



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

Who are you:	Agent
Name:	Mr John Brady of [REDACTED]
Reference:	GDKLAP-113814
Submission Made	January 31, 2024 11:41 AM

Topic

Other topics for you to have your say on! - Environmental Assessment - Plan Implementation -Plan Delivery

Submission

Please find our client's submission attached. Best wishes, Brendan Buck.

File

BPS Greystones-Delgany _ Kilcoole LAP Submission - John Brady - 31.1.2024.pdf,
1.96MB



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SUBMITTED VIA THE WCC PORTAL¹

Greystones-Delgany & Kilcoole LAP Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96.

31 January 2024

Dear Sir/Madam,

Submission to the Greystones-Delgany & Kilcoole Local Area Plan (Pre-Draft Public Consultation Phase). Submission requests the existing 'AG/GB' – 'Agriculture / Greenbelt areas' zoning adopted under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 on the subject lands be changed to 'AG' – 'Agriculture' (as per their original pre-zoned status) as they are outside of the 'Settlement Boundary' of Greystones.

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - have been appointed by Mr John Brady of Ballynerrin, Kilcoole, Greystones, Co. Wicklow to make a submission on his behalf to Wicklow County Council for consideration as part of advertised² 'Pre-Draft Public Consultation Phase' for the emerging Greystones-Delgany & Kilcoole Local Area Plan regarding lands at Ballynerrin, Kilcoole, County Wicklow.

Submissions are invited from 29 November 2023 to **31 January 2024**. Please find Mr Brady's submission attached and within the required deadline.

If you require any further details, please contact BPS using the details supplied on this letterhead.

With best wishes,

Brendan Buck

**Brendan Buck MIPI
Managing Director
BPS Planning & Development Consultants LTD**

Encl: LAP submission report.

¹ <https://greystones-delgany-kilcoole-lap-wicklow.hub.arcgis.com/pages/submission>

² <https://greystones-delgany-kilcoole-lap-wicklow.hub.arcgis.com/>



Planning & Development
Consultants

Submission to the Greystones- Delgany & Kilcoole Local Area Plan (Pre-Draft Public Consultation Phase)

Submission to the Greystones-Delgany & Kilcoole Local Area Plan (Pre-Draft Public Consultation Phase). Submission requests the existing 'AG/GB' – 'Agriculture / Greenbelt areas' zoning adopted under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 on the subject lands be changed to 'AG' – 'Agriculture' (as per their original pre-zoned status) as they are outside of the 'Settlement Boundary' of Greystones.

Submission produced for and on behalf of Mr John Brady of Ballynerrin, Kilcoole, Greystones, County Wicklow.

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1.0 Introduction

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - have been appointed by Mr John Brady of Ballynerrin, Kilcoole, Co. Wicklow to make a submission on his behalf to Wicklow County Council for consideration as part of advertised¹ 'Pre-Draft Public Consultation Phase' for the emerging Greystones-Delgany & Kilcoole Local Area Plan regarding lands at Ballynerrin, Kilcoole, Greystones, County Wicklow.

We confirm that Mr Brady owns the lands described below and which are the subject of this submission.

1.0 Summary

This submission is made in respect of lands with an area of approx. 32 hectares to the southwest of the existing Greystones developments named Charlesland and Aldborough Manor and partly alongside the well-known the Shoreline athletic track (see Figs. 1 and 2). The subject lands are sited within the existing 'LAP Boundary' but outside of the 'Settlement Boundary' of Greystones. They comprise part of a generally agricultural area sited between the south of Greystones and the north of Kilcoole.

Our client asks that the existing 'AG/GB' – 'Agriculture / Greenbelt areas' zoning adopted under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 on the subject lands be changed to 'AG' – 'Agriculture' (as per their original pre-zoned status) and to align with the definition of 'Agriculture' as set out under the Wicklow County Development Plan 2022-2028 ["WCDP"].

Under the existing LAP, the 'AG/GB' – 'Agriculture / Greenbelt areas' zoning aims: "To generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes". Footnote 10 of the LAP states: "For the sake of clarity, GB lands form part of the rural area. Planning applications shall be assessed on the basis of the objectives and standards for the rural area, as set out in the Wicklow County Development Plan". However, the WCDP does not include the LAP's Section 9.2 'OBJECTIVES'. Our client's lands are impacted by Objective HER10 which states:

Within Agriculture / Greenbelt areas, it is the objective of the Council to generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes. The following objectives shall apply to the agriculture / greenbelt areas:

