

	<h1>Greystones-Delgany &amp; Kilcoole LPF Variation No.4</h1>
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<b>Who are you:</b>	Agent
<b>Name:</b>	John Spain Associates on behalf of D/RES Properties and the Evans Family
<b>Reference:</b>	GDKLPF-150329
<b>Submission Made</b>	June 20, 2025 3:05 PM

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- 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.1 Introduction
- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole
- A.3 Factors influencing future development options
- A.4 Overall strategy

## Local Planning Framework PART B Settlement Specific Objectives.

- B.2 Residential Development

- B.6 Heritage, biodiversity and green infrastructure
- B.8 Land Use Map and Zoning
- B.9 Specific local objectives (SLOs)

Please select which town you want to comment on:

Greystones/Delgany

Map

Site Description:

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25177- GDK LPF-Proposed Variation No. 4 Submission Final.pdf, 3.26MB

'Variation No.4'  
Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Road,  
Wicklow Town,  
Co. Wicklow.

Date: 20<sup>th</sup> June 2025  
JSA Ref: PT/TD JN 25177

Dear Sir/Madam,

**RE: SUBMISSION IN RESPECT OF THE DRAFT GREYSTONES-DELGANY & KILCOOLE LOCAL PLANNING FRAMEWORK 2025 / PROPOSED VARIATION NO. 4 OF WICKLOW COUNTRY DEVELOPMENT PLAN 2022-2028) IN RELATION TO LANDS AT, CHARLESLAND GOLF CENTRE, CHARLESLAND ROAD, KILLINCARRIG, GREYSTONES, WICKLOW**

## **1.0 INTRODUCTION / EXECUTIVE SUMMARY**

On behalf of our clients, D/RES Properties and the Evans Family, C/O Donnybrook House, 36-42 Donnybrook Road, Dublin 4, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission on the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 which is being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, in respect to lands in the control of our clients (as illustrated in Figure 2.1 and Appendix 1- Masterplan proposals prepared by Reddy Architecture + Urbanism (RAU)) at the former Charlesland Golf Centre, Charlesland Road, Greystones, Wicklow. The public consultation runs until the 20<sup>th</sup> June 2025.

D/RES Properties, is a major housebuilder in the Dublin Metropolitan Area, including Wicklow, and has consistently engaged in plan-led development across County Wicklow. With over 50 years of experience in residential delivery, D/RES is one of Ireland's leading private housebuilders, known for delivering sustainable, high-quality homes with a strong emphasis on design, placemaking and environmental responsibility. The company is recognised for its leadership in sustainable construction and is committed to best practice in low-carbon development and ecological sensitivity.

D/RES is a significant employer within County Wicklow and has built a number of sustainable communities and best in class developments including Tinakilly Park, Altidore - Newtownmountkennedy, Bellevue - Delgany, Eastmount - Delgany and Ballinahinch Wood – Ashford, all of which exemplify the company's focus on creating high-quality, resilient communities that integrate form, function, and sustainability.

As set out in this submission, and particularly in the context of the National Planning Framework First Revision (2025), the Urban Development Zone (UDZ) provisions introduced under the Planning and Development Act 2024, the updated national target of delivering 50,000 homes per annum to 2040 (up from 25,000 under the 2018 NPF), the move to 10-year development plans, and the forthcoming Ministerial guidance which we understand will allow for 50% headroom in residential zonings, it is submitted that the subject lands are ideally positioned to contribute to meeting these targets. In particular, given the location of Greystones within the Dublin Metropolitan Area (DMA), on the North-

South Corridor, and its high-capacity transport links via the DART corridor and bus services, and the identification in the MASP spatial framework and in Table 5.1 of the Eastern and Midland RSES for Greystones to identify a strategic development site(s) for housing delivery, the subject lands provide a key opportunity to support compact, transit-oriented growth within the metropolitan area.

## 1.1 SUBJECT LANDS

The subject lands comprise approximately **63 hectares**, located at Charlesland, Greystones, Co. Wicklow, and form part of Strategic Land Use Objective SLO 3 under the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 and are identified as being subject to an Active Open Space zoning. The lands are situated to the east and south of the Charlesland dual carriageway (R774), bordering the Dublin–Wexford railway line, and within walking and cycling distance of the Greystones DART station, bus services, the town centre, and key social and community infrastructure.

It is important to highlight at the outset, that part of the eastern portion of the landholding is zoned for residential development under the Greystones–Delgany and Kilcoole Local Area Plan (2013–2019), as illustrated in Figure 2.2 below. Our client had intended to bring forward a residential application for these lands, and accordingly as set out elsewhere in this submission, we request that this existing residential zoning be retained. We note that the proposed LPF includes flood risk designations with potential future scenarios, which impacts on part of the subject lands, however, it is likely that this is exaggerated and would be reduced once a site-specific flood risk assessment is undertaken.

Historically, the lands were occupied by the Charlesland Golf Club and also include portions currently in agricultural use. The site directly adjoins the Shoreline Sports Park, existing residential neighbourhoods to the north and west, and is in close proximity to Greystones Community College, various primary schools, and local retail and leisure facilities (see Appendix 1- RAU Masterplan for further details).

The lands benefit from proximity to public transport, including DART and bus routes, accessibility via the Charlesland dual carriageway and existing roundabout network adjacent to planned and existing active travel networks and potential greenway corridors, and therefore have the potential to be successfully integrated as part of a new urban neighbourhood, with significant additional active and passive open space uses, within the built-up area of Greystones, supporting compact growth.

The site also features natural assets such as the Three Trouts Stream, areas of mature vegetation, and coastal views, while certain low-lying portions are identified as subject to flood risk, offering potential for biodiversity-led parkland and open space enhancement. Given its size, location, serviceability, and connectivity, the site represents one of the last significant, consolidated landbanks suitable for strategic planning and phased, infrastructure-led development within the settlement boundary of Greystones.

As outlined in Section 2, the subject lands, notwithstanding that they are in private ownership, are currently zoned ‘AOS – Active Open Space’ under the Draft Local Planning Framework, which significantly restricts future development to recreational, and community uses. While this submission sets out that such a designation is overly limiting and premature in the context of evolving national policy and housing needs, it is acknowledged that the SLO 3 objective provides a degree of direction for the future use of these lands. Specifically, the SLO outlines a vision for expanded sports and community facilities, enhanced vehicular access from the Charlesland dual carriageway (R774), protection and integration of biodiversity areas and flood-prone lands, particularly along the Three Trouts Stream, and delivery of a landscaped greenway to connect with adjacent strategic assets including Shoreline Sports Park, SLO 1 lands to the north, and the proposed Greystones-Wicklow Coastal Greenway.

While these aspirations are noted and supported in part, this submission advocates for a more balanced, plan-led approach that allows for residential-led mixed-use development in appropriate locations within the subject lands, supported by complementary green infrastructure and community provision. It is submitted that through a RN2 zoning (which could be revisited as the Development Plan is updated to align with the Revised NPF) and alternative SLO 3 objective that there would be a real possibility of some of the planning and community gain in the form of the active open space uses being delivered.

## **1.2 KEY ISSUES RAISED IN THIS SUBMISSION**

In preparation of this submission, our clients have engaged Reddy Architecture + Urbanism and John Spain Associates to undertake a detailed assessment of the Draft LPF 2025, including the implications of proposed Variation No. 4 on the long-term development potential of the subject lands.

Based on this review, and having regard to the above context, and as elaborated upon below, the submission raises the following key issues:

### **1. Prematurity of the Draft LPF**

The Draft LPF is being advanced prior to the statutory variation of the Wicklow County Development Plan 2022–2028 to align with the Revised National Planning Framework (NPF), April 2025. The updated NPF has doubled national housing delivery targets to 50,000 units per annum, necessitating a fundamental reappraisal across growth settlements such as Greystones, which is situated within the Dublin Metropolitan Area, identified as a strategic growth area in the MASP spatial framework and Table 5.1 of the RSES, including the need to identify a strategic development site for housing, and served by the DART and bus services.

Advancing the LPF in the absence of an updated Core Strategy raises serious concerns regarding the robustness and longevity of the land use framework now proposed, and therefore in order to futureproof the proposed LPF we make some further suggestions below in the context of the subject lands.

### **2. Request for RN2 Designation**

As noted in Section 1.1, the eastern part of the subject landholding is currently zoned for residential development under the Greystones-Delgany and Kilcoole Local Area Plan (2013–2019), and this should be reflected in the proposed LPF, in addition to the further request below.

The submission requests that the overall subject lands be designated as ‘*RN2 – New Residential Priority 2*’. These lands are well-located within walking and cycling distance of the DART and key community infrastructure, are serviceable, and offer a logical and sustainable opportunity for future phased residential development, with supporting active and passive open space (see Appendix 1- RAU Masterplan) in line with compact growth and transit-oriented development principles.

Designation as RN2 would allow the lands to be planned and delivered in a phased and sustainable manner, in line with anticipated housing demand and strategic infrastructure delivery and help future proof the County Development Plan in the context of the Revised NPF and the additional housing and residential zoning needs in Wicklow that will arise from same.

### **3. Associated Proposed Alternative to SLO 3**

Linked to the requested ‘RN2- New Residential Priority 2’ zoning, this submission proposes that the current SLO 3 be replaced with a revised objective supporting a residential-led mixed-use masterplan, with supporting active and passive open space uses. The accompanying Masterplan prepared by Reddy A+U (see Appendix 1) envisions a mix of housing typologies (including elderly and passive/low-carbon homes), community facilities (e.g. crèche, local retail), an extensive green and blue infrastructure network, a biodiversity parkland on flood-prone lands, and strategic permeability through walking/cycling links to adjacent residential areas, schools, the town centre, and the planned Greystones-Wicklow Coastal Greenway. While the lands to the south (outside the client’s ownership) are best suited to accommodate formal sports facilities and a potential community hub, the proposed development on our client’s lands will support and interface with these wider community assets.

It is submitted, that the only mechanism to facilitate Active Open Space on these privately owned lands will be as part of an overall new residential community as illustrated in Reddy A+U’s Masterplan brochure, and we request the Planning Authority to have regard to viability issues when considering request 2 and 3 above.

### **4. Potential for Urban Development Zone (UDZ) Designation**

The subject lands meet the criteria for designation as an Urban Development Zone (UDZ) under the Planning and Development Act 2024, offering:

- A large, consolidated landbank;
- Direct access to high-capacity public transport; and
- Clear potential to support compact, integrated and infrastructure-led housing delivery.

The Active Open Space zoning under the Proposed LPF does not have regard to the Revised NPF which the County Development Plan is required to comply with, Greystones designation as a Metropolitan Growth Town and location on the DART corridor, and therefore may undermine the site’s eligibility for UDZ status and limit Wicklow’s ability to access future national investment mechanisms to support housing delivery.

### **5. Retention of Existing Zoning – Alternative Option**

As outlined above, part of the subject landholding is currently zoned for residential development under the Greystones–Delgany and Kilcoole Local Area Plan (2013–2019). This submission seeks, as a minimum, the retention of the existing residential zoning on these lands, and objects to any proposed downgrading or removal of this zoning through the Local Planning Framework process.

