



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

Who are you:	Agent
Name:	John Spain Associates on behalf of
Reference:	GDKLPF-122336
Submission Made	November 21, 2025 4:19 PM

Topic

LAP - Proposed Material Amendments No 3 Submission

Submission

Please refer to the attached submission document.

Topic

LAP - Proposed Material Amendments No 4 Submission

Submission

Please refer to the attached submission document.

Topic

LAP - Proposed Material Amendments No 16 Submission

Submission

Please refer to the attached submission document.

Topic

LAP - Proposed Material Amendments No 20 Submission

Submission

Please refer to the attached submission document.

Topic

LAP - Proposed Material Amendments No 23a Submission

Submission

Please refer to the attached submission document.

File

24159- GDK LPF- Variation No. 4 MA Submission Final.pdf, 1.73MB

'Variation No.4 / draft GDK LPF',
Administrative Officer,
Planning Department,
Wicklow County Council
County Buildings,
Station Road,
Wicklow Town,
A67 FW96

Date: 21st November 2025
Reference: PT/YM JN 24159

Dear Sir/Madam,

RE: SUBMISSION IN RESPECT OF THE PROPOSED MATERIAL ALTERATIONS TO PROPOSED VARIATION NO. 4 OF THE WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028 / DRAFT GREYSTONES-DELGANY & KILCOOLE LOCAL PLANNING FRAMEWORK IN RELATION TO LANDS AT BULLFORD, KILCOOLE, CO. WICKLOW.

1.0 INTRODUCTION AND RELEVANT CONTEXT

On behalf of our client, Brookhampton Limited, Collegefort, Carpenterstown Road, Castleknock, Dublin 15, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission to the Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow County Development Plan 2022-2028 / Draft Greystones-Delgany & Kilcoole Local Planning Framework (Draft LPF 2025), which runs until the 21st of November 2025, in relation to lands at Bullford, Kilcoole, Co. Wicklow.

Our client, who has delivered a significant number of developments across the Dublin and Wicklow areas and is committed to delivering sustainable medium density residential development in the Wicklow area over the coming years, are the owners of a landbank within the boundary of the Draft LPF 2025 which will form part of the Wicklow County Development Plan 2022-2028 (CDP) when adopted into the County Development Plan via the variation procedure set out under Section 13 of the of the Planning & Development Act 2000 (as amended).

Our client welcomes this opportunity to make a submission on the Proposed Material Alterations (PMAs) to the Draft LPF 2025 which, through the proposed designation of lands as 'RN1' and the increased in the lands zoned 'TC', support the delivery of much needed housing and commercial development on their lands at Bulford, and therefore is very much welcomed. Development of the subject lands will benefit the wider Kilcoole Town, which is designated as a Level 4 settlement ('self-sustaining town') within the County settlement hierarchy.

However, to ensure a timely delivery of much needed housing units on the subject lands, in accordance with the NPF Implementation: Housing Growth Requirements, published in July 2025, which require planning for an average of approximately 55,000 new homes per annum nationally between 2025 and 2034, we ask that the LPF provide an appropriate and flexible framework to facilitate the Phase 1 proposal currently under consideration by Wicklow County Council under Reg. Ref.: 25/60623 which along, with the overarching masterplan for the land,

has been subject of extensive consultation with the Planning Authority, and reflects the Section 28 Guidelines, the CDP development management standards, and has regard to the site's planning history, topography, and site context.

In this context, the LPF represents an opportunity to proactively address previous challenges encountered in securing planning permission, particularly those relating to density, infrastructural capacity to support additional development, and the provision of essential infrastructure on third-party lands.

We also note that under Appendix 1 of the NPF Implementation: Housing Growth Requirements (July 2025), Wicklow's annual housing target is revised from 745 no. units (under the 2020 Housing Supply Target) to 2,068 no. units for the period 2025–2034. Thus, there is a requirement to zone enough land across the County to cater for a minimum of c 23,473 no. homes over the next 13 year period i.e. the period covering the next Development Plan (2027-2033) and the lifespan of the new 10 year Development Plan period (10 years x 2,068, plus an additional 3 years at 931), increasing to c. 35,210 new homes when additional provision up to 50% is factored in (10 years x 2,068+ 50% headroom, plus an additional 3 years at 931 + 50% headroom).

1.1 KEY GROUNDS OF SUBMISSION

The key grounds of this submission on the Proposed Material Alterations on the Draft LPF can be summarised as follows:

Proposed Material Alteration No. 20

- That the proposed text under Proposed Material Alteration No. 20 which restricts occupancy of residential units pending activation of the community facility within SLO 5 be omitted. It is considered that the Draft LPF should incorporate greater flexibility in the phasing approach within the proposed SLO5 lands, to facilitate timely and efficient housing delivery, and that the provision of housing should not be contingent upon the prior delivery of community infrastructure;
- That the proposed text under Proposed Material Alteration No. 20 which requires an excessively large community facility should be omitted. The scale of the community facility envisaged in the Draft LPF is considered excessive, unjustified and disproportionate having regard to likely demand based on existing and future population and typical usage patterns. It is submitted that, in the absence of a specific Social Infrastructure Audit for Kilcoole, the level of community floorspace is not evidence based and overly onerous on a single developer, and will impact on the viability of housing, which runs contrary to Government initiatives and recent guidance;
- Proposed Material Alteration No. 20 should be further altered to provide for greater flexibility, particularly in respect to the provision of open space. It is considered that the open space requirements under SLO 5 are overly aspirational and have not had regard to the natural constraints on the lands, including steep topography and the ecological buffer, which make it impractical to provide the required playing fields without compromising the environmental and spatial functionality of the developable lands;

