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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.

18 June 2025



Dear Sir/Madam,

Submission to The Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 of the Wicklow County Development Plan 2022 – 2028. Submission seeks clarification, removal or amendments to the LPF as regards the siting and scale of GDK59B "Charlesland to Kilcoole Corridor" proposed to pass through farmlands in active agricultural use and proposed to be zoned 'AG – Agriculture'. The subject lands are outside of the Settlement Boundaries of Greystones and Kilcoole.

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants – have been appointed by Roy and Eileen Byrne of Coolings Lodge, Lott Lane, Kilcoole, County Wicklow to make a submission on their behalf to Wicklow County Council for consideration as part of advertised² Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 of the Wicklow County Development Plan 2022 – 2028.

Please find our client's submission report attached. A USB memory drive is also attached to this submission which contains video clip exhibits of previous Wicklow County Council works undertaken on our client's lands.

The Wicklow County Council advertisement states:

*The LPF / variation will be available to view from Friday 09 May 2025 to Friday 20 June 2025.
Submissions / observations are invited from the public and interested bodies. Written submissions / observations made before midnight on 20 June 2025 will be taken into consideration before the making of the LPF / Proposed Variation.
Submissions may be made in one of the following ways:*

- 1. Write to 'Variation No.4, Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town.*
- 2. Through the online consultation portal (link below).*

This submission is lodged via the online consultation portal and on or before the 20th of June 2025.

We confirm that Roy and Eileen Byrne own the farmlands described below and which are the subject of this submission.

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: Submission report.

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

² <https://www.wicklow.ie/Living/Services/Planning/Development-Plans-Strategies/Local-Area-Town-Settlement-Plans/Greystones-Delgany/Greystones-Delgany-Kilcoole-Local-Planning-Framework-Variation-No-4-to-the-County-Development-Plan-2022-2028/Draft-Greystones-Delgany-Kilcoole-Local-Planning-Framework>



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Submission to The Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 of the Wicklow County Development Plan 2022 - 2028

Submission to the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 of the Wicklow County Development Plan 2022 - 2028. Submission seeks clarification, removal or amendments to the LPF as regards the siting and scale of GDK59B "Charlesland to Kilcoole Corridor" proposed to pass through farmlands in active agricultural use and proposed to be zoned 'AG - Agriculture'. The subject lands are outside of the Settlement Boundaries of Greystones and Kilcoole.

Submission produced for and on behalf of Roy and Eileen Byrne of Coolings Lodge, Lott Lane, 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 Roy and Eileen Byrne of Coolings Lodge, Lott Lane, Kilcoole, County Wicklow to make a submission on their behalf to Wicklow County Council for consideration as part of advertised¹ Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 of the Wicklow County Development Plan 2022 – 2028.

The Wicklow County Council [hereafter "WCC"] advertisement states:

The LPF/ variation will be available to view from Friday 09 May 2025 to Friday 20 June 2025.

Submissions /observations are invited from the public and interested bodies. Written submissions / observations made before midnight on 20 June 2025 will be taken into consideration before the making of the LPF / Proposed Variation.

Submissions may be made in one of the following ways:

1. Write to 'Variation No.4, Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town.
2. Through the online consultation portal (link below).

This submission is lodged via the online consultation portal and on or before the 20th of June 2025.

We confirm that Roy and Eileen Byrne own the farmlands described below, and which are the subject of this submission.

2.0 Summary

This submission seeks clarification and amendments to the LPF as regards the siting and scale of Objective GDK59B 'Charlesland to Kilcoole Corridor' proposed to pass through farmlands in active agricultural use and proposed to be zoned 'AG – Agriculture'. These lands are sited outside of the settlement boundaries of both Greystones and Kilcoole.

The siting and scale of Objective GDK59B as it is proposed to pass through our clients' farmland is difficult to understand:

- Map No. 5 'Transport Strategy' includes two Objective GDK59Bs (see Fig. 11). One is a standard width and pink dashed line showing a pedestrian and cycle path proposal passing along an existing road. The other is an extremely large – in length and width - area of land (shown hatched in pink and white) which could incorporate a section of motorway with space left over on either side for cycle lanes, footpaths, and laybys. All other GDK pedestrian and cycling route objectives are represented by thin dashed pink lines.
- The main document 'Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 (related to draft Greystones – Delgany & Kilcoole Local Planning Framework)' refers to Objective GDK59B at page 87 in a table called 'Greystones-Delgany & Kilcoole Infrastructure Objectives'. Objective GDK59B is outlined as follows:

*To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes: ... b) **Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road** (emphasis added).*

Objective GDK59B is not referred to in the main document as the 'Charlesland to Kilcoole Corridor'. The origin of this description is unclear.

- A footnote attached to the table at page 87 states that the Objective GDK59 proposals are "non-binding and indicative" and "Such new projects shall be subject to feasibility assessment, taking into account the environmental constraints and the objectives of the LPF relating to sustainable mobility". That is, WCC has not yet established any basis for why 12.75 hectares of farmland should be reserved for a possible footpath/cycle path. Indeed, WCC cannot yet be sure this route across our client's farmland would be required stating: "A Corridor and Route Selection Process will be undertaken for such projects where appropriate".

¹ <https://www.wicklow.ie/Living/Services/Planning/Development-Plans-Strategies/Local-Area-Town-Settlement-Plans/Greystones-Delgany/Greystones-Delgany-Kilcoole-Local-Planning-Framework-Variation-No-4-to-the-County-Development-Plan-2022-2028/Draft-Greystones-Delgany-Kilcoole-Local-Planning-Framework>

This footnote refers essentially to the indicative routes for pedestrian and cycle infrastructure delineated, as noted above, by dashed pink lines on Map No. 5. It was clearly not written to cover an expansive 12.75 hectares of farmland which could accommodate, as noted above, a full motorway or other significant development, when a shared footpath/cycle lane would, at most, be 6.5 m wide (incorporating a 4 m wide two-way cycle lane and a 2 m wide footpath).

The Cycle Design Manual's width standards (Section 4.2.7.2; see Fig. 17) set out requirements of 3m to 4m for the width of Shared Active Travel Facilities and Greenways.

With respect, our client considers that the maximum width of any Shared Active Travel Facility would only be 4m wide. Why then is so much land proposed to be reserved?

- The published Greystones-Delgany and Kilcoole LPF Transport Objectives included in the 'Implementation Programme' document refers to Objective GDK59B at page 39 and Section 8. 'IMPLEMENTATION OF OBJECTIVES' with the stated aim:

To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes: ... b) Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road.

Our client requests clarification from WCC as regards:

- Why is Objective GDK59B's extent, as it is shown passing through our client's farmlands, so much greater in size and scale than that of the other Objective GDK59B or of Objectives GDK59A, GDK59B, GDK59C, GDK59D, GDK59E, GDK59I, GDK59M, GDK59N, GDK59S, etc. as it passed through our client's lands, while the same objective splits into two routes to the north which are both as much as 1/10 the width (or more) and to the south continues as Objective GDK60C which is also 1/10 the width (or more)?
- Why does the other Objective GDK59B to the west and every other Objective GDK59 proposed pedestrian and cycling route appear to follow an existing road or route while that proposed to pass through our client's lands would create a wholly new route across open farmlands outside of any Settlement Boundary?
- Why is our client's land included in any part of Objective GDK59B at all when the other Objective GDK59B to the west offers a perfectly achievable route and there are roads to the east along which a wholly new pedestrian and cycle route could pass without the need to open up and bisect existing farmlands?