Without prejudice to the primary requests above, should the RN2 designation of the lands and revised SLO 3 objective not be deemed appropriate as part of the Proposed LPF process (i.e. the Planning Authority may consider better to address through the next variation to align with the Revised NPF), this submission requests that the existing land use zoning be retained in full. This would avoid prejudicing the long-term strategic planning of Greystones and allow for a coordinated, evidence-led review of zoning in line with the forthcoming Core Strategy variation and Revised NPF requirements.

The requests above are addressed in further detail in the following sections of this submission and are supported by a Masterplan brochure prepared by Reddy A+U, which includes a site context and constraints assessment, an alternative proposed masterplan / SLO 3 for the lands, and accompanying mapping and schedules which are included in Appendix 1.

## 2.0 SITE LOCATION AND CONTEXT

The lands the subject of this submission form part of Strategic Land Use Objective (SLO) 3 in the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025. The extent of the overall SLO 3 lands is outlined in Figure 2.1 and comprise of approximately 88 hectares and are located at Charlesland, Greystones, within the administrative area of Wicklow County Council. The extent of our client's lands within the SLO 3 area is also illustrated in Figure 2.1, subsequent figures and Appendix 1.

**Figure 2.1: Aerial Photo of the SLO 3, subject lands and surrounding area**



Source: RAU

The lands occupy a prominent coastal position, bounded to the east by the Dublin–Wexford railway line and coastline, and to the west by the Charlesland dual carriageway (R774). The site is immediately adjacent to the built-up area of Greystones, and within close proximity to Greystones DART station, less than 2km to the north, bus corridors serving Greystones and surrounding settlements and key community, educational and recreational facilities, including Greystones Community College, local primary schools, and Shoreline Sports Park (immediately west of the site).

To the north and west, the lands are flanked by established residential neighbourhoods and local centres including Charlesland and the wider Greystones town area. To the south, the site interfaces with open countryside and agricultural land, including potential strategic links to Kilcoole. The coastal corridor to the east offers the opportunity for a future section of the Greystones-Wicklow Coastal Greenway, and a rich environmental context for a biodiversity-led open space strategy.

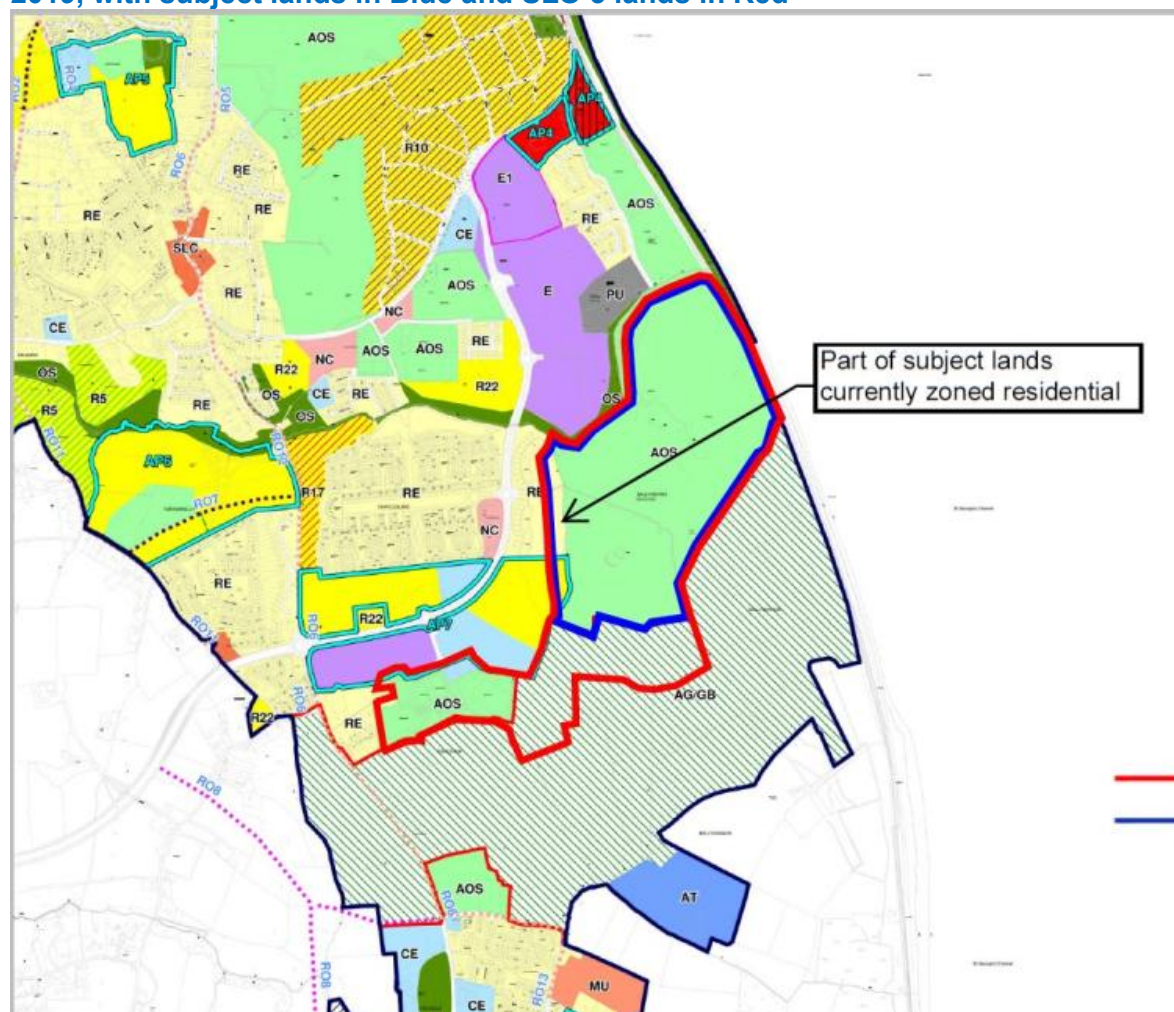
The site is readily accessible via multiple entry points, including roundabouts on the Charlesland dual carriageway. Its location supports Transit-Oriented Development (TOD) principles, integration with planned and existing walking/cycling infrastructure, including potential greenway and riverwalk corridors, logical and phased extensions of the existing urban form in a compact growth model.

The lands are characterised by a mix of open grassland, former golf fairways, and mature tree clusters. The Three Trouts Stream, which traverses the site from west to east and presents both ecological and flood risk considerations. Low-lying coastal lands adjacent to the railway line, where flood risk mapping identifies potential constraints best suited for biodiversity enhancement and passive open space.

The location, scale, and physical characteristics of the site, as well as its proximity to Greystones town centre and strategic infrastructure, underline its potential to contribute meaningfully to the long-term growth of the settlement in accordance with compact, infrastructure-led development principles.

As illustrated in Figure 2.2 below, part of the subject landholding is currently zoned for residential development under the Greystones–Delgany and Kilcoole Local Area Plan (2013–2019). The subject lands are identified as having long-term development potential, either as part of the strategic reserve or through flexible zoning that supported future residential and mixed-use development in a master planned format. The 2013 LAP recognised the location, scale, and infrastructure capacity of Charlesland as strategically important to the future growth of Greystones. This submission seeks, as a minimum, the retention of the existing residential zoning on these lands, and objects to any proposed downgrading or removal of this zoning through the Local Planning Framework process.

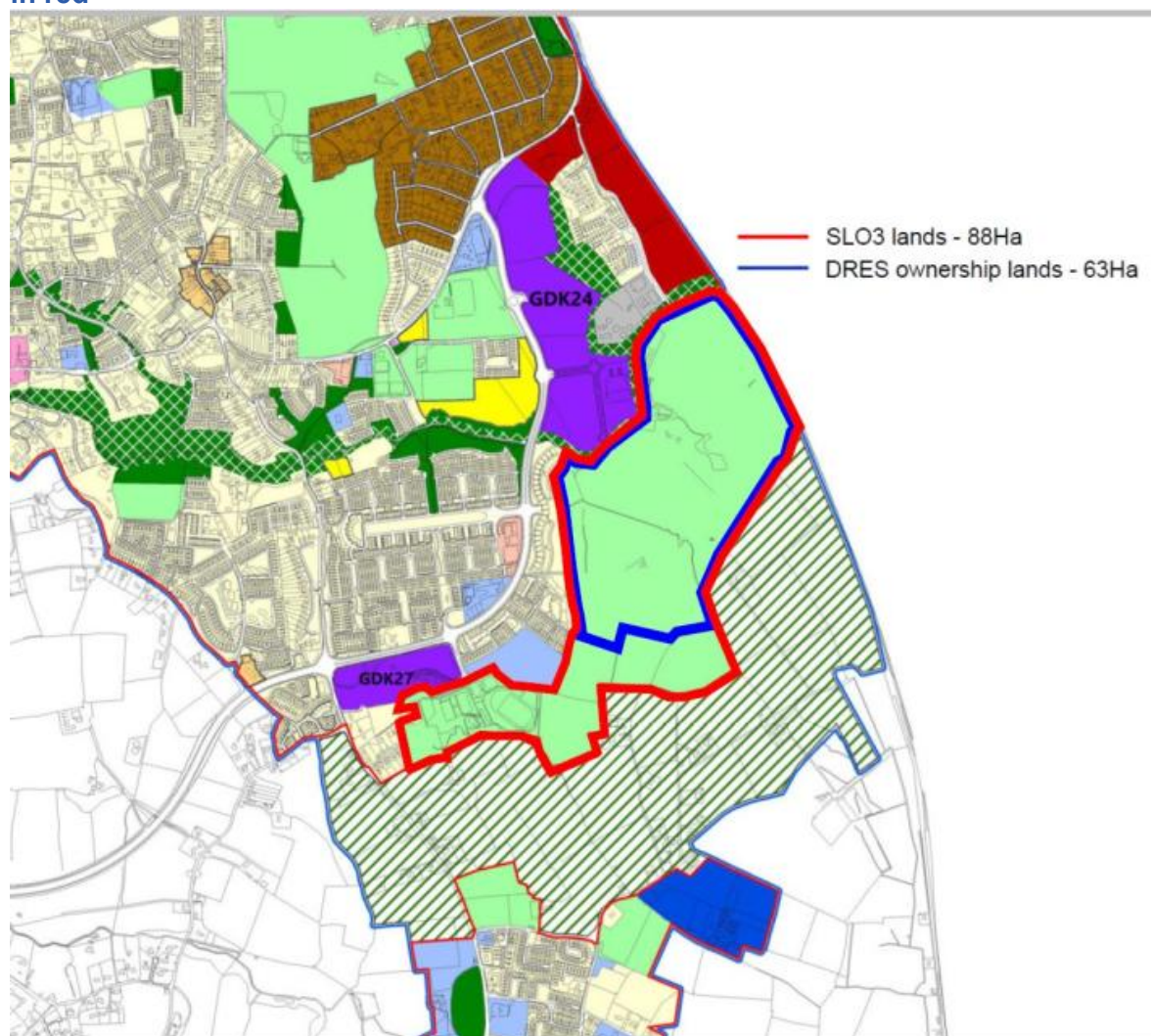
**Figure 2.2: Extract from Zoning Map Greystones – Delgany and Kilcoole LAP 2013-2019, with subject lands in Blue and SLO 3 lands in Red**



In contrast, the Draft LPF 2025 designates the subject lands entirely as ‘AOS – Active Open Space’, as illustrated in Figure 2.3 below, representing a significant shift away from the previous forward-looking approach for the lands. The Planning Authority envisages these lands utilised for a wider range of sporting and social – community activities, including (but not limited to) the use of the land for outdoor and indoor sports pitches / courts etc (given capacity issues in existing clubs in the LPF area) as well as for casual parkland for informal recreation. This new designation restricts land use to recreational and community facilities and removes any formal policy pathway for future residential development. Such a change occurs despite the site’s proximity to high-capacity public transport, adjoining residential areas, and key infrastructure – and without a revised Core Strategy to support this reclassification.

