



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

Who are you:	Agent
Name:	Mr Paul Brady of Ballycrone, Kilcoole, Co. Wicklow
Email Address:	[REDACTED]
Reference:	GDKLAP-121023
Submission Made	January 31, 2024 12:12 PM

Topic

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

Submission

Please find Mr Paul Brady's submission attached. Best wishes, Brendan Buck

File

BPS Greystones-Delgany _ Kilcoole LAP Submission - Paul Brady - 31.1.2024.pdf,
3.51MB



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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 'SLB' zoning on the subject lands under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 be updated to R22 'Residential' zoned lands – 'To provide for the development of sustainable residential communities up to a maximum density of 22 units per hectare and to preserve and protect residential amenity'. The remainder of the lands, currently sited to the east of the existing LAP boundary to be included in the Draft LAP (when it is published) and re-zoned R22, or, failing this, 'SLB'.

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - have been appointed by Mr Paul Brady of Ballycrone, Kilcoole, 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 Ballycrone, 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) regarding lands at Ballycrone, Kilcoole, County Wicklow. Submission requests the existing 'SLB' zoning on the subject lands under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 be updated to R22 'Residential' zoned lands - 'To provide for the development of sustainable residential communities up to a maximum density of 22 units per hectare and to preserve and protect residential amenity'. The remainder of the lands, currently sited to the east of the existing LAP boundary to be included in the Draft LAP (when it is published) and re-zoned R22, or, failing this, 'SLB'.

Submission produced for and on behalf of Mr Paul Brady of Ballycrone, Kilcoole, 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 Paul Brady of Ballycrone, Kilcoole, Co. Wicklow to make this 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 Ballycrone, Kilcoole, County Wicklow.

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

2.0 Summary

This submission is made in respect of lands with an area of 2.5 hectares to the south end of Kilcoole which are part zoned 'SLB' – 'Strategic Land Bank' and part sited outside of the Local Area Plan ["LAP"] boundary under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 (see Fig. 8). The lands are also located to the south of other lands which are currently zoned 'RE' – 'Existing Residential'.

This submission proposes:

1. The existing 'SLB' zoning on part of Mr Brady's lands be updated to R22 'Residential' zoned lands – 'To provide for the development of sustainable residential communities up to a maximum density of 22 units per hectare and to preserve and protect residential amenity'.
2. The remainder of the lands, currently sited to the east of the existing LAP boundary be included in the Draft LAP (when it is published) and re-zoned R22, or, failing this, 'SLB'.

This would provide 2.54ha. of 'RE' zoned lands which would be sufficient area in which to develop a high quality housing development.

It is noted that under the previous plan, our client's 'SLB' zoned lands were deemed needed for future housing provision. This submission seeks to activate these lands for residential development and to add the adjoining lands to ensure that a viable and quality housing development can be achieved.

The area of subject lands zoned 'SLB' were not deemed to be constrained in any under the 2013-2019 LAP 'and' the lands are fully serviceable with an existing housing estate located to the north and connecting roads, mains water pipes, foul sewer mains pipes, storm water drainage, and electricity lines available.

If the lands are zoned 'RE', in part or fully, it is anticipated that a planning application could be lodged for a housing development within 3 to 6 months.

3.0 Location of the subject lands

Kilcoole is situated in the north of County Wicklow and located approximately 35 km from Dublin and 5 km south of Greystones. It is a commuter town with close proximity to rail based public transport and Dublin Bus services.

The subject lands are located to the south of the town. The area is developing rapidly with new housing and employment/enterprise estates to the north and west and a new school to the north. Since 2013, the demand for housing has far outstripped supply.

The lands are located to the south of Cooldross Lane. The lane has been upgraded as part of a number of housing and enterprise developments. It is now a local distributor road of good quality (see below).

The south and southwest areas of Kilcoole have traditionally comprised the location of employment lands (E1, E2, and E3). The proposed zoning would provide additional R22 zoned lands alongside lands already zoned and part developed for same 'and' which are sited close to areas of employment to reduce commuting, etc.

The subject lands are located to the south of the area of the town which comprises of significant employment uses would appear to be an appropriate area for the future expansion of Kilcoole.

To the northwest of the subject lands is an existing employment/enterprise unit development and to the north is an existing housing estate designed to facilitate the development of Mr Brady's lands. Mr Brady's lands would provide a natural extension of this development (see below).

