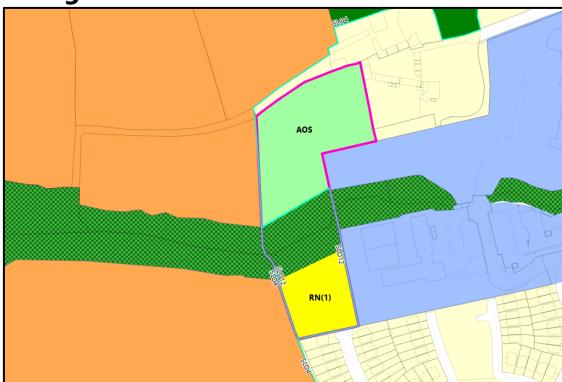
Should the Elected Members decide to proceed with Proposed Material Alteration No. 27, beyond that part recommended by the CE, the following modifications are recommended:

'Amend zoning of lands at Coolagad from RE 'Existing Residential' (c. 0.9ha) and RN2 'New Residential – Priority 2' (c. 0.4ha), to AOS 'Active Open Space' (c. 0.9ha) and RN1 'New Residential – Priority 1' (c. 0.4ha).

Change from:



Change to:



Add new text for SLO13 as follows:

SLO 13 – Coolagad East

This SLO is located in the townland of Coolagad and measures c. 0.8ha. This SLO is comprised of:

- c. 0.4ha zoned RN1 'New Residential – Priority 1'.
- c. 0.4ha zoned OS2 'Natural Areas'.

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Vehicular Access to this SLO shall be via Waverly Avenue.
- Access for pedestrians and cyclists **only** shall be provided through the RN1 lands into SLO4 Coolagad.
- **A Mixed Use Games Area (MUGA) of c. 600sqm shall be delivered on lands zoned RN1 'New Residential – Priority 1' as part of the development of these lands. No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until this MUGA is fully developed and available for public use.'**

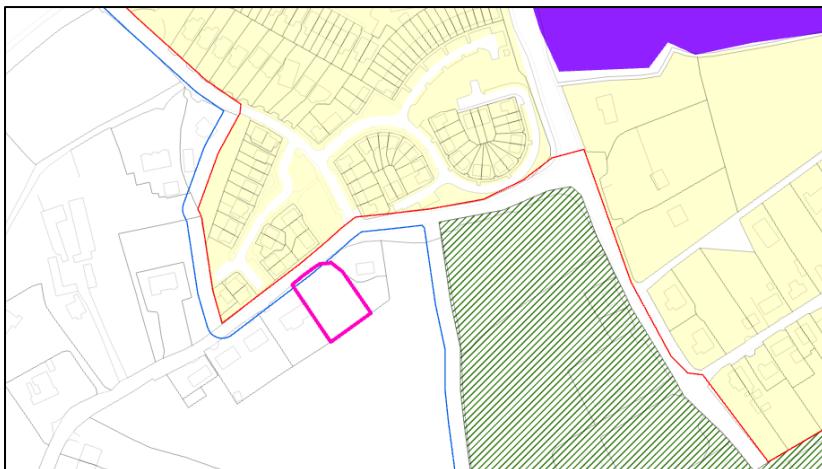
MAPS & APPENDICES

Proposed Material Alteration No. 28

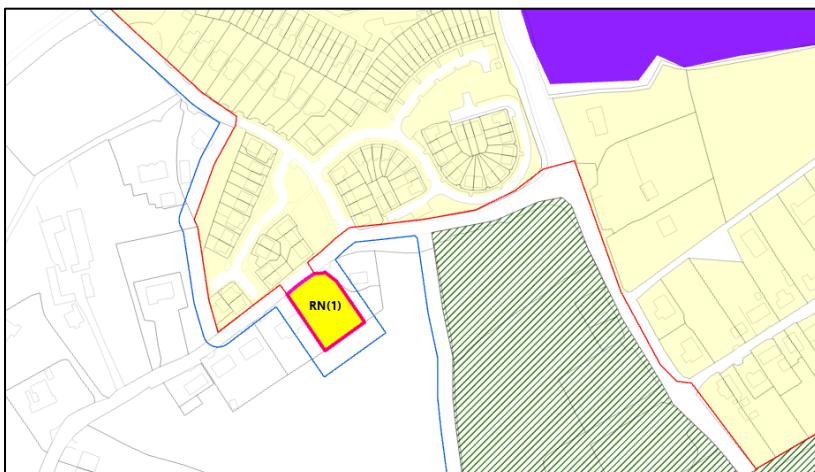
Amend **MAP NO. 1 LAND USE ZONING** land at Priestsnewtown

Amend zoning of land at Priestsnewtown measuring c. 0.14ha from unzoned outside the settlement/LPF boundary to RN1 'New Residential – Priority 1' (c. 0.14ha).

Change from:



Change to:



Submissions to Proposed Material Alteration No. 28

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 28 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

Opinion of Chief Executive

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not oppose the change in zoning.

This proposed material alteration was proposed by the Elected Members at the Council meeting of the 6th of October 2025. The CE does not support the residential component of the proposed alteration for the reasons already set out in the CE Report, namely:

'The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- *The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- *Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement. In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- *Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)*
- *Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.'*

Recommendation of Chief Executive

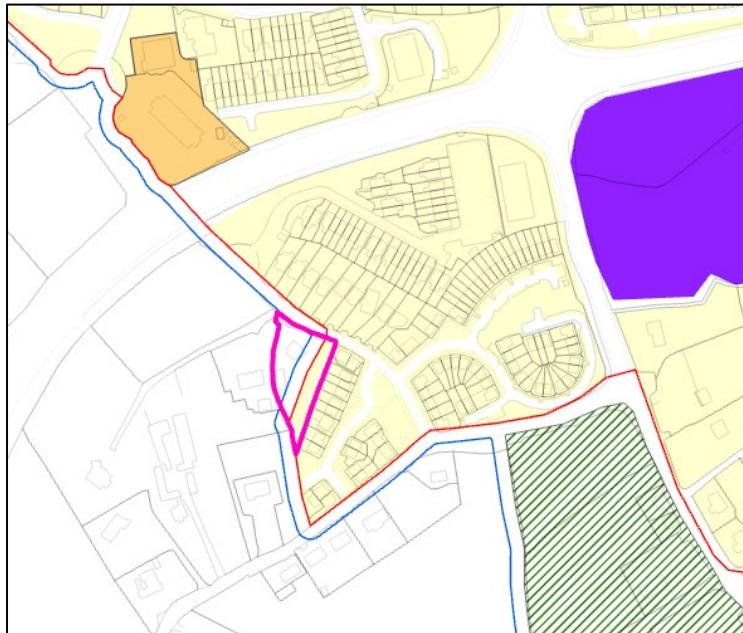
Do **not** proceed to make Proposed Material Alteration No. 28

Proposed Material Alteration No. 29

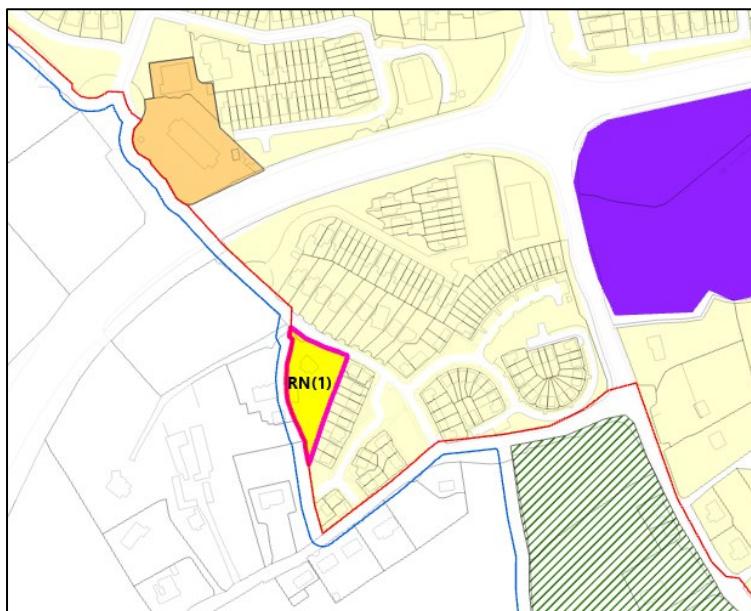
Amend **MAP NO. 1 LAND USE ZONING** land at Farrankelly

Amend zoning of land at Farrankelly measuring c. 0.24ha from partially unzoned outside the settlement/LPF boundary and partially RE 'Existing Residential', to RN1 'New Residential – Priority 1'.