This zoning change materially alters the planning context of the lands and significantly limits their potential to contribute to long-term growth in Greystones, at odds with previous policy direction and current national housing targets.

**Figure 2.3: Extract of Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 zoning map with approximate extent of subject lands shown in red**



As illustrated in Figure 2.4 below, the lands are identified as being within SLO 3 Charlesland, which is largely made up of the Charlesland golf club, the Shoreline Sports Park and some lands currently in use for agriculture.

Section 5.4 of the Draft LPF outlines that in accordance with the Social Infrastructure Audit, to address enhancement of public open space, it is a strategy to maintain the AOS zoning of the now closed Charlesland golf club and expand the AOS zoning in this area and encourage the development of these lands as a new sports and recreation zone for the wider area, including but not limited to new sports pitches, casual walking / cycling areas, playgrounds / outdoor gyms, dog parks etc. Objective GDK41 states *“To support and encourage the redevelopment of Charlesland golf club as a regional scale sports and recreation centre, linking up with the existing Charlesland Sport Centre, in accordance with the SLO-3 objectives set out in this LPF.”*

However, there has been no engagement with the landowner in respect to the delivery of these proposals, and it is submitted, that the only mechanism to facilitate Active Open Space on these privately owned lands will be as part of an overall new residential community as illustrated in Reddy A+U’s Masterplan brochure, and we request the Planning Authority to have regard to viability issues when considering request 2 and 3 above.

**Figure 2.4: SLO3 Concept Plan**



The Draft LPF states that “Any proposals shall comply with the following requirements:

- *In addition to the existing access routes via the Woodlands Road and at Charlesland Sports Park (Ballynerrin roundabout), further access points from the Charlesland dual carriageway will be expected; in particular, access routes via the ‘Kilfernoc’ and the ‘Glen’ roundabouts will be supported;*
- *Natural biodiversity areas, mature trees and flood management zones shall be maintained throughout the area and in particular along the Three Trouts Stream, the size and layout of which shall be determined following ecological and site specific flood risk assessment;*
- *A ‘green link’ including walking/cycling infrastructure shall be to the forefront of the overall design and shall be determined prior to any redevelopment / reorganisation of the space, linking the lands with the SLO1 lands to the north and Shoreline Sports Park to the west. Any such route shall also link with options for the Greystones – Wicklow coastal greenway. The green link should be an attractive, supervised and easily accessible link that is a planted and well-landscaped open space.”*

The Draft LPF acknowledges that Greystones has experienced significant growth in recent decades, with over 3,000 new homes delivered between 2004 and 2024 and a doubling of the population since 1996, as follows:

- Between 2004 and 2024, over 3,000 new housing units were delivered in six major residential developments, largely enabled by strategic infrastructure like the Charlesland dual carriageway and Farrankelly Road.
- Population increased from approximately 11,296 in 1996 to 22,009 in 2022, reflecting rapid growth, especially post-2016.
- This growth was primarily greenfield and peripheral, raising concerns about sprawl, car dependency, and potential coalescence with Kilcoole.
- The LPF notes that the focus now is on ‘catch-up’ infrastructure delivery, and consolidation rather than significant expansion, despite the settlement’s designation as a Self-Sustaining Growth Town.

This growth is reflective of the location of Greystones with the DMA, the high quality public transport and urban and natural environment, and it is submitted that given national housing targets that it should continue to contribute to the housing needs of the DMA. The area is now characterised by a maturing suburban structure with a need to balance further growth with infrastructure delivery, compact development, and environmental protection.

The subject lands sit within this evolving settlement context and represent one of the few remaining large, consolidated and serviceable landbanks within the urban boundary of Greystones. Their location, scale, and accessibility provide a strategic opportunity to accommodate future housing and community infrastructure in a phased, plan-led manner, consistent with national policy on compact growth and transit-oriented development.

Greystones is included within the wider Dublin Metropolitan Area (DMA), as defined in the Eastern and Midland Regional Spatial and Economic Strategy (RSES), which covers the continuous built-up city area and its highly urbanised satellite settlements. Furthermore, Greystones is identified as requiring a Strategic Site for housing development as part of the North-South Corridor of Table 5.1 - “*Strategic Development Areas and Corridors: Capacity, Infrastructure and Phasing*” in the RSES Metropolitan Area Strategic Plan (MASP).

Section 5.2 of the MASP outlines that its spatial framework is underpinned by the Settlement Strategy in Chapter 4 “People and Place” and sets out an integrated land use and transportation strategy for the sequential development of the metropolitan area. This strategy focuses on consolidation within Dublin City and Suburbs, the Key Towns of Swords, Maynooth and Bray, and the planned development of strategic growth areas such as Donabate, Dunboyne, Leixlip and Greystones.

In this context, the subject lands at Charlesland are exceptionally well-placed to contribute to the planned and infrastructure-led expansion of the metropolitan area in accordance with national and regional policy.

This is particularly important in light of the Revised National Planning Framework (NPF) 2025, which significantly increases the scale of housing delivery expected in metropolitan and peri-urban settlements. Greystones' role as a commuter-accessible settlement linked to DART, high-frequency bus services, and a maturing urban structure, positions it as a natural contributor to the MASP's goals of sustainable, infrastructure-led development at the metropolitan edge.

### **3.0 SUBMISSION REQUESTS**

Having regard to the site context, zoning history, and emerging national and regional policy, particularly the Revised National Planning Framework (NPF) and the need to plan for an annual housing output of 50,000 new homes, this submission sets out the following key requests in respect of our client's lands at Charlesland, Greystones.

These requests are made to ensure the Draft Local Planning Framework (LPF) 2025 responds appropriately to national housing targets, protects strategically located landbanks for future use, and maintains flexibility pending the statutory review of the Wicklow County Development Plan (CDP) 2022–2028.

#### **Submission Request No. 1: Prematurity of Proposed Variation**

This submission raises a fundamental concern regarding the prematurity of progressing Variation No. 4 to the Wicklow County Development Plan and the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025, prior to the statutory variation of the CDP required to align with the Revised National Planning Framework (NPF), April 2025.

The Revised NPF sets out an increased national housing delivery target of 50,000 units per annum, up from 25,000 in 2018. This represents a material change in national planning policy with direct implications for counties within the Eastern & Midland Regional Assembly (EMRA) area, including Wicklow, and particularly for Greystones, which is included within the Dublin Metropolitan Area (DMA), located on the DART corridor, and identified as requiring a strategic development within the MASP spatial framework and Table 5.1 of the Eastern and Midland RSES..

Adopting the Draft LPF in advance of this statutory alignment:

- Risks misalignment with national and regional policy,
- Undermines the role of Greystones in delivering strategic housing supply, and
- Prejudices the long-term potential of serviceable, well-located landbanks such as the subject lands at Charlesland.

We therefore request that Variation No. 4 and the Draft LPF 2025 be postponed, or at a minimum, that no restrictive zoning changes, such as the proposed AOS zoning on the subject lands, be adopted until the Core Strategy and Housing Strategy of the CDP have been formally updated.

In this context, it is critical that Wicklow County Council ensures that the LPF does not preempt decisions that rightfully belong within the scope of the forthcoming Core Strategy variation.

The subject lands at Charlesland are strategically positioned within walking and cycling distance of Greystones DART station, adjacent to existing bus corridors and strategic road

infrastructure and close to schools, neighbourhood services, and existing community amenities.

These attributes make the lands ideally suited to contribute to compact, transit-oriented growth in line with the Revised NPF, the RSES, and the MASP strategy for sequential development of strategic sites such as Greystones. The site also holds clear potential for designation as an Urban Development Zone (UDZ) under the Planning and Development Act 2024, which provides for fast-tracked strategic housing delivery in sustainable, infrastructure-rich urban locations.

Premature downzoning or restriction of these lands through the LPF process would conflict with the intent of the Revised NPF and RSES, undermine their eligibility for UDZ designation, and jeopardise the Council's capacity to respond to future population and housing demand.

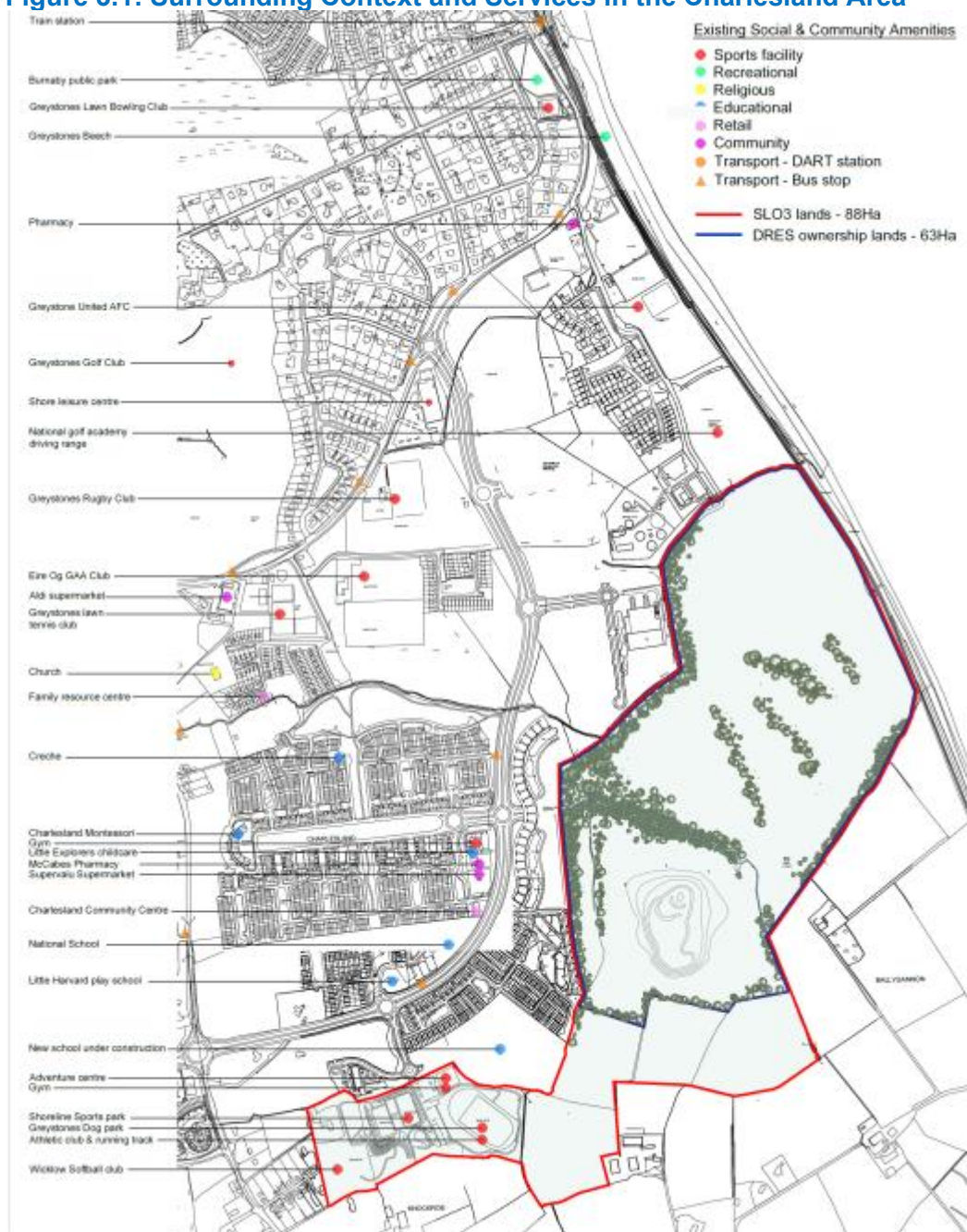
Accordingly, this submission requests that the LPF process be realigned with national and regional planning policy and timelines and that the long-term strategic value of the Charlesland lands be preserved through policy flexibility and the avoidance of restrictive reclassification at this stage.