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

The subject lands are located in the vicinity of the main employment lands within the town of Kilcoole at Renmore and Bullford Business Parks and the newly constructed Network Business Park). Therefore, this would appear to be the appropriate area of Kilcoole for additional lands to be zoned for same.

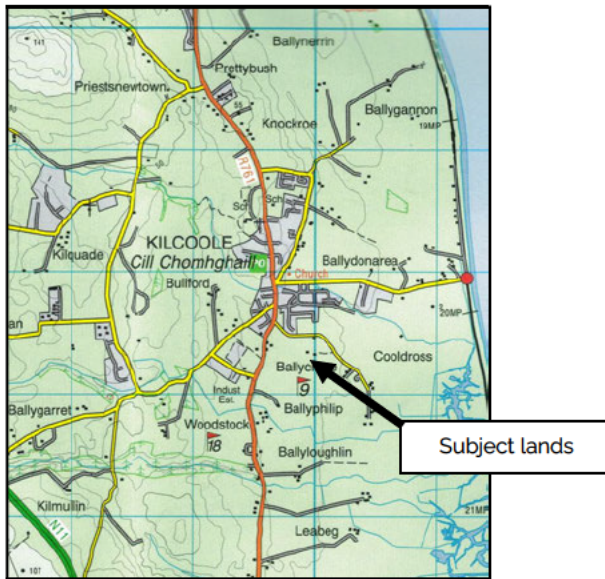


Fig. 1: Location map regarding the subject lands (Source: Ordnance Survey²)



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

² This map is reproduced from a submission prepared by BPS for our client during the drafting of the previous LAP.



Fig. 3: Location and outline of the subject lands (Source: Google Earth)



Fig. 4: Ballycrone Manor residential scheme to the north of the subject lands (Source: Google Streetview)



Fig. 5: Employment development adjoining the subject lands (Source: Google Streetview)

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 2.54 hectares.

In the context of Kilcoole, these lands could be described. The 'SLB' zoned lands maintain a long boundary with the adjoining housing estate to the north and the employment development to the west. The remainder of the lands would further fill in a jagged edge in the LAP boundary allowing for a consolidation of the LAP area at this location.

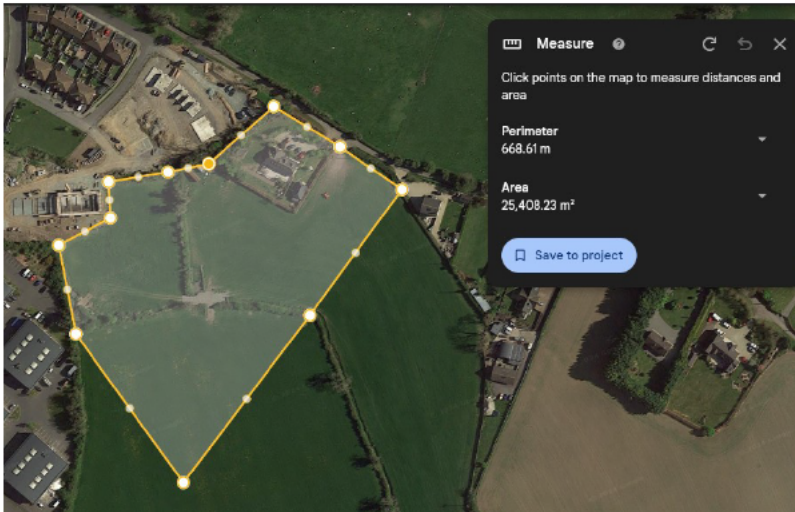


Fig. 6: Measured area of the subject lands (Source: Google Earth)