Recommendation

Our client asks that WCC amend Map No. 5 to remove any part of Objective GDK59B from their lands. They submit that the realisation of this objective would have an adverse impact on their farm.

If WCC considers that there is no possible alternative to providing a pedestrian and cycle route through our client's lands, then this route should be no more than the width of a shared cycle lane and footpath at approx. 4m wide. In our client's opinion, there is no justification for the extent of lands currently shown to be included in pink and white hatch (see Fig. 11). At most, a dashed pink line only should be included on Map No. 5 (as per every other pedestrian and cycle route objective).

The current proposals for Objective GDK59B as they pass through our client's farmland in an expansive manner would not be compatible with the Wicklow County Development Plan 2022-2028 (including with Section 2.1.6 of Appendix 1 'Design and Development Standards'), with our client's ongoing farming operations, and with fairness as regards to the possible sterilisation impact of such an objective on existing land prices.

An alternative proposal

Section 9.0 of this submission sets out an alternative proposal for achieving Objective GDK59B which would make more common sense than the current WCC proposal. This alternative would have a reduced impact on our client's farmlands. This alternative would achieve the same aim of offering a future pedestrian and cycle route connection from south Greystones to north Kilcoole but it would do so along existing field boundaries and while avoiding passing closely to the west of our client's farmyard.

Section 10.0 of this submission illustrates how adverse impacts on one landowner can arise unfairly if a given infrastructure project is focused primarily on their lands.

3.0 Location and description of the subject lands

3.1 Location of subject lands owned by Roy and Eileen Byrne

Fig. 1 sets out the extent of agricultural lands owed by our client which would be impacted by proposed Objective GDK59B. These lands are actively farmed and are presently in an undeveloped condition containing no laneways or tracks through their extent in the north/south directions.

The family own an active farmyard as located on Fig. 1A. This is a large farmyard with no existing public access through it or alongside it (see Fig. 1B).

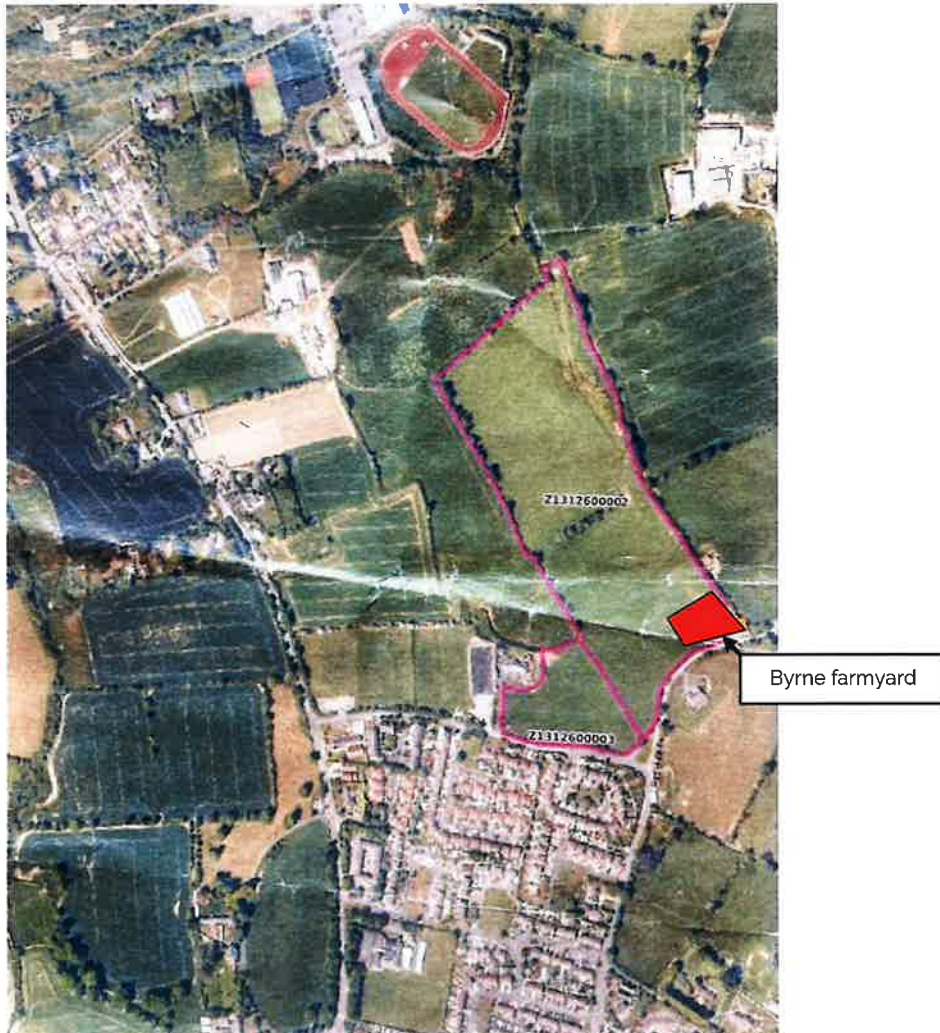


Fig. 1A: Location of lands owned by Eileen and Roy Byrne (Source: Land Registry annotated aerial photograph)



Fig. 1B: Farmyard owned by Eileen and Roy Byrne (Source: Client photograph)

3.2 Location of lands included by WCC under Objective GDK59B

Greystones and Kilcoole are located approximately 33/34 km from Dublin. They are commuter towns with settlement boundaries in close proximity to one another.

They are presently separated by agricultural lands of which part much of the intervening farmland is owned by our client (see Fig. 1). There are existing road connections between Greystones and Kilcoole which are served by footpaths and cycle lanes.

Kilcoole is located to the south of these lands and there are housing estates in that direction. Greystones is to the north of these lands with the well-known Charlesland development and Shoreline running track on the southern border.

The lands are proposed to be zoned 'AG – Agriculture' as they are in active agricultural use. These lands are essentially a greenbelt between Greystones and Kilcoole.