Proposed Material Alteration No. 3

- That the specific area of the proposed plaza set out under Proposed Material Amendment No. 3 (1,600 sq.m) be omitted from the text of Objectives GDK OP7 so that the Draft LPF is aligned with the current Phase 1 proposal and the overarching masterplan under Reg. Ref.: 25/60623 as it relates to the provision of a plaza. The current proposal provides for a flexible multi-functional space at an appropriate scale, which is overlooked by residential and commercial / community floorspace, connected to the proposed adjoining open space to the west, which has regard to the surrounding streetscape, future use and maintenance;

- If the above is not acceptable to the Planning Authority, then at a minimum the text of OP7 should confirm that the 1,600 sq.m plaza area relates to the total area of the plaza provided when all improvements to the public realm, the area at the existing 'The Brook' plaza, Monteith Park green space and the Farm Lane to be closed are included.
- That Proposed Material Amendment No. 3 be amended to confirm that the removal of staggered junction means the closure of Farm Lane to Main Street;
- That the Draft LPF incorporate greater flexibility overall in respect to the development of OP7, given that the lands are appropriately located, serviceable, and sequential to existing development, and proposes a minor alteration of the text of GDK7 to provide for same.

Proposed Material Amendment No. 23A

- That Proposed Material Alteration No. 23A, which introduces a new SLO (proposed SLO 9 – Darraghville) on lands immediately contiguous to the northern portion of our client's lands which were designated as SLB under the 2013 LAP, be amended to provide for connections southward from proposed SLO 9 to the previous SLB lands, and SLO 5. This will ensure the coordinated delivery of residential development across the sequential lands to the west of Kilcoole Main Street, this submission requests that Proposed Material Alteration No. 18 be amended to provide for connections southward from proposed SLO 9 to the previous SLB lands, and SLO 5.
- In this regard, establishing southward vehicular, pedestrian and cyclist connections would enhance active travel opportunities and strengthen connectivity to the proposed linear park located on lands zoned for open space to the west.

Proposed Material Amendment No. 4

- That Proposed Material Alteration No. 4 be removed, and that the text of Objectives GDK OP8 revert to the original wording as set out under the Draft LPF, which it is considered provides a balanced and appropriate framework for guiding development within the TC zoned lands. It is considered that the restriction on standalone retail or residential blocks within TC-zoned lands proposed under Proposed Material Alteration MA No. 4 is unnecessary, overly prescriptive and onerous. Its implementation would significantly constrain the development potential of the TC-zoned lands and is likely to result in avoidable delays in delivering urgently needed housing and supporting retail and community infrastructure within the proposed TC zoned lands;
- Furthermore, it is considered that the introduction of additional requirements under Proposed Material Alteration No. 4, requiring the inclusion of additional outdoor community spaces, including a furnished pocket park is overly onerous and disproportionate. It is submitted that the proposed introduction of additional outdoor space / pocket park would reduce achievable residential density, and would be an inefficient use of serviced TC zoned lands, contrary to the principles of compact growth and efficient land use;
- If the requirement for residential use above all ground level commercial or retail development is retained in the Draft LPF, this submission requests that Proposed Material Alteration No. 4 be amended to include a building height range of up to 6 storeys. This would cater for a more viable development format within the TC zoned lands, which would accommodate both the requirements of a foodstore operator in terms of building height and the requirement for residential accommodation overhead.

Proposed Material Amendment No. 16

- That Proposed Material Alteration No. 16, which introduces a new requirement for a Local Transport Plan (LTP) for Greystones Delgany and Kilcoole, be updated to confirm that in advance of the adoption of the LTP, planning applications will be assessed on their merits, having regard to the overall objectives of the LPF, and accompanying transport assessments, and development will not be considered premature pending agreement of the Greystones-Delgany and Kilcoole LTP.

Other Matters

- In addition to the above, while acknowledging that this matter may be outside the scope of the current stage of the consultation process, we ask that in planning for the future development of the County consider the potential of the northern portion of our client's lands to accommodate additional housing growth in light of the current housing shortfall and the urgent need to deliver residential development in sustainable locations, having regard to the Government's new housing strategy Delivering Homes, Building Communities, 2025–2030, which sets an ambitious target of 300,000 new homes. These lands, which were designated as SLB under the 2013 LAP, are contiguous to the proposed SLO 9 – Darraghville lands. It is considered that the LPF presents a significant opportunity to proactively address the housing challenge, and in this context we highlight that these lands are available to contribute to housing growth in the County.

The following sections of this document set out the grounds of submission and supporting arguments for same in further detail, as they relate to specific proposed amendments. Detail in support of each recommendation is provided in Section 3, with relevant site location and planning context provided in Section 2.

2.0 SITE LOCATION AND PLANNING CONTEXT

2.1 SITE LOCATION

The lands the subject of this submission are located at Bullford, Kilcoole, west of Kilcoole town centre and the existing built-up area (see Figure 2.1). The lands include frontage onto the western side of Main Street (the R761), facing Sea Road. The lands are located at a sequentially suitable location to cater for the growth of the town.