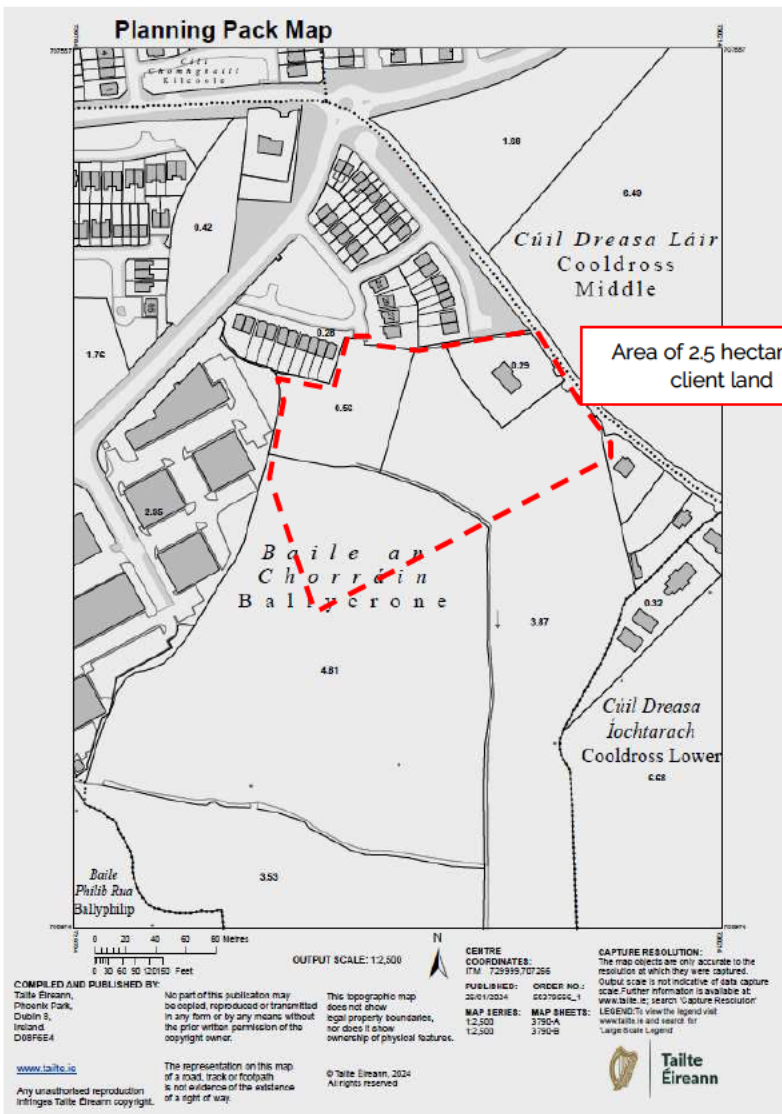


Fig. 7: OS Map of the subject lands (Source: OS Planning Pack, BPS 26/1/2024)

5.0 Planning status of the subject lands

Under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 (see Fig. 8), the subject lands are zoned as follows:

- The northern part is zoned 'SLB' - 'Strategic Land Bank'. SLB lands are so designated, according to the existing LAP, "To provide a strategic land bank for future phases of development of the settlement after the lifetime of this plan". These lands are sited within the LAP boundary. The existing LAP also states:

These lands are identified as potentially being part of the envelope of the settlement with regard to proximity and accessibility to infrastructure. However detailed consideration of these areas and appropriateness for zoning will only be considered after the lifetime of this plan. For the sake of clarity, SLB 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 remainder of the adjoining lands to the south are unzoned agricultural lands which form part of the rural area. These lands are currently sited outside of the LAP boundary.

The County Development Plan (see Fig. 9) sites Kilcoole 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 part 'Urban Area' and part 'Coastal Area - Area of Outstanding Natural Beauty'.

