

	<h1>Greystones-Delgany &amp; Kilcoole LPF Variation No.4</h1>
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<b>Who are you:</b>	Agent
<b>Name:</b>	Dwyer Nolan Developments Ltd.
<b>Reference:</b>	GDKLPF-174307
<b>Submission Made</b>	June 17, 2025 5:45 PM

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

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

### Local Planning Framework PART A Strategy

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

### Local Planning Framework PART B Settlement Specific Objectives.

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

Please select which town you want to comment on:

Kilcoole

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Kilcoole LPF.docx, 1.2MB

Colin McGill.

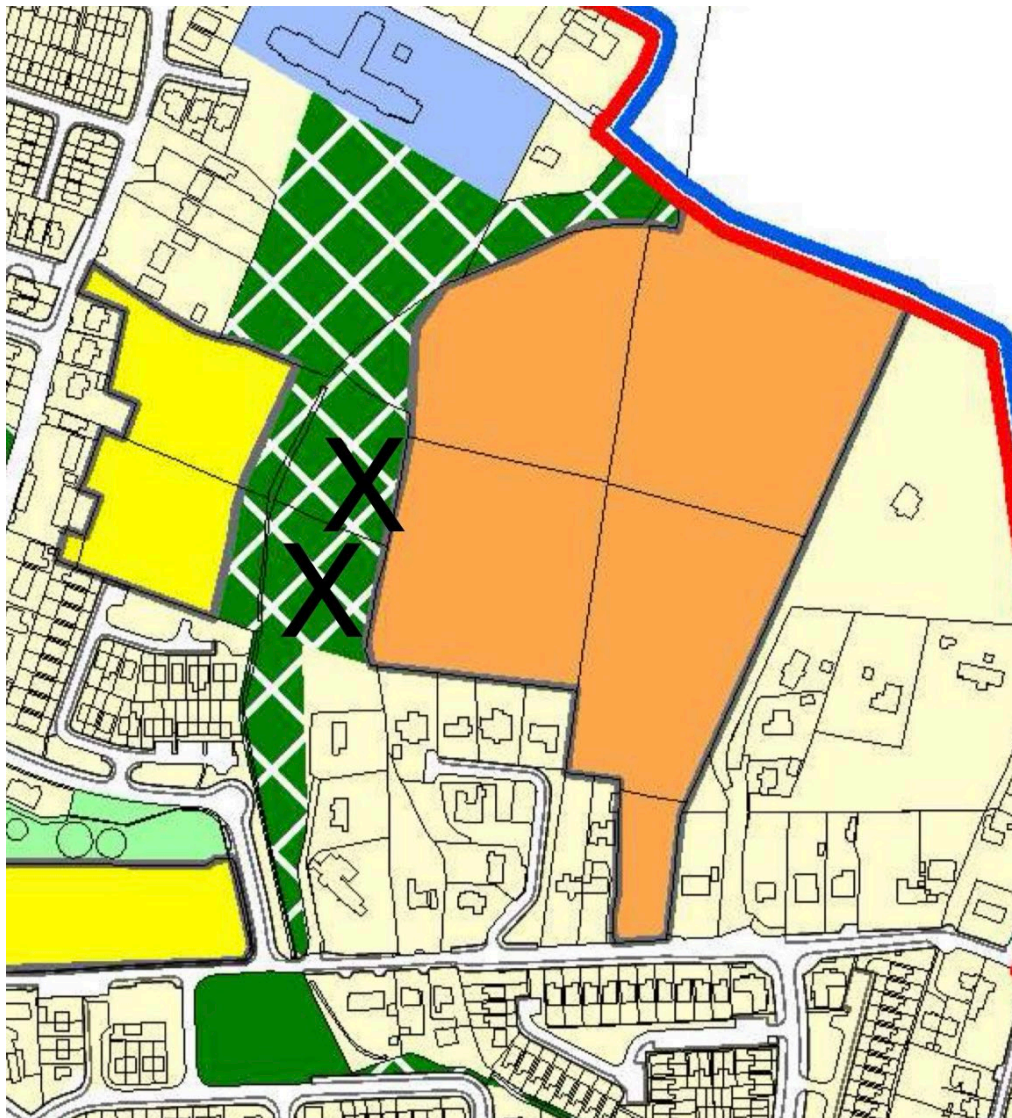
██████ Eden Gate Centre,

Delgany. ██████.