Figure 2.1: Aerial Photograph of Bullford, Kilcoole with the approximate subject landholding identified with a red outline



Source: Google Earth

In the context of the Proposed Material Alterations to the Draft LPF 2025, we note the southern part of the subject lands (marked 'A' on the aerial photo at Figure 2.1) relates to the area designated as "SLO 5 – Bullford" under the Draft LPF. These lands are proposed as "RN1:

New Residential- Priority 1” zoned lands under Proposed Material Alteration No. 20 of the Draft LPF (see extract from the Draft LPF 2025 Map No. 1 - Proposed Altered Land Use Zoning Objectives at Figure 2.2).

Part of these lands are included within the red line boundary of planning application Reg. Ref.: 25/60623 referred to above, which comprises a proposed Phase 1 residential and commercial development (99 no. residential and 2 no. commercial / community units). This application is currently the subject of a Further Information (FI) Request from the Planning Authority dated the 2nd October 2025. (See Appendix 1- Planning History for details).

In addition, the eastern part of the lands fronting Kilcoole Main Street relates to two areas designated as opportunity sites, namely “OP7 Kilcoole Centre” and “OP8 Kilcoole West – ‘The Molly’s” (marked ‘B’ and ‘C’ on the aerial photo at Figure 2.1, respectively) and proposed as “TC: Town Centre” zoned lands under the Draft LPF. Proposed Material Alteration No. 4 of the Draft LPF proposes the extension of proposed OP8 westwards to provide for additional TC zoned lands.

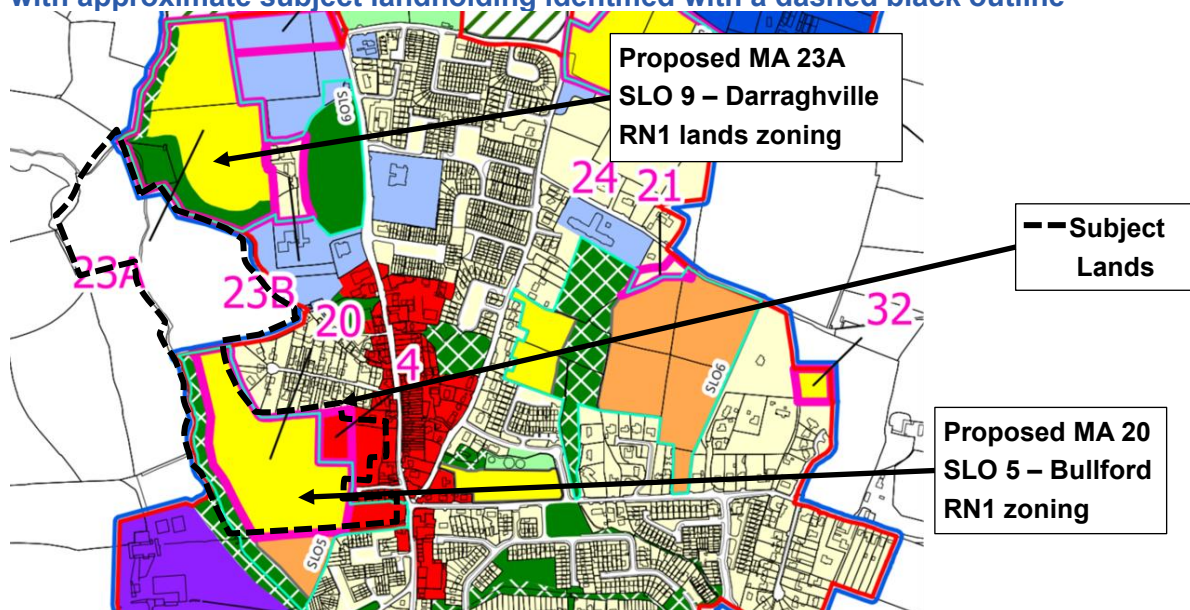
The proposed OP7 lands are also within the red line boundary of planning application Reg. Ref.: 25/60623 referred to above.

The proposed OP8 lands are within the red line boundary of a planning application for a discount foodstore (Lidl) under Reg. Ref.: 24/60545, which is currently the subject of an appeal to An Coimisiún Pleanála under ACP Ref. No.: L27.323073. A decision from ACP is due on the 20th November 2025. (See Appendix 1- Planning History for details).

Part of the northern portion of the lands (marked ‘D’ on the aerial photo at Figure 2.1) were designated as Strategic Land Bank (SLB) under the Greystones-Delgany and Kilcoole Local Area Plan 2013 – 2019 (2013 LAP), as demonstrated in the extract from the Map A of the 2013 LAP at Figure 2.4.

These lands are immediately south of and contiguous to the lands designated under Proposed Material Alteration No. 23A as “SLO 9 – Darraghville” (marked ‘E’ on the aerial photo at Figure 2.1) and proposed as “RN1: New Residential- Priority 1” zoned lands, as demonstrated in the extract from the Draft Land Use Zoning Map at Figure 2.2.