Change from:



Change to:



Submissions to Proposed Material Alteration No. 29

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 29 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

Opinion of Chief Executive

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not oppose the change in zoning.

This proposed material alteration was proposed by the Elected Members at the Council meeting of the 6th of October 2025. The CE does not support the residential component of the proposed alteration for the reasons already set out in the CE Report, namely:

'The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- *The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- *Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement. In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- *Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)*
- *Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.*

'The submission states that the subject lands are located 'on the edge' of the 2.5km radius of the town centre. Rather, the subject lands are located beyond this radius, and on this basis the subject lands were not assessed under Section A3.3 of the draft LPF. The impact on future development options of areas 'Delgany 3' and 'Delgany 4', those areas closest to the subject site, was as follows:

*'While these areas are adjoining the built envelope of Greystones-Delgany and some are proximate to some services, concerns arise with respect to suitability of road infrastructure, serviceability, flood risk, **unnecessary sprawl into the rural landscape at all locations** and impacts on archaeology, landscape and the natural environment. **It is the strategy therefore that currently unzoned lands should not be zoned for new development** and zoning be removed from the following four locations (a) high elevations of Bellevue Hill, (b) the lands at risk of flooding on the west side of Bellevue Hill, (c) the RSpecial lands to the west of Bellevue Hill and (d) Blackberry Lane, south of Three Trouts River.' [emphasis added]*

*'As zoning was removed from comparable adjacent areas which are **closer** to the town centre than the subject lands, it would not be consistent to zone the subject site and bring it within the settlement/LPF boundary. This approach is explicitly stated in Section A.4 'Development Strategy' as follows:*

'The development strategy for Greystones-Delgany will be one primarily of consolidation and infill, with no further settlement expansion beyond the previous LAP boundary;'

'The CE does not agree with the categorisation of the subject site as an 'infill' site. Intensification of development of this site would increase the population at a peripheral/edge of centre location, rather than focusing on infill opportunities that already exist within the LPF boundary. To do so would not be consistent with the Development Strategy set out in Section A.4, as follows:

'To focus on the dense, mixed use regeneration and development of town and village centre infill sites (particularly vacant or under-utilised sites) that are currently served or proximate to public transport services, as a priority above edge of centre or peripheral, greenfield locations.'

'On this basis, it is not recommended to zone the lands RE 'Existing Residential' or bring the lands within the settlement/LPF boundary.'

Recommendation of Chief Executive

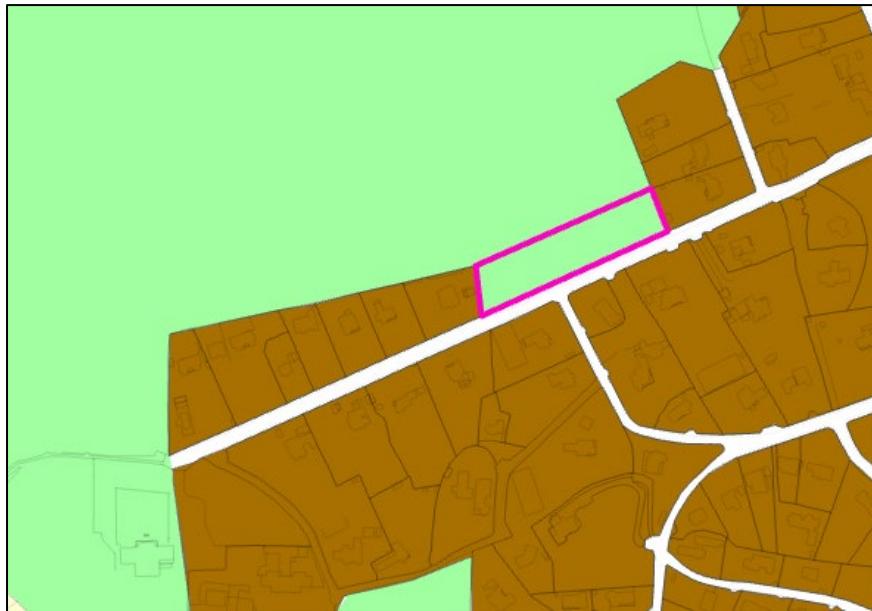
Do **not** proceed to make Proposed Material Alteration No. 29

Proposed Material Alteration No. 30

Amend **MAP NO. 1 LAND USE ZONING** land at Greystones Golf Club

Amend zoning of land at Killincarrig measuring c. 0.5ha from AOS 'Active Open Space' to RS 'Special Residential'.

Change from:



Change to:



Submissions to Proposed Material Alteration No. 30

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 30 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

Opinion of Chief Executive

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not oppose the change in zoning.

This proposed material alteration was proposed by the Elected Members at the Council meeting of the 6th of October 2025. The CE does not support the residential component of the proposed alteration for the reasons already set out in the CE Report, namely:

'The change in zoning is not in error. The AOS zoning reflects the current usage of the lands as part of the golf course. The previous zoning of this land was not taken up at any time and no applications for residential development have been made. In addition, the lands front into the Burnaby, where only lower density housing would be possible in accordance with the objectives of the LPF and it was not considered appropriate therefore to maintain this zoning in the new LPF, but rather to allocate other lands for new residential development that have the potential for more intensive housing.'

Recommendation of Chief Executive

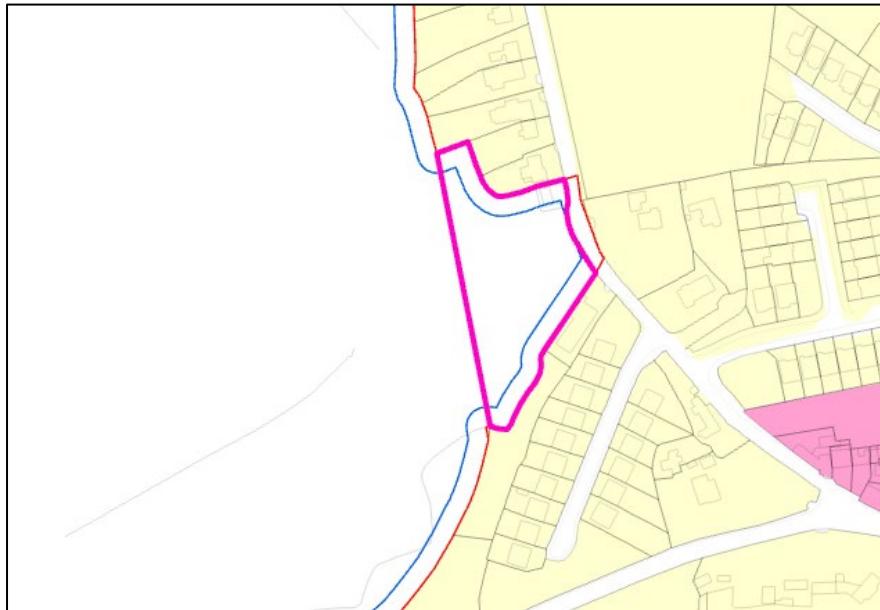
Do **not** proceed to make Proposed Material Alteration No. 30

Proposed Material Alteration No. 31

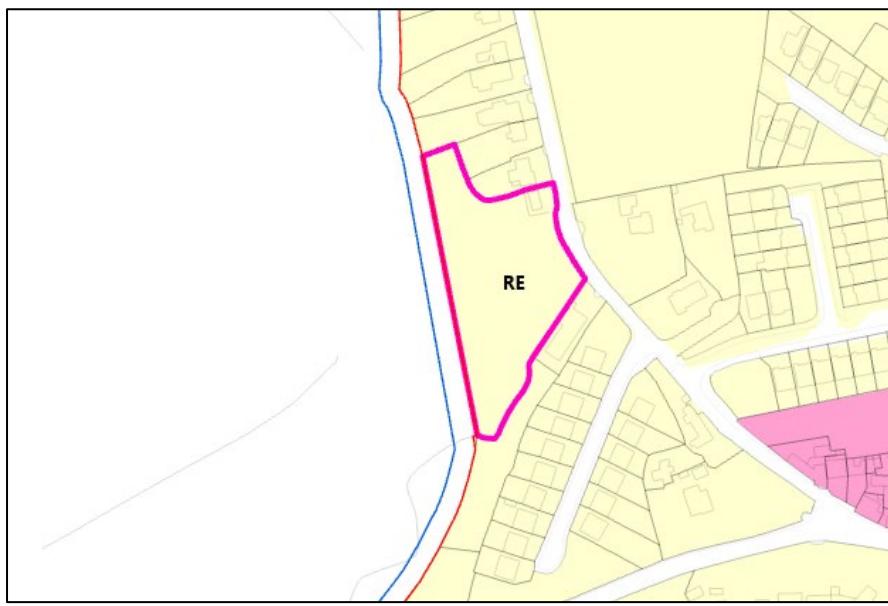
Amend **MAP NO. 1 LAND USE ZONING** land at Delgany Golf Club

Amend zoning of land at Bellevue Demesne measuring c. 0.6ha from unzoned/outside the LPF boundary to RE 'Existing Residential'.