### **Submission Request No. 2: Designate the Lands as 'RN2 – New Residential Priority 2'**

In light of the urgent and increasing need to identify and safeguard future residential land supply following the Revised National Planning Framework (NPF) 2025, this submission requests that the former Charlesland Golf Club lands (c. 63 ha, and if considered appropriate the adjoining SLO 3 lands not within our clients ownership) be designated as 'RN2 – New Residential Priority 2' within the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025. This request reflects the strategic potential of the site and the need to plan for a phased, plan-led, and infrastructure-supported pattern of growth, consistent with national and regional policy.

The subject lands at Charlesland present a rare and critical opportunity to secure a long-term, consolidated landbank for sustainable urban development. The lands are as follows:

- Contiguous to the built-up area of Greystones and integrated within the existing urban footprint;
- Located within walking and cycling distance of the Greystones DART station, Dublin–Wexford rail line, and public bus corridors;
- Immediately proximate to key community infrastructure, including Greystones Community College, several primary schools, the Shoreline Sports Park, neighbourhood retail, and employment nodes;
- Serviceable by existing infrastructure, with potential for future upgrades as part of planned investment in active travel, drainage, and utility services.

**Figure 3.1: Surrounding Context and Services in the Charlesland Area**

Source: RAU

This locational context provides a compelling basis for the designation of the Charlesland lands as RN2 - New Residential Priority 2, enabling them to form part of the County's long-term strategic housing supply pipeline. The lands are ideally placed to support compact growth, transit-oriented development (TOD), and sustainable, infrastructure-led urban expansion.

The Revised National Planning Framework (NPF), published in April 2025, now targets the delivery of 50,000 new homes per annum, doubling previous estimates. This places an increased responsibility on Tier 1 counties within the Eastern & Midland Regional Assembly (EMRA) area, including Wicklow, to identify and protect landbanks that can meaningfully contribute to future housing supply. Greystones, as part of the Dublin Metropolitan Area (DMA), located on the North-South DART / Economic Growth Corridor, and identified in the MASP spatial framework and in Table 5.1 of the RSES as requiring a strategic development site for housing, is expected to play a key role in meeting this demand.

However, the current Draft LPF does not adequately respond to this strategic imperative. By failing to acknowledge or plan for the long-term potential of serviceable lands such as Charlesland, the plan risks undermining Greystones' ability to deliver on its metropolitan growth role. Failure to designate such lands appropriately could lead to unnecessary constraints on future housing capacity and missed opportunities to support the compact, sustainable growth envisaged in national and regional policy.

Designating the Charlesland lands as RN2 – New Residential Priority 2 would safeguard their strategic role for future development, without requiring immediate delivery. It would facilitate a phased and managed approach to growth, aligned with infrastructure investment and evolving population needs. This approach would enhance clarity and transparency in land use planning, reduce the risk of ad-hoc rezoning, and strengthen the Council's ability to maintain a robust five-year housing supply pipeline, in line with Housing Need and Demand Assessment (HNDA) requirements.

The subject lands are of a scale and configuration uniquely suited to delivering a diverse range of housing types, including provision for elderly residents, passive and low-carbon homes, and affordable housing options. Their development could also support a complementary mix of local services and community infrastructure, such as childcare and neighbourhood retail, while delivering an integrated network of green and blue infrastructure. This includes the opportunity for a biodiversity-led parkland on flood-prone areas, and strategic linkages to the Greystones-Wicklow Coastal Greenway, the Three Trouts Stream corridor, and the broader active travel network.

In this context, the Charlesland lands also clearly meet the criteria for Urban Development Zone (UDZ) designation under the Planning and Development Act 2024, which provides a legislative mechanism to fast-track development in strategically located, serviceable urban areas with access to high-capacity public transport.

We therefore respectfully request that the Draft LPF be amended to designate the former Charlesland Golf Club lands as 'RN2 – New Residential Priority 2'. This designation would safeguard a vital landbank for future housing delivery, ensure consistency across all levels of planning policy, enable Wicklow County Council to respond flexibly to emerging demand, and avoid the premature sterilisation of land pending a full review of the County's Core Strategy.

### **Submission Request No. 3: Proposed Alternative to SLO 3 – Charlesland for Residential-Led Mixed-Use Objective**

Linked to Request No. 2 above, this submission proposes that the current SLO 3 designation be replaced with a revised objective that reflects a more balanced, sustainable, and forward-looking framework for the development of the Charlesland lands. This alternative vision, underpinned by a Masterplan exercise undertaken by Reddy Architecture + Urbanism (RAU), is designed to respond meaningfully to the site's strategic location, serviceability, and capacity to contribute to long-term residential growth, consistent with Greystones' strategic role in the Dublin Metropolitan Area and in line with national and regional policy..

The proposed approach envisions the creation of a residential-led, mixed-use neighbourhood that supports a variety of housing needs and complements the settlement's existing character and delivers on the strategic objectives set out in the MASP and RSES for compact, infrastructure-led growth in the DMA. The RAU Masterplan delivers a range of high-quality homes, including specific provision for older persons and units built to passive house or low-carbon standards, supporting both housing diversity and climate resilience.

In addition to residential uses, the Masterplan integrates essential community and neighbourhood amenities, such as a childcare facility, small-scale local retail, and shared community infrastructure. The layout has been carefully designed to prioritise permeability,

ensuring seamless integration with surrounding residential areas, schools, the town centre, and sustainable transport nodes. Walking and cycling routes are embedded throughout the scheme, supporting strong modal shift and active travel objectives.

A key feature of the Masterplan is its green infrastructure network, which is both ecologically sensitive and spatially coherent. It incorporates a riverside greenway and riverwalk along the Three Trouts Stream, a proposed linear coastal greenway that may eventually form part of the Greystones-Wicklow greenway corridor, and a north-south active travel route linking Charlesland to Kilcoole and adjacent school facilities. These corridors support everyday connectivity, recreational use, and biodiversity enhancement, while also facilitating safe and convenient non-car access across the wider urban area.

Central to the green infrastructure strategy is the delivery of a large park on lands identified as flood-prone. Rather than being sterilised, these lands will be actively transformed into a biodiversity-led parkland that provides ecological, recreational, and educational benefits to the community. The space will serve both as an amenity and as a nature-based solution to flood management.

While the primary provision of formal active open space, such as playing fields and a sports hub, is best accommodated to the south of the overall SLO 3 lands, outside the client's ownership, this submission supports a coordinated approach to their delivery. In particular, it is proposed that shared sports and community facilities, including youth space, changing rooms, and meeting areas, be co-located near the secondary school and Shoreline track to maximise public benefit and operational synergy.

The subject lands will play a critical enabling role in delivering this vision through improved interface design, the provision of green infrastructure links, and the establishment of strong connectivity with surrounding networks. The development will be guided by a detailed Masterplan to be prepared in agreement with the Planning Authority, ensuring a plan-led and infrastructure-aligned approach to delivery.

Accordingly, the following wording is proposed as a replacement objective for SLO 3:

### ***“SLO 3 – Charlesland***

*These lands measuring c. 88ha are located to the east and south of the Charlesland dual carriageway and bordering the railway line. The lands are largely made up of the Charlesland golf club, the Shoreline Sports Park and some lands currently in use for agriculture.*

*The lands benefit from a highly strategic location, within walking and cycling distance of Greystones DART station, the town centre, and a range of community and educational amenities. Given the absence of other sequentially preferable, serviceable landbanks within the settlement boundary of Greystones to accommodate long-term growth, these privately owned, former golf course lands are being designated as a Strategic Development Area for the town, to enable sustainable, compact and infrastructure-led expansion of the settlement in accordance with the Revised National Planning Framework (2025), the Eastern and Midland RSES and MASP, and national housing delivery targets.*

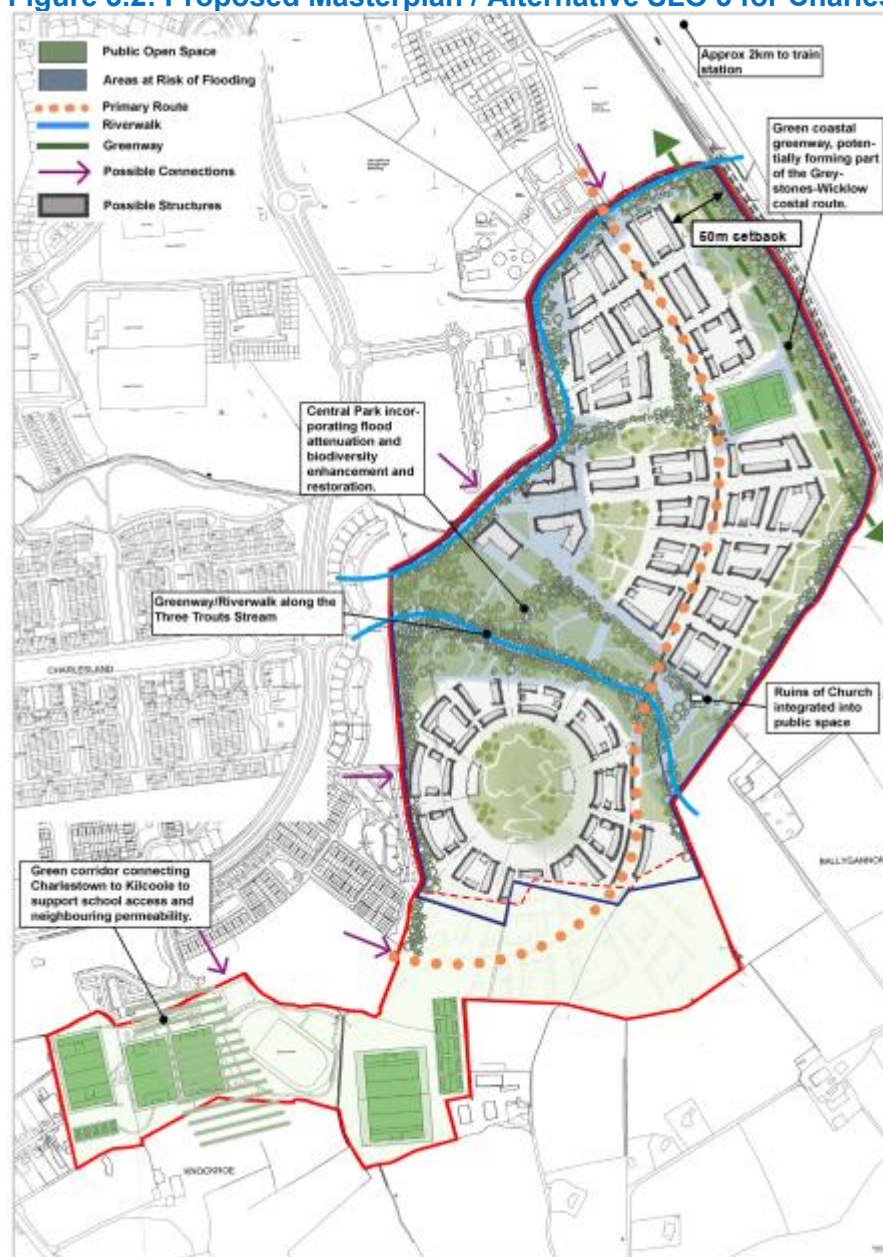
*To support the sustainable, phased delivery of a high-quality, residential-led neighbourhood at Charlesland, development will be guided by a detailed Masterplan to be agreed with the Planning Authority, incorporating a coordinated approach to land use, infrastructure, green infrastructure, and community amenities.*

