



# Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

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<b>Reference:</b>	GDKLAP-145807
<b>Submission Made</b>	January 30, 2024 2:59 PM

## File

Sutton\_s LAP submission.pdf, 0.79MB

# MARSTON

## PLANNING CONSULTANCY

Planning Department  
Wicklow County Council  
Council Buildings  
Whitegates  
Station Road  
Wicklow

29<sup>th</sup> January 2024

Our Ref. 23093

**Re: Formal submission to the Draft Greystones-Delgany and Kilcoole Local Area Plan 2024 in relation to lands at**

### Pre-Draft Public Consultation

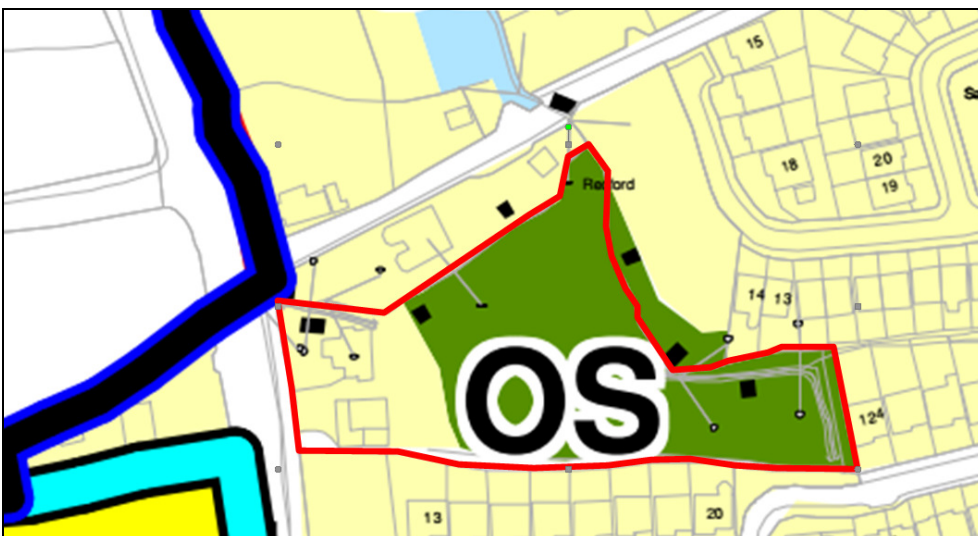
Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by our clients Ciaran Sutton, Brian Sutton and Seaghan Sutton who are the owners of extensive lands and property at Saint Mary's, Redford, Greystones, Co. Wicklow; and associated lands outlined in red on the map below to make this submission in respect of the Draft Greystones-Delgany and Kilcoole Local Area Plan 2024 under section 20 of the Planning and Development Act 2000. We have now had an opportunity to prepare a detailed professional observation on the preparation of the Draft Local Area Plan insofar as it relates to their landholding.

The submission is made having regard to the overarching policies and objectives of the Wicklow County Development Plan 2022-2028; Rebuilding Ireland: Action Plan for Housing and Homelessness; Regional Spatial and Economic Strategy for the Eastern and Midland region 2019-2031; the National Planning Framework.

### Description of the subject lands

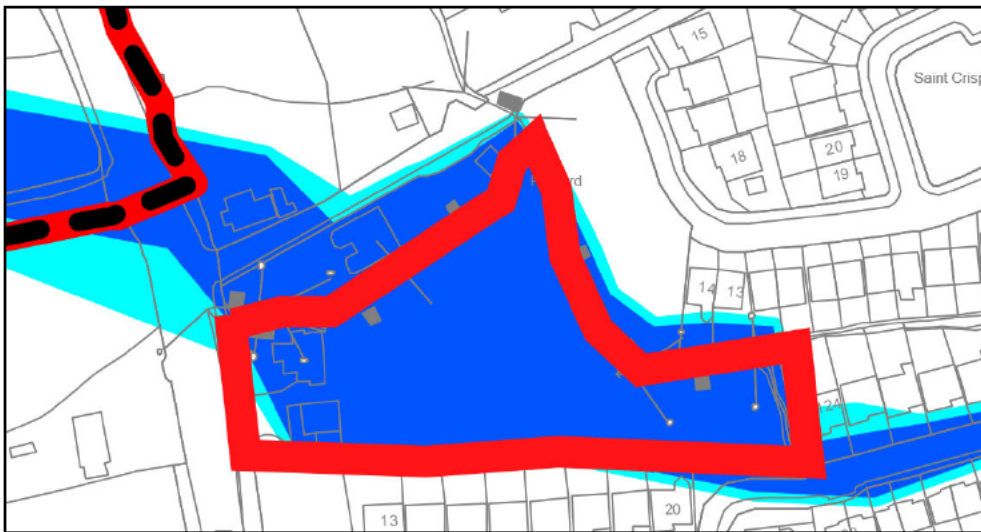
Our clients' lands include a roughly triangular tranche of fields and lands that lie towards the northern boundary of Greystones to the immediate east of the R761 (Bray Road) and to the south of The Grove road. The map below indicates the entire landholding as it relates to the adopted Greystones-Delgany and Kilcoole LAP 2013.