- *Agriculture / Greenbelt areas form part of the rural area. As such, the rural development objectives and standards of the Wicklow County Development Plan shall apply as appropriate. Rural housing may be permitted subject to compliance with the rural development objectives and standards of the CDP. The Coastal Zone Management Plan objectives, as set out in the CDP shall apply to areas designated a 'coastal cell'.*
- *Protect the integrity of Natura 2000 sites in accordance with objective HER2.*
- *Protect listed views/prospects and other features of natural and built heritage.*
- *Provide for the development of greenroutes in the area. In particular, facilitate the development of (i) a pedestrian/cycling route between Lott Lane, Kilcoole and Shoreline Sports Park, Charlesland, and (ii) a coastal walk, having due regard to environmental designations and compliance with the EU Habitats Directive, and to restrict development that interferes with the achievement of this objective.*

While it may be WCC's intention that lands zoned 'AG/GB' are treated the same as 'Agriculture' zoned lands only (this is repeated a number of times in the LAP), this is not our client's experience or understanding. He considers that a straight 'Agricultural' zoning would remove the perception currently created by the existing LAP that his lands are 'Greenbelt' only.

Under the WCDP 'Agriculture' maintains a 'Strategic Objective' that is "To encourage the continued operation of farming and its associated uses where it already exists, and to facilitate the diversification of the agricultural economy through the support of appropriate alternative farm enterprise sources". This more closely fits the future our client envisages for these lands than does the AG/GB LAP zoning.

For example, under the WCDP, the 'Agriculture' and related objectives and sections provide our client with a wider range of options regarding the future of his farmlands than does the present zoning with its 'GB' emphasis. These include Objectives CPO 9.35, 9.37, 9.38, 9.41, 9.42, 11.2.4, 11.15, 11.16 and 11.34.

While WCC Planning Department may wonder at this submission – 'Why ask to be zoned for agriculture when there are adjoining fully developed lands to the north and west?' The answer is that our client wishes to get on with sustainably farming 'and' diversifying his lands as required to continue being a viable farm. The addition of 'GB' to the zoning of his land does not help this. Indeed, it, coupled with the inclusion of the lands within Cell

¹ <https://greystones-delgany-kilcoole-lap-wicklow.hub.arcgis.com/>

5 'Greystones to Kilcoole (Ballynerrin)' – to which our client has no objection – serves to essentially sterilise these farmlands regarding many farm and rural diversification options.

The current 'AG/GB' zoning of these lands appears somewhat at odds with national and regional rural and farm diversification policies, including with NPO 23 of the National Planning Framework and RPO 6.7 and 7.28 of the Regional Spatial and Economic Strategy 2019-2031. These NPO and RPOs look to a rural economy characterised by sustainable agricultural practices 'and' diversification of farms into rural tourism and other areas of diversification.

It is our client's opinion that the current zoning is acting as a deterrent to any ideas and/or proposals he may have to intensify the farming of his lands and/or to diversify the lands. These are working farm lands – they are not a greenbelt parkland for Greystones. This should be reflected in a wholly 'Agriculture' zoning that allows flexibility regarding the future of the lands.

BPS submits that our client's request is wholly reasonable. The lands are already part zoned 'Agriculture' and the other 'GB' aims and objectives of the LAP and WCDP regarding these lands and this area of Greystones and the county do not need to be contained in the zoning. Including them in the zoning may in fact prevent the achievement of these objectives by limiting a landowners' ability to include them in their future plans.

In light of the above, we recommend that the existing 'AG/GB' zoning of Mr Brady's lands be updated to 'AG' only as per the Wicklow County Development Plan's application of 'Agriculture' to all rural farm land areas located outside of the 'Settlement Boundaries' of existing towns and villages in the county.

The zoning objective is considered the most appropriate in light of the need to facilitate the development of this area of the rural economy through supporting a sustainable and economically efficient agriculture and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.

This re-zoning would be compatible with the Wicklow County Development Plan 2022-2028.

3.0 Location of the subject lands

Greystones is located approximately 33 km from Dublin on. It is a commuter town with close proximity to rail based public transport and Dublin Bus services.

The subject lands are located to the southeast of the town. The area is now very developed with the Charlesland and Aldborough Manor developments located to the north and northwest. To the west of the lands is Shoreline Sports Park with its running track immediately on the shared boundary.

Under the existing LAP, the subject lands are zoned 'AG/GB'.

This is a mixed area of the town and one which has emerged to represent the new residential and mixed services areas sited along the dual carriageway access road from the town centre to the N11/M11.