Change from:



Change to:



Submissions to Proposed Material Alteration No. 31

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 31 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

77. Paul Hyland

The submission opposes the following proposals - 8, 26 and 31.

In the case of PMA31, it is put forward that this would also open up Bellevue Hill to more intensive development.

Opinion of Chief Executive

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not oppose the change in zoning.

Paul Hyland – The CE notes the submission, which opposes PMA No. 31.

This proposed material alteration was proposed by the Elected Members at the Council meeting of the 6th of October 2025. The CE does not support the residential component of the proposed alteration for the reasons already set out in the CE Report, namely:

"The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- *The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- *Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

"The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

"In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- *Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).*
- *Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement.*

"To zone these lands would not align with the analysis of this area, and subsequent impact on development options, as discussed in Section A3.3 of the Draft LPF.

"It should be noted that the previous residential zonings of these lands was not taken up at any time and no applications for residential development have been made.

"It is not considered proper planning and sustainable development to zone lands not for the purpose intended i.e. the delivery of needed housing but to manage bank loans.

"The roadside frontage of these lands comprise an historic gateway and driveway into the Bellevue Demesne, and it is likely that protection of same would anyway limit development potential.

"On this basis, it is not recommended to zone the subject lands."

Recommendation of Chief Executive

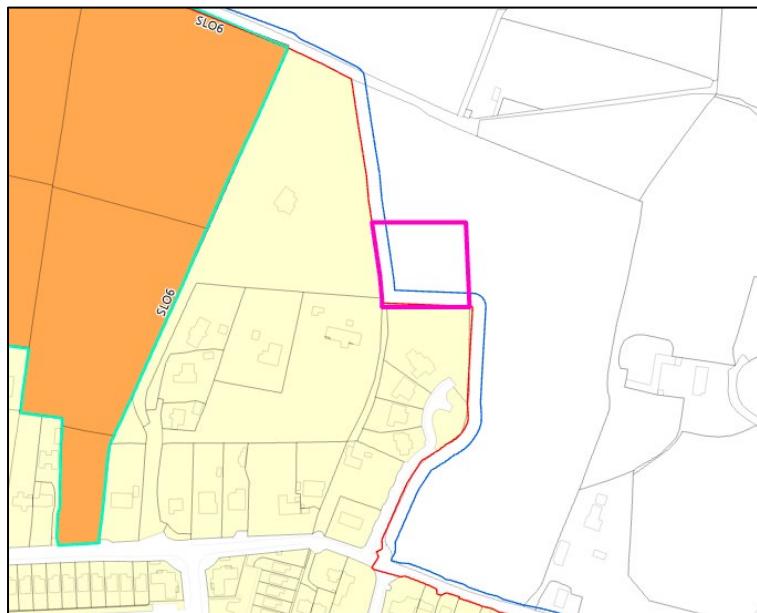
Do **not** proceed to make Proposed Material Alteration No. 31

Proposed Material Alteration No. 32

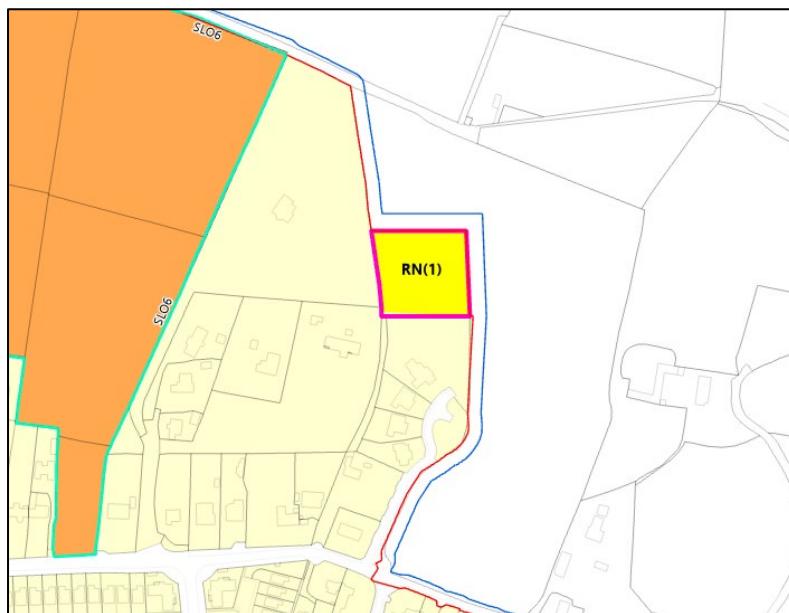
Amend **MAP NO. 1 LAND USE ZONING** land at The Laurels, Kilcoole

Amend zoning of lands at Sea Road measuring c. 0.42ha from unzoned/outside the LPF boundary to New Residential – Priority 1 (RN 1).

Change from:



Change to:



Submissions to Proposed Material Alteration No. 32

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 32 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

28. Richard and David Fox

The submission raises the following issues:

- It is requested that the Councillors do not adopt any of the proposed alterations involving residential zoning in Kilcoole.
- It was highlighted at all stages that there was enough residentially zoned land in Kilcoole.
- The submitters question why has land that was zoned Strategic Land Bank (SLB) in the 2013 Local Area Plan been rezoned and different New Residential - priority 1 (RN1) sites been added in (only one of which was previously SLB)
- The submitters query whether the Council now intending on not complying with the County Development Plan population projections
- They draw attention to the fact that it has been widely reported in the media that the Council is under pressure to zone more land for residential development. If this is the case, amendments should be done initially in conjunction with the planners.
- It is proposed to amend the zoning of this 0.42ha site from outside of the LPF boundary to being inside the boundary, residential development priority 1. It is put forward that no further details have been supplied in the "Proposed Material Alterations" document for this site and as a result, it is very difficult to comment on the reasoning, access and suitability of this site. However, it is pointed out that it was not previously zoned AGR or SLB and is further from the town centre than the submitter's lands at Cooldross Middle.

36. Hubi Kos & 78. Hubi Kos

These 2 No. submissions are approximate duplicates and are summarised together here. The submissions raise the following issues:

1. The [party seeking the rezoning] has no legal right of access through The Laurels, which is served by a privately owned internal road, private service ducts, and a private foul-drainage system. There is no wayleave/easement/land reservation/etc. Section 34(13) of the Planning and Development Act 2000 (as amended) states that '*A planning permission or zoning does not confer any right to access another person's property.*'
2. The [party seeking the rezoning] cannot use, extend or connect to any utilities or services within The Laurels. All utilities within the Laurels are private. The private pumping station serving The Laurels was designed for four houses and is operating at capacity.
3. The lands are isolated agricultural acres with no servicing and no access. The lands are outside the settlement boundary and not contiguous to any public service corridor; no independent access route, no water connection, no Irish Water foul drainage, no road frontage suitable for development, and no infrastructure capacity in the vicinity.
4. The Planning Executive has already rejected this location for development.
5. The LPF Written Statement (Section A.3.2) confirms these lands are unsuitable

56. Des and Edith Battye

The submission raises the following issues:

- The Laurels is a new small private development of four houses and is totally surrounded by its own permanent fence and hedge with its own exit/ entrance onto Sea Road and its own private services.
- There is an existing entrance directly from Sea Road onto this acre/ field. This entrance has always been used when machinery is needed to do work on the acre.
- The existing exit/ entrance in and out of the field are very dangerous, this is getting worse with the increase of traffic / pedestrians up and down the road to the train and beach.