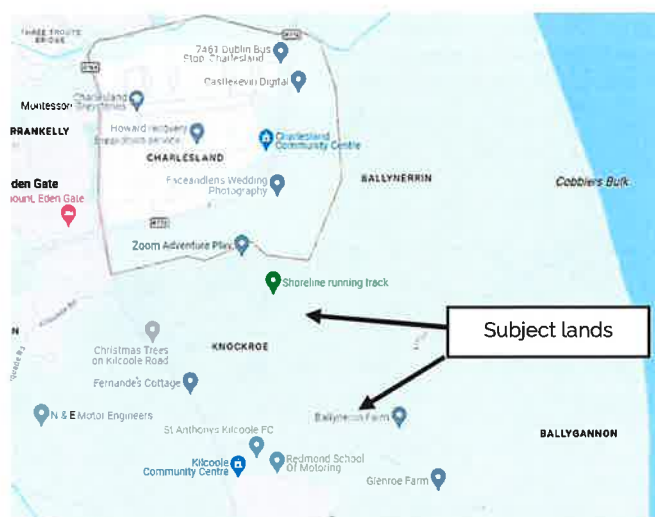


Fig. 1: Location of the subject lands between Greystones and Kilcoole settlement boundaries (Source: Google Maps)

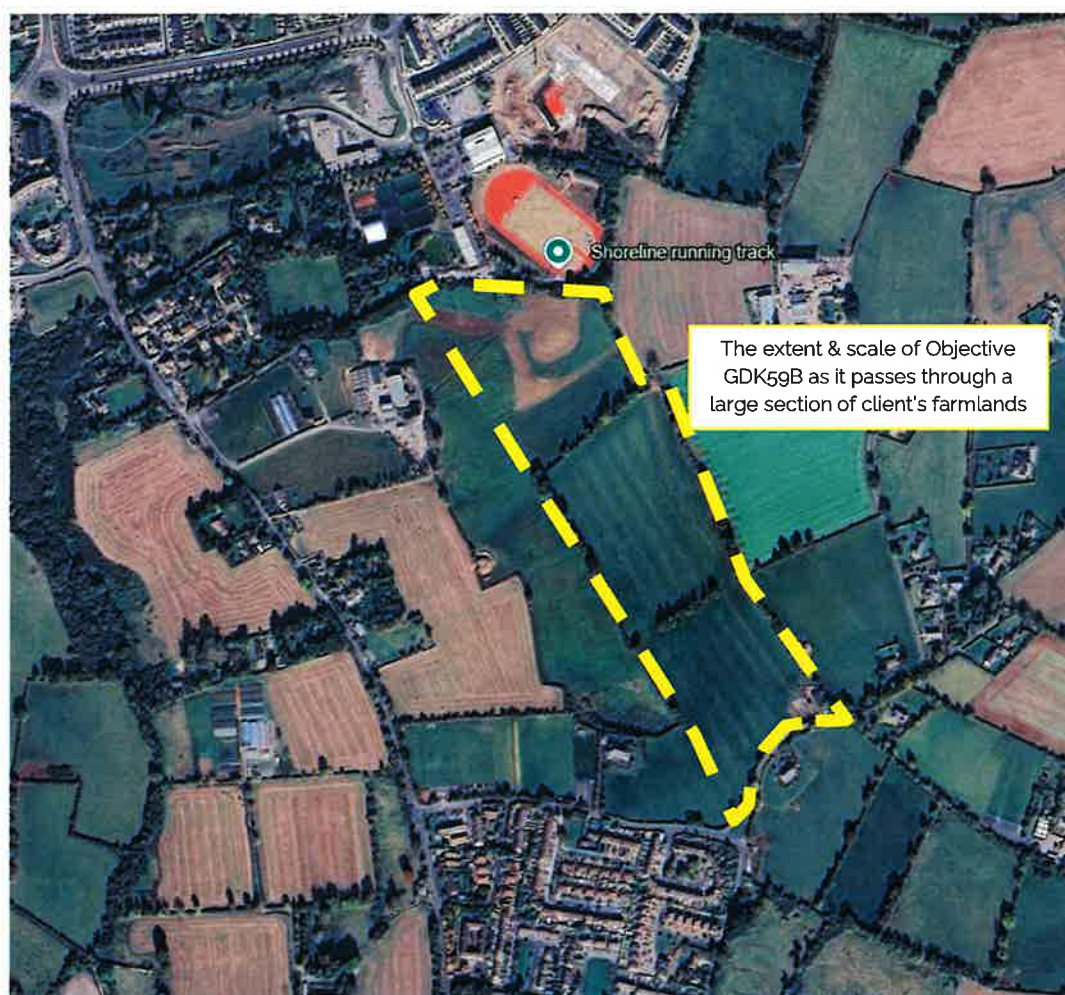


Fig. 2: Location of the subject lands within Greystones (Source: Google Earth)



Fig. 3: Location of the subject lands between the Settlement Boundaries of Kilcoole and Greystones (Source: Google Earth)



Fig. 4: View into the agricultural lands where Objective GDK59B is proposed (Source: Google Earth)



Fig. 5: View into the agricultural lands where Objective GDK59B is proposed (Source: Google Earth)



Fig. 6: View into the agricultural lands where Objective GDK59B is proposed (Source: Google Earth)



Fig. 7: Location, boundaries, and approx. area of the subject lands (Source: Google Earth)

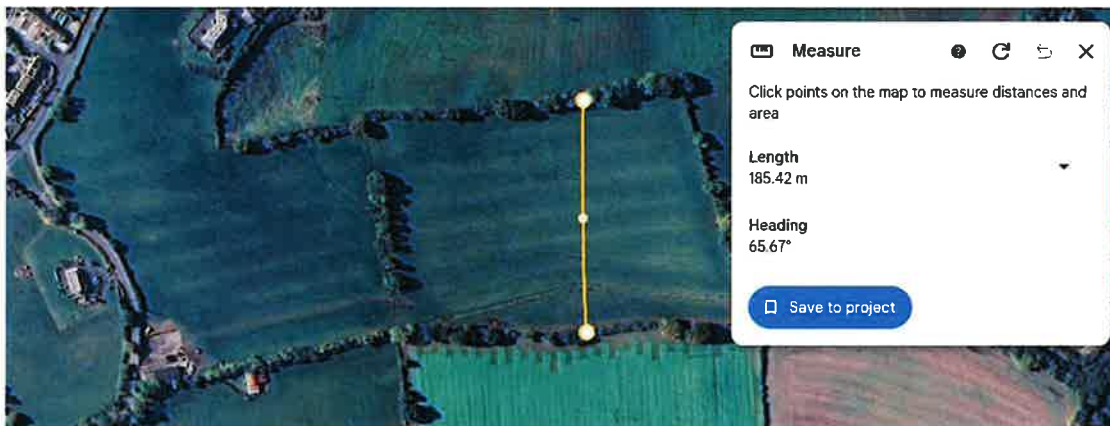


Fig. 8: Width of the subject lands (Source: Google Earth)