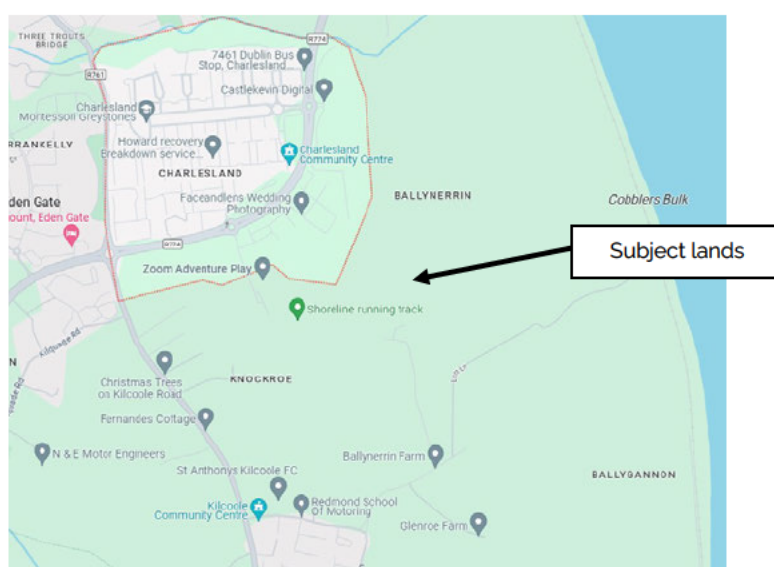


Fig. 1: Location of the subject lands within Greystones (Source: Google Earth)



Fig. 2: Location of the subject lands within Greystones (Source: Google Earth)



Fig. 3: Location, boundaries, and approx. area of the subject lands within Greystones (Source: Google Earth)

4.0 Description of the subject lands

The extent of the lands included in this submission are shown in Figs. 6 & 7. The outlined lands maintain an area of 32 hectares. In the context of the existing Greystones LAP, these lands are sited within the existing 'LAP Boundary' but outside of the 'Settlement Boundary' of Greystones. They comprise part of a generally agricultural area sited between the south of Greystones and the north of Kilcoole.

The lands, which comprise open fields, are in agricultural use being farmed by our client. The lands/the existing farm is accessed from Lott Lane to the south. This access has been included in the subject re-zoning request (which accounts for the shape of the subject lands at their southern end).

5.0 Planning status of the subject lands

Under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 (see Fig. 4), the subject lands are zoned 'AG/GB'. This zoning aims: "To generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes". Footnote 10 of the LAP states: "For the sake of clarity, GB lands form part of the rural area. Planning applications shall be assessed on the basis of the objectives and standards for the rural area, as set out in the Wicklow County Development Plan".

The LAP includes Section 9.2 'OBJECTIVES'. Our client's lands are subject to Objective HER10 which states:

Within Agriculture / Greenbelt areas, it is the objective of the Council to generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes. The following objectives shall apply to the agriculture / greenbelt areas:

- *Agriculture / Greenbelt areas form part of the rural area. As such, the rural development objectives and standards of the Wicklow County Development Plan shall apply as appropriate. Rural housing may be permitted subject to compliance with the rural development objectives and standards of the CDP. The Coastal Zone Management Plan objectives, as set out in the CDP shall apply to areas designated a 'coastal cell'.*
- *Protect the integrity of Natura 2000 sites in accordance with objective HER2.*
- *Protect listed views/prospects and other features of natural and built heritage.*
- *Provide for the development of greenroutes in the area. In particular, facilitate the development of (i) a pedestrian/cycling route between Lott Lane, Kilcoole and Shoreline Sports Park, Charlesland, and (ii) a coastal walk, having due regard to environmental designations and compliance with the EU Habitats Directive, and to restrict development that interferes with the achievement of this objective.*

The County Development Plan (see Fig. 5) sites Greystones and its environs within Wicklow's landscape areas as comprising of part 'Urban Area' and part 'Coastal Area - Area of Outstanding Natural Beauty'. The subject lands fall within the 'Coastal Area - Area of Outstanding Natural Beauty'.