Co. Wicklow.

**SUBMISSION to PROPOSED LOCAL PLANNING FRAMEWORK  
for GREYSTONES- DELGANY KILCOOLE. 2025.**

This submission is made on behalf of Dwyer Nolan Developments Ltd, Stonebridge House, Stonebridge Close, Shankill. Co. Dublin. The submission concerns lands at Ballydonarea, Kilcoole which are subject to proposed SLO 6. of the proposed planning framework.



**PROPOSED SLO 6 ZONING MAP.**

The SLO states that the lands (12.7 hectares) are zoned RN1 and RN2 – New Residential Priority 1 and 2 (respectively) and OS1- Open Space. This submission will address three main issues which are of concern to the landowner.

1. The nature of the proposed open space zoning
2. The extent of the open space zoning, which it is proposed to significantly increase over existing.
3. The proposal to zone the majority of the residential lands priority 2.
- 4.

## **1. OPEN SPACE**

On page 102 of the LPF, it is stated that the lands to be open space are OS1. This is also indicated on the proposed zoning map contained in the SLO. It is stated that a central green area shall be provided (3.6 ha) to include a “natural” undisturbed area of 10 metres either side of the existing stream that traverses the site. Subsequent to ecological assessment (accompanying a planning application) any areas within the OS zone deemed suitable for redevelopment shall include uses for recreational purposes, to include play spaces, walks, seating areas etc.

All of the above are considered to be reasonable and capable of being assessed and developed in a planning application for the site. However, upon examination of MAP No.1 Land Use Zoning Objectives, the open space in question, is zoned OS2: Natural Area. Such a designation is completely different from OS1. Section 8.8 of the LPF outlines descriptions for each of the zoning objectives.

*OS1 seeks “to facilitate further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas...”*