*Development on these lands shall:*

- *Deliver a mix of residential units, including areas dedicated housing for the elderly, in a form and layout that supports compact growth, sustainable densities, and climate-resilient design (including passive and low-carbon typologies);*
- *Provide for supporting community uses including a childcare facility, local retail, and public open space, with complementary linkages to wider active open space provision within the overall SLO 3 lands*
- *Integrate a robust green infrastructure network, including:*
  - *A greenway/riverwalk along the Three Trouts Stream;*
  - *inear coastal greenway (with appropriate coastal setback to protect biodiversity and views), potentially forming part of the Greystones–Wicklow coastal route;*
  - *A green corridor connecting Charlesland to Kilcoole to support school access and neighbourhood permeability;*
  - *A central park incorporating flood attenuation and biodiversity enhancement and restoration;*
- *Ensure comprehensive permeability and active travel connectivity to the DART station, town centre, schools, and adjacent residential areas;*
- *Facilitate wider strategic active open space provision, including the potential for shared sports and community facilities (e.g. pitches, clubhouse, youth centre), ideally located in the southern portion of the SLO area in proximity to the secondary school and the existing Shoreline Sports Park, to maximise integration with existing facilities and promote shared use;*
- *Maintain and enhance existing landscape, coastal and ecological features, and manage development with regard to identified flood risk areas, in line with nature-based solutions and climate resilience principles*

*The Masterplan shall be prepared in consultation with relevant stakeholders and shall include a phasing programme aligned with infrastructure capacity.”*

The replacement SLO 3 diagram / masterplan image, which illustrates the text above, is included as Figure 3.2 below and should be incorporated also.

**Figure 3.2: Proposed Masterplan / Alternative SLO 3 for Charlesland**

#### **Submission Request No. 4: Retention of Existing Zoning**

In the event that the Planning Authority is not in a position to support either the proposed RN2 – New Residential Priority 2 designation or the alternative SLO 3 residential-led mixed-use objective at this stage, we respectfully request that the existing zoning of the subject lands be retained in full.

It is critical that the Local Planning Framework (LPF) process does not result in the effective sterilisation of strategic, serviceable lands through the imposition of a restrictive land use objective, particularly in the absence of a formal statutory variation to the County Development Plan (CDP). The subject lands, currently designated under the existing CDP for appropriate and active use, should not be reclassified or downzoned through the LPF process and in advance of the CDP being updated to comply with the Revised NPF, which is a statutory requirement.

The subject lands, formerly part of the Charlesland Golf Club, are located within the existing built-up footprint of Greystones and lie adjacent to well-established transport links, schools, community facilities, and strategic active travel corridors. They have previously

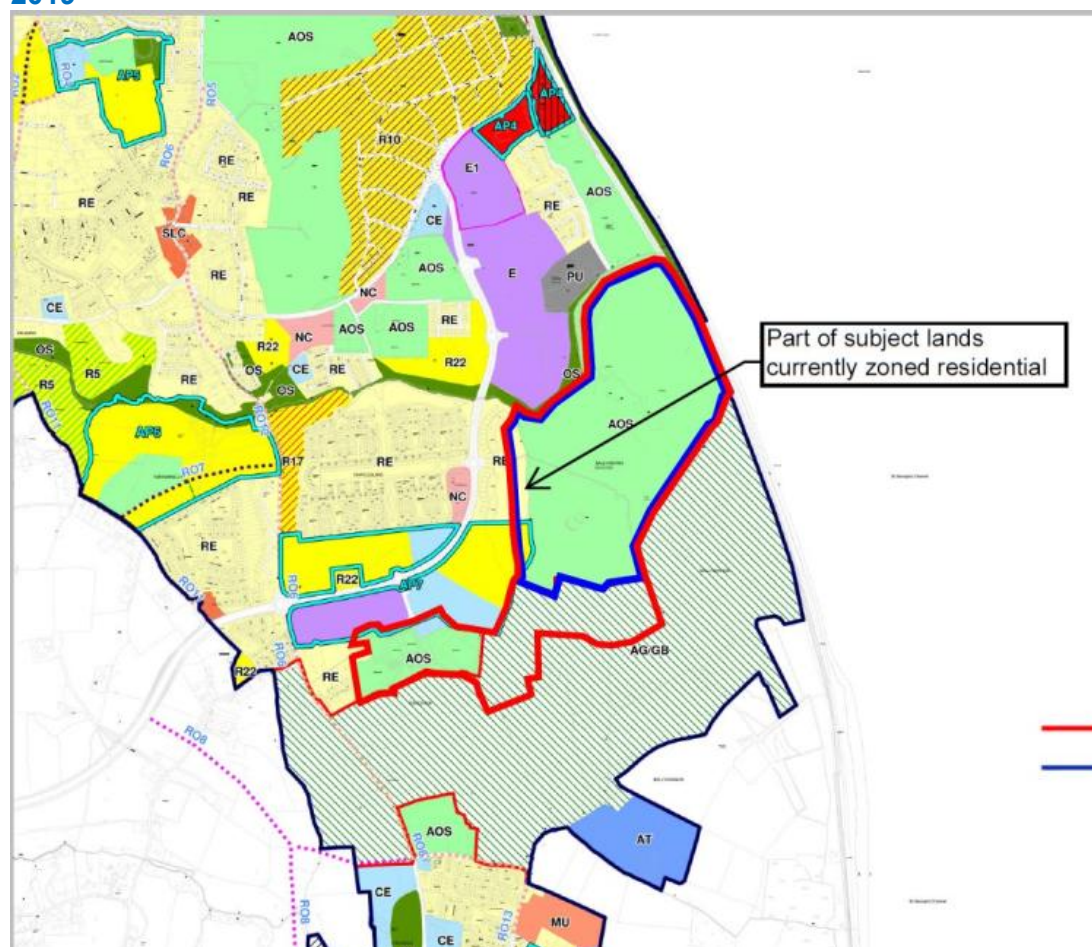
accommodated elements of housing-led development and remain an obvious and logical extension of the existing residential fabric. The lands are of a scale and character that can meaningfully contribute to future compact growth in accordance with national policy.

To rezone or significantly alter their development potential in advance of a revised Core Strategy and Housing Strategy, particularly in light of the Revised National Planning Framework (NPF) (April 2025), which has doubled annual housing delivery targets, would be both premature and counterproductive. The ongoing review of the CDP will need to consider how Wicklow can best respond to these revised targets, especially in settlements such as Greystones which are designated for sustained growth within the Dublin Metropolitan catchment.

Maintaining the current zoning at this juncture will ensure that the Council retains flexibility to assess and allocate housing lands in a coherent, evidence-led manner through the appropriate statutory process. It will also protect the long-term development potential of the Charlesland lands, which are already demonstrably suitable for phased, infrastructure-aligned, residential-led development.

In summary, we strongly oppose the introduction of any restrictive or downzoning of the subject lands through the LPF process. If the proposed RN2 designation or SLO 3 revision is not supported at this time, the retention of the existing zoning is the only appropriate and procedurally sound outcome, preserving the strategic potential of these lands for consideration in the statutory CDP review to align with the Revised NPF.

**Figure 3.3: Extract from Zoning Map Greystones – Delgany and Kilcoole LAP 2013-2019**



## 4.0 CONCLUSION

This submission has been prepared on behalf of our clients, D/RES Properties and the Evans Family, in response to the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 and proposed Variation No. 4 to the Wicklow County Development Plan 2022–2028. The submission reflects a thorough review of the draft framework and presents a clear, evidence-based case for a more balanced and future-focused approach to the strategic planning of Greystones as a key strategic growth area within the Dublin Metropolitan Area (DMA), consistent with the RSES and MASP.

The subject lands at Charlesland represent one of the last remaining large, consolidated, and serviceable landbanks within the existing urban boundary of Greystones. These lands are uniquely positioned, within walking and cycling distance of high-capacity public transport, adjacent to community infrastructure, and integrated with the existing built environment, to contribute to long-term, compact, and infrastructure-led growth in line with the Revised National Planning Framework (2025), the Eastern and Midland RSES, and MASP objectives for the DMA.

Given the Revised National Planning Framework (2025), which significantly increases Ireland's housing delivery targets to 50,000 units per annum, it is imperative that well-located and strategic landbanks such as Charlesland are protected, planned for, and used efficiently. Premature or restrictive zoning under the LPF, in advance of a statutory review of the Core Strategy, risks undermining this goal and may lead to missed opportunities to support sustainable and coordinated growth in key settlements such as Greystones, which is identified as requiring a strategic site within the DMA and in Table 5.1 of the RSES.

Accordingly, this submission seeks:

- The deferral of restrictive zoning decisions under the LPF pending a statutory review of the County Development Plan aligned with the Revised NPF, RSES and MASP objectives;
- The designation of the subject lands as 'RN2 – New Residential Priority 2', recognising their long-term development potential;
- The replacement of the current SLO 3 with a revised, residential-led mixed-use objective, supported by a detailed Masterplan;
- The acknowledgement of the subject lands' potential for future Urban Development Zone (UDZ) designation; and
- The retention of existing zoning should the above not be supported at this time, to ensure procedural integrity and strategic flexibility.

We respectfully request that Wicklow County Council take these matters into full consideration when finalising the Draft LPF and progressing Variation No. 4, whilst noting the need for the County Development Plan to firstly comply with the Revised NPF, and that the proposed amendments set out within this submission are incorporated as appropriate.

We would be pleased to discuss this submission or the lands to which it relates, should the Council have any queries.