Figure 2.2: Draft LPF 2025 Proposed Altered Land Use Zoning Objectives for Kilcoole, with approximate subject landholding identified with a dashed black outline



Source: Proposed Material Alterations to Draft LPF Map No. 1

Figure 2.3: Draft LPF 2025, Opportunity Site 7- Kilcoole Centre (OP7)



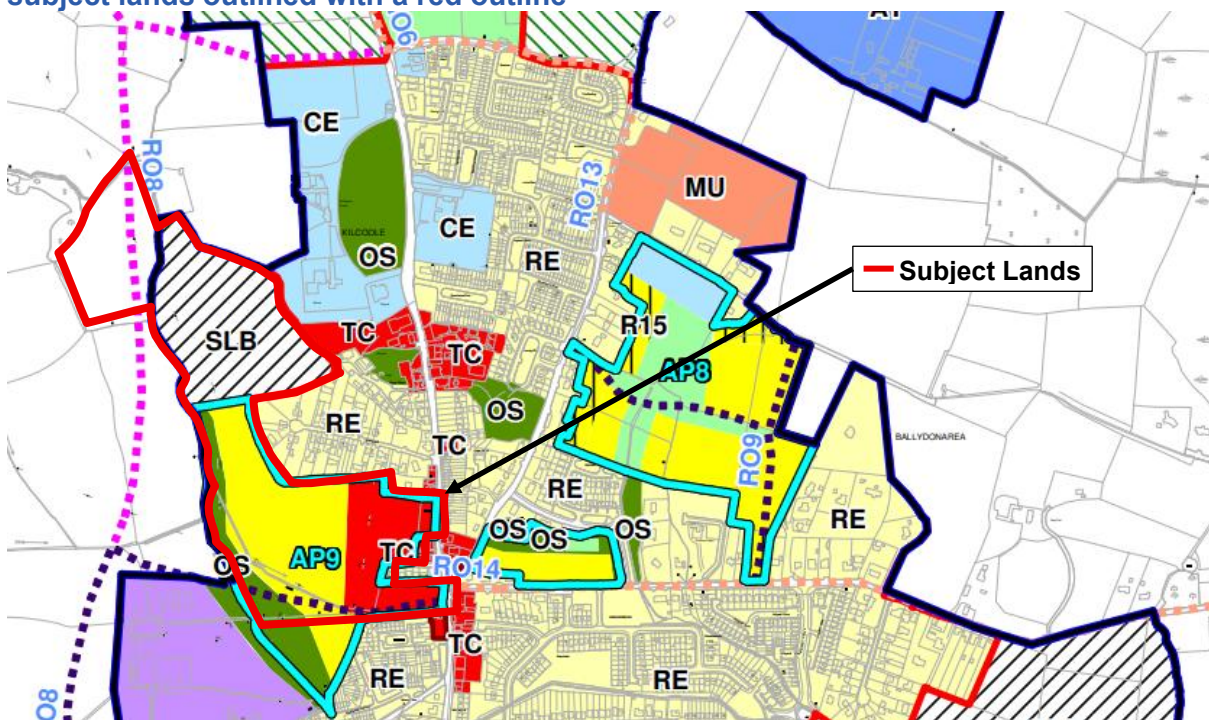
Source: Proposed Variation No. 4 to the Wicklow CDP / Draft LPF

Figure 2.4: Draft LPF 2025, Opportunity Site 7- Kilcoole Centre (OP7)



Source: Proposed Variation No. 4 to the Wicklow CDP / Draft LPF

Figure 2.5: Greystones-Delgany and Kilcoole LAP 2013-2019 zoning map (extract), with subject lands outlined with a red outline



Source: Greystones, Delgany & Kilcoole LAP 2013-2019, Map a land Use Zoning Objectives (extract)

2.2 PLANNING CONTEXT / PLANNING HISTORY SUMMARY

In terms of the planning history of the subject land we note that our client has encountered challenges, mainly due to concerns raised by the Planning Authority and ACP as outlined above, notwithstanding that the principle of a residential development on the subject lands is supported by ACP and the Planning Authority, as evidenced under the S.247 consultations that took place in respect of a proposed Phase 1 residential development that is currently the subject of an FI Request from the Planning Authority under Reg. Ref.: 25/60623.

We note that the concerns in respect to prematurity due to Irish Water constraints are now resolved, as evidenced by the IW COF letter which accompanied the most recent application.

In summary:

- **Reg. Ref.: 25/60623-** planning application Reg. Ref.: 25/60623, which comprises a proposed Phase 1 residential and commercial development for 99 no. residential and 2 no. commercial / community units, is currently the subject of a FI Request from the Planning Authority dated the 2nd October 2025.

This application includes a new masterplan for the area designed to be consistent with the zoning provisions under the 2013 LAP, with c. 1.902 ha of Town Centre zoned land (within the proposed masterplan / application site boundary- including the new access road), 4.97 ha of R-22 residential zoned lands, and 1.611 ha of Open Space of zoned land, which seeks to respond to the issues raised under the previous applications and the guidance provided by the Planning Authority and ACP, and includes potential future connections to the adjoining lands to the south (See Appendix 1- Planning History for details).

- **Reg. Ref.: 22/15-** Wicklow County Council (WCC) refused planning permission under Reg. Ref.: 22/15 on the 1st of September 2022, for a residential development of 56 no. houses, internal roads, car parking, pedestrian and cycle paths, public open space and all associated site and infrastructural works to facilitate connections to public services, on the southern portion of our client's overall landholding. The refusal reasons included *inter alia* insufficient density of development on the site resulting in under-utilisation of centrally located lands, failure to provide an appropriate mix of house types, and it not being demonstrated that the proposed road infrastructure would have sufficient capacity to cater for the development of the remainder of the AP9 zoned lands.