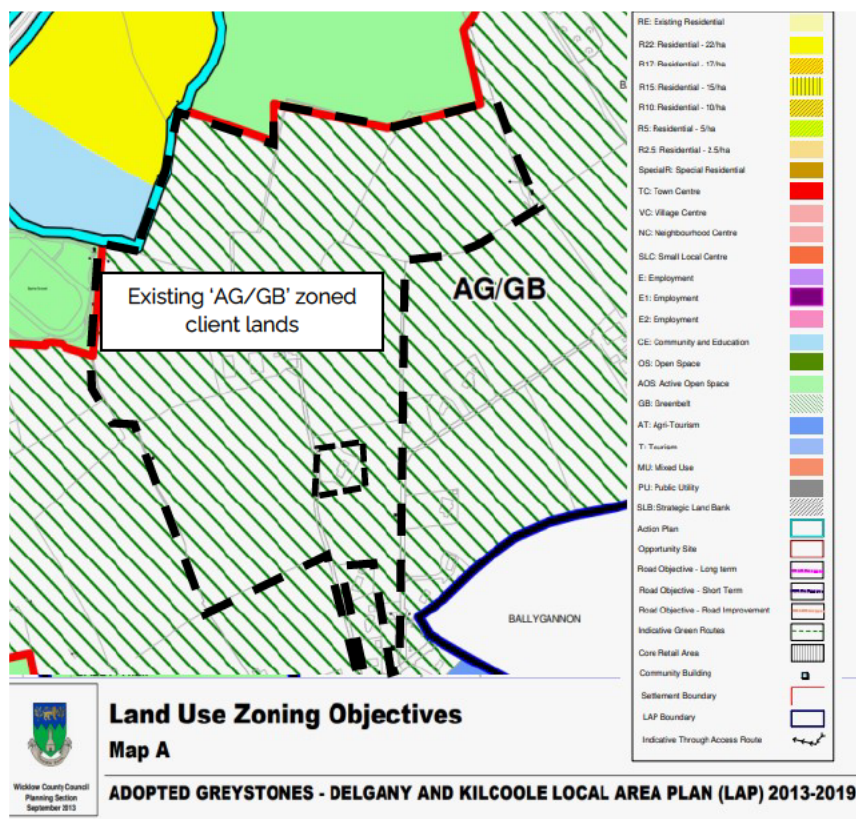


Fig. 4: The existing zoning of the site under the 2013-2019 Local Area Plan

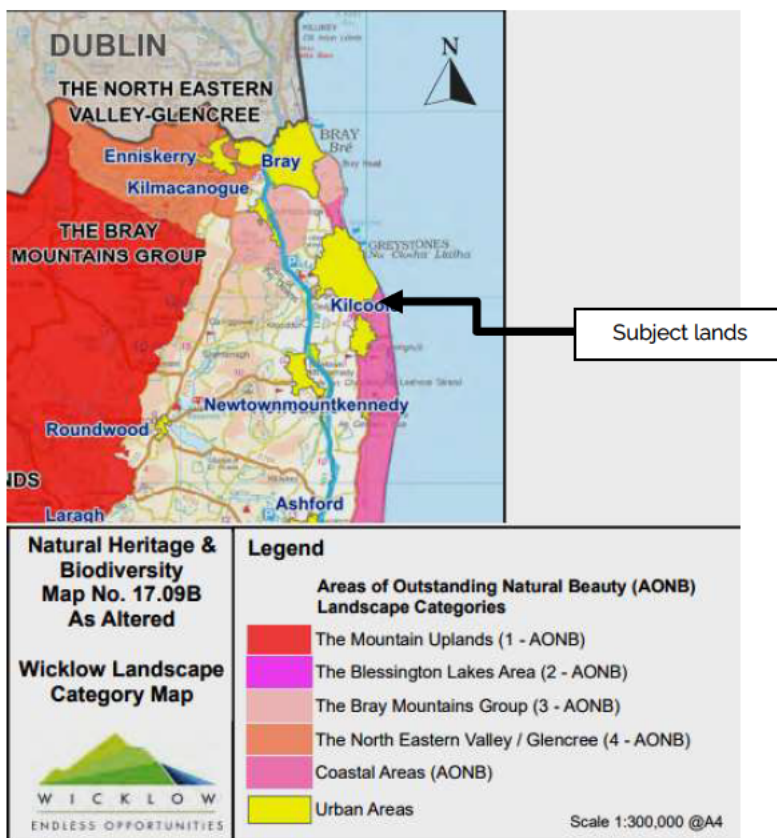


Fig. 5: Excerpt from Map No. 17.09B of the WCDP 2022-2028

5.1 Planning history of the subject lands

There is no relevant planning history pertaining to the subject lands which remains in agricultural use.

6.0 Planning status of adjoining/surrounding lands

Under the existing LAP:

- Adjoining lands to the south and east are zoned 'AG/GB'.
- Adjoining lands to the north and west are zoned 'AOS – Active Open Space'.
- To the northwest lands are zoned 'CE – Community & Education' and R22 'Residential 22/ha.'.