Yours sincerely,



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**John Spain Associates**

## **APPENDIX 1- RAU MASTERPLAN FOR THE LANDS**



# Masterplan Proposals

**Former Charlestown Golf Club Lands  
Greystones, Co. Wicklow**

CLIENT  
D/RES Properties

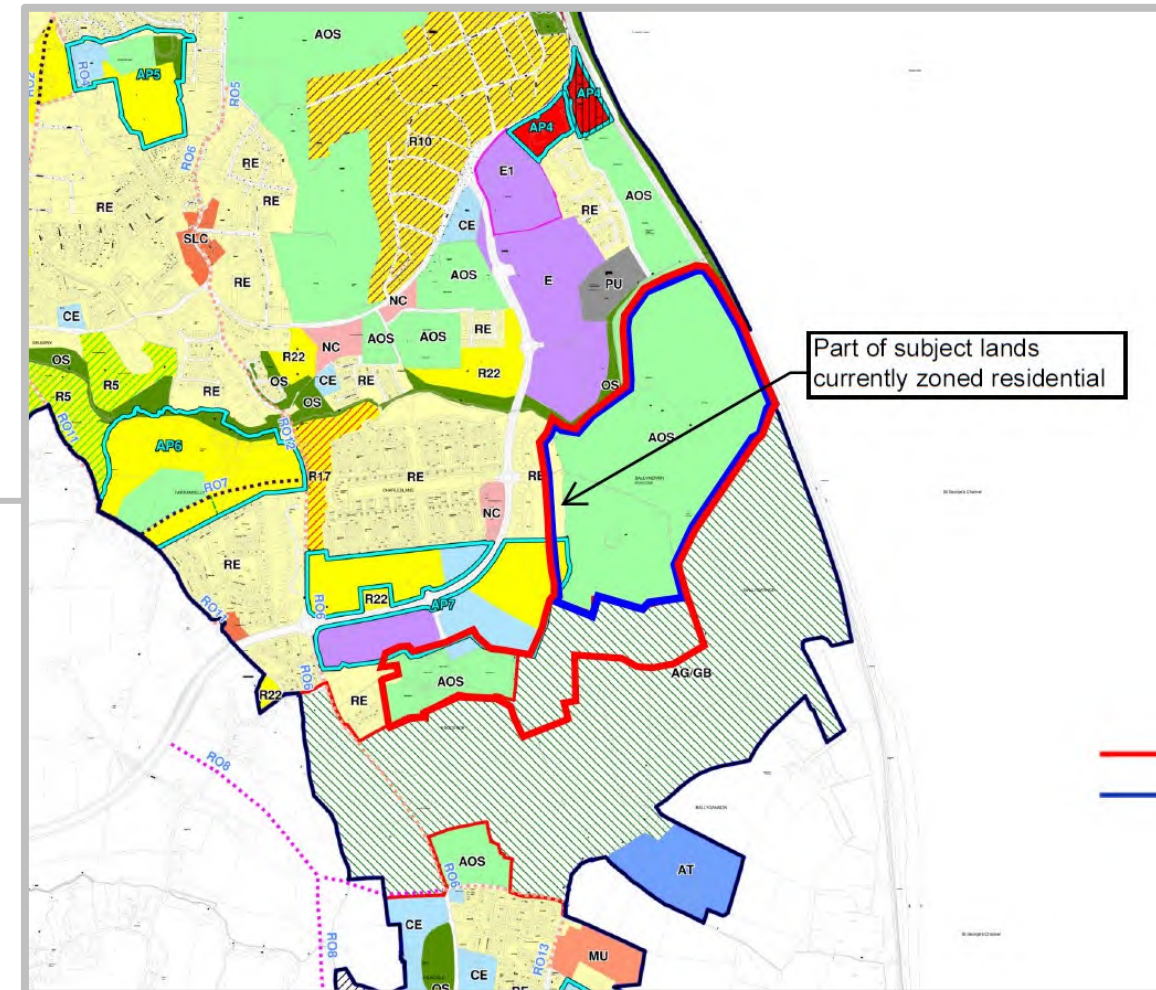
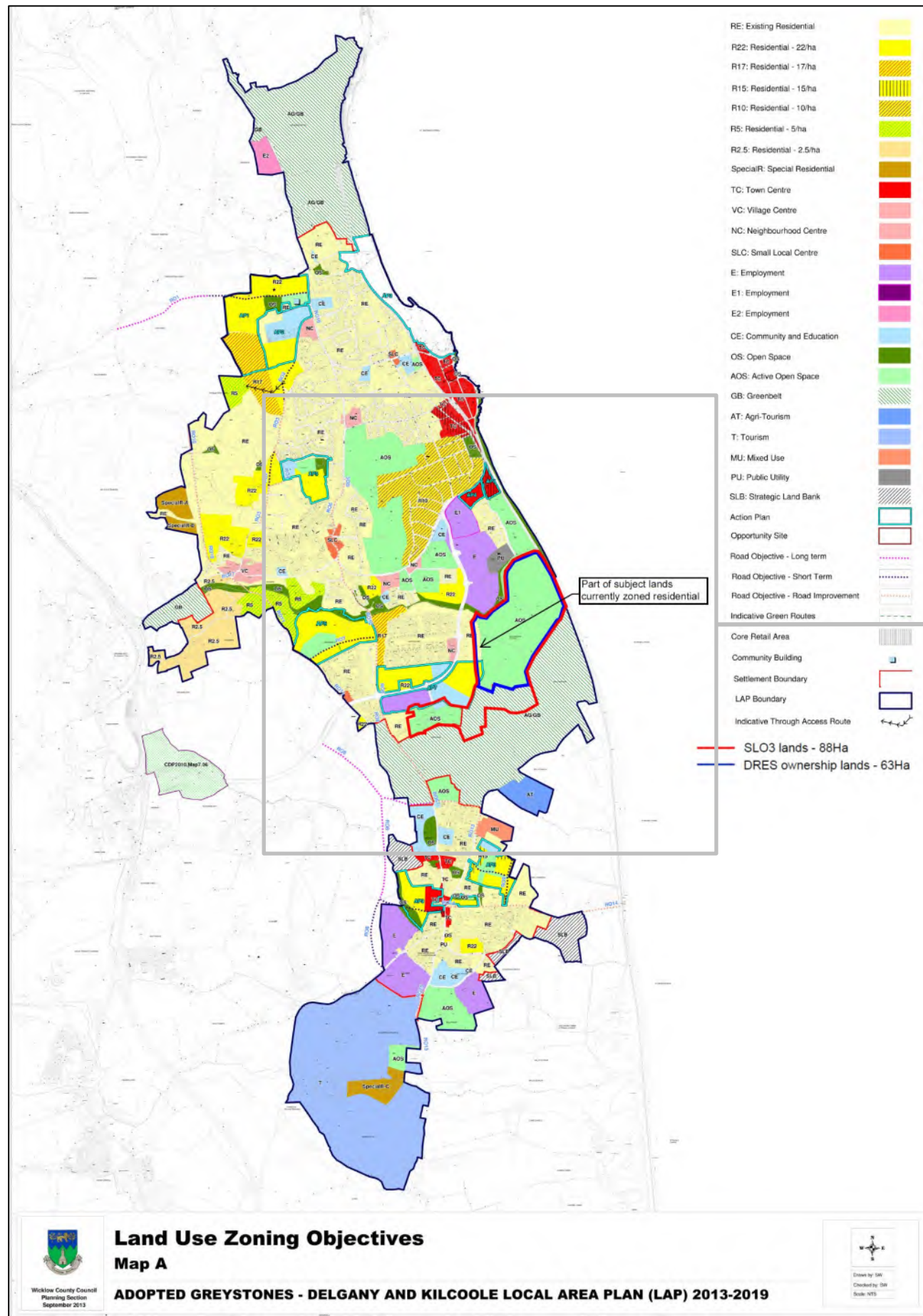
DATE  
16<sup>th</sup> June 2025