- The bus terminal for the double decker bus which comes every 30 minutes is directly opposite the entrance to the field and acre.
- The speed of traffic on Sea Road and the dangerous bends in the road.
- The narrowness of the road and lack of footpath.
- Two accidents at the entrance to the field / acre have been witnessed in [the submitter's] short time here.
- Any development has an adverse impact on the natural world. Since the development of the chestnuts on Sea Road the woodpeckers have gone, and the wrens have also gone

58. Uisce Éireann

While UE indicates it has no objections to the proposed changes in land zoning; they draw attention to the following:

- 1) The GDA water supply RAG status remains Amber.
- 2) Watermain upgrades may be required in some areas, particularly where the adjacent mains are of small diameter. If there is no UE project in the area, upgrades shall be developer funded.
- 3) Sewer and / or pumping station upgrades may be required in some areas. Where there is no UE project, these shall be developer funded.

66. Office of the Planning Regulator

The Office notes that the proposed material alterations include additional Residential Phase 1 zonings in Kilcoole, which are less favourably located in terms of access to public transport, services, and amenities than Greystones. This approach risks pushing much needed housing to more peripheral locations, which are farther from existing and future services and amenities, and are more car-dependent with consequent implications for carbon emission and targets under the Climate Action Plan 2025.

69. Sandra Hayes

The submission raises the following issues:

- The submission is opposed to PMA No. 32.
- A planning permission or zoning does not confer any right to access another person's property.
- The Planning Executive does not support this submission based on: the Core Strategy, Wicklow County Development Plan 2022-2028, that it would constitute sprawl into un-zoned countryside, that it conflicts with the Kilcoole Area 1 assessment, that no development outside the 2.5 km radius should be facilitated without a very high level of infrastructure and accessibility, which this land demonstrably lacks. The LPF Written Statement (Section A.3.2) outlines these lands are unsuitable.
- The site lies very close to nationally and European-designated sites, including SPAs, SACs, and the Kilcoole marshes, which support protected bird species such as little terns and other migratory birds.
- This and adjacent band of agricultural land serves an essential natural drainage function, reducing flood risk by absorbing rainfall and channelling it towards natural watercourses. Rezoning for any future developments off the Sea Road from the Laurels towards the beach would likely replace permeable soil with impermeable surfaces, increasing surface-water runoff and exacerbating flood risks downstream.
- Car/Pedestrian traffic has increased since the Laurels was developed in 2019/2020, especially within 2025 due to additional housing development and the introduction of the L2 on a 1/2 hour basis. 3 accidents have taken place within a few hundred meters each side of the entrance.
- Public transport/commuter trains are full in the morning.

71. National Transport Authority

Material Alterations 20, 23A, 24, 25 & 32

The NTA points out that above-mentioned alterations propose the application of the 'New Residential Priority 1' zoning objective to various greenfield sites on the edge of the established built-up-area of Kilcoole, on land either zoned for

other purposes, primarily 'New Residential Priority 2', or on land not zoned and beyond the current town boundary. The NTA notes, as per the Chief Executives Report on the Draft LPF, that the zoning of land for residential purposes under the Draft LPF has followed a robust assessment of the Core Strategy requirements and that additional zoned land beyond that in the Draft would be surplus to requirements at this time. Based on the above and the location of the subject lands, the NTA is concerned that these proposed changes would not be aligned with local, regional and national objectives that seek to provide for sequential and compact forms of development, including Measure Plan 4 of the Transport Strategy which states the following:

"the NTA will support and prioritise development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services."

The NTA considers that the application of the 'New Residential Priority 1' zoning to an abundance of lands on the edge of the established built-up area, could facilitate an unsustainable form of development and lead to high levels of car dependency in the subject areas, particularly in advance of the LTP being prepared. Given that there are more sequentially appropriate residentially zoned lands already identified as part of the Draft LPF, it is submitted that these lands, that are largely unserved by active travel infrastructure, should remain under their current zoning designations at this time.

NTA Recommendation: The NTA recommend that the proposed zonings under MAs 20, 23A, 24, 25 & 32 not be brought forward at this time.

Opinion of Chief Executive

Richard and David Fox – The CE notes this submission, which opposes PMA No. 32.

Hubi Kos – The CE notes this submission, which opposes PMA No. 32.

Des and Edith Battye – The CE notes this submission, which opposes PMA No. 32.

Uisce Éireann – The CE notes the submission of Uisce Éireann, which does not oppose the change in zoning.

Office of the Planning Regulator – The CE notes the submission of the OPR.

Sandra Hayes – The CE notes this submission, which opposes PMA No. 32.

NTA – The CE notes this submission, which opposes PMA No. 32.

This proposed material alteration was proposed by the Elected Members at the Council meeting of 6th October 2025. The CE does not support the proposed alteration for the reasons already set out in the 1st CE Report, namely:

'The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;*
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).*

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)*

- *Conflict with the assessment of Kilcoole 'Area 1' and the resultant impact on future development options as set out in Section A.3.2 of the draft LPF Written Statement.*
- *Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.'*

In addition to these reasons, the CE also has concerns about the developability of these lands given that it appears that services are not available.