6.1 Planning applications on adjoining lands

The significant permissions which adjoin the subject lands, derived from a planning search (see Fig. 6) are as follows:

- To the north:

Strategic Housing application reg. ref. 201904: Planning permission granted subject to conditions for a mixed use, residential and employment proposal comprising the following: residential development of 354 no units including: 124 no 2 storey houses (comprising 13 no 2 bed, 93 no 3 bed and 18 no 4 bed), 2 no apartment blocks (5-6 storeys in height), comprising 170 no units (36 no 1 bed, 123 no 2 bed and 11 no 3 bed). The apartment development will include a concierge, security room and communal amenity room. 60 no duplex apartments (30 no 2 bed and 30 no 3 bed), all residential units provided with private garden / balcony / terrace space to standard and facing north / south / east / west. Provision of public and communal open spaces, car parking (456 no spaces) and cycle parking (388 no spaces). An employment development comprising a 2 storey community enterprise building (1356 sqm) and a 2 storey office building (1376 sqm), 91 no parking spaces and 108 no bicycle spaces, the relocation of the existing temporary bus parking facility to the western side of the unnamed local road leading to Shoreline Sports Park, accesses to the development from the unnamed local road and via Seabourne apartment development to the north, provision of pedestrian connections including across 774 / L1221 to Charlesland Neighbourhood Centre, all associated site development works, drainage and infrastructural works, servicing (including 2 no

substations, bin stores), landscaping, open spaces and boundary treatment works. The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan (Wicklow County Development Plan 2016-2022) and local area plan (Greystones - Delgany and Kilcoole Local Area Plan 2013 - 2019). The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land. An Environmental Impact Assessment Report has been prepared in respect of the proposed development.

- To the west:

Reg. ref. 22168: Planning permission granted subject to conditions for a 1 to 3 storey post primary school. 37 no. general classrooms, 20 no. specialist classrooms, PE hall, a special needs unit, 6 no. hard play courts and all ancillary pupil and staff facilities with a total internal floor area of c.10,808 sqm. Associated car parking, bicycle parking and open spaces/landscaping. A pedestrian and vehicular access is from the unnamed road and two further pedestrian entrances are proposed from the school to the north and east into Hawkins Wood. All associated site works including boundary treatments, plant, bin stores, site services and connections to facilitate the development (The application site, comprising 4.6 ha, is south of Hawkins Wood residential, Greystones, ABP Ref 305773-19, currently under construction and to the east of the unnamed road).

Shoreline: Various permissions.

- To the south and east:

Various: Rural house planning applications and developments to the north side of Kilcoole.

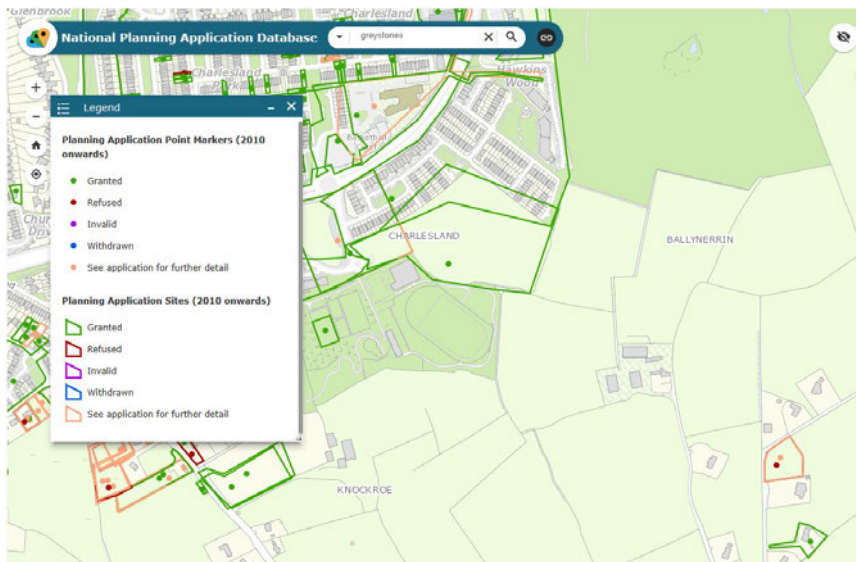


Fig. 6: National Planning Applications Database search (BPS - January 2024)

7.0 Zoning objective sought

This submission proposes that the existing 'AG/GB' - 'Agriculture / Greenbelt areas' zoning adopted under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 on the subject lands be changed to 'AG' - 'Agriculture' (as per their original pre-zoned status) and to align with the definition of 'Agriculture' as set out under the Wicklow County Development Plan 2022-2028.

8.0 Planning and development basis for proposed zoning

Having been requested to visit this site and to suggest reasons why this site should be re-zoned for 'AG - Agriculture' only under the forthcoming Greystones-Delgany & Kilcoole Local Area Plan, we submit the following grounds.