*OS2 seeks “to protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity”.*

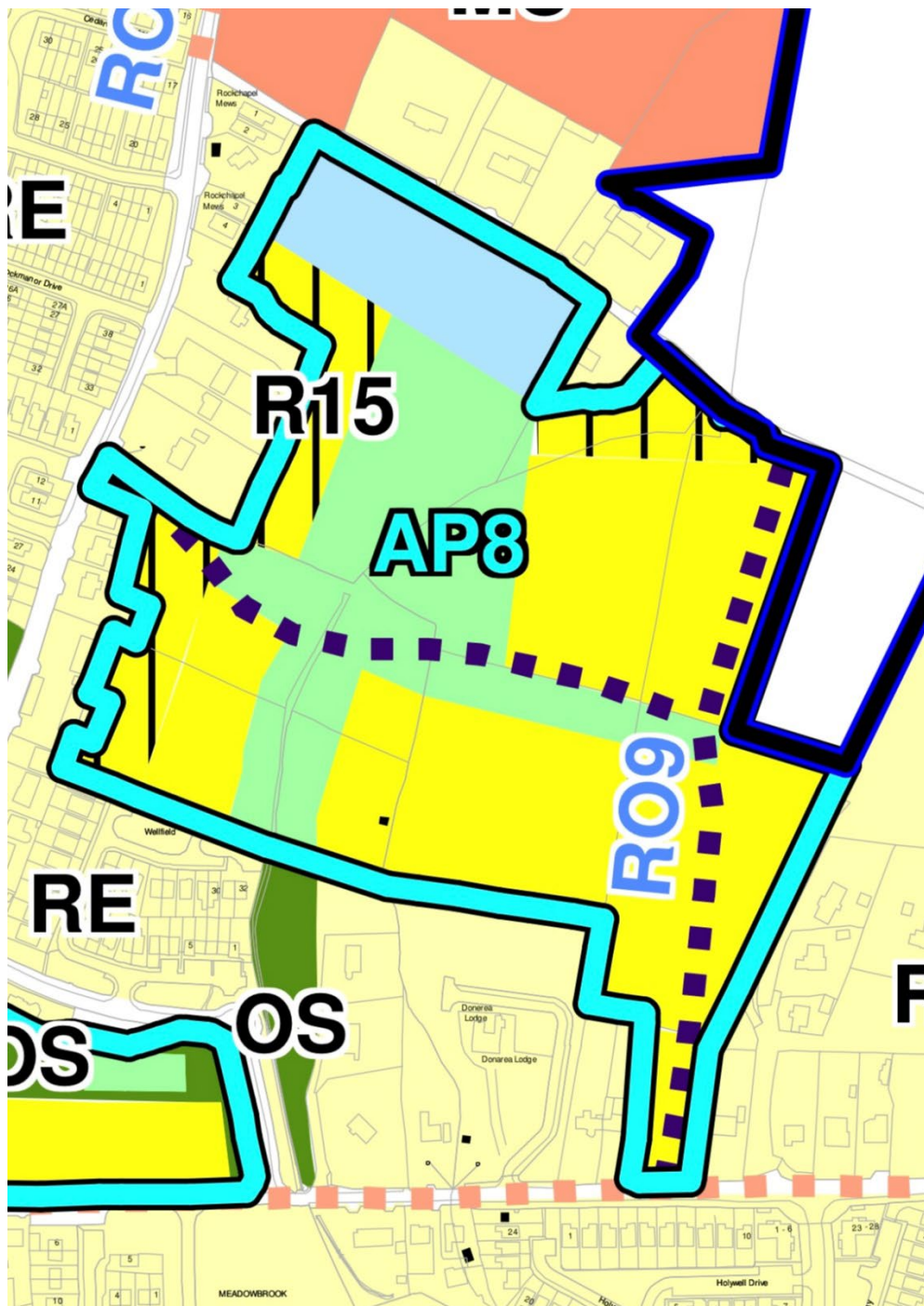
It is considered that the OS1 description is much more suited to an area of open space located between residential developments, either side of it to the west and east. Indeed, the criteria outlined for OS2 zoning do not apply to the lands in question. The existing stream is very small, often dry, and there is no record of flooding. Biodiversity levels are low, created at best by a few hedgerows of limited growth and quality. OS2 zoning is not necessary for a riparian corridor, either side of the stream, as recommended in the Inland Fisheries Guidelines for Urban Watercourse, to be provided.

In summary, the contradiction between the detail contained in SLO6 of the LPF written statement and that shown on Map No. 1 needs to be rectified. That is the lands in question to be zoned OS1. Should the designation in Map No.1, as OS2, prove not be in error then it is requested that the zoning of the lands be OS1, as outlined above.

## **2. EXTENT of OPEN SPACE.**

Subsequent to the above, it appears that the extent of Open Space indicated (the same extent is identified in SLO6 and MAP No. 1), has been enlarged from that which is in the current Local Area Plan (LAP). It is considered that the extent of the proposed increase is not needed. This is particularly the case in the area marked “X” on the SLO6 map above. When comparison is made with the existing LAP zoning map it is the case that an area approximately 30 metres by 120 metres has been rezoned from residential to open space. This creates a c.90m wide corridor to the stream (25m to the west and c.65m to the east). Given that the lands in question do not warrant an OS2 Natural Area zoning, the proposed open space zoning is, therefore, considered excessive. It is suggested that it should revert to a residential zoning, as per the extent of the existing, in the LAP. A riparian corridor of 25 metres,

either side of the stream, is deemed adequate- as per the Inland Fisheries Guidelines for Urban Water Courses.