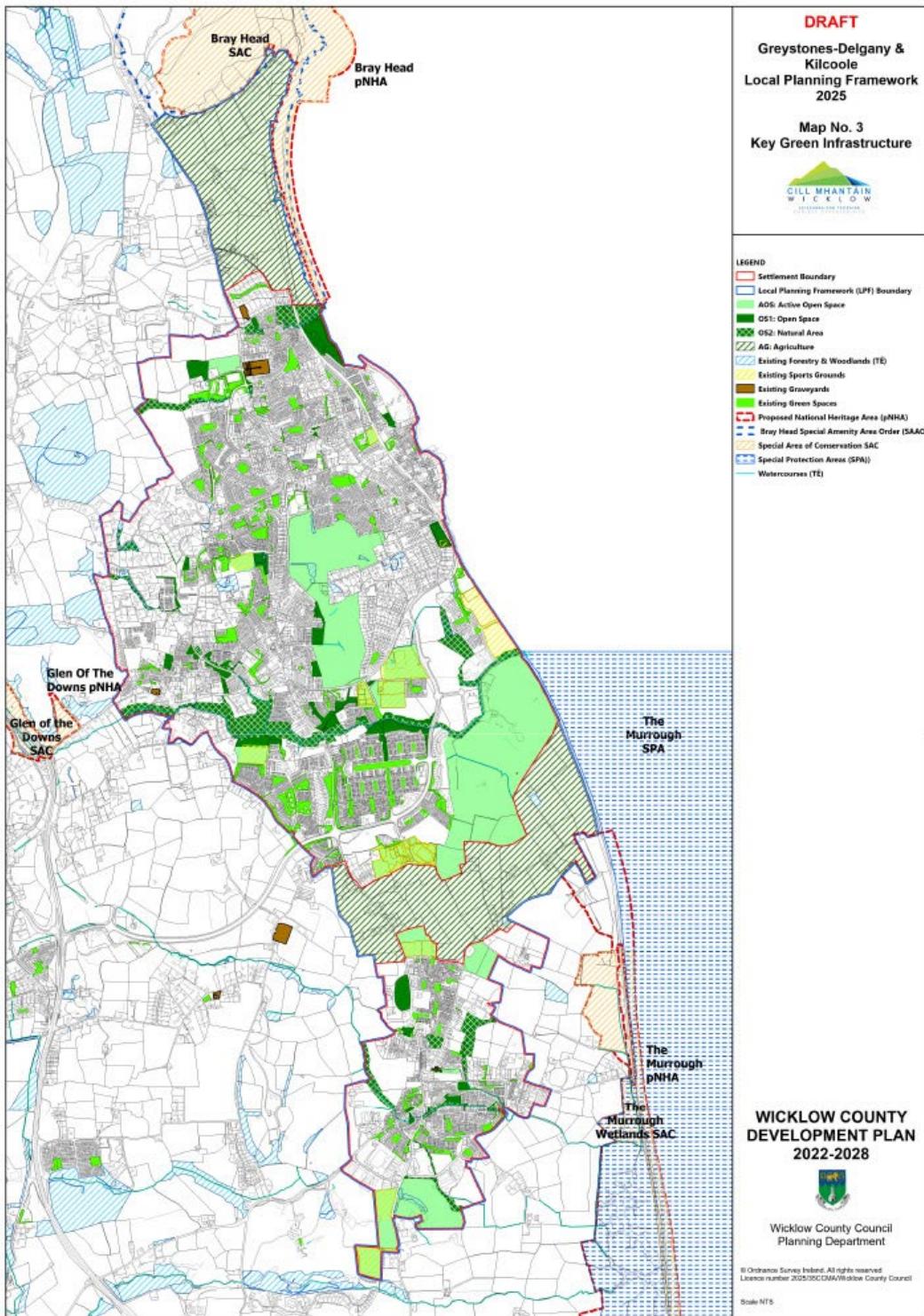
Recommendation of Chief Executive

Do **not** proceed to make Proposed Material Alteration No. 32

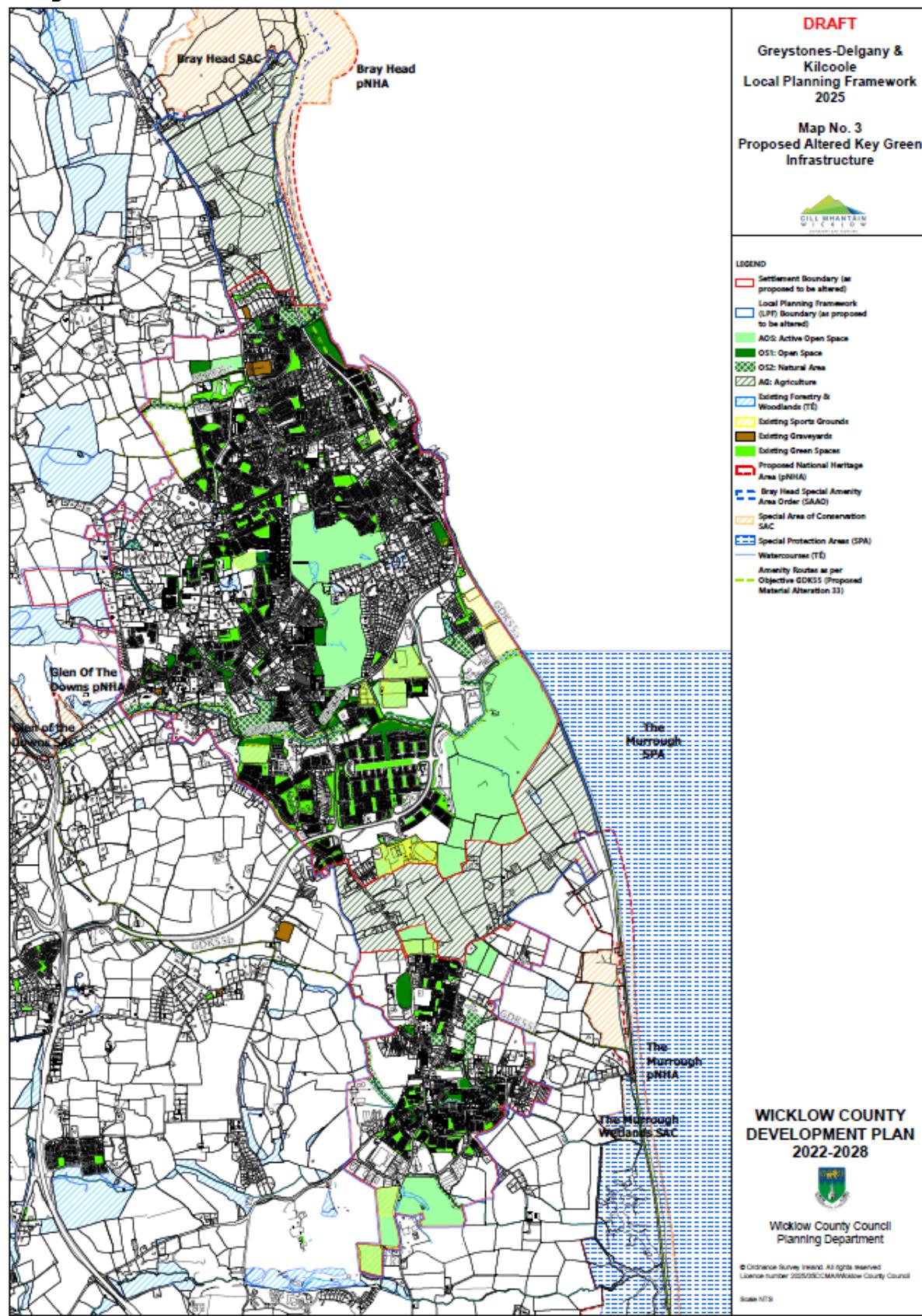
Proposed Material Alteration No. 33

Amend **MAP NO. 3 KEY GREEN INFRASTRUCTURE** to add amenity routes listed in Objective GDK55

Change from:



Change to:



Submissions to Proposed Material Alteration No. 33

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 33 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

No other submissions received related to PMA33

Opinion of Chief Executive

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 33

APPENDIX 3: STRATEGIC FLOOD RISK ASSESSMENT

Proposed Material Alteration No. 34

Update **APPENDIX 3: STRATEGIC FLOOD RISK ASSESSMENT** as follows:

Update the Strategic Flood Risk Assessment and associated flood maps to consider the National CFRAM coastal dataset.

See accompanying **Addendum I.2, Strategic Flood Risk Assessment** and associated flood maps

Proposed Material Alteration No. 34

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 34 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

54. Office of Public Works

Coastal Flood Datasets

The OPW welcomes the updating of mapping to consider the National CFRAM coastal dataset.

Opinion of Chief Executive

OPW – The CE notes the submission of the OPW, welcoming the proposed material alteration.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

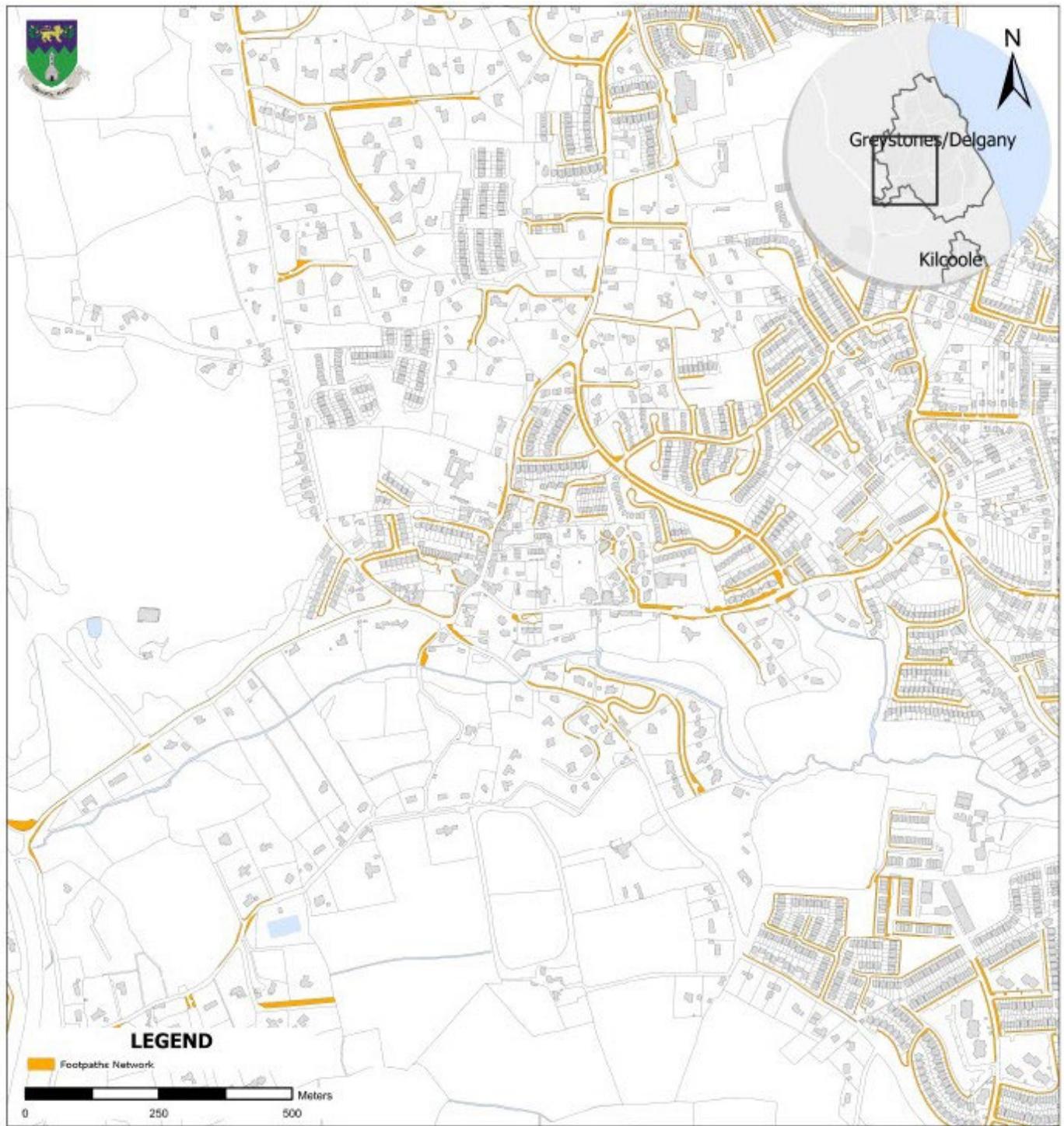
To proceed to make Proposed Material Alteration No. 34