8.1 The subject lands are outside of the 'Settlement Boundary' and should be rural 'AG' only

The current 'AG/GB' zoning causes our client's farmlands which are included in the 'LAP Boundary', though located outside of the 'Settlement Boundary' of Greystones, to be treated the same as all other effectively 'Agriculture' zoned lands under the WCDP.

Concerns arise that causing our client's lands to be located within the LAP Boundary has the – possibly unintended – consequence of making them appear part of the town on paper, but in reality they are outside.

The subject lands should reasonably be located as though they are outside of the town and zoned 'AG' only and align with the definition of 'Agriculture' as set out under the WCDP.

8.2 The 'GB' zoning and Objective HER20 cause the lands to appear as 'Greenbelt' only

Under the existing LAP, the 'AG/GB' – 'Agriculture / Greenbelt areas' zoning aims: "To generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes". Footnote 10 of the LAP states: "For the sake of clarity, GB lands form part of the rural area. Planning applications shall be assessed on the basis of the objectives and standards for the rural area, as set out in the Wicklow County Development Plan". However, the WCDP does not include the LAP's Section 9.2 'OBJECTIVES'. Our client's lands are impacted by Objective HER10 which states:

Within Agriculture / Greenbelt areas, it is the objective of the Council to generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes. The following objectives shall apply to the agriculture / greenbelt areas:

- *Agriculture / Greenbelt areas form part of the rural area. As such, the rural development objectives and standards of the Wicklow County Development Plan shall apply as appropriate. Rural housing may be permitted subject to compliance with the rural development objectives and standards of the CDP. The Coastal Zone Management Plan objectives, as set out in the CDP shall apply to areas designated a 'coastal cell'.*
- *Protect the integrity of Natura 2000 sites in accordance with objective HER2.*
- *Protect listed views/prospects and other features of natural and built heritage.*
- *Provide for the development of greenroutes in the area. In particular, facilitate the development of (i) a pedestrian/cycling route between Lott Lane, Kilcoole and Shoreline Sports Park, Charlesland, and (ii) a coastal walk, having due regard to environmental designations and compliance with the EU Habitats Directive, and to restrict development that interferes with the achievement of this objective.*

The removal of the 'GB' part of the zoning from these lands would allow them to be viewed as farmland and rural land without any inference – intended or otherwise – that they are to provide a de facto sterilised greenbelt for Greystones in which future even farm or farm-based diversification projects may be limited.

8.3 The proposed re-zoning would better align the LAP and the WCDP

While it may be WCC's intention that lands zoned 'AG/GB' are treated the same as 'Agriculture' zoned lands only (this is repeated a number of times in the existing LAP), this is not our client's experience or understanding. He considers that a straight 'Agricultural' zoning would remove the perception currently created by the existing LAP that his lands are 'Greenbelt' only.

Under the WCDP 'Agriculture' maintains a 'Strategic Objective' that is "To encourage the continued operation of farming and its associated uses where it already exists, and to facilitate the diversification of the agricultural economy through the support of appropriate alternative farm enterprise sources". This more closely fits the future our client envisages for these lands than does the AG/GB LAP zoning.

Under the WCDP 'Agriculture' maintains a 'Strategic Objective' that is "To encourage the continued operation of farming and its associated uses where it already exists, and to facilitate the diversification of the agricultural economy through the support of appropriate alternative farm enterprise sources". That is, an 'Agriculture' zoning with related objectives and sections would provide our client with a wider range of options regarding the future of his farmlands than does the present zoning with its 'GB' emphasis. This more closely fits the future our client envisages for these lands than does the AG/GB LAP zoning.

For example, under the WCDP, the 'Agriculture' objectives provide our client with options regarding the future of his farmlands. These include:

- **CPO 9.35** To permit the development of small-scale commercial / industrial developments in rural areas that are not dependent on an existing local resource, subject to compliance with all of the following criteria: The proposed development shall be a small-scale industrial / commercial scheme or service and the number employed shall be appropriate in scale to the location and its characteristics, including

proximity to the workforce and customers; the proposed development shall be located on the site of a redundant farm building / yard or similar agricultural brownfield site; and the nature and scale of the proposed development and the proposed process or activity to be carried out, shall be appropriate to and compatible with, the character of the rural environment of the site at which the development is proposed, and shall not be detrimental to the rural amenity of the surrounding area. In the assessment of planning applications, cognisance shall be taken of the location of the site vis-à-vis the proximity of the site to the national and regional road network.