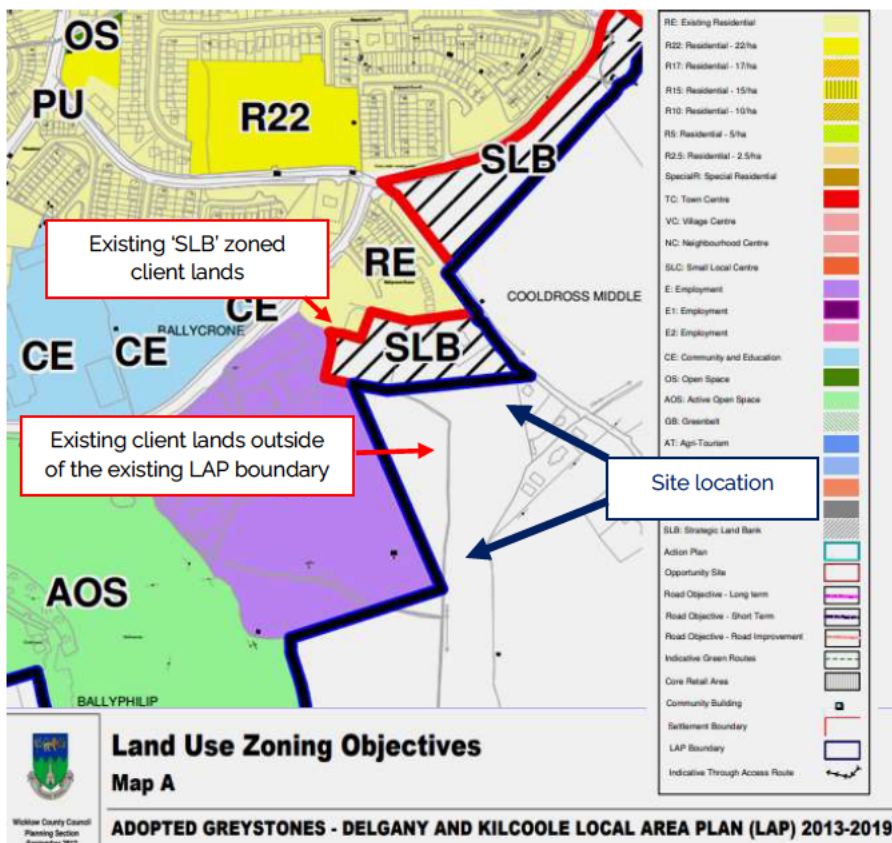


Fig. 8: The existing zoning of the subject lands under the 2013-2019 Local Area Plan

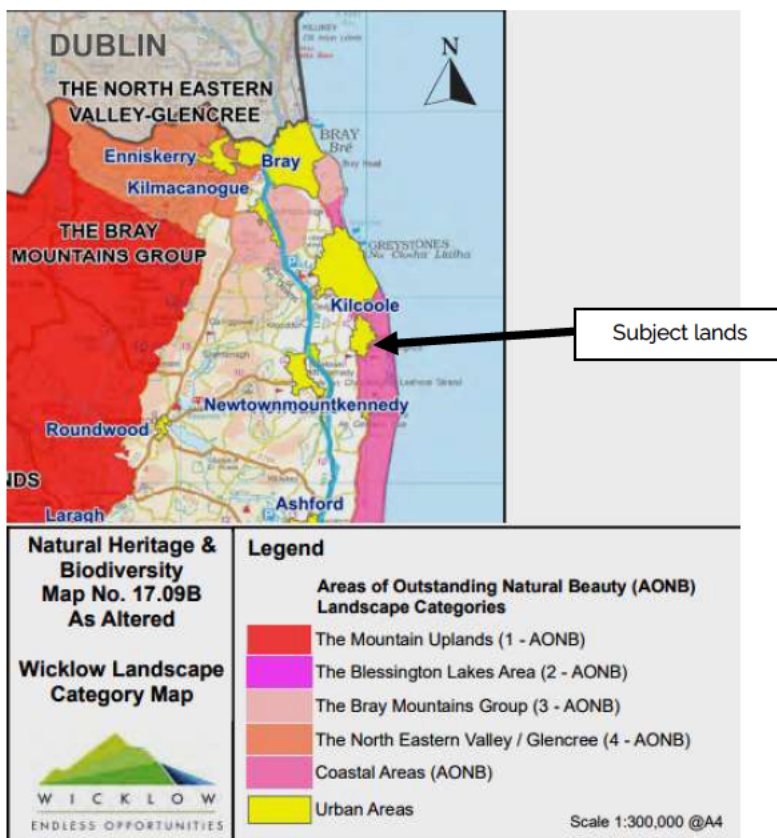


Fig. 9: Excerpt from Map No. 17.09B of the WCDP 2022-2028

6.0 Planning status of adjoining/surrounding lands

To the northwest of these lands a development of employment or enterprise units has been constructed (see Figs. 3 and 5).

To the north, there is residential development named Ballycrone Manor which is fully occupied.

The LAP boundary passes along the south edge of the area of the subject lands zoned 'SLB'.

To the west of these lands is the Kilcoole Golf Club (which is now permanently closed).

To the south and east of these lands are lands zoned 'AG' – 'To provide for agricultural uses' under the WCDP 2022-2028.

6.1 Planning applications on adjoining lands

The significant permissions which adjoin the subject lands are as follows. They provide for light industrial blocks directly to the northwest on E2 zoned lands and for Residential to the north on RE zoned land.