# SITE CONTEXT

DRES LANDS



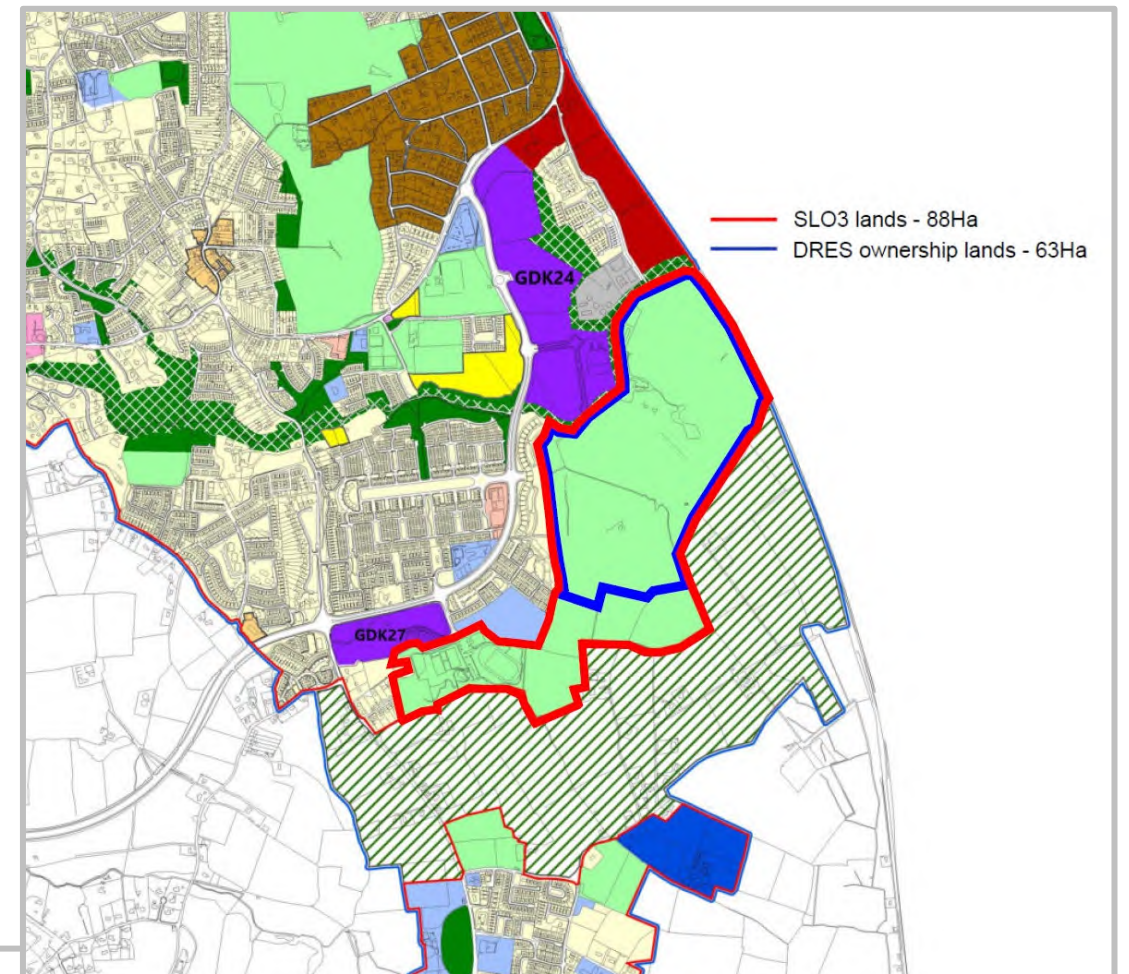
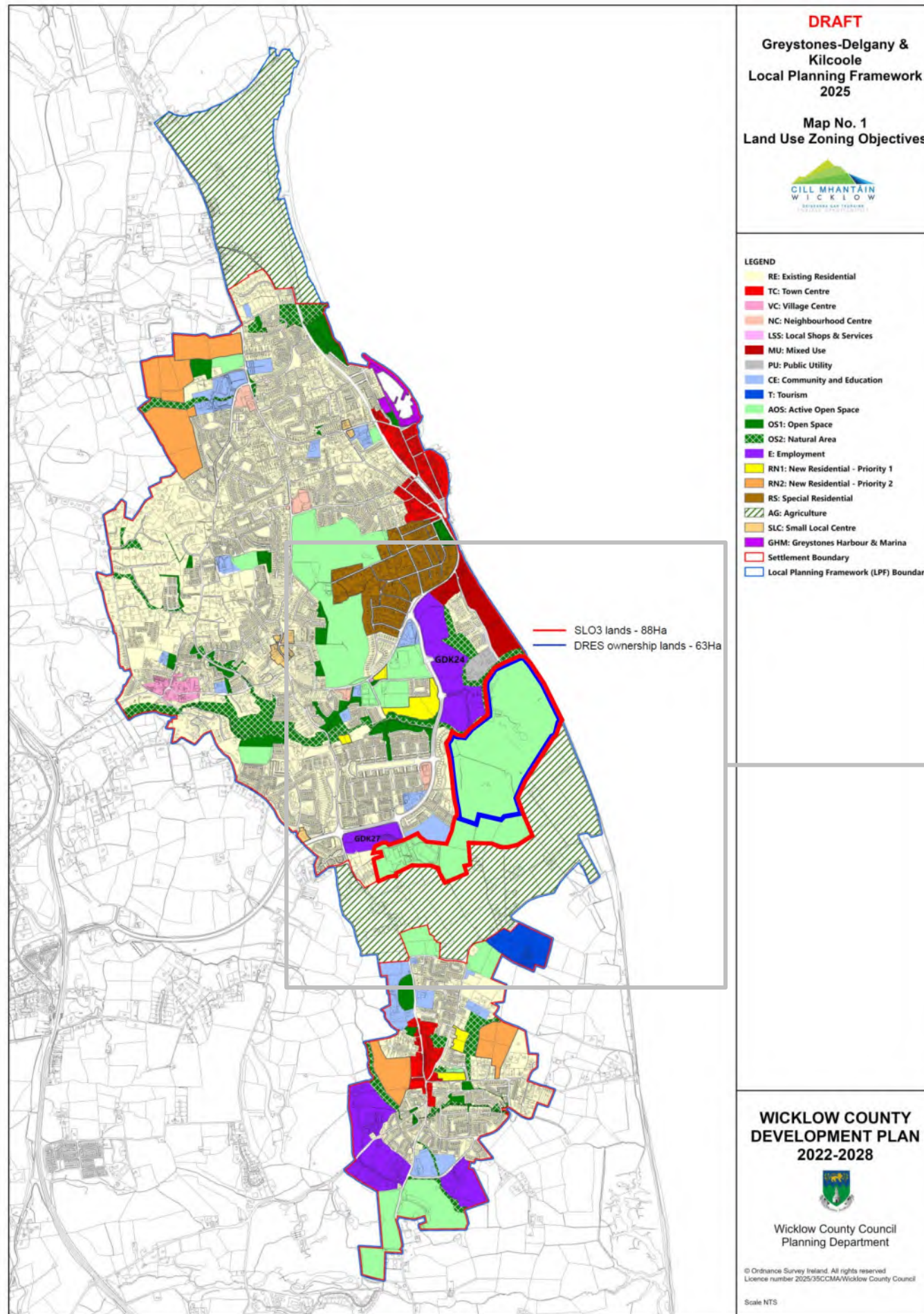
# LAND USE ZONING



## SLO 3 – Charlesland

These lands measuring c. 88ha are located to the east and south of the Charlesland dual carriageway and bordering the railway line. The lands are largely made up of the Charlesland golf club, the Shoreline Sports Park and some lands currently in use for agriculture. The lands benefit from a highly strategic location, within walking and cycling distance of Greystones DART station, the town centre, and a range of community and educational amenities.

# LAND USE ZONING



## SLO 3 – Charlesland

Given the absence of other sequentially preferable, serviceable landbanks within the settlement boundary of Greystones to accommodate long-term growth, these privately owned, former golf course lands are being designated as a Strategic Development Area for the town, to enable sustainable, compact and infrastructure-led expansion of the settlement in accordance with national and regional policy objectives.

To support the sustainable, phased delivery of a high-quality, residential-led neighbourhood at Charlesland, development will be guided by a detailed Masterplan to be agreed with the Planning Authority, incorporating a coordinated approach to land use, infrastructure, green infrastructure, and community amenities

# CONTEXT

## SLO 3 – Charlesland

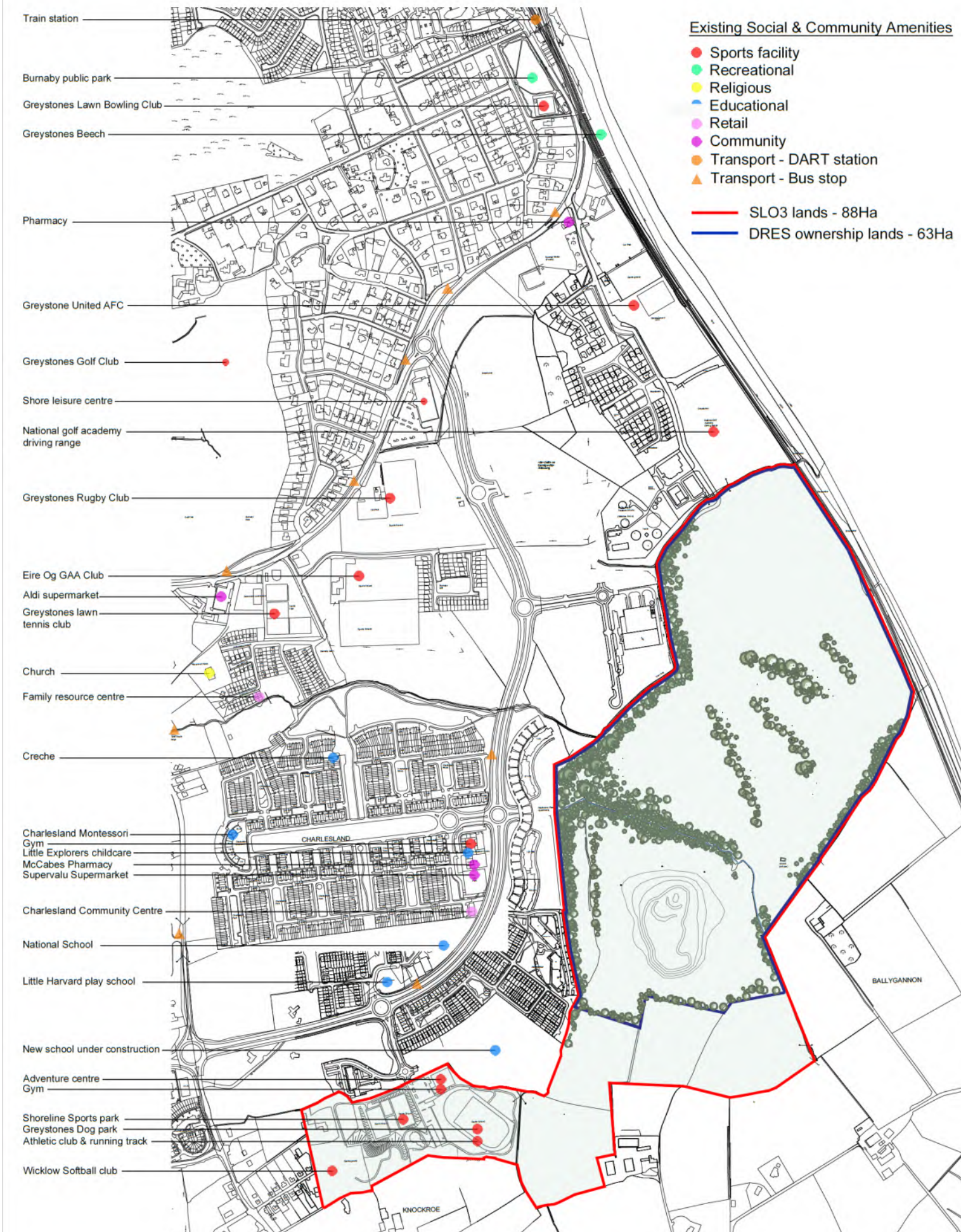
Development on these lands shall:

Deliver a mix of residential units, including areas dedicated housing for the elderly, in a form and layout that supports compact growth, sustainable densities, and climate-resilient design (including passive and low-carbon typologies);

Provide for supporting community uses including a childcare facility, local retail, and public open space

Integrate a robust green infrastructure network, including:

- A greenway/riverwalk along the Three Trouts Stream;
- A linear coastal greenway (50m setback), potentially forming part of the Greystones–Wicklow coastal route;
- A green corridor connecting Charlesland to Kilcoole to support school access and neighbourhood permeability;
- A central park incorporating flood attenuation and biodiversity enhancement and restoration;
- Ensure comprehensive permeability and active travel connectivity to the DART station, town centre, schools, and adjacent residential areas;
- Facilitate wider strategic active open space provision, including the potential for shared sports and community facilities (e.g. pitches, clubhouse, youth centre), ideally located in the southern portion of the SLO area in proximity to the secondary school and the existing Shoreline Sports Park, to maximise integration with existing facilities and promote shared use;
- Maintain and enhance existing landscape, coastal and ecological features, and manage development with regard to identified flood risk areas.
- The Masterplan shall be prepared in consultation with relevant stakeholders and shall include a phasing programme aligned with infrastructure capacity.”



# SITE ANALYSIS



## Landscape and Topography

- The lands benefit from natural landscape features which can enhance and become central amenity benefits to a new community.
- The sea views and location adjacent a greenway will have huge attraction for new housing opportunities afforded by the developable lands.
- The three trout river and other natural landscape such as hedgerows aligned with the site topography create a framework within which connected accessible lands are formulated.



## Access and Movement

- Whilst the primary access is located to the north of the lands, there are 5 no potential access points to the lands from the west which cater for pedestrian/cyclist/vehicular access, making the lands fully permeable.
- A main north-south spine road is purposefully laid out to create serial views along this primary route with a tree lined avenue effect.
- The Charlestown to Kilcoole Corridor Pedestrian & Cycleway combined with the greenway provide new previously closed off access to benefit from the amenity of the lands.



## Development Quarters

- Arising from the site analysis, three main development zones become apparent. To the north at the main entrance with sea views to the east and adjacent the greenway this zone affords a mix of density opportunities.
- To the south of the three trout river watercourse and aligning with the main location of topographical scale, this affords an opportunity to use this as an organizing amenity feature to create a Residential cluster of radial housing.
- Centrally along the spine road a large central development location benefits from the watercourse to the south and the greenway to the east.