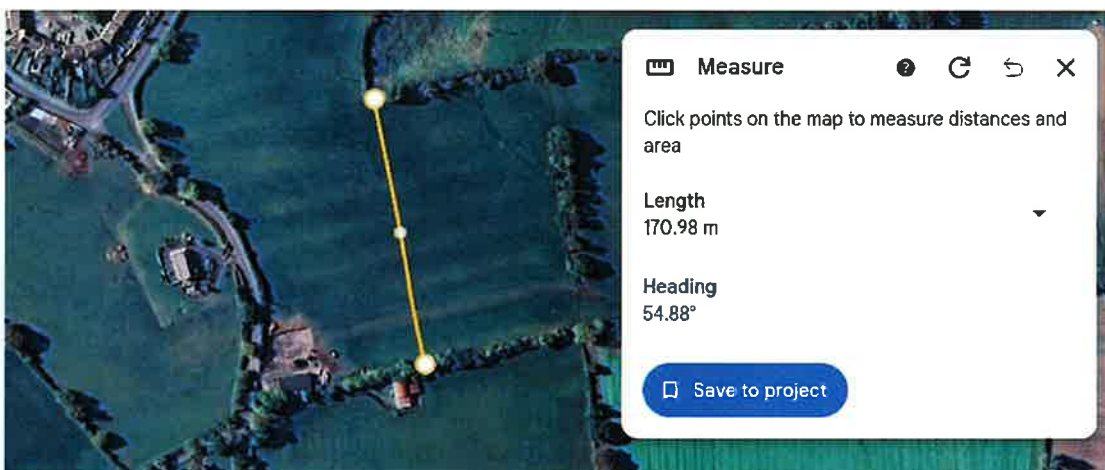


Fig. 9: Width of the subject lands (Source: Google Earth)

3.2 Description of the subject lands

The extent of the farmlands the subject of this submission are shown in Figs. 2 to 9. The outlined lands maintain an area of 12.75 hectares. A large part of this land is owned by our client. This is a considerable area of land and, as noted above, could accommodate a new motorway and associated development, housing estates, etc. However, it is not zoned for any of these developments, but is zoned and proposed to be zoned again such that our client can continue to actively farm the lands.

These are open farmlands with no existing laneway connection from north to south (beyond tractor marks) and no public lighting. They are not flat lands but are undulating. There is no passive surveillance of these farmlands from any existing dwelling, etc.

4.0 Existing planning status of the subject lands

Under Map A of the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 (see Fig. 10), the subject lands are zoned 'AG/GB'. This zoning aims: "To generally protect the open nature and landscape quality of lands, to protect and enhance local biodiversity, and to maintain the primary use of the land for agricultural purposes".

Footnote 10 of the LAP states: "For the sake of clarity, GB lands form part of the rural area. Planning applications shall be assessed on the basis of the objectives and standards for the rural area, as set out in the Wicklow County Development Plan".

There are no 'Indicative Green Routes' passing through our client's farmlands and the Road Objective R06 to the west does not impact their lands.

The existing LAP protects our client's farmlands and avoids introducing urban or associated development within what is a farm.

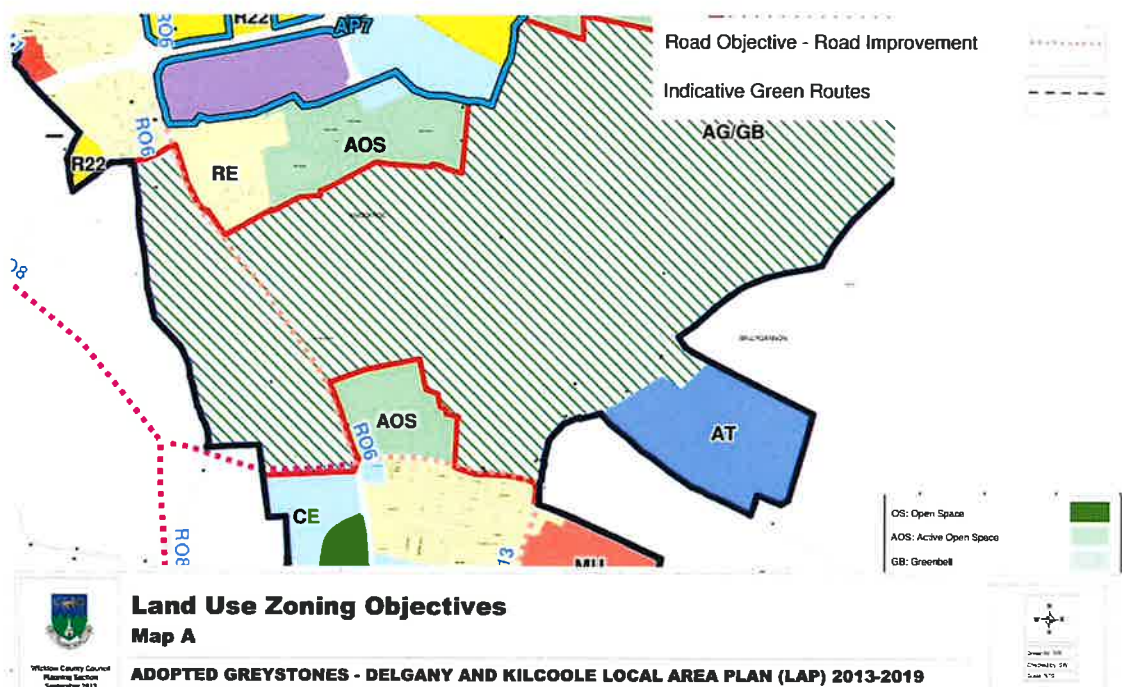


Fig. 10: Excerpt from Map A 'Land Use Zoning Objectives' of the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019

5.0 Proposed planning status of the subject lands

Under the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 of the Wicklow County Development Plan 2022 - 2028, these lands are proposed to be zoned 'AG - Agriculture' as they are in active agricultural use.

The proposals include Objective GDK59B which is shown to pass through our clients' farmland:

- Map No. 5 'Transport Strategy' includes two Objective GDK59Bs (see Fig. 11). One is a standard width and pink dashed line showing a pedestrian and cycle path proposal passing along an existing road. The other is an extremely large – in length and width – area of land (shown hatched in pink and white).
- The main document 'Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 (related to draft Greystones – Delgany & Kilcoole Local Planning Framework)' refers to Objective GDK59B at page 87 in a table called 'Greystones-Delgany & Kilcoole Infrastructure Objectives'. Objective GDK59B is outlined as follows:

*To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes: ... b) **Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road** [emphasis added].*

- A footnote attached to the table at page 87 states:

*The detail associated with new transport or green/blue infrastructure projects referred to in this LPF, including locations and associated mapping, that are not already permitted or provided for by existing plans / programmes / etc. **is non-binding and indicative. Such new projects shall be subject to feasibility assessment, taking into account the environmental constraints and the objectives of the LPF relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken for such projects where appropriate. Proposed interventions will be required to demonstrate that they are consistent with all relevant legislative requirements** [emphasis added].*

This footnote refers essentially to the indicative routes for pedestrian and cycle infrastructure delineated, as noted above, by dashed pink lines on Map No. 5.

- The published Greystones-Delgany and Kilcoole LPF Transport Objectives included in the 'Implementation Programme' document refers to Objective GDK59B at page 39 and Section 8. 'IMPLEMENTATION OF OBJECTIVES' with the stated aim:

*To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes: ... b) **Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road.***

The proposals for Objective GDK59B are applied to an area of 12.75 hectares of farmland which comprises a large part of the overall farm. This objective raises concerns over the planning status of these farmlands and over their future as farmlands as these proposals would bisect the farm.