1. **04/20:** 7 No. Light Industrial Blocks, all comprising mezzanine storage and ancillary office accommodation, comprising Block A totals 1860 sqm. of floor area and comprises 4 No. Office Units & 7 light industrial units comprising of enterprise units, Block B totals 1200 sqm. of floor area and comprises 4 no light industrial units, Block C totals 1343 sqm. of floor area and comprises 3 light industrial units, Block D totals 1368 sqm. of floor area and comprises 3 light industrial units, Block E totals 4379 sqm. of floor area and comprises 4 office units and 7 light industrial units, Block F totals 3402 sqm of floor area and comprises 16 light industrial units, Block G totals 1200 sqm of floor area and comprises 4 Light industrial units. All of the above together with associated car parking, sewage treatment works and site development works and the construction of a portion of the proposed Western distributor road as per County Development Plan from R761, together with all associated works. Address: Ballycrone, Kilcoole, Co. Wicklow. Decision: Grant of planning permission.
2. **04/1533:** 32 two storey dwellings with site ancillary work including pumping station. Proposal consists of 8 x 2 bedroom, 20 x 3 bedroom, 4 x 4 bedroom dwellings. Address: Ballycrone, Kilcoole, Co. Wicklow. Decision: appealed to An Bord Pleanála which granted planning permission, under reg. ref. PL 27.216106.

3. **05/2978:** Permission sought for minor revisions to facades & internal layouts to previously granted planning permission 04/20, comprising of 7 no. light industrial units. Address: Ballycrone, Kilcoole, Co. Wicklow. Decision: Grant of planning permission.
4. **151019:** Extension to ref. 10/2612 (revised layout, house types and sites to house No.s 29 to 35 inclusive, and proposed extra 4 No. two storey dwellings with revised site boundaries all with connection to services and site ancillary works). Decision: Grant extension of duration. Date: 24/11/2015.
5. **181127:** Extend the appropriate period of a permission - 13/8757 - retention and completion of six partially constructed two storey dwellings and proposed construction of two x 2 storey semi detached dwellings and four detached 2 storey dwellings with connection to services as previously granted under planning ref. no. 04/1533 and ancillary site works including roads, footpaths and civil works. Decision: Grant extension of duration. Date: 30/11/2018.
6. **201305:** revised layout, house types and sites to house No.s 29 to 35 inclusive, and proposed extra 3 No. two storey dwellings with revised site boundaries all with connection to services and site ancillary works. Decision: Grant extension of duration. Date: 19/2/21.

7.0 Zoning objective sought

This submission proposes:

3. The existing 'SLB' zoning on part of Mr Brady's lands be updated to R22 'Residential' zoned lands – 'To provide for the development of sustainable residential communities up to a maximum density of 22 units per hectare and to preserve and protect residential amenity'.
4. The remainder of the lands, currently sited to the east of the existing LAP boundary be included in the Draft LAP (when it is published) and re-zoned R22, or, failing this, 'SLB'.

This would provide 2.54ha. of 'RE' zoned lands which would be sufficient area in which to develop a high quality housing development.

8.0 Planning and development basis for proposed zoning

Having been requested to visit this the subject lands and to suggest reasons why they should be zoned for residential under the forthcoming Greystones-Delgany & Kilcoole Local Area Plan, we submit the following grounds.

8.1 The re-zoning would support the compact growth of Kilcoole

Mr Brady supports a vision for Kilcoole of medium to fast paced growth. In order to achieve such growth, there is a need for housing development to meet demand.

Mr Brady's lands, located adjacent to existing lands zoned RE, would be appropriate for residential zoning as part of the ongoing growth of Kilcoole.

Part of these lands has formed a Strategic Land Bank for Kilcoole since 2013. These lands are now needed.

8.2 The location of the lands justify their re-zoning to residential

Kilcoole is designated as a Level 4, 'Self-Sustaining Town', i.e. towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.

There is a population allocation of c. 4,778 persons for 2028 (from a population of c. 4,244 persons in 2016).

Greystones-Delgany and Kilcoole will need approximately 850 new homes built between now and 2031 The 'Issues Paper' states: "It is estimated that growth in these settlements will exceed this target range before the end of the plan period due to legacy housing developments under construction".