The decision was the subject of a first party appeal to An Bord Pleanála (ABP), and the Board upheld the Council's decision and refused permission under ABP 314724-22 on the 9th of February 2024 for 2 no. reasons, which related to density and unit mix (relating to the provision of primarily two-storey semi-detached houses and the suburban type layout), and junction and capacity assessment, respectively.

- **Reg. Ref.: 23/2-** WCC also refused planning permission under Reg. Ref.: 23/2 on the 23rd of February 2023, for a discount foodstore (Lidl) and 3 commercial / retail units on the eastern part of the subject landholding, which are zoned for Town Centre purposes, for reasons including *inter alia* size of the proposed retail unit in the context of the existing medium sized convenience stores in Kilcoole, single storey design, protection of the Kilcoole Town Centre Character Area; and development of the access to the wider AP9 lands would be premature pending the determination by the planning/roads authority of a road layout for the area.
- **Reg. Ref.: 24/60545-** A second application for a discount foodstore (Lidl), a Café unit, and a 5 no. dwellings was refused planning permission by WCC under Reg. Ref.:

24/60545 on the 24th June 2025 for reasons related to the efficient and sustainable use of zoned lands in a town centre associated with requirements in terms of living over the shop, residential density, and mix. This application is currently the subject of an appeal to ACP under ACP Ref. No.: L27.323073. A decision from ACP is due on the 20th November 2025. (See Appendix 1- Planning History for details).

- **ABP Ref. No. 302552-18-** The above applications were preceded by an SHD application under ABP Ref. No. 302552-18, which was refused on the 13th of December 2018 for reasons of prematurity due to deficiencies in Irish Water infrastructure, failure to demonstrate that the SHD would not impact on The Murrough SPA/SAC, and the provision of a small number of residential units on open space zoned lands. However, the Board did not have any fundamental concerns in respect to the quantum, layout and mix of development proposed in the context of the LAP provisions.

It is also noted that following the SHD application, a subsequent SHD application in 2019 (under ABP Ref. No. 304348) did not proceed past Stage 2, following the issuing by ABP of an opinion that the proposal required further consideration pertaining to infrastructural constraints and unit mix.

We note that under the Wicklow County Development Plan 2022-2028, Kilcoole is classified under “Small Towns and Villages” under which a graduated density standard of between 30 – 40+ units per ha in centrally located sites to 20-35 dwellings per ha in edge of centre sites is applicable. The Sustainable and Compact settlements Guidelines, 2024 indicates that the density range for the subject lands in Kilcoole would be to ‘Respond to existing context’ for the town centre zoned lands and 25-40 dph for the remainder of the lands, under the ‘Suburban / Urban Extension’ category.

Thus, while our client supports the preparation of a Local Planning Framework for Kilcoole, and welcomes this opportunity to make a submission on the PMAs to the Draft LPF 2025, this submission highlights that it is essential that the LPF is aligned with both the Phase 1 proposal currently under consideration by Wicklow County Council under Reg. Ref.: 25/60623 and the overarching masterplan for the lands to ensure a timely delivery of much needed housing units on the subject lands.

In this context, this submission suggests a number of the Proposed Material Alterations to the Draft LFP 2025, which are aligned with our client’s realistic expectation for the subject lands based on recent discussions with the Planning Authority, coupled with the revised national housing targets set out in the National Planning Framework First Revision (Revised NPF).

3.0 GROUNDS OF SUBMISSION

3.1 PROPOSED MATERIAL ALTERATION NO. 20- AMEND MAP NO. 1 (LAND USE ZONING) AND SLO 5 - BULLFORD AND BOUNDARY

Our client welcomes Proposed Material Alteration (MA) No. 20, which proposes that the zoning objective of c. 6.1 ha. of our client’s lands at Bullford (identified in the draft LPF 2025 as “SLO 5 – Bullford”) be amended to RN1 ‘New Residential – Priority 1’.

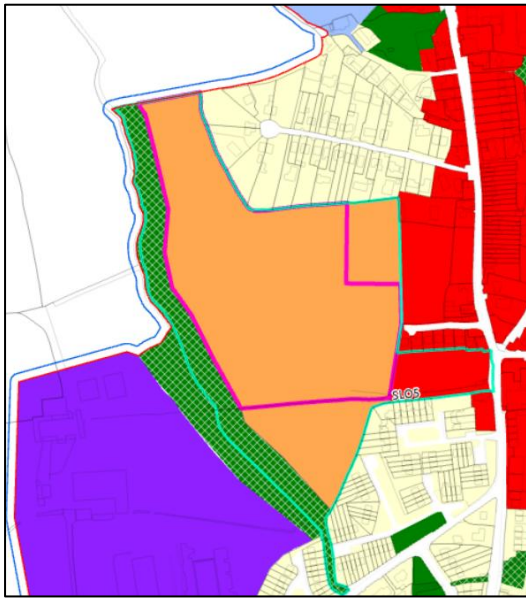
Proposed MA No. 20 reads as follows and includes the map extracts at Figure 3.1.