APPENDIX 6: INFRASTRUCTURE ASSESSMENT AND IMPLEMENTATION PROGRAMME

Proposed Material Alteration No. 35

Update **APPENDIX 6: INFRASTRUCTURE ASSESSMENT AND IMPLEMENTATION PROGRAMME** to include additional Delgany Footpaths map as follows:

Include map:



Submissions to Proposed Material Alteration No. 35

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 35 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

30. Transport Infrastructure Ireland:

TII notes that the "Transport Strategy" of the draft LPF is fundamentally linked to Appendix 6 Infrastructure Assessment & Implementation Programme of the draft LPF. TII is a named stakeholder at section 2 Key Stakeholders, subsection 2.2 Roads & Transportation Infrastructure. Subsection 3.3 Transportation & Movement opens with a description of the progression of the "Greystones-Delgany & Kilcoole Transport Study (WCC / NTA)" stating that the Study is to become the Local Transport Strategy which is "still in development".

In this regard, TII notes that proposed Material Alteration nos. 35, 36 and 37 pertain to Draft LPF Appendix 6: Infrastructure Assessment and Implementation Programme.

- Proposed Material Alteration no. 35 is an "additional Delgany Footpaths map" which appears to indicate existing footpaths immediately adjacent N11 Junction 10 (Delgany) and potentially within the Motorway Maintenance and Renewal Contract (MMaRC) Network Area A.

Opinion of Chief Executive

TII – The CE notes this submission. The maps of footpaths shown is derived from Tailte Éireann Prime2 base mapping and is intended to show existing footpaths in the area, as opposed to being a policy/intended network map. It is not evident therefore what, if any, issue or concern is being raised by the TII.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 35

Proposed Material Alteration No. 36

Update **APPENDIX 6: INFRASTRUCTURE ASSESSMENT AND IMPLEMENTATION PROGRAMME** to amend **Implementation & Infrastructure Delivery Schedule Table** as follows:

Implementation & Infrastructure Delivery Schedule Table

Infrastructure	Delivery Schedule	Funding
TRANSPORT		
Delgany Village Accessibility Scheme (Convent Road Phase)	Medium term	State, WCC
Chapel Road Pedestrian and Cyclist Infrastructure Improvement Scheme	Immediate	State, WCC
Alternative route to the east of Kilcoole to 'by-pass' the core town centre	Ongoing	Developer, State, WCC
Pedestrian and cycling infrastructure from Kilcoole Main Street to Kilcoole train station	Medium term	State, WCC
Pedestrian and cycling infrastructure from Kilcoole to Charlesland	Medium term Short term	Developer, State, WCC
Pedestrian and cycling infrastructure from Kilcoole to Newtownmountkennedy	Medium term	State, WCC
Pedestrian infrastructure along the full length of Priory Road from Eden Gate to Delgany	Short term	State, WCC
Pedestrian infrastructure from Delgany to Kindlestown Woods	Immediate	State, WCC
Pedestrian and cycling safety improvements on the Charlesland dual carriageway from Kilcoole Road to Mill Road (part of Pathfinder Programme)	Immediate	State, WCC
Pedestrian and cycling safety improvements from Killincarrig crossroads to Greystones station (part of Pathfinder Programme)	Immediate	State, WCC
Pedestrian and cycling safety improvements from Greystones station to the harbour via Church Road and Victoria Road (part of Pathfinder Programme)	Immediate	State, WCC
Pedestrian and cycling safety improvements along Church Lane	Medium term	State, WCC
Pedestrian and cycling infrastructure from Church Road to the harbour via La Touche Place and Trafalgar Road, including the potential development of a new foot/cycle bridge over the railway line	Medium term	State, WCC
Pedestrian and cycling infrastructure along the Kilcoole Road from Killincarrig crossroads to Knockroe roundabout	Short term	State, WCC
Pedestrian and cycling infrastructure from Charlesland Wood to Mill Road via Burnaby Lawns including a new bridge across the Three Trout's River (part of Pathfinder Programme)	Immediate	State, WCC
Pedestrian, cycling and road layout improvements in Castle Villas, Carrig Villas and New Road in Killincarrig in order to create a 'homezone' environment	Medium term	State, WCC
Pedestrian and cycling improvements, including potential full pedestrianisation, of Killincarrick Road along Burnaby Park from the Church Road junction to the Burnaby Road junction	Long term	State, WCC

Pedestrian and cycling infrastructure from Prettybush Corner to Kilquade	Medium term	State, WCC	
Pedestrian and cycling infrastructure from R761 to Chapel Road via Applewood Heights	Medium term	State, WCC	
<p>To cooperate with NTA, Iarnrod Eireann and other relevant transport planning bodies in the delivery of a high quality, integrated and accessible transport system in the LPF area. In particular to support and facilitate the following schemes / programmes:</p> <p>a) The improvement of mainline train and DART services</p> <p>b) The improvement of existing and provision of new bus services within the LPF area and linking the LPF area to the wider County and to Dublin</p>	Ongoing	State, WCC	

Submissions to Proposed Material Alteration No. 36

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 36 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

30. Transport Infrastructure Ireland:

TII notes that the "Transport Strategy" of the draft LPF is fundamentally linked to Appendix 6 Infrastructure Assessment & Implementation Programme of the draft LPF. TII is a named stakeholder at section 2 Key Stakeholders, subsection 2.2 Roads & Transportation Infrastructure. Subsection 3.3 Transportation & Movement opens with a description of the progression of the "Greystones-Delgany & Kilcoole Transport Study (WCC / NTA)" stating that the Study is to become the Local Transport Strategy which is "still in development".

In this regard, TII notes that proposed Material Alteration nos. 35, 36 and 37 pertain to Draft LPF Appendix 6: Infrastructure Assessment and Implementation Programme.

- Proposed Material Alteration no. 36 pertains to the "Implementation & Infrastructure Delivery Schedule Table" where TII notes the retention unchanged of the intention to implement "Pedestrian and cycling infrastructure from Kilcoole to Newtownmountkennedy."

Opinion of Chief Executive

TII – The TII submission relates to concerns set out in their submission to the Draft LPF that the LPF and associated transport objectives / maps include provision of pedestrian and cycling infrastructure between Kilcoole and Newtown, which would pass under the N11 and therefore interact with a TII asset. In order to address this (and other concerns raised) the CE had recommended in her first report an additional objective as follows:

'GDK-XX To protect the strategic function of the N/M11 in accordance with Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.'

The Elected Members did not accept this recommended alteration at the Council Meeting of 6th October 2025.

As PMA No. 36 relates to only a single minor change in the timeframe of pedestrian and cycling infrastructure from Kilcoole to Charlesland, it is not possible at this stage to include any further modification to other items in this table.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 36

Proposed Material Alteration No. 37

Update **APPENDIX 6: INFRASTRUCTURE ASSESSMENT AND IMPLEMENTATION PROGRAMME** to amend **INFRASTRUCTURE ASSESSMENT AND REQUIREMENTS FOR KEY DEVELOPMENT AREAS (IDENTIFIED AS SLOs)** as follows:

Infrastructure assessment and requirements for key development areas (identified as SLOs)

Site ID	Current servicing status				Additional infrastructure needs to support full development of site
	Water Supply	Wastewater Infrastructure	Surface Water Infrastructure	Roads & Transportation	
SLO1: Mill Road – South Beach	1	1	1	1	N/A
SLO2: Mill Road	1	1	1	1	N/A
SLO3: Charlesland	1	1	1	1	N/A
SLO4: Coolagad	1	1	2	1	Surface Water - Surface Water Management Plan required – Developer + WCC Wastewater and water supply main upgrades downstream - Developer + UE Sports / Amenity Park – Developer Community facilities – Developer +WCC
SLO5: Bullford	1	1	1	1	Sports / Amenity Park – Developer Community facilities (childcare) – Developer Additional community facilities – Developer +WCC
SLO6: Ballydonarea	1	2	1	1	Wastewater Services - Drainage Area Plan required – Developer + WCC + UE Watermain upgrades - Developer + UE Amenity Park – Developer Community facilities (childcare) – Developer Additional community facilities – Developer +WCC
SLO7 : Three Trouts	1	1	1	1	Amenity Park – Developer

1 = serviced, 2 = serviceable, 3 = unserviced

Submissions to Proposed Material Alteration No. 37

Some submissions (including that of the Department of Housing, Local Government, and Heritage) have ticked PMA No. 37 on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

30. Transport Infrastructure Ireland:

TII notes that the "Transport Strategy" of the draft LPF is fundamentally linked to Appendix 6 Infrastructure Assessment & Implementation Programme of the draft LPF. TII is a named stakeholder at section 2 Key Stakeholders, subsection 2.2 Roads & Transportation Infrastructure. Subsection 3.3 Transportation & Movement opens with a description of the progression of the "Greystones-Delgany & Kilcoole Transport Study (WCC / NTA)" stating that the Study is to become the Local Transport Strategy which is "still in development".