**EXISTING RESIDENTIAL ZONING of LANDS in GREYSTONES- DELAGANY  
KILCOOLE LOCAL AREA PLAN 2013-19.**

### 3. PROPOSED PHASING- RESIDENTIAL PRIORITY 2

The SLO6 and Land Use Zoning Objective Map indicate that the lands to the east of the central open space area are to be Priority 2 residential. That is proposals for development will not be considered until development for Priority 1 Lands has been “activated” (permission granted and development commenced).

There are two RNI areas of land indicated in yellow on the zoning maps. The area to the west of the stream is in the ownership of Dwyer Nolan and the subject of a planning application for 67 dwellings, currently with An Bord Pleanála. The smaller RN1 area, to the south, has planning permission for 45 dwellings (including 40 duplex units) granted in 2024. It is considered that the phasing of development on the subject residential lands is both unreasonable and unnecessary.

In the first instance the lands are subject to Residential Zoned Land Tax. A tax applied which seeks to avoid residential land banks being created and not developed in the short term. Yet a proposed zoning dependent on phasing and activity on other lands, actually prevents the planning of any development on RN2 lands, in the immediate future.

Much more important than the above, is the impact that a phased RN2 zoning has upon delivery of dwellings. Dwellings that are badly needed in the current housing crisis, where supply and delivery of houses needs to be substantially increased. It is appreciated that the proposed phasing of residential lands, in general, is informed by population/ housing targets in the Core Strategy of the County Development Plan. Targets based upon information and data that are out of date.

Put simply, the proposed RN2 zoning of the subject lands will hamper and delay the preparation and commencement of any planning applications for the site. Planning application(s) that could deliver 130-150 dwellings by an established housing developer, which is already active in Wicklow.

Reference is made to **the Development Plan Guidelines for Planning Authorities 2022**. A more feasible approach to land use zoning is advocated in Section 4.4.1 *“It is policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new plan under preparation, **should not be subject to de-zoning**”*.

**This applies to the proposed change of zoning to open space referenced above.**

The Section goes on to refer to the potential for phasing of zoned and serviced land with a preferred sequence of development for such sites.

*“However, phasing should be applied where there is a sound planning rationale for doing so, based on factors such as site location, the availability or proximity of, or capacity to provide, off site services, facilities or infrastructure. This should also be viewed in the context of the urgent needs to increase housing supply. Phasing may not be necessary where the planning judgement is that unconstrained zoned and serviced housing sites are of broadly equivalent merit for development purposes in a particular settlement or area at the planning making stage. In all cases, whether phasing is applied or not, **development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan from coming forward**”*.

Section 4.4.3 of the Guidelines states

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


The sections of the Guidelines quoted above, readily allow for a flexible approach to the zoning of the Residential lands in Ballydonarea. A flexibility which allows for the lands in question to be zoned RN1- New Residential Priority 1.

### **SUMMARY.**

Consequent to the above, the Council is asked to amend the proposed zoning of the subject lands in the Local Planning Framework as per the map below, on next page:

1. To rezone the area of proposed open space, that is zoned residential in the current Local Area Plan, to RN1.
2. Correct /change the proposed zoning of the central open space from OS2 to OS1.
3. Change the proposed zoning of the residential lands to the east of the SLO area from RN2 to RN1- New Residential Priority 1.