*Excerpt from previous Greystones-Delgany and Kilcoole LAP indicating clients lands identified in red that are partly zoned residential, and partly zoned as open space*

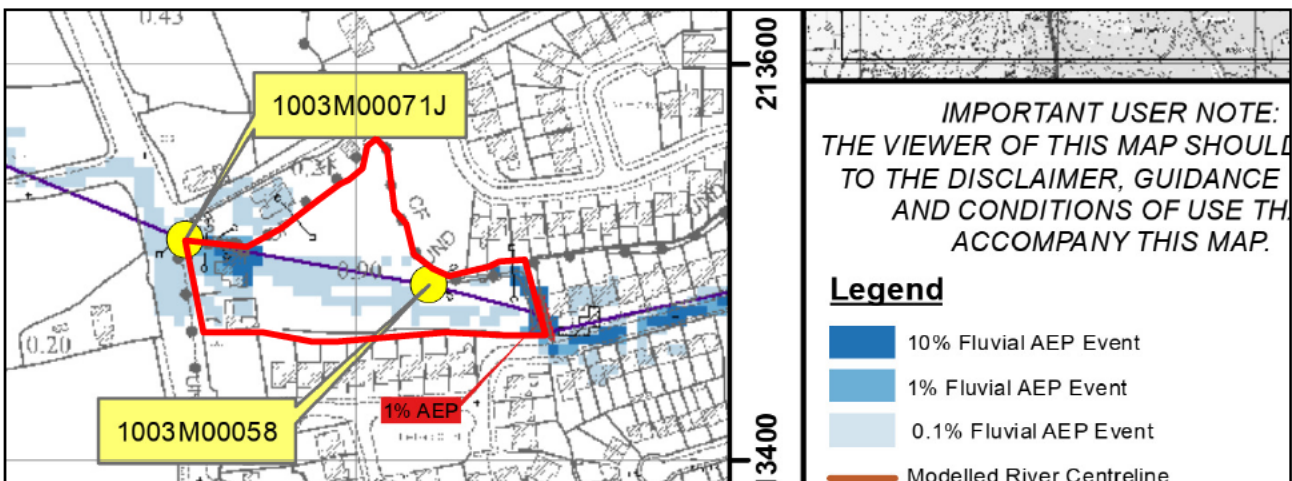
The excerpt from the land use zoning map indicated that the western part of the site (c. 2,400sqm) was zoned Existing Residential (RE), with the remaining lands zoned as open space (6,300sqm). The zoning history of this site is notable in that prior to the 2013 LAP being adopted, the majority of the site was zoned residential, with only the north-east boundary being zoned as open space. It therefore cannot be questioned whether it is appropriate in principle to zone these lands entirely or more substantially as residential.

We note that the lands remained similarly zoned when the pre-draft land use zoning map was published prior to the Draft Local Area Plan being published in 2012. However, the zoning was amended when the draft LAP was published. The reasoning and rationale behind this change to the zoning was the potential of the lands to flood. Map C of the Draft Greystones-Delgany and Kilcoole LAP 2013 identified areas of the LAP that were prone to flooding and defined them as being Flood Zone A (dark blue) or B (cyan). The Map indicated that these flood zones were indicative with the majority of the site identified as being Flood Zone A under Map C. This Map also identified that these flood zones were indicative and based on the available information back in 2012, and that all information may be subject to substantial alteration and subject to publication of CFRAMS.



Excerpt from Map C of the Greystones-Delgany and Kilcoole LAP 2013 indicating clients lands within indicative flood zones.

The CFRAM study has been subsequently published and indicates a less extensive degree of flooding on the site on the following combined CFRAM drawing that indicates a 1: in 1000; 1 in 100 and 1 in 10 year fluvial flood event for the site.



Fluvial Flood Extents indicated in CFRAM drawing (Drawing no. E10GRE\_EXFCD\_F2\_07)

The Redford Stream is culverted through the site, and extends from the west of the R774, and centrally through the lands in question. An indication of the alignment of the underground culvert is shown by way of a purple line in the previous page, which indicates it running through the site with critical structure in form of culvert openings either side.



*Excerpt from Figure 4.5.17 of the Easter CFRAM Study HA10 Hydraulics Report, Greystones Model indicating culvert at south-east corner of the overall site*

We note that remedial works were carried out following a flood event in August 2008 downstream of the site. A flood wall (1.8m) was constructed to divert flood waters around two properties in Redford Park and convey the flow down the road. This wall was included within the model and was shown to provide protection up to the 0.1% AEP event. The study indicates that “Flooding occurs from the culvert at 1003M00071J, on the Redford watercourse” (at the north-west corner of the site), during the 0.1% AEP event (1 in 1000 year event), affecting one property and an area of open ground.