There is a housing growth target for Kilcoole of c. 170 from 2022 to 2031. The 'Issues Paper' states: "It is estimated that growth in Kilcoole will exceed this target range before the end of the plan period due to legacy housing developments under construction".

Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet this housing target. These homes must be provided for in a sustainable manner, aligning with the provisions of the Core Strategy of the County Development Plan, and having regard to established and sustainable settlement patterns and the natural environment.

The subject lands are located adjacent to existing lands zoned RE.

There are many sites around Kilcoole which could be zoned RE, but few are as well positioned as Mr Brady's lands. The subject lands are located within walking distance of the full range of infrastructure, services and amenities including the town centre.

Dublin Bus and Iarnród Éireann mainline trains serve Kilcoole within walking distance of these lands.

Having visited Kilcoole and walked around the town and its environs, the southern and southwestern end of the town is that where employment uses have been traditionally located, including at Renmore and Bullford Business Parks with 10 and 13 industrial units respectively within each of these business parks and Network Business Park located further southeast of the village which contains industrial blocks. These employment hubs require homes for workers. Our client's lands offer an appropriate location to provide these homes.

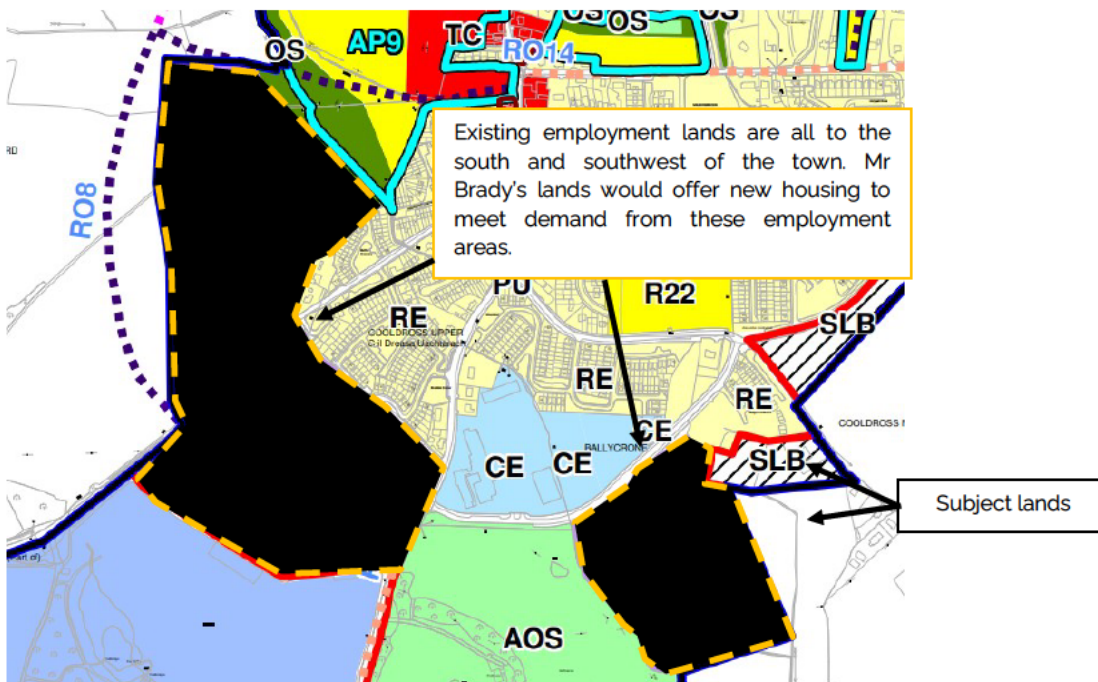


Fig. 10: The location of employment lands within Kilcoole

8.3 These lands can be serviced

There would not appear to be any infrastructural constraint which would prevent the zoning of these lands for development. Adjoining employment and residential developments are each served by recent road, mains water, surface water, foul water and electricity infrastructure.

8.3.1 Road access is available

The evolving distributor road network in this area has already been determined by existing developments and planning permissions.

These lands can be accessed via the Cooldross Lane/Holywell Avenue roundabout and through the Ballycrome Manor residential scheme where a future entrance into our client's lands zoned 'SLB' already exists (see Figs. 11 and 12).