In this regard, TII notes that proposed Material Alteration nos. 35, 36 and 37 pertain to Draft LPF Appendix 6: Infrastructure Assessment and Implementation Programme.

Opinion of Chief Executive

TII – The CE notes the submission of TII, however it is not clear what specific comment or request is being made in relation to PMA No. 37.

This proposed alteration was recommended by the Chief Executive in her previous report and is still recommended.

Recommendation of Chief Executive

To proceed to make Proposed Material Alteration No. 37

5.1 Summary of SEA / AA issues raised and CE's opinion and recommendation

STRATEGIC ENVIRONMENTAL ASSESSMENT

Strategic Environmental Assessment

Some submissions have ticked Strategic Environmental Assessment on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here. Of particular note are many submissions requesting that SEA/other environmental assessment be undertaken for PMA No. 26. This is addressed under that PMA.

32. Environmental Protection Agency

The EPA makes the following observations:

In our role as an SEA environmental authority under the SEA Regulations, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions do not include approving or enforcing SEAs or plans.

Proposed SEA Determination

We note your proposed determination regarding the need for SEA of the Alterations

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land-use plans at county and local level, we provide a 'self-service approach' via guidance document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources'. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority land-use plans. These should be considered, as appropriate and relevant to the Alterations.

Sustainable Development

In proposing the Alterations, Wicklow County Council should ensure that the Variation, as amended, is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Variation.

In considering the Alterations, Wicklow County Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

Wicklow County Council should also ensure that the Variation is consistent with key relevant higher-level plans and programmes.

Specific Comments to be considered

Where the SEA has identified any alterations as having potential for likely significant environmental effects or which conflict with national environmental or planning policy, clear justification should be given for proceeding with those alterations. The Plan, prior to its adoption, should also consider and integrate the recommendations of the SEA.

Future Modifications to the Variation

Where further changes to the Variation are proposed, these should be screened for likely significant effects in accordance with SEA Regulations.

SEA Statement – “Information on the Decision”

Once the Variation is adopted/made, you should prepare an SEA Statement that summarises the following:

- How environmental considerations have been integrated into the Variation;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Variation;
- The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Variation.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/publications/monitoring--assessment/assessment/EPA_Guidance_web.pdf

Environmental Authorities

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Climate, Energy and the Environment; and,
- Minister for Agriculture, Food, and the Marine.
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

If you have any queries or need further information in relation to this submission, please contact me directly. I would also be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.

42. Inland Fisheries Ireland

Inland Fisheries Ireland (IFI) is a statutory agency responsible for inland fisheries in Ireland. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management, and conservation of the inland fisheries resource.

The IFI makes the following observations:

In the SEA Environmental Report for Proposed Material Alterations Appendix III – Non-Technical Summary the following is stated, which is an oversimplified review of the current capacity available within the Kilcoole WWTP.

“The Kilcoole WWTP (Registration No. D0087-01) has a design capacity of 4,000 Population Equivalent (PE), with current load of 1,955 PE and, as indicated by Uisce Éireann, has spare capacity available. The Kilcoole WWTP is currently fully compliant with the Emission Limit Values (ELVs) set in the Wastewater Discharge Licence in the most recent available Annual Environmental Report 2022.20 Notwithstanding this, the EPA has identified the plant on its Priority Area List, in order to further contribute to the protection of water quality, with an upgrade to the plant proposed to be completed by 2030.”

IFI would like to inform the Local Authority that although the Kilcoole WWTP is compliant with the current ELV's, prescribed in the Discharge licence, this does not protect the receiving water body, from deteriorating water quality d/s of the discharge from the plant.

This is evident when years of ambient monitoring data are examined, which shows a consistent impact downstream of the discharge from the WWTP at the current wastewater loading levels.

If UE are considering allowing any further connections to this WWTP, a review of the discharge licence is required to allow new stricter ELVS to be set to protect the receiving water body, and the level of treatment and storm water storage would have to be improved considerably to cater for any increased loadings.

Even if improvements were made to current treatment processes which improved the discharge emission standards, it would only result in reducing the current impact that the plant is having on the receiving water body.

IFI are of the opinion that it may not be technically feasible to combine increased loadings with improved ELV's without resulting in a further deterioration in water quality d/s of the discharge from the plant.

In the interest of sustainable development and compliance with the Local Authorities legal requirements in accordance with the Water Framework Directive, The Habitats Directive to protect both surface and groundwater sources, designated sites from significant environmental impact, it is recommended that any future development is approved, only after the necessary infrastructural upgrades to the wastewater and drainage infrastructure have been completed.

83. Department of Housing, Local Government, and Heritage

This submission raised specific issues in relation to PMAs 23A and 26. The issues in question are addressed under the PMA in question and will not be replicated here.

Opinion of Chief Executive

EPA – The 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been considered in the SEA of the Variation and LPF.

Wicklow County Council has ensured and will continue to seek to ensure that the emerging Variation and LPF aligns with and is consistent with higher-level objectives, including those relating to proper planning and sustainable development, the provision of critical service infrastructure, climate action and key relevant higher-level plans and programmes.

The SEA Statement will detail how environmental considerations, including SEA recommendations, have been integrated into the Variation and LPF.

Any future modifications will be considered to ensure that they would not be likely to result in environmental effects, using a methodology that is similar method of assessment applied in the SEA of the Proposed variation and LPF.

An SEA Statement will be prepared including the required information and taking into account the cited EPA guidance on SEA Statements. A copy of the SEA Statement will be circulated to environmental authorities consulted during the SEA process.

The relevant environmental authorities have been and continue to be consulted with through the SEA/Variation - LPF preparation process.

IFI - Under "Waste Water", the Non-Technical Summary to the SEA Environmental Report states:

"Uisce Éireann, working in partnership with Wicklow County Council, is making investments to undertake essential upgrade works to waste treatment plants in towns and villages across the County. The upgrading of infrastructure will contribute towards compliance with the Water Framework Directive, EU Urban Waste Water Treatment Directive and Drinking Water Regulations and will help to protect human health and maintain the quality of surface and ground waters. The Local Planning Framework area is served by two Wastewater Treatment Plants (WWTPs): one at Woodlands, Greystones; and one at Cooldross, Kilcoole.

The Greystones WWTP (Registration No. D0010-01) has a design capacity of 40,000 Population Equivalent (PE), with current load of 26,712 PE and, as indicated by Uisce Éireann, has spare capacity available. The Greystones WWTP is currently fully

compliant with the Emission Limit Values (ELVs) set in the Wastewater Discharge Licence in the most recent available Annual Environmental Report 2023.

The Kilcoole WWTP (Registration No. D0087-01) has a design capacity of 4,000 Population Equivalent (PE), with current load of 1,955 PE and, as indicated by Uisce Éireann, has spare capacity available. The Kilcoole WWTP is currently fully compliant with the Emission Limit Values (ELVs) set in the Wastewater Discharge Licence in the most recent available Annual Environmental Report 2022. Notwithstanding this, the EPA has identified the plant on its Priority Area List, in order to further contribute to the protection of water quality, with an upgrade to the plant proposed to be completed by 2030."