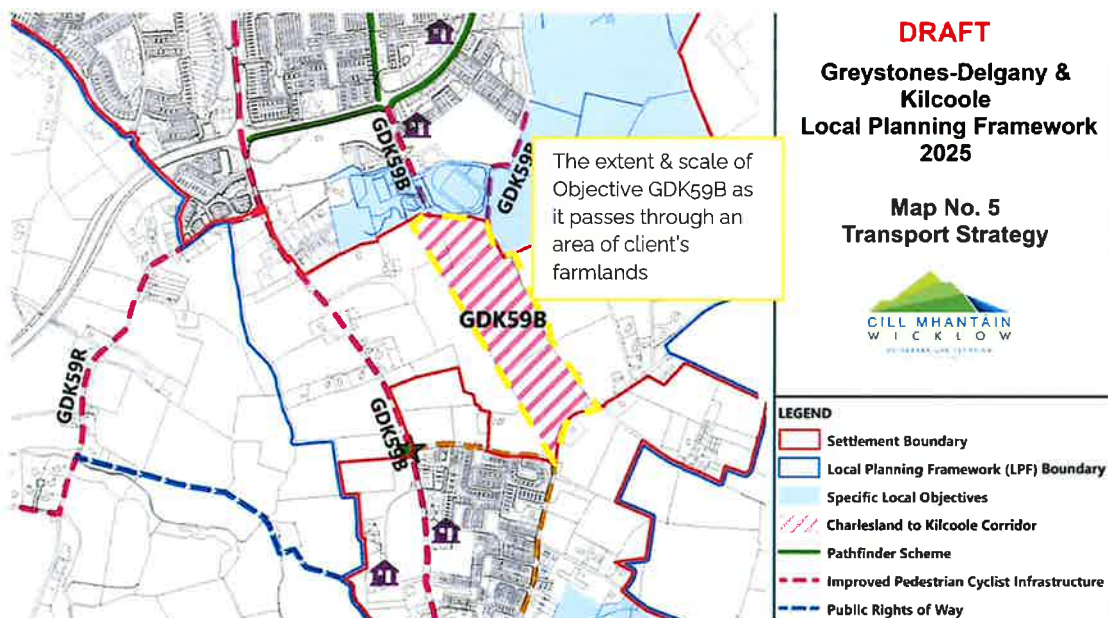


Fig. 11: Excerpt from Map No. 5 'Transport Strategy' of the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 of the Wicklow County Development Plan 2022 – 2028

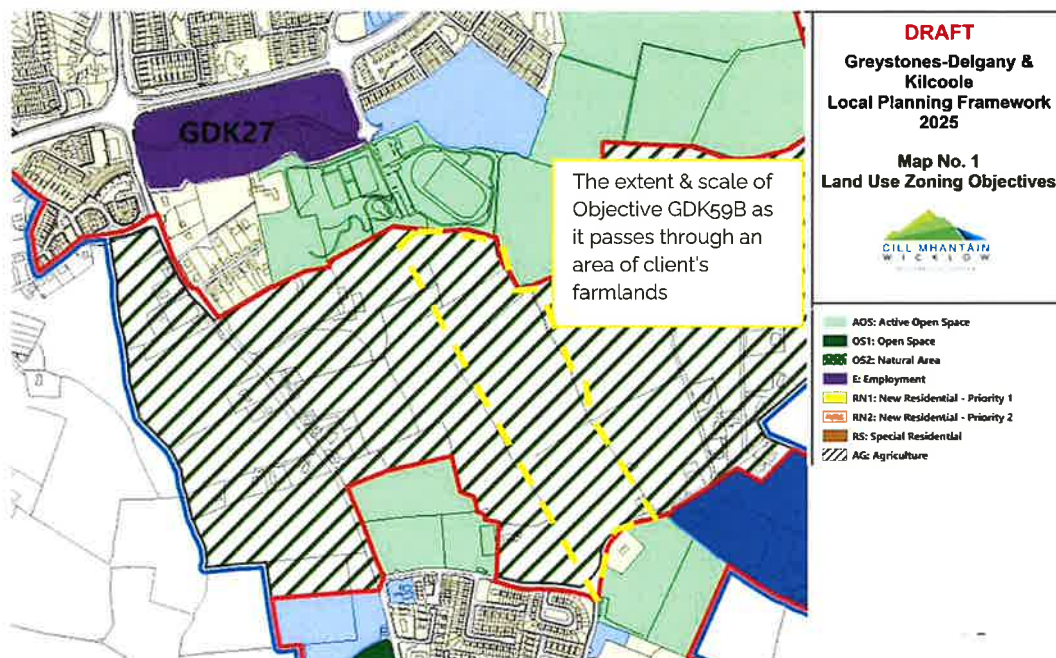


Fig. 12: Excerpt from Map No. 1 'Land Use Zoning Objectives' of the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 of the Wicklow County Development Plan 2022 - 2028

The County Development Plan sets out a wide range of infrastructure objectives that will apply directly in Greystones-Delgany and Kilcoole. In addition, the following objectives shall apply in the LPF area:

GREYSTONES - DELGANY & KILCOOLE INFRASTRUCTURE OBJECTIVES ²⁵	
GDK58	New significant residential or mixed use development proposals shall be required to be accompanied by an 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car (a) local services including shops, schools, health care and recreational facilities, and (b) public transport services. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.
GDK59	To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes: a) Pedestrian and cycling infrastructure from Kilcoole Main Street to Kilcoole train station b) Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road

Fig. 13: Excerpt from the proposed Variation No. 4 to the Wicklow County Development Plan 2022 - 2028 (related to the Draft Greystones - Delgany & Kilcoole Local Planning Framework) refers to Objective GDK59B at page 87 in a table called 'Greystones-Delgany & Kilcoole Infrastructure Objectives'

GREYSTONES - DELGANY & KILCOOLE LOCAL PLANNING FRAMEWORK			IMPLEMENTATION PROGRAMME											
Ref.	Objective	Timescale	WICKLOW COUNTY COUNCIL								STATE AGENCIES			
			Development Management	Strategic Planning	Technical Development Unit	Transport Unit	Town Regeneration Office	Planning & Building Control	Transportation & Infrastructure Development	Climate, Environment, Recreation & Amenity Directorate	Social Development Directorate	Transport Infrastructure Unit	Railway Transport Authority	Other Agencies
GDK59	To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes: a) Pedestrian and cycling infrastructure from Kilcoole Main Street to Kilcoole train station b) Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road	Ongoing												

Fig. 14: Excerpt from the published Greystones-Delgany and Kilcoole LPF Transport Objectives included in the 'Implementation Programme' document refers to Objective GDK59B at page 39 and Section 8. 'IMPLEMENTATION OF OBJECTIVES'

5.1 Anticipated pedestrian and cycle lane under Objective GDK59B

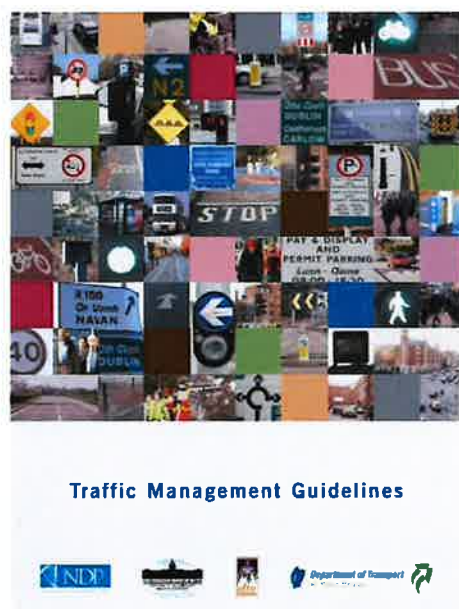
WCC proposes to reserve approx. 12.75 hectares of land with widths of as much as 185m from east to west.