- **CPO 9.37** To facilitate the development of environmentally sustainable agricultural activities, whereby watercourses, wildlife habitats, areas of ecological importance and other environmental assets are protected from the threat of pollution, and where development does not impinge on the visual amenity of the countryside. Developments shall not be detrimental to archaeological and heritage features of importance.
- **CPO 9.38** To encourage and facilitate agricultural diversification into suitable agri-businesses. Subject to all other objectives being complied with, the Council will support the alternative use of agricultural land for the following alternative farm enterprises: Specialist farming practices, e.g. organic farming, horticulture, specialised animal breeding, deer and goat farming, poultry, flower growing, forestry, equine facilities, allotments, bioenergy production of crops and forestry, organic and speciality foods; and suitable rural enterprises.
- **CPO 9.41** To permit the development of new, appropriately located and designed agricultural buildings, which are necessary for the efficient and environmentally sound use of the agricultural practice. New buildings will generally only be permitted in cases where there are no suitable redundant buildings on the farm holding which would accommodate the development and where the Council is satisfied that the proposal is necessary for the efficient operation of the farm. Developments shall be compatible with the protection of rural amenities, and should not create a visual intrusion in the landscape or be the cause of an environmental nuisance.
- **CPO 9.42** To encourage proposals for farm shops¹⁵ where it can be clearly demonstrated that: the products to be sold are primarily produce grown on the farm holding; the scale and scope of the retailing proposed will not harm the viability or retail facilities in any nearby town or village; and the proposed shop is operated by the owner of the farm and is ancillary to the main use of the property for agricultural activities.
- **CPO 11.15** Holiday home / self-catering developments on a farm holding shall be provided by farmhouse extension or by the utilisation of other existing dwellings / structures on the property. Only where it has been demonstrated that these are not viable options, will permission be considered for new build development. Any new build development shall be in close proximity to the existing farmhouse
- **CPO 11.16** To facilitate modest camping / glamping facilities as part of farm diversification proposal. In such instances the farm should remain as the predominant land use on the landholding and documentary evidence shall be submitted to substantiate the proposed development.
- **CPO 11.34** To facilitate and promote the development of small-scale tourist enterprises that are developed in conjunction with established rural activities such as agriculture. Such enterprises may include open farms, health farms, heritage and nature trails, pony trekking etc.
- **Section 11.2.4 Accommodation** It is important to facilitate an adequate range of tourist accommodation options including hotels, self-catering, camping, glamping² etc that will facilitate increasing the amount of overnight visitors to the county. All tourist accommodation should be primarily directed into existing settlements where existing services can be availed of and where the development will support the vibrancy of those settlements. All tourist development should be of a scale that the settlements can sustain. The Planning Authority will carefully manage the development of accommodation in the rural area to ensure that the role of settlements as tourist hubs would not be undermined. Exceptions to this include farm diversification proposals or tourist accommodation provided in association with the restoration of a historic structure including protected structures. It is important that all applications for tourist accommodation are of a high standard of design and do not unduly detract from the character of the landscape or settlement in which they are situated.

While WCC Planning Department may wonder at this submission – 'Why ask to be zoned for agriculture when there are adjoining fully developed lands to the north and west?' The answer is that our client wishes to get on with sustainably farming 'and' diversifying his lands as required to continue being a viable farm. The addition of 'GB' to the zoning of his land does not help this. Indeed, it, coupled with the inclusion of the lands within Cell 5 'Greystones to Kilcoole (Ballynerrin)' – to which our client has no objection – serves to essentially sterilise these farmlands regarding many farm and rural diversification options.

8.4 The proposed re-zoning would better align the LAP and national & regional policy

The current 'AG/GB' zoning of these lands appears somewhat at odds with national and regional rural and farm diversification policies, including with:

National Planning Framework

NPO 23 aims to:

Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism [emphasis added].

Regional Spatial and Economic Strategy 2019-2031

RPO 6.7 aims to:

Support local authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy, tourism, and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage [emphasis added].

RPO 7.28 aims to:

Work with local authorities and relevant stakeholders, to identify areas of high value agricultural land and to ensure food security in the Region and to promote sustainable farming practices that maintain the quality of the natural environment, protect farm landscapes and support the achievement of climate targets [emphasis added].

The above NPO and RPOs look to a rural economy characterised by sustainable agricultural practices 'and' diversification of farms into rural tourism and other areas of diversification.

It is our client's opinion that the current zoning is acting as a deterrent to any ideas and/or proposals he may have to intensify the farming of his lands and/or to diversify the lands. These and working farm lands – they are not a greenbelt parkland for Greystones. This should be reflected in a wholly 'Agriculture' zoning that allows flexibility regarding the future of the lands.