“Amend zoning of land at Kilcoole measuring c. 6.1ha from RN2 ‘New Residential – Priority 2’ to RN1 ‘New Residential – Priority 1’.”¹

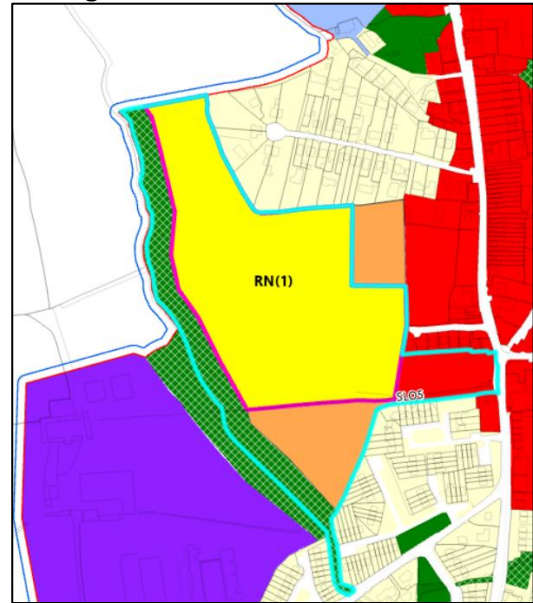
¹ Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 29

Figure 3.1: Proposed MA No. 20

Change from:



Change to:



Source: Proposed Material Alterations To Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) (extract)

The proposed RN1 designation will support the delivery of much needed housing on our client's lands at Bullford. Subject to a grant of planning permission our client intends to bring forward development on the lands in the short term.

Proposed restriction on residential occupancy pending community facility activation

However, our client is seriously concerned with the proposed amendment of the SLO5 text, which restricts occupation of dwellings on the RN1 lands until OP7 is fully developed. The relevant text extract is as follows (*proposed MA in red*):

- *“No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until OP7 is fully developed and any community facilities provided therein are available for community use”²*

We ask that the LPF provide an appropriate and flexible framework to facilitate the timely delivery of housing. It is considered that the proposed text is disproportionate, and overly onerous. Its implementation would likely lead to avoidable delays in the delivery of urgently needed housing in the area.

Our client fully recognises the need for the provision of community facilities, and is committed to delivering the community facilities in parallel with the residential units, as demonstrated under planning application Reg. Ref.: 25/60623 which includes commercial / community floorspace of c. 241 sq.m, located at ground level of the 3 storey block (Block A) fronting the western side of Main Street, and the proposed new public open space / town plaza.

However, we respectfully submit that the above text is unnecessarily restrictive and that the Draft LPF should incorporate greater flexibility in the phasing approach within the proposed SLO5 lands, to facilitate timely and efficient housing delivery, and that the provision of housing should not be contingent upon the prior delivery of community infrastructure.

² Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 30

In this context we highlight that the required water, wastewater and electricity infrastructure may not be in place to support community facilities at the early stages of development, due to delays with Uisce Éireann (Irish Water) and ESB Networks being unable to provide timely connections, and even when housing units are completed, activation of utility services can be delayed, making early delivery of community facilities unfeasible.

In addition, the commercial reality is that community facilities typically do not generate revenue in the short term, making them financially unviable to deliver before housing sales begin. Typically, early housing sales are relied upon to fund later phases, including community infrastructure. Thus, requiring upfront delivery of community facilities would impact the overall project viability, especially where an end user / users have not been secured for the community facilities.

While the importance of delivering appropriate community facilities to support the scale of development envisaged under SLO5 is fully acknowledged, requiring their provision in advance of urgently needed housing is considered unrealistic and unduly restrictive.

It is therefore respectfully submitted that the Proposed Material Amendment outlined above be omitted from the text of SLO5. This will ensure that the Draft LPF 2025 reflects a more realistic and deliverable phased approach where the provision of housing facilitates both the funding and the demand necessary to support community infrastructure.

Proposed phasing strategy and scale of proposed community facilities

Our client has also raised significant concerns in relation to the proposed amendment of the SLO5 text which introduces new requirements in respect of the phasing of the childcare facility and community facilities, and includes a requirement for an excessively large community building. The relevant text extract is as follows (*proposed MA in red*):

- “Community facilities shall be provided within the SLO area *in the first phase of development* to meet the needs of the new resident community of the area. In particular, the development shall include at a minimum a childcare facility *and a community building of c. 600sqm*; in determining additional requirements for community facilities, a community services audit shall be carried out.”³

The concerns in respect to the proposed MA above relate to phasing of childcare and community facilities, and the proposed size of the community building. These are addressed in turn below. Again we ask that the LPF provide for a flexible framework to facilitate the Phase 1 proposal currently under consideration by Wicklow County Council under Reg. Ref.: 25/60623 which along, with the overarching masterplan for the land, has been subject of extensive consultation with the Planning Authority, and reflects the Section 28 Guidelines, the CDP development management standards, and has regard to the site's planning history, topography, and site context.

It is considered that the proposed text introduced in respect of the phasing of the childcare facility and community facilities could be interpreted as requiring both the childcare facility and the community facilities in Phase 1. This approach to delivery of childcare facilities would not align with the current approach proposed under Reg. Ref.: 25/60623, which was the subject of extensive consultation with the Planning Authority prior to the submission of the current planning application.

As outlined above, our client fully recognises the need for the provision of community facilities, we highlight that the current proposal provides for the delivery of key community facilities in

³ Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 30

Phase 1, with a childcare facility scheduled for Phase 2. This phased approach ensures that an appropriate level of community infrastructure is delivered alongside the initial 99 residential units. Taking viability into account, the childcare facility is planned for Phase 2, when a sufficient population base will exist to support its operation.