By any standard, this is an extraordinary amount of land to reserve for a future pedestrian path/cycle lane.

At most, a shared footpath/cycle lane would be 6m wide if it incorporates a two-way cycle lane at 4m wide and a footpath at 2m wide. These are maximum widths. Even if a two-way footpath and two 2.5 m wide cycle lanes were introduced, the maximum cross-section width would be 9 m, which is 4 m wider than many rural roads. It would be the width of a rural road with footpaths on either side.

A shared footpath/cycle lane of 6m to 9m wide would exceed all applicable standards. Section 2.1.6 of Appendix 1 'Design and Development Standards' of the Wicklow County Development Plan 2022-2028 states: "New pedestrian and cycle paths shall be designed in accordance with the standards set out in the Traffic Management Guidelines and the National Cycle Manual and shall ensure ease of connectivity to the surrounding area". The Cycle Design Manual's width standards (provided in Section 4.2.7.2 – see Fig. 17) set out requirements of 3m to 4m for the width of Shared Active Travel Facilities and Greenways.

With respect, our client considers that the maximum width of any Shared Active Travel Facility would only be 4m wide – 6m with footpath and cycle lanes fully separated. Why then is so much land proposed to be reserved? Fig. 18 shows that the maximum bike sizes which would travel any future route delivered through our client's land would not require more than the path widths described above.



4.2.7.2 Width

Greenways in urban areas will generally be busier than in rural areas. All routes should meet the absolute minimum widths set out in Table 4.15 to be able to comfortably accommodate larger cycles and mobility scooters and designers should also consider the current, forecast and any target increase in users. A width greater than the minimum will increase the level of service, enable sociable (side by side) cycling and walking, and help minimise conflicts between users.

Table 4.15 Shared Active Travel Facilities and Greenway Widths

Location	Desirable minimum width	Absolute minimum width
Urban areas	4.0m	3.0m
Rural areas	3.0m	2.5m

Fig. 17: Cycle Design manual's width standards for Shared Active Travel Facilities and Greenways (NTA & Dept of Transport)

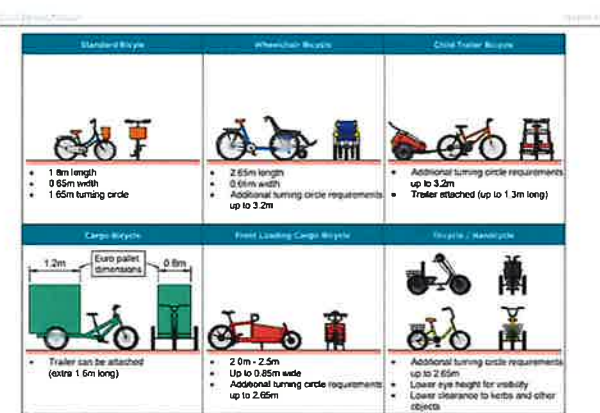


Fig. 18: Maximum sizes of bicycles which could pass along a cycle lane under Objective GDK59B (Source: Cycle Design manual, NTA & Dept of Transport)

6.0 Planning status of adjoining/surrounding lands

Under the existing LAP:

- Adjoining lands to the east and west are zoned 'AG/GB'.
- Adjoining lands to the north are zoned 'AOS – Active Open Space'.
- Adjoining lands to the south are zoned 'RE - Existing Residential' or are outside of the Settlement Boundary of Kilcoole.

Under the Draft Greystones – Delgany & Kilcoole Local Planning Framework, the

- Adjoining lands to the east and west are to be zoned 'AG – Agricultural'.
- Adjoining lands to the north will be zoned 'AOS – Active Open Space'.
- Adjoining lands to the south will be zoned 'RE - Existing Residential' or 'AOS – Active Open Space'.

The only significant difference in the planning status of the subject lands as regards adjoining lands is that WCC is proposing Objective GDK59B which appears designed to connect lands to the north and south by way of altering the planning status of our client's lands such that they become a large-scale public footpath and cycle way. It is unclear why such a footpath and cycle lane route would be required when an existing alternative exists and there are better alternatives for a new footpath/cycle route.

7.0 Planning history of the subject lands

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

8.0 Purpose of this submission

This submission seeks clarification and amendments to the LPF as regards the siting and scale of Objective GDK59B 'Charlesland to Kilcoole Corridor' proposed to pass through farmlands in active agricultural use and proposed to be zoned 'AG – Agriculture'. These lands are sited outside of the settlement boundaries of both Greystones and Kilcoole.

The siting and scale of Objective GDK59B as it is proposed to pass through our clients' farmland is difficult to understand:

- Map No. 5 'Transport Strategy' includes two Objective GDK59Bs (see Fig. 11). One is a standard width and pink dashed line showing a pedestrian and cycle path proposal passing along an existing road. The other is an extremely large – in length and width - area of land (shown hatched in pink and white) which could incorporate a section of motorway with space left over on either side for cycle lanes, footpaths, and laybys. All the other GDK pedestrian and cycling route objectives comprise only of thin dashed lines in pink.
- The Objective GDK59B is outlined in the Draft LPF (see Section 5.0 of this report) as "**Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road** [emphasis added].

Objective GDK59B is not referred to in the main document as the 'Charlesland to Kilcoole Corridor'. It is unclear from where this description arises.

- A footnote attached to the table at page 87 states that the Objective GDK59 proposals are "non-binding and indicative" and "Such new projects shall be subject to feasibility assessment, taking into account the environmental constraints and the objectives of the LPF relating to sustainable mobility". That is, WCC has not yet established any basis for why 12.75 hectares of farmland should be reserved for a possible footpath/cycle path. Indeed, WCC cannot yet be sure this route across our client's farmland would be required stating: "A Corridor and Route Selection Process will be undertaken for such projects where appropriate".

This footnote refers essentially to the indicative routes for pedestrian and cycle infrastructure delineated, as noted above, by dashed pink lines on Map No. 5. It was clearly not written to cover an expansive 12.75 hectares of farmland which could accommodate, as noted above, a full motorway or other significant development, when, at most, a shared footpath/cycle lane would be 6.5m wide (if it incorporates a two way cycle lane at 4m wide and a footpath at 2m wide).

The Cycle Design Manual's width standards (Section 4.2.7.2; see Fig. 17) set out requirements of 3m to 4m for the width of Shared Active Travel Facilities and Greenways.