It is acknowledged that compliance with ELVs prescribed in the Discharge licences does not necessarily protect the receiving water body from deteriorating water quality. As detailed under Section 4.9 of the main SEA Environmental Report, the Water Framework Directive status (2016-2021) of the Kilcoole Stream, both upstream and downstream of Kilcoole, is identified as being poor, not high or good as is the objective of the Directive. As identified, the stream is at risk of not meeting the WFD's objectives due to damage caused by significant pressures related to urban wastewater pressures.

Any review of the discharge licence is beyond the scope of the Proposed Variation and associated SEA process.

As identified under Chapter 13 of the existing Development Plan:

"EU Urban Wastewater Treatment Directive 91/271/EC The Urban Waste Water Treatment Directive sets standards to be met in the collection and treatment of wastewater as well as the monitoring requirements for wastewater discharges from urban areas. The directive is about protecting the environment from the adverse effects of urban wastewater discharges. On 1 January 2014, the management of urban wastewater collection and treatment infrastructure transferred from local authorities to Irish Water. Compliance with the requirements of the directive is monitored by the EPA, and annual reports on compliance are available from the EPA."

The licensing or certification of wastewater discharges was introduced in 2007 under the Waste Water Discharge (Authorisation) Regulations 2007. The regulations identify the EPA as the regulator that authorises discharges from wastewater treatment plants.

Larger wastewater treatment plants are licensed, whereas smaller plants are subject to certification. The licenses set out conditions and remedial actions to be taken to ensure compliance with standards for various substances' discharges. Licenses also outline the actions needed for meeting obligations under a number of EU Environmental Directives. The licensing and certification processes are open and transparent and access to the application documentation is freely available from the EPA."

CPO 13.15 of the existing Development Plan provides that:

"In order to fulfil the objectives of the Core Strategy, Wicklow County Council will work alongside and facilitate the delivery of Irish Water's Water Services Investment Programme, to ensure that all lands zoned or identified for development are serviced by an adequate wastewater collection and treatment system and in particular, to endeavour to secure the delivery of regional and strategic wastewater schemes..."

Any proposal for development under the Plan, as varied, would be required to comply with the provisions of both the Local Planning Framework and the Development Plan in order to be granted permission. The Local Planning Framework provides that:

- GDK51, "Where relevant, applications for development must demonstrate that the proposal for development would not, individually or cumulatively, affect a water body's ability to meet its objectives under the Water Framework Directive".
- Under Part B.8 - European Sites Objectives, "Projects giving rise to adverse effects on the integrity of European Sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements,

emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this LPF¹."

Recommendation of Chief Executive

SEA documents will be updated upon adoption of the Variation and LPF.

It is recommended to include the following text at the end of the Waste Water baseline subsections in both the main SEA Environmental Report and the associated Non-Technical Summary:

'Compliance with ELVs prescribed in the Discharge licences does not necessarily protect the receiving water body from deteriorating water quality. The Water Framework Directive status (2016-2021) of the Kilcoole Stream, both upstream and downstream of Kilcoole, is identified as being poor, not high or good as is the objective of the Directive. As identified, the stream is at risk of not meeting the WFD's objectives due to damage caused by significant pressures related to urban wastewater pressures.'

¹ Except as provided for in Article 6(4) of the Habitats Directive, viz. there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) adequate compensatory measures in place.

APPROPRIATE ASSESSMENT

Appropriate Assessment

Some submissions have ticked Appropriate Assessment on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here. Of particular note are many submissions requesting that AA/other environmental assessment be undertaken for PMA No. 26. This is addressed under that PMA.

83. Department of Housing, Local Government, and Housing

This submission raised specific issues in relation to PMAs 23A and 26. The issues in question are addressed under the PMA in question and will not be replicated here.

Opinion of Chief Executive

An Appropriate Assessment determination will be made upon adoption of the Variation and LPF.

Recommendation of Chief Executive

No recommendation.

STRATEGIC FLOOD RISK ASSESSMENT

Strategic Flood Risk Assessment

Some submissions have ticked Strategic Flood Risk Assessment on the consultation portal as the subject of their submission. However, on review it is evident that the majority of such submissions relate primarily to subsequent PMAs, or no specific proposed material alteration.

In these circumstances, these submissions have therefore been considered under the relevant PMA or elsewhere, and in order to avoid duplication, are not considered here.

54. Office of Public Works

The OPW makes the following observations:

The Office of Public Works (OPW), as lead agency for the coordination of an integrated, 'whole-of-Government' approach to flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Material Alterations to Proposed Variation No. 4 to the Wicklow County Development Plan 2022-2028 (re. the Draft Greystones - Delgany & Kilcoole Local Planning Framework (LPF) 2025).

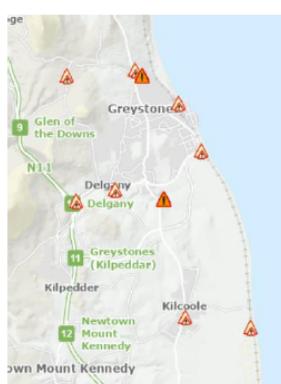
This submission is made specifically concerning flood risk management. Further submissions on the material alterations may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

Coastal Flood Datasets

The OPW welcomes the updating of mapping to consider the National CFRAM coastal dataset.

Past Flood Events

The OPW previously commented that "A review of past flood events in the settlement areas should be undertaken. Past flood events reported to the OPW can be viewed on the webportal Floodinfo, however Wicklow County Council may have other records". This comment has not been addressed in the material alterations. This could include listing the events, the source of the flooding, year of the event etc., assessing the location in relation to the flood risk extents, and noting in sequential approach assessments and justification tests that previous flood events have occurred.



Floodinfo, Past Flood Events

Flood Relief Schemes

The OPW had previously commented that "A flood relief scheme is proposed for Greystones and Environs, as well as a potential scheme subject to further assessment for Kilcoole. Wicklow County Council should have regard to these to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures.

Discussion in relation to these proposals should be included and that consideration has been given during the zoning of lands. A specific objective in this regard should be included in the Draft Local Area Plan". This comment has not been

addressed in the material alterations. Details of the proposed measures can be found in the relevant Flood Risk Management Plan, which is available in Publications on floodinfo.

66. Office of the Planning Regulator

The Office welcomes the update of the Strategic Flood Risk Assessment (SFRA) to consider the National Catchment-based Flood Risk Assessment and Management coastal dataset and its inclusion in the SFRA Addendum 1.

Opinion of Chief Executive

Past Flood events: The OPW appears to consider that past flood events have not been taken into account in the SFRA. The OPW raised this matter in their submission to the Proposed Variation – Draft LPF and in her 1st Report, the CE responded that '*The SFRA has been prepared in line with the Flood Risk Guidelines. All past flood event records correspond with areas identified as at risk of flooding in the flood maps prepared for the SFRA*'.

With respect to the Proposed Material Alterations, which are the only matters still to be considered at this stage of variation making, all PMAs have been subject to flood risk assessment as set out in the published 'Addendum I.2 to the SFRA'. None of the PMAs overlap with identified 'past flood events'.

Flood Relief Schemes: The OPW appears to consider that flood relief schemes have not been taken into account in the SFRA. The OPW raised this matter in their submission to the Proposed Variation – Draft LPF and in her 1st Report, the CE responded as follows:

It is noted from the OPW's website floodinfo.ie that there is a future 'Greystones & Environs Flood Relief Scheme' where it is proposed to "progress the development of a flood relief scheme for Greystones & environs". It is further stated that the measure outline is as follows -

"Progress the project-level development and assessment of a Flood Relief Scheme for Greystones & Environs, including environmental assessment as necessary and further public consultation, for refinement and preparation for planning / exhibition and, if and as appropriate, implementation. The proposed measure for Greystones that may be implemented after project-level assessment and planning or Exhibition and confirmation might include physical works, such as a series of hard defences (flood embankments and walls, 1.5km long) and a storage area. The measure would protect to the 1% AEP fluvial flood event, with an average hard defence height of 0.9m (reaching a maximum height of 1.8m)."

*It would appear that this Flood Relief Scheme is in its very initial stages; the details are unclear/unknown and it is not being actively progressed; and therefore it is not possible to integrate support for same in any clear or specific manner in this LPF. However, all such schemes are already supported under the Flood Risk Management Objective **CPO14.05** of the County Development Plan:*

"To continue to work with the OPW and other agencies to deliver Flood Defence Schemes in the County as identified in current and future FRMPs..."

Therefore it is not considered necessary to include a specific objective in the LPF.

Office of the Planning Regulator: The CE notes the submission of the OPR.

Recommendation of Chief Executive

SFRA documents will be updated upon adoption of the Variation and LPF.