However, it is clear it is the capacity of the underground culvert to take the flows of the Redford stream that is critical to addressing the flooding events that are modelled to occur on this site. We respectfully submit that if this is addressed then there is potential that the flooding concerns relating to the site, would be addressed.

### **Background to submission and LAP**

This submission outlines the current strategic land use and planning objectives for the Greater Dublin Area and North Wicklow including Greystones. In this regard, we have undertaken a comprehensive analysis of the current strategic policy and statutory planning context of development in County Wicklow and in particular in the area of Greystones and its environs. We set out hereunder our findings in relation to these policy guidelines and the implications of these for future patterns of development and suitability of our clients' lands to be developed.

We respectfully submit that the LAP is being prepared at a time where the need to increase housing supply in a compact, attractive, liveable and well designed manner is paramount. All strategic documents currently are pushing for suitable compact urban growth that delivers appropriate residential densities and does not contribute to urban sprawl.

It cannot be questioned that this is an underutilised site within the built up area of Greystones. Putting aside the concerns over flooding, which in our considered opinion has the potential to be dealt with on-site, and along the Redford stream both upstream and downstream of the site, it is unquestionable that the site of 0.87ha. has capacity of delivering 30-44 residential units even if it were developed at a residential density of 35-50 units per hectare.

We submit that this site is ideally located relative to the new school and local services and facilities that have been recently been built to the west of the R761 to engender compact growth fully in accordance with the new Sustainable and Compact Settlements, Duidelines for Planning Authorities (2024).

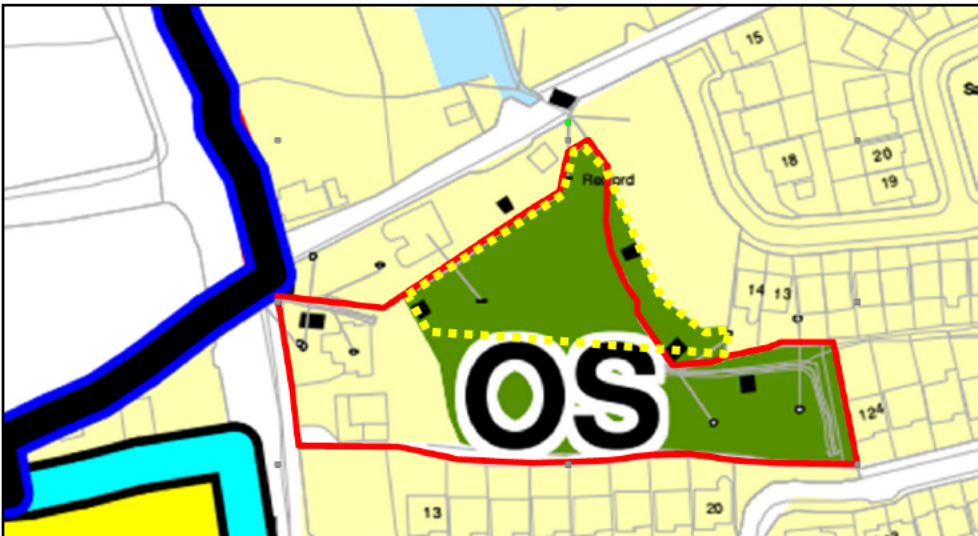
### **Town planning rationale**

We respectfully submit that the rezoning of our clients lands should not in principle be in question. The lands in question have been previously zoned, and their now forming a mix of zonings as being residential and open space is in our considered opinion contrary to the long term planning and sustainable development of Greystones.

We submit there appears to be two options to the Council to bring these lands into being considered as being totally zoned for residential purposes under the new LAP.

Firstly, the implementation of a Specific Local Objective on these lands that required the flooding issue to be resolved, either as part of the application, such as through the increase in the capacity of the underground culvert, or by other means, would mean that the flooding of the site would be addressed as part of any development, and would also provide an opportunity to alleviate flooding along other parts of the stream including at the R761, and further downstream.

Secondly, the option would be to rezone parts of the lands, as follows (inside the yellow dashed line) to reflect the lands not now being identified as being within Flood Zone C. Still inserting a Specific Local Objective on these lands that required the flooding issue to be resolved, either as part of the application, such as through the increase in the capacity of the underground culvert, or by other means, would mean that any future development is fully in accordance with the Planning System and Flood Risk Management Guidelines, as well as the proper planning and sustainable development of the area.



*Suggested lands to be rezoned as residential if all lands are not considered appropriate*

### **Conclusions**

It is submitted that the location of the identified clients' lands provides an appropriate location and inclusion of these lands to be zoned New Residential with a Specific Local Objective on part or the entirety of the lands that will ensure the proper planning and sustainable development of Greystones and our client's lands.

We would be obliged if you will acknowledge receipt of this submission in due course and we would be happy to furnish any further information that you may require to deal with this matter.

Yours faithfully,

Anthony Marston (MIPI, MRTPI)  
**Marston Planning Consultancy**