# DEVELOPMENT ZONES



Greenway



Access



Main Circulation Spine



Existing Watercourse



Landscape Features



Area of Potential Future  
Flood Risk



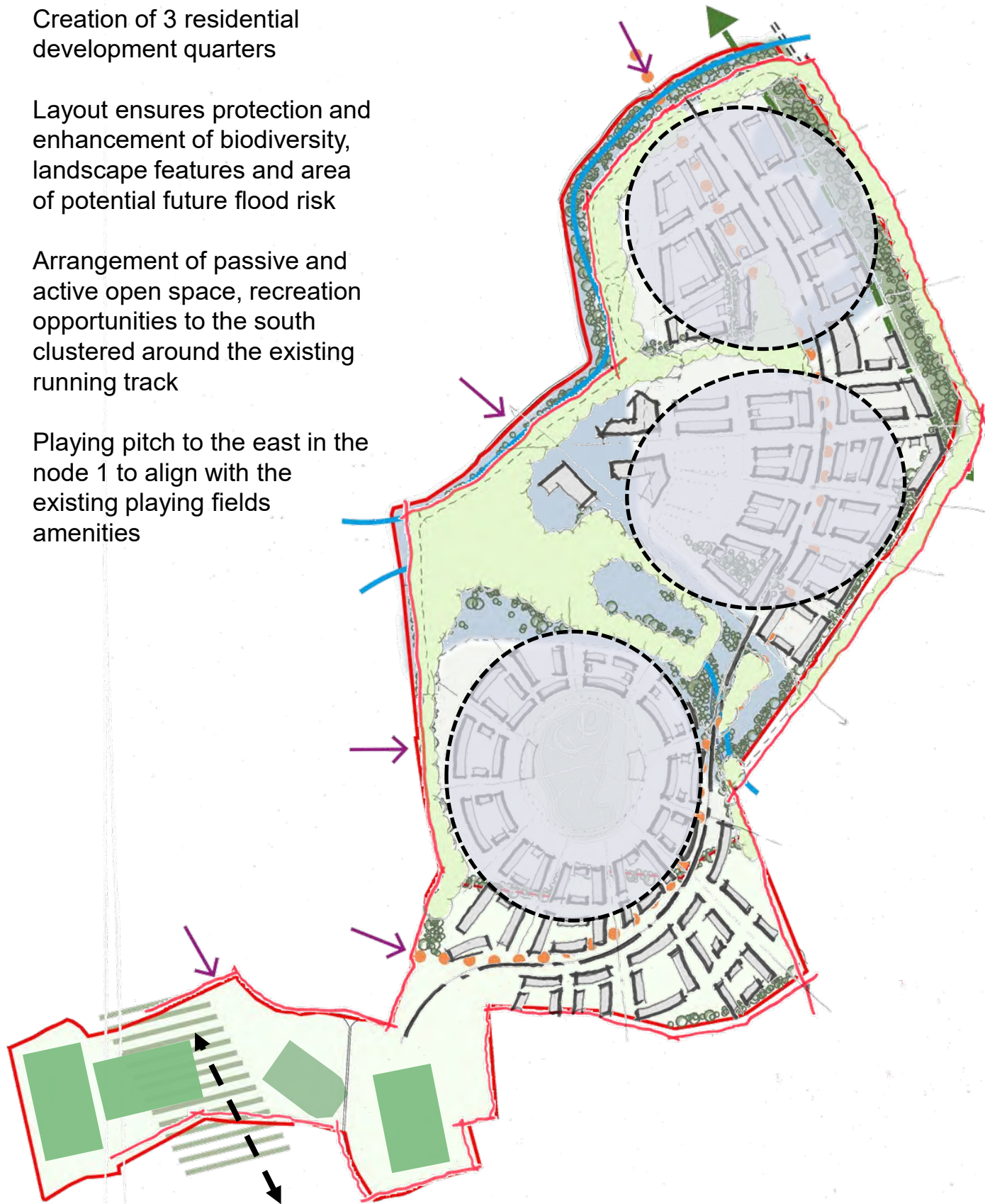
Charlestown to Kilcoole  
Corridor Pedestrian &  
Cycleway

Creation of 3 residential development quarters

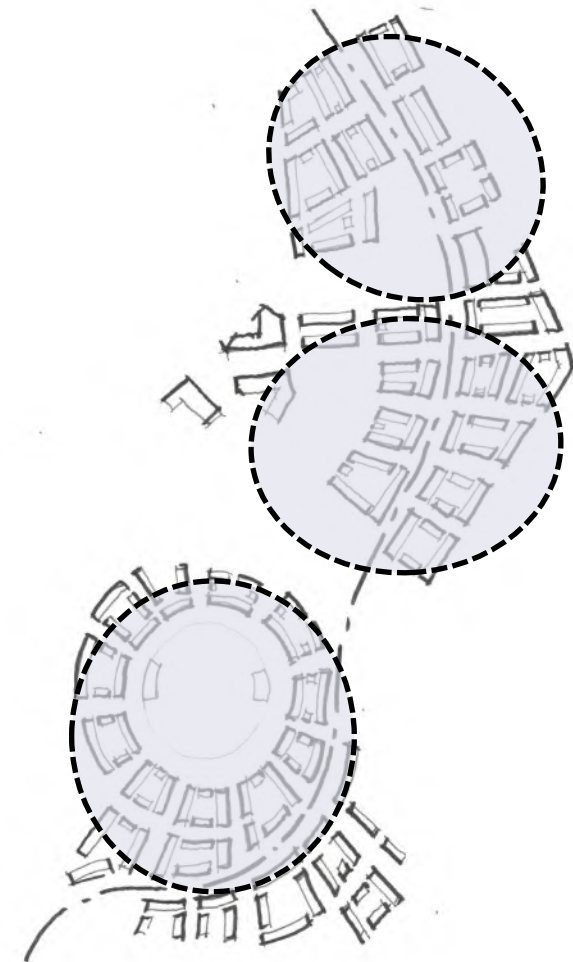
Layout ensures protection and enhancement of biodiversity, landscape features and area of potential future flood risk

Arrangement of passive and active open space, recreation opportunities to the south clustered around the existing running track

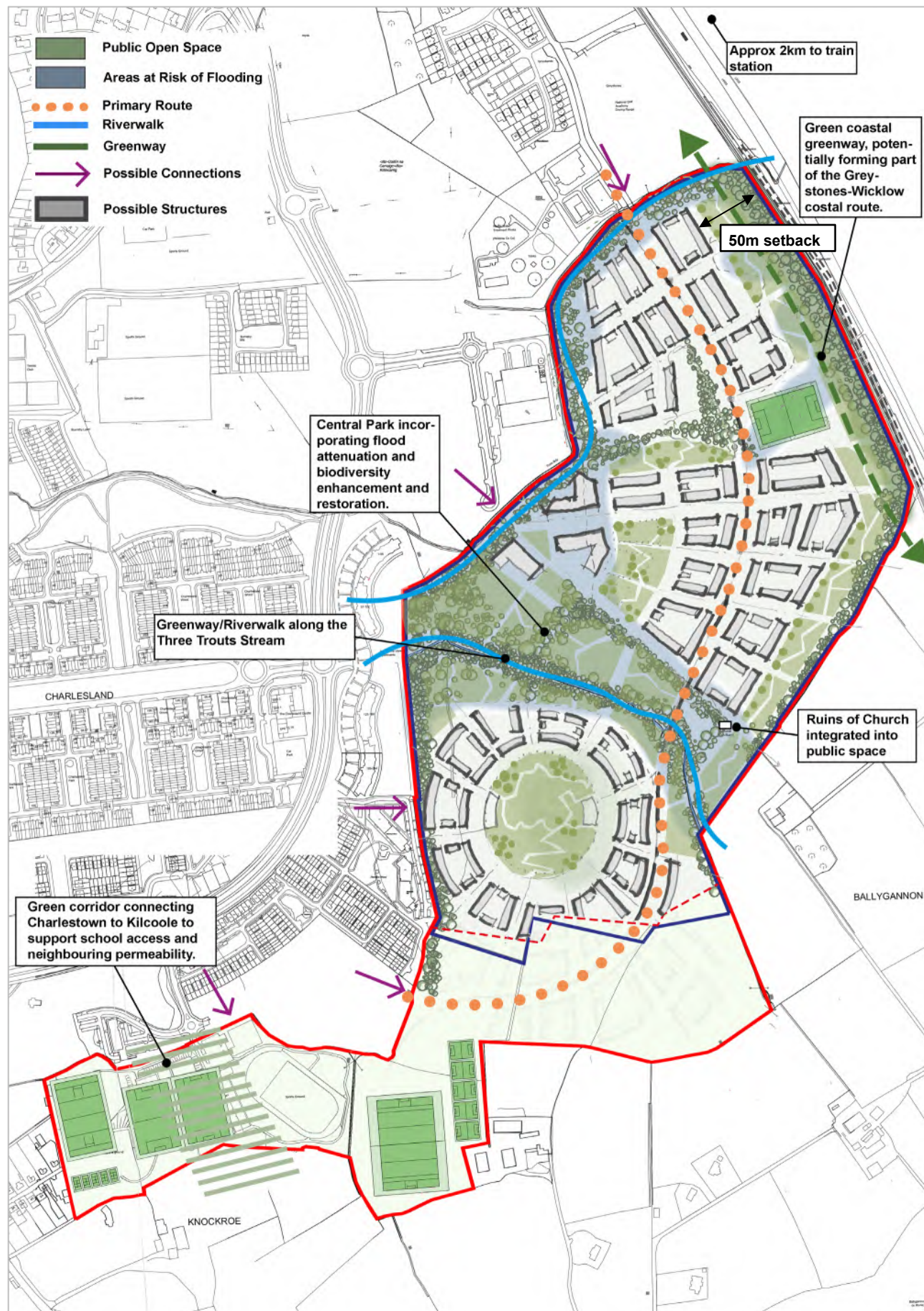
Playing pitch to the east in the node 1 to align with the existing playing fields amenities



# MASTERPLAN



- The masterplan concept is led by 2 alternative axial set out alignments.
- The east- west fan axis, connected to existing main road, is employed to create entry from the east though community buildings and associated commercial uses (within the designated flood zone) acting as a gateway to the site with the liner radial roads maintaining long views to the sea to the west.
- The blocks are purposefully aligned to maintain this critical site connection though this site sector.



# MASTERPLAN

- The meander of the main north-south spine road is purposefully laid out to create serial views along this primary route with differentiated design features and massing.
- Variation in set-back frontages carefully arranged to create interest and variation along this primary tree lined avenue.
- The south axial arrangement uses the hill as an organising characteristic with radial blocks creating connection to this.
- The raised feature will also impact the impact of scale in this area, acting as a visual buffer in travel across and around this zone and also as a identifying community feature at the heart of the southern development zone.
- The masterplan will employ a range of primary secondary and tertiary road typologies which will be sectionally designed to provide separated pedestrian and vehicular roadways routes by planted green verges and patterned landscape.
- Heights and tenure will be carefully orchestrated to create variation across the masterplan block.
- Designated in 3 distinct character zones to encourage neighbourhood identities and a broad variation in typology.