With respect, our client considers that the maximum width of any Shared Active Travel Facility would only be 4m wide – 6m with footpath and cycle lanes fully separated. Why then is so much land proposed to be reserved?

Our client requests clarification from WCC as regards:

- Why is Objective GDK59B's extent, as it is shown passing through our client's farmlands, so much greater in size and scale than that of the other Objective GDK59B or of Objectives GDK59A, GDK59B, GDK59C, GDK59D, GDK59E, GDK59I, GDK59M, GDK59N, GDK59S, etc. as it passed through our client's lands, while the same objective splits into two routes to the north which are both as much as 1/10 the width (or more) and to the south continues as Objective GDK60C which is also 1/10 the width (or more).
- Why does the other Objective GDK59B to the west and every other Objective GDK59 proposed pedestrian and cycling route appear to follow an existing road or route while that proposed to pass through our client's lands would create a wholly new route across open farmlands outside of any Settlement Boundary.
- Why is our client's land included in any part of Objective GDK59B at all when the other Objective GDK59B to the west offers a perfectly achievable route and there are roads to the east along which a wholly new pedestrian and cycle route could pass without the need to open up and bisect existing farmlands.

Recommendation

Our client asks that WCC amend Map No. 5 to remove any part of Objective GDK59B from their lands. They submit that the realisation of this objective would have an adverse impact on their farm.

If WCC considers that there is no possible alternative to providing a pedestrian and cycle route through our client's lands, then this route should be no more than the width of a shared cycle lane and footpath at approx. 4m wide – 6m with footpath and cycle lanes fully separated. In our client's opinion, there is no justification for the extent of lands currently shown to be included in pink and white hatch (see Fig. 11). At most, a dashed pink line only should be included on Map No. 5 (as per every other pedestrian and cycle route objective).

The current proposals for Objective GDK59B as they pass through our client's farmland in an expansive manner would not be compatible with the Wicklow County Development Plan 2022-2028, with our client's ongoing farming operations, and with fairness as regards to the possible sterilisation impact of such an objective on existing land prices.

An alternative proposal

Section 9.0 of this submission sets out an alternative proposal for achieving Objective GDK59B which would make more common sense than the current WCC proposal. This alternative would have a reduced impact on our client's farmlands. This alternative would achieve the same aim of offering a future pedestrian and cycle route connection from south Greystones to north Kilcoole but it would do so along existing field boundaries and while avoiding passing closely to the west of our client's farmyard.

9.0 Alternative proposal as regards Objective GDK59B

Our client anticipated that WCC will likely view this submission as being wholly opposed to the aims of Objective GDK59B. This is not the case. The family agrees with the principle of what it wants to achieve – a pedestrian and cycle link connecting south Greystones to north Kilcoole.

There are many ways for this to be achieved. Our client does not consider the current WCC proposal for Objective GDK59B to be reasonable or to make common sense.

Objective GDK59B in its present siting would pass through open farmland. It would not even follow the alignment of any existing field boundaries.

It would, with respect, make much more common sense for the proposed route to follow the alignment shown in Fig. 19. From south to north, this route would pass to the east of our client's existing farmyard and along existing field boundaries through lands owned by Fishers, then into lands owned by the Bradys, into lands owned by our client, and then into lands owned by the Nolans. It would then connect to the two northward sections of Objective GDK59B to which the Nolan lands connect. An alternative version of this route would see the route divided half and half between our client and the Bradys as it reaches the point where our client's farm and the Brady farm meet.

Of the farmland owners to be impacted by Objective GDK59B, the current proposals essentially include mostly our client's farmland, and, to the north, lands owned by Pat Nolan. This alternative more common sense proposal would see the impact(s) of the objective shared among landowners.

WCC is asked to carefully consider this proposal which would more fairly divide the lands required to achieve Objective GDK59B between four and not two landowners and it would do so in a more visually appropriate manner along existing field boundaries, and it would avoid impacting adversely on our client's farmyard.

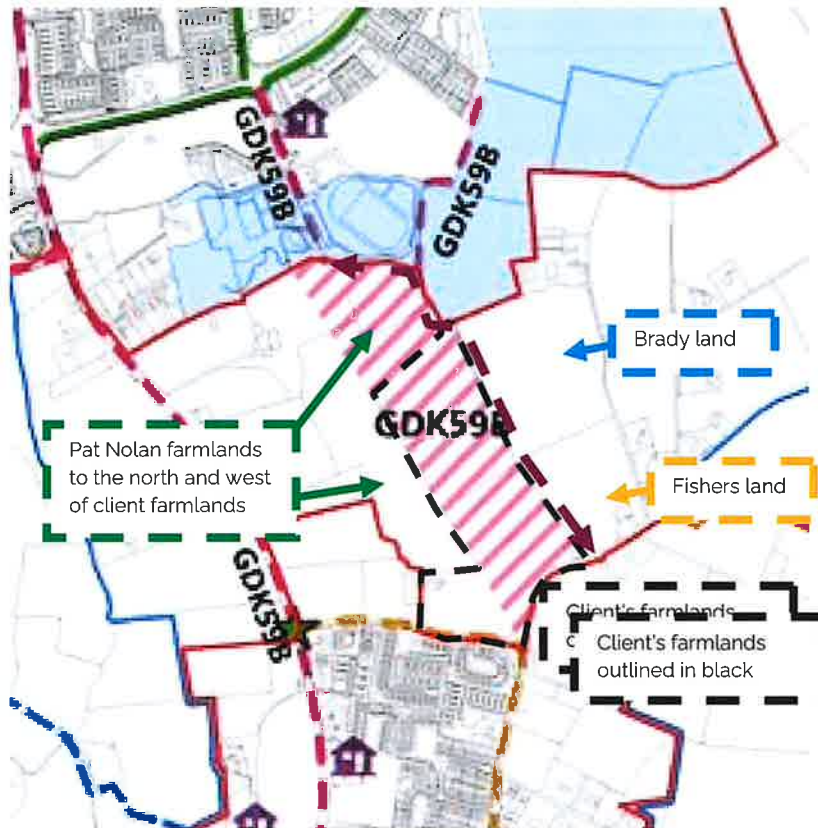


Fig. 19: Alternative proposed route for Objective GDK59B along existing field boundaries, avoiding client farmyard, and sharing land take between 4 and not 2 landowners

10.0 Concerns regarding client lands being developed by WCC

Our client notes that they have previous experience with WCC undertaking works on his land which caused problems which have not been addressed. When they found out that WCC was proposing this new objective through their lands they contacted WCC, WCC councillors, and the National Transport Authority. They have also attended WCC consultation events and been told to make a submission.

Appendix 1 of this submission contains an email issued to the National Transport Authority. This states:

I am writing to formally object in the strongest possible terms to the inclusion of my privately owned land in Kilcoole in the Charlesland/Kilcoole Greenway proposal. I objected at the first consultation meeting and was advised to write to Wicklow County Council to request that my land be removed from this. I immediately notified Wicklow County Council that my land was not to be included in any part of this proposed route. Despite this, the recently released plan has incorporated our whole field without my consent. This is unacceptable and shows a complete disregard for my rights as a landowner. This land is actively farmed and forms part of our family livelihood. We have already suffered a serious loss due to a compulsory purchase order on our farm in Rathnew, which remains unresolved. That CPO process has had a significant impact on our family, both mentally and financially and this current proposal threatens to repeat and worsen this experience.