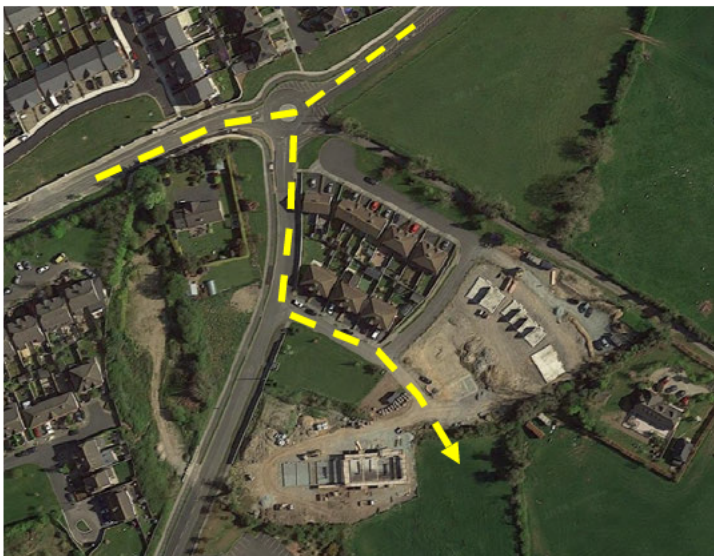


Fig. 11: Road access from Cooldross Lane/Holywell Avenue roundabout through Ballycraone Manor residential scheme to the north of the subject lands (Source: Google Maps)



Fig. 12: Existing road access and entrance planned, built and in place through Ballycraone Manor residential scheme to the north of the subject lands (Source: Google Streetview)

The roads network in the area has significantly developed and matured since the existing LAP was adopted. The pertinent planning permissions are now over 20 years old and this is an increasingly mature urban area which needs additional housing. See:

1. Planning Authority Ref. 03/8346 (An Bord Pleanála Ref. 27.204542) has determined the northern side of the upgraded road.
2. Planning Authority Ref. 04/216, An Bord Pleanála Ref. 27.210720 has determined the location and layout of the proposed roundabout and the alignment of the new distributor road to the north-east. This permission includes provision for the construction of the greater part of the roundabout.
3. Pleanála Ref. 27.204542) has determined the northern side of the upgraded road. Of particular importance Planning Authority Ref. 04/216, An Bord Pleanála Ref. 27.210720 has determined the location and layout of the proposed roundabout and the alignment of the new distributor road to the north-east. This permission includes provision for the construction of the greater part of the roundabout.
4. Planning Authority Ref. 04/1533, An Bord Pleanála Ref. PL 27.216106 provides for the completion of the south-west part of the roundabout and a part of the proposed distributor road.

As Figs. 13 to 15 show, the subject lands would be served by distributor roads with footpaths and cycle lands. These roads are fully completed.

It is submitted that the subject lands can be accessed in a manner which would be in keeping with the proper planning and sustainable development of this area of Kilcoole.



Fig. 13: The quality of the Cooldross Lane carriageway with footpaths and cycle lanes on both sides (Source: Google Streetview)



Fig. 14: The quality of the Cooldross Lane/Holywell Avenue roundabout with footpaths and cycle lanes on both sides (Source: Google Streetview)



Fig. 15: The quality of the access road toward the Ballycrone Manor residential scheme with footpaths and cycle lanes on both sides (Source: Google Streetview)

8.3.2 Waste water services infrastructure is in place

Kilcoole's growth was restricted for many years by limited public wastewater treatment capacity in the mains system serving the town. This situation had existed for as much as 15 years and was reflected in County Development Plan proposals for the growth of population at Kilcoole back when the existing LAP was adopted.

Uisce Eireann's website presently indicates that there is no issue with capacity in the Kilcoole WWTP (see Fig. 16). Connections are currently feasible.

Therefore, the zoning of additional lands to permit the growth of Kilcoole need no longer be restricted by existing wastewater capacity. In this context it would appear to be appropriate to consider zoning Mr Brady's lands.