In the context of the above, we note that the estimated childcare demand arising from the current Phase 1 scheme under Reg. Ref.: 25/60623 is approximately 32 children—comprising 9 aged 0–4 and 23 aged 5–14 (based on a total of 99 residential units, including 4 one-bed, 24 two-bed, 53 three-bed, and 18 four-bed units). This level of demand is insufficient to support a viable standalone childcare facility at this stage.

Moreover, national data indicates that not all children avail of formal childcare services. According to Census 2022, fewer than one in three children under the age of 15 were in childcare nationally, with a significant proportion cared for by unpaid relatives or family members. Specifically in Wicklow, Census 2022 Profile 3 – Households, Families and Childcare – confirms that only 31% of children in the county were in childcare, aligning with the national average. Of those, just 39% attended a crèche, Montessori, playgroup, or after-school service, while over 25% were cared for by unpaid relatives and a further 16% by childminders operating from their own homes.

These figures reinforce the position that the demand generated by Phase 1 would not justify the early delivery of a childcare facility, and that its provision is more appropriately aligned with later phases, when a sufficient population base exists to support its viability.

The second concern in respect of the proposed MA above relates to the size of the community facility. It is considered that a community facility of 600 sq.m would be excessive having regard to demand and feasibility.

The scale of the community building proposed under MA No. 20 of the Draft LPF is disproportionate having regard to likely demand based on existing and future population and typical usage patterns.

In this context we note WCC's Wicklow Town-Rathnew LAP 2025 'Social Infrastructure Audit' recommends the following:

“Social infrastructure standards, as included within this policy document, include the following: 1.1 ‘The Council will ensure where possible that proper provision of sport and recreation facilities is provided as part of new developments. As a guideline, the Council will in future aim to make provision for an average of 200m² multi-use community space per 1000 population, or where an identified need exists, which includes provision for sports and recreation activity.’

Given that large buildings require significant energy and maintenance which may not be justified by initial usage levels, the provision of an oversized community facility would likely lead to operational inefficiencies and financial strain, whereas an appropriately sized, more flexible facility can meet immediate needs. In this regard we note the scale of existing community facilities in the surrounding area are typically significantly below 600 sq.m, demonstrating a precedent for more modest provision, as follows:

- Kilcoole GAA Club House – c. 400 sq.m;
- Kilcoole Community Centre – c. 300 sq.m;
- St. Patrick's Hall – c. 300 sq.m;
- Kilcoole Scout Den – c. 180 sq.m

Furthermore, experience from other similar developments indicates that large community buildings are often underused in early years, and that smaller, multi-purpose spaces tend to be more effective and adaptable, serving a broader range of community needs without excessive overhead.

Furthermore, we note that the National Planning Framework- First Revision (April 2025) encourages infrastructure delivery that is proportionate, demand-led, and supports compact growth, highlighting that planning affords an opportunity to facilitate and deliver a more socially inclusive society through better integration and greater accessibility at all stages of the life cycle, noting co-location of community facilities and uses to ensure communities are active during the day and into the evening. A rigid requirement for large-scale facilities may conflict with these principles and undermine broader planning objectives.

As outlined above, planning application Reg. Ref.: 25/60623 includes commercial / community floorspace of c. 241 sq.m, located at ground level of the 3 storey block (Block A) fronting the western side of Main Street, and the proposed new public open space / town plaza.

It is submitted that the scale of the proposed commercial/community space represents a realistic and proportionate response to the anticipated population of the area. This approach supports sustainable development by avoiding underutilised infrastructure and promoting efficient use of land and resources. In contrast, the scale of facility envisaged in the Draft LPF is considered excessive and unduly onerous and the proposed text should be removed from SLO5.

Furthermore, it is considered that introducing consistent, activity-generating uses, such as hospitality and retail uses, would to create vibrancy around the plaza, and thus would be more appropriate within this part of Kilcoole having regard to site context and existing and emerging adjoining uses. A dedicated community space could be delivered in later development phases, ideally positioned adjacent to the childcare facility proposed in Phase 2, to benefit from the clustering of complementary uses and shared car parking provision.

It is therefore respectfully submitted that the new requirements in respect of the phasing of the childcare facility and community facilities proposed under Proposed Material Amendment No. 20, specifically the reference to a specific floor area for community facilities (in sq.m) be omitted from the text of SLO5, or be reduced from 600 sq.m to c. 200 sq.m, or that it be clarified that the 600 sq.m of community facilities referred to includes both the childcare facility and the community facilities building.

Layout and scale of proposed open space

Finally, our client is very concerned that the onerous requirements under SLO 5 as it relates to open space provision is not proposed to be altered under Proposed MA No. 20. The relevant text extract is as follows:

“Open space shall be provided with each phase of development as follows:

- An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.*
- A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc.*
- A minimum of 0.15ha per 100 houses for casual recreation space, parks etc.*
- A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.*
- 500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc.*

- *The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.*⁴

Our client's concerns in respect to the above are outlined in detail in our submission to the Draft LPF in June 2025, and are not repeated here. However, in summary a review of SLO5 by the design team (including Darmody Architects, Studio Glasu Landscape Architects, and 2HQ Engineers), raised concerns in respect to the cumulative impact of the requirements of SLO5 as it relates to open space provision.