8.5 The sensitivity of 'Coastal Cell 5' can be protected by an 'AG' zoning (with HER10)

Our client accepts how the LAP and WCDP include policies to protect what are known as 'Coastal Cells' in the sensitive 'Coast Area' of the county's landscape. He understands the subject lands are in Cell 5 but he does not however consider that this requires that his lands continue to be zoned 'Greenbelt'. He believes that sustainable farming and farm diversification is needed to ensure the sustainability of the coastal area and that the existing coastal cell protections are sufficient without the need for any 'GB' zoning.

Section 19.3 'Coastal Cells' of the WCDP states:

As not all coastal areas have the same characteristics or pressures, the County has been divided into coastal 'cells' as shown on Maps 19.01 A & B and 19.02. For each cell a set of objectives is set out as follows; the provisions contained are subject to compliance with the European Habitats, Birds and Water Framework Directives, including protection of Bray Head SAC, Murrough Wetlands SAC, Murrough SPA, Wicklow Reef SAC, Wicklow Head SPA, Magherabeg Dunes SAC, Buckroney-Brittias Dunes and Fen SAC and Kilpatrick Sandhills SAC.

The subject lands are located in Cell 5 'Greystones to Kilcoole (Ballynerrin)'. Section 19.3 of the WCDP describes this cell:

*This cell consists of the coastal strip between the R761 and the coast between the southern 'settlement boundary' for Greystones - Delgany and the northern 'settlement boundary' for Kilcoole (including the northern tip of the lands designated 'The Murrough pNHA' and excludes the lands designated 'The Murrough cSAC'). **This area is intensively used for agricultural purposes** and includes pockets of rural housing - at Ballygannon near Glenroe Open Farm and near the train station. This area is characterised by a soft shore line, which has implications for both the existing railway line and the development of new dwellings. Coastal protection works have been carried out by Iarnrod Eireann to protect the railway line, particularly the installation of rock armour on the seaward side of the line. These works however are not adequate to protect all lands to the east of the railway line from risk from flooding and therefore the*

development of new dwellings requires to be strictly controlled, in the interests of public health and safety
emphasis added.

The WCDP acknowledges that the area is intensively used for agriculture and Objective CPO 19.20 sets out restrictive policies aimed at the area. There is no additional need to continue to zone the area 'GB' as these protections are sufficient. Objective COP 19.20 states:

- 1. To facilitate the development of visitor and interpretative facilities, particularly those relating to bird watching, in a sustainable and suitable manner which does not compromise either landscape quality or habitats.*
- 2. To control and limit residential development to that shown to be strictly necessary (in accordance with the County settlement and rural development strategies) and to require the highest standards of siting and design for any new dwellings and regard to environmental designations.*
- 3. To prohibit the development of new dwellings within 100m of the shoreline.*
- 4. To protect all listed views and prospects along the R761 and coast in this cell.*
- 5. To strictly control the development of new entrances and access driveways on the R761, to those which can be proven to be necessary for either traffic safety reasons or the normal functioning of the landholding.*
- 6. To facilitate the development of a coastal walk (having due regard to environmental designations and compliance with the EU Habitats Directive) and to restrict development that interferes with the achievement of this objective.*
- 7. To facilitate and support the upgrading of Kilcoole train station and associated facilities.*
- 8. To facilitate coastal protection works (natural, soft and hard engineered), to protect both the ecological and amenity value of the coastline and the significant economic and social value of the railway line.*

A review of the above objectives and those set out in HER10 of the existing LAP confirms that even without the 'GB' zoning, these are highly protected lands. There is no need to further stymie future agricultural and agricultural diversification projects on the lands by retaining the 'GB' part of the existing zoning.

9.0 Conclusion & recommendation

Arising from the above analysis, it is the professional opinion of BPS, as an accredited firm of town planning consultants, that the subject lands should be re-zoned 'Agricultural' with the 'GB' part of the existing zoning removed.

We consider that Objective HER10 and Section 19.3 'Coastal Cells' (including Objective CPO 19.20) of the WCDP offer sufficient protections regarding the proper planning and sustainable development and management of our client's lands without also zoning them 'Greenbelt'. The retention of the 'GB' part of the existing zoning represents an unreasonably restrictive interpretation of the future of this area which is currently intensively farmed and adjoins what is now the built-up area of Greystones.

In light of the above, we recommend that the existing 'AG/GB' zoning of Mr Brady's lands be updated to 'AG' only as per the Wicklow County Development Plan's application of 'Agriculture' to all rural farm land areas located outside of the 'Settlement Boundaries' of existing towns and villages in the county.

The zoning objective is considered the most appropriate in light of the need to facilitate the development of this area of the rural economy through supporting a sustainable and economically efficient agriculture and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.

This re-zoning would be compatible with the Wicklow County Development Plan 2022-2028.

BPS Planning Consultants LTD
Members of the Irish Planning Institute
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