Yours sincerely,

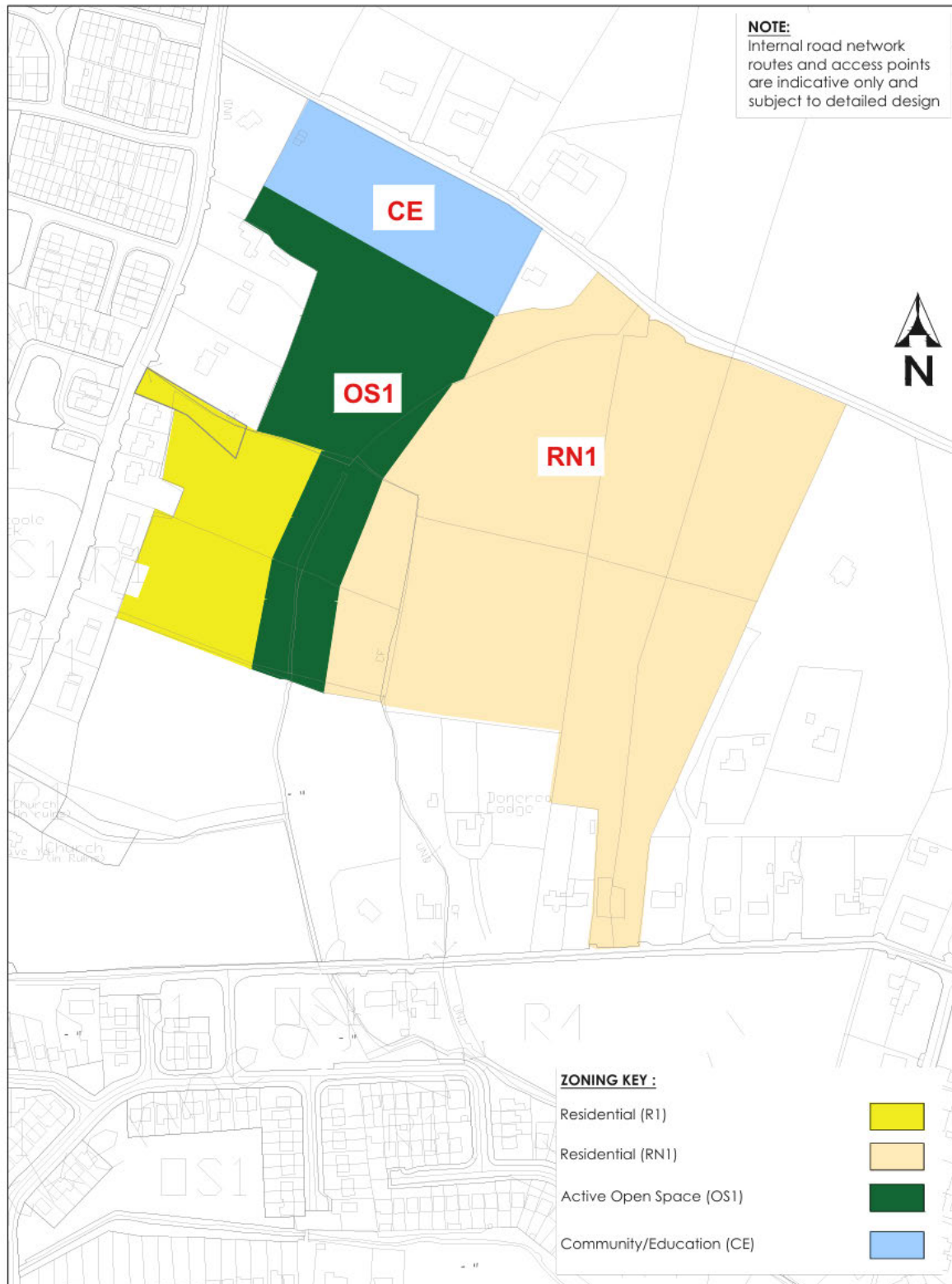


Colin McGill. B.A.(Hons), M.Sc. MRTPI

Chartered Town Planner.

17<sup>th</sup> June 2025.

## PROPOSED LAND USE ZONING MAP.



**PROPOSED AA1 LANDS AT KILCOOLE - Scale 1:2500  
MAP NO.1 - ZONING**

**REV. #**

**NOTE:**  
Map produced for diagrammatic purposes only. Do not scale.