Wicklow County Council have already put a sewage line through this land, hence destroying all our land drainage pipes and causing our land to flood for the last 20 years. There is a stream that also runs through this land, and we are one of the few remaining working farms in this area. We work very hard to maintain our land and take great pride in our farm. If you could come and meet with us and see how this proposal will impact us, which is impossible to imagine unless witnessed in person.

I am formally demanding the immediate removal of my land from the proposed route. Written confirmation from the Department of Transport acknowledging this objection and outlining how it will be addressed. Failure to exclude my land from this plan will result in my taking legal action, including seeking a judicial review, and I will be pursuing complaints to the office of the Ombudsman, elected representatives.

Sewage pipes were installed by WCC on their farmlands causing considerable issues including loss of access to farmland, surface water drainage and flooding problems (see Figs. 20 to 23), etc. for as long as 20 years. The

area of works was significant and caused large areas of the farm to be unusable for a long period. Post-construction, our client considers that there remain issues which have not been addressed. Mr Byrne states: "the land has never been the same, they never reinstated our land drainpipe in the far field and now it floods every year". Please find a USB memory stick attached to this submission which contains detailed video clips of these works.

To our client, the extent of farmlands required previously by WCC caused them significant loss of earnings, etc. The family is concerned that the current proposals would repeat the problems which previously arose as to loss of earnings and WCC leaving areas of their farmland in a poor condition.

They consider that any land take should be minimal and ideally the alternative route set out in Section 9.0 should be adopted by WCC. The adverse impacts arising from WCC installing necessary infrastructure should not fall primarily on one landowner.



Fig. 20: Previous WCC works underway on client farmland



Fig. 21: Previous WCC works underway on client farmland



Fig. 22: Previous WCC works underway on client farmland



Fig. 23: Previous WCC works underway on client farmland

11.0 Conclusion & recommendation

Based on the above analysis, BPS, an accredited firm of town planning consultants, considers the proposed 'Agricultural' zoning of the subject lands appropriate. This zoning will protect the ongoing active farming activities taking place in these farmlands.

Concerns arise, however, that our client's farm would be adversely impacted if proposed Objective GDK59B, as it passes through our client's farmland in an expansive manner, is retained. With respect, we submit that no adequate justification has been provided for reserving approximately 12.75 hectares of farmland for a possible north-south footpath/cycleway, when all other similar objectives are represented by a thin line on Map No. 5 of the Draft LPF. Even as a "non-binding and indicative" objective, Objective GDK59B, if adopted, would impact on the value and on the future viability of the existing farm. In short, WCC has not yet established any basis for why 12.75 hectares of farmland should be reserved for a possible footpath/cycle path. Indeed, WCC cannot yet be sure this route across our client's farmland would be required stating: "A Corridor and Route Selection Process will be undertaken for such projects where appropriate".

While it is accepted that pedestrian and cycle connections are needed between Greystones and Kilcoole, our client does not consider any adequate justification has been given for why such connections should pass through their farmlands where there is not even an existing farm track, no public lighting, and no way to manage any associated anti-social behaviour. A second Objective GDK59B passes to the west of our client's farm and would form a more appropriate pedestrian and cycle route. Similarly, if a second north-south route is needed then this should be researched as regards the path of least resistance as regards existing driveways, laneways, paths, etc. and not merely forced through our client's undeveloped farmlands.

If a footpath/cycle lane connection route is to be reserved through the subject farmlands, this need only be 4m wide. The Cycle Design Manual's width standards (provided in Section 4.2.7.2 of the manual– see Fig. 17) set out requirements of 3m to 4m for the width of Shared Active Travel Facilities and Greenways. With respect, our client considers that the maximum width of any Shared Active Travel Facility would only be 4m wide – 6m with footpath and cycle lanes fully separated. Why then is so much land proposed to be reserved? We submit that the quantum of land which is included in Objective GDK59B should be reduced to the absolute minimum and with a dashed pink line only possibly shown on Map No. 5.

In light of the above, we recommend that Objective GDK59B be removed from our client's land or reduced significantly in size to be represented only by a dashed pink line on Map No. 5. This would be compatible with the Wicklow County Development Plan 2022-2028 including with Section 2.1.6 of Appendix 1 'Design and Development Standards'.

The current proposals are not compatible with our client's ongoing farming operations, with fairness as regards to the possible sterilisation impact of such an objective on existing land prices, and with the proper development of pedestrian and cycling corridors in urban areas which require public lighting and passive surveillance.

Section 10.0 of this submission sets out an alternative proposal for achieving Objective GDK59B which would make more common sense than the current WCC proposal. This alternative would have a reduced impact on our client's farmlands. This alternative would achieve the same aim of offering a future pedestrian and cycle route connection from south Greystones to north Kilcoole but it would do so along existing field boundaries and while avoiding passing closely to the west of our client's farmyard.

Signed,

Brendan Buck

BPS Planning Consultants LTD
Members of the Irish Planning Institute
18 June 2025

Appendix 1: Email issued by Roy and Eileen Byrne to the National Transport Authority

From: Eileen Byrne
Sent: 08 June 2025 14:59
To: NRGAT@transport.gov.ie <NRGAT@transport.gov.ie>
Subject: Charlesland/Kilcoole corridor Co. Wicklow.o. Wicklow

Dear Sir/ Madam,

I am writing to formally object in the strongest possible terms to the inclusion of my privately owned land in Kilcoole in the Charlesland/Kilcoole Greenway proposal.

I objected at the first consultation meeting and was advised to write to Wicklow County Council to request that my land be removed from this. I immediately notified Wicklow County Council that my land was not to be included in any part of this proposed route. Despite this, the recently released plan has incorporated our whole field without my consent. This is unacceptable and shows a complete disregard for my rights as a landowner.

This land is actively farmed and forms part of our family livelihood. We have already suffered a serious loss due to a compulsory purchase order on our farm in Rathnew, which remains unresolved. That CPO process has had a significant impact on our family, both mentally and financially and this current proposal threatens to repeat and worsen this experience. The Wicklow County Council have already put a sewage line through this land, hence destroying all our land drainage pipes and causing our land to flood for the last 20 years. There is a stream that also runs through this land, and we are one of the few remaining working farms in this area. We work very hard to maintain our land and take great pride in our farm. If you could come and meet with us and see how this proposal will impact us, which is impossible to imagine unless witnessed in person.

I am formally demanding the immediate removal of my land from the proposed route. Written confirmation from the Department of Transport acknowledging this objection and outlining how it will be addressed.

Failure to exclude my land from this plan will result in my taking legal action, including seeking a judicial review, and I will be pursuing complaints to the office of the Ombudsman, elected representatives.

Please treat this as an official objection and respond urgently.

Yours faithfully,

Dermot Roy & Eileen Byrne.