Region	County	Settlement	Census pop. (2016)	Wastewater Treatment Plant (WWTP)	Reg #	Indication of Available Capacity	WWTP Project Planned/Underway
EM	Wicklow	Bray	32,600	Shanganagh WWTP	D0038	+ Green	
EM	Wicklow	Greystones	18,140	Greystones WWTP	D0010	+ Green	
EM	Wicklow	Wicklow	13,954	Wicklow WWTP	D0012	+ Green	
EM	Wicklow	Arklow	13,163	-	D0006	+ Green*	Yes
EM	Wicklow	Blessington	5,520	Blessington WWTP	D0063	+ Green	
EM	Wicklow	Kilcoole	4,239	Kilcoole WWTP	D0087	+ Green	

Fig. 16: Uisce Eireann's assessment of capacity in the Kilcoole WWTP (Source: Uisce Eireann, 25/1/2024)

8.3.3 Public water is available

The public water supply serving the town is supplied by Dublin Corporation from the Varray treatment works from an existing connection of the Dublin Corporation main at Kilpeddar. The service reservoir of 2.2 million litres is located at Priestnewtown and the town's water supply is adequate to cater for Kilcoole's anticipated demand. Therefore, the availability of water is not a constraint to the future development of Kilcoole.

It is submitted that were Mr Brady's lands zoned for development, they can be serviced with water.

8.4 Zoning these lands would provide certainty:

Zoning gives a degree of certainty to residents, developers, etc. The Local Area Plan needs to provide landowners and developers in the town with a clear idea of the future shape of the town. Mr Brady suggests that the town be consolidated with the town's future shape in this case, taking in the north-eastern corner which has previously been left only partly zoned 'SLB' and left undeveloped.

8.5 No impacts would arise from the future development of these lands

The zoning of these lands would not appear to raise any impacts on any sensitive designations or on any adjoining properties.

These lands could be zoned without raising any objection. This would appear to provide a balance between the need for additional housing land and the need to prevent impacts.

8.5.1 These lands are not the subject of any sensitive designations

While the subject lands adjoin or are sited in the 'Coastal Area – Area of Natural Beauty' under the WCDP 2022-2028, this designation is applied to approx. half of the area around the town of Kilcoole, with the other half zoned 'Corridor Area'.

The subject lands can reasonably be called peri-urban. Beyond this general landscape designation, these lands are not within, or within the vicinity of, any of the following amenity, landscape, environmental or other designations:

1. Natural Heritage Area,
2. Special Area of Conservation,
3. Special Protection Area,
4. Zone of Archaeological Protection,
5. Protected Structure,
6. Architectural Conservation Area,
7. Preserved views or prospects,
8. Tree Preservation Orders, etc.

The lands are suitable for residential use as now sought as they would connect into the existing housing estate to the north and can offer quality public and communal open spaces. The subject lands can also offer a landscaped boundary to lands that would remain outside of the LAP boundary.

8.5.2 No impacts on adjoining properties

The zoning of these lands for housing would not impact on any adjoining properties and certainly no residential properties. The estate to the north has been planned to connect to these lands and, as such, they reasonably expect this to happen in due course.

Surrounding land is either owned by Mr Brady, is already developed for residential or employment use, or is part of the now closed Kilcoole Golf Club which is hidden behind heavy boundary landscaping.

8.5.3 No visual impact concerns arise

The subject lands are not visible within the landscape. They are hidden behind existing employment development to the north and a golf club to the west. Other boundaries comprise of agricultural land for considerable distance.

The zoning of the subject lands for residential development would not have any discernible impact on the landscape, but would facilitate modern settlement and development needs.

8.6 The zoning would provide a hard edge to the south of Kilcoole

The subject lands are located between employment/enterprise units to the west and the residential estate to the north. The lands are bisected by the LAP boundary to the south.

The zoning of these lands and their future development into a housing development would provide a hard edge to Kilcoole as this location. An edge beyond which no further development would occur as no access would exist. The estate would be developed as a cul-de-sac as required.

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 for development and that this re-zoning can be achieved in a manner which does not cause any significant adverse impacts on the environment, on the landscape, on adjoining and neighbouring developments, and on the proper planning and sustainable development of the area.

In light of the above, we recommend that:

- The existing 'SLB' zoning on part of Mr Brady's lands be updated to R22 'Residential' zoned lands – 'To provide for the development of sustainable residential communities up to a maximum density of 22 units per hectare and to preserve and protect residential amenity'.
- The remainder of the lands, currently sited to the east of the existing LAP boundary be included in the Draft LAP (when it is published) and re-zoned R22, or, failing this, 'SLB'.

The zoning objective is considered the most appropriate in light of the need for Kilcoole to reduce its dependency on commuters.

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

BPS Planning Consultants LTD
Members of the Irish Planning Institute
31 January 2024