



Greystones - Delgany & Kilcoole Draft LPF Amendment Stage Submission - Report

Who are you:	Private Individual
Name:	Hubi Kos
Reference:	GDKLPF-163030
Submission Made	November 21, 2025 4:35 PM

Topic

LAP - Proposed Material Amendments No 32 Submission

Submission

APOLOGIES IF YOU ARE SEEING THIS FOR A SECOND TIME, AS I DID NOT SEE MY FIRST SUBMISSION ON THE WEBSITE

Re: Submission GDKLPF-150518 – Rezoning Request by Andrew O’Kane
Lands adjoining The Laurels, Sea Road, Kilcoole

Dear Sir / Madam,
I wish to lodge a formal objection to Submission GDKLPF-150518.

This objection focuses specifically on the absolute absence of lawful access by Andrew O'Kane, the impossibility of using or connecting to any utilities or services within The Laurels, and the isolated nature of the applicant's agricultural land, which cannot be serviced, accessed, or developed through the adjoining private estate.

1. The applicant has no legal right of access through The Laurels

The Laurels is a private residential development, served by a privately owned internal road, private service ducts, and a private foul-drainage system. The entire boundary of The Laurels is also fully fenced, clearly defining it as a self-contained private estate with no provision for, or obligation to provide, access or services to any adjoining lands.

The applicant has:
no right-of-way,
no easement,
no shared access,
no legal entitlement,
no planning condition,
no wayleave,
and no development reservation
Over any portion of The Laurels.

This is a decisive planning matter because:
Section 34(13) – Planning and Development Act 2000
A planning permission or zoning does not confer any right to access another person's property.
As the applicant has no lawful access, the lands are undeliverable for any residential purpose.

Any rezoning request, depending on hypothetical future access through The Laurels, is therefore legally invalid.

2. The applicant cannot use, extend or connect to any utilities or services within The Laurels

The applicant's submission falsely states that "all utilities are located at the boundary of the existing development."
This is materially incorrect.

The facts:

2.1 All utilities in The Laurels are private.

The following infrastructure is privately owned and privately funded by the residents:

foul drainage
private pumping station
stormwater system
water service connections
ESB ducts
broadband ducts
internal road network

None of these may be accessed, extended, diverted, or connected to by any external party under property law, contract law, or planning law.

2.2 The private foul sewer pump cannot serve any additional load

The private pumping station serving The Laurels:
was designed solely for the four existing houses,
has no spare capacity,
already operates at its technical limit,
is not a public asset, and
cannot be used to service any external development.

Therefore, even one additional dwelling cannot be accommodated, let alone a rezoning for a new residential area.

3. The lands are isolated agricultural acres with no servicing and no access

The applicant's fields are:
outside the settlement boundary,
agricultural,
un-serviced,
physically separated,
infrastructure-isolated,
and not contiguous to any public service corridor.

These lands have no independent access route, no water connection, no Irish Water foul drainage, no road frontage suitable for development, and no infrastructure capacity in the vicinity. The suggestion that The Laurels can serve as the gateway to this land is false.

4. The Planning Executive has already rejected this location for development

Your own Planning Executive has confirmed:

The land exceeds the Core Strategy requirements.

It would be inconsistent with the County Development Plan (Section 19(2) Planning Act 2000).

It would constitute sprawl into un-zoned countryside, not compact growth.

It conflicts with the Kilcoole Area 1 assessment.

It is not suitable or appropriate for future release during the lifetime of the LPF.

No development outside the 2.5 km radius should be facilitated without a very high level of infrastructure and accessibility, which this land demonstrably lacks.

This is an authoritative professional assessment that must be given full weight.

5. The LPF Written Statement (Section A.3.2) confirms these lands are unsuitable

Section A.3.2 explicitly states that many outer lands are:

"not suitable or appropriate for future release for development... unless a very high level of infrastructure, accessibility, and environmental mitigation can be demonstrated."

The applicant cannot demonstrate any of these requirements.

The land fails:

on access,

on servicing,

on infrastructure,

on environmental criteria,

on compact growth,

and on delivering the LPF strategy.

6. Conclusion

For the reasons above, the rezoning request must be rejected.

The lands:

have no legal access,
have no servicing,
cannot connect to The Laurels' private utilities,
lie outside the sequential development pattern,
are infrastructure-isolated agricultural acres,
and have already been identified by the Planning Executive as unsuitable for zoning under the CDP, LPF, and the Planning Act.

The rezoning request is therefore undeliverable, factually incorrect, and contrary to law, policy, and the established planning framework.

Yours faithfully,

Wicklow County Council
County Buildings
Whitegates
Wicklow Town
Co. Wicklow

Dear Sir / Madam,

Re: Submission GDKLPF-150518 – Rezoning Request by Andrew O’Kane (Lands adjoining The Laurels, Sea Road, Kilcoole)

I am attaching my formal objection to the above-captioned submission.

In summary, the objection addresses the absence of any lawful access or servicing rights through The Laurels estate, the impossibility of utilising its private utilities (particularly the foul sewer pump-station), the isolated nature of the subject lands and their unsuitability under the local plan and LPF as already established by the Planning Executive.

Please acknowledge receipt of this submission and ensure that it is included in the file of the proposed rezoning amendment for full consideration.

Yours faithfully,