In particular, the Studio Glasu Landscape review assessed the feasibility of providing fully serviced playing pitches within the public open space in accordance with the Draft LPF objectives under SLO5. The study revealed that, due to the site's steep topography and the presence of the 25m riparian buffer zone along the southeast boundary, there is not enough flat areas within the lands to accommodate full-size, fully serviced pitches. The site's natural constraints, including steep topography and the ecological buffer, make it impractical to provide the required playing fields without compromising the environmental and spatial functionality of the developable lands.

The review concluded that the open space requirements set out for SLO 5 in the Draft LPF are overly aspirational. It also highlighted a critical oversight in the plan's preparation, namely, the absence of site-specific surveys or detailed landscape analysis to inform the feasibility of the proposed objectives.

Thus, this submission respectfully requests that SLO 5 Bullford be amended to provide for more flexibility as it relates to open space provision and to align more closely with the proposal under Reg. Ref.: 25/60623, including the current masterplan for the overall landholding, which includes large areas of open space and accommodates both active and casual recreation areas. Along with the linear pedestrian and cycle route which run parallel to the river, and the feature social seating areas for community engagement and gatherings, the public open space includes various active recreational areas such as teqball table, tennis table, outdoor fitness equipment, and formal playgrounds, and informal recreational spaces including open lawn areas for kickabout use and naturalized earth mounds for nature-based play.

Our client acknowledges and supports the need for community facilities and open space. However, it is respectfully submitted that the Planning Authority should be mindful of the substantial works and associated costs involved in delivering these provisions, including both initial construction and ongoing maintenance and repair obligations.

3.1.1 Summary of Submission Request No. 1- Proposed Material Alteration No. 20

Based on the above, to ensure the timely delivery of much needed housing units on the subject lands, this submission requests that Proposed Material Alteration No. 20 be amended to align with both the Phase 1 proposal currently under consideration by Wicklow County Council under Reg. Ref.: 25/60623 and the overarching masterplan for the lands as it relates to phasing, the provision of community facilities, and provision of open space noting that both the Phase 1 proposal and the masterplan have been the subject of extensive consultation with Wicklow County Council.

It is considered that the Draft LPF should incorporate greater flexibility in the phasing approach within the proposed SLO5 lands, to facilitate timely and efficient housing delivery, and that the

⁴ *Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 30*

provision of housing should not be contingent upon the prior delivery of community infrastructure.

Furthermore, the scale of the community facility envisaged in the Draft LPF is considered excessive, unjustified and disproportionate having regard to likely demand based on existing and future population and typical usage patterns.

Finally, it is considered that the open space requirements under SLO 5 are overly aspirational and have not had regard to the natural constraints on the lands, including steep topography and the ecological buffer, which make it impractical to provide the required playing fields without compromising the environmental and spatial functionality of the developable lands.

Thus, this submission respectfully requests that the text proposed under MA No. 20 should be removed from SLO5, and also that the text be further altered to provide for flexibility, particularly in respect to the provision of open space as set out in the text box below (MA-proposed text in **red** and text to be deleted in **blue** with a strikethrough, Submission request-proposed text in **green** and text to be deleted in **purple** with a strikethrough):

SUMMARY OF SUBMISSION REQUEST NO. 1

“Amend SLO5 text as follows:

SLO 5 – Bullford

*These SLO lands are located west of Kilcoole Main Street and measure c. 10ha and are zoned for ‘TC – Town Centre’, ‘RN1 – New Residential Priority 1’, ‘RN2 – New Residential Priority 2’ and ‘OS2 – Natural Areas’. This area may be developed for a mix of uses including residential, community, commercial, retail / retail services and open space, **generally** in accordance with the following requirements:*

- *The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre, adjoining residential areas and existing transport services.*
- *These lands shall be accessed only via Main Street at the Main Street – Sea Road junction, which shall be redesigned as a crossroads with traffic lights. Land measuring c. 0.6ha immediately west of this new junction shall be developed in accordance with the criteria set out in this LPF as ‘Opportunity Site 7’.*
- ~~*No dwelling units that may be permitted on foot of the RN1 zoning may be occupied until OP7 is fully developed and any community facilities provided therein are available for community use.*~~
- *A total area of c. 7.5ha is zoned for new housing development which shall be divided into a least two distinct character areas ~~/ estates either side of a central green area~~, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.*
- *Community facilities shall be provided within the SLO area ~~in the first phase of development as and when required~~ to meet the needs of the new resident community of the area. In particular, the development shall include at a minimum a childcare facility **and an appropriate size community building determined by a***

Community Services Audit of c. 600sqm; in determining additional requirements for community facilities, a community services audit shall be carried out.

- Open space shall **generally** be provided ~~with each phase of development~~ as follows:
 - An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.
 - ~~— A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc.~~
 - A minimum of 0.15ha per 100 houses for casual recreation space, parks etc.
 - A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
 - 500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc.
 - The ~~majority of the required~~ open space as detailed above shall ~~be provided in the form of 1 or 2 highly accessible large parks that~~ provide for both active and casual recreation that ~~and~~ include playgrounds, ~~and MUGAs and playing pitches / courts~~ which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary ~~and service / management buildings."~~

3.2 PROPOSED MATERIAL ALTERATION NO. 3- OP7 KILCOOLE CENTRE

Our client is very concerned with Proposed MA No. 3, which relates to proposed opportunity site OP7 Kilcoole Centre, which introduces a requirement for the proposed public park / plaza within the OP7 lands be a minimum of 1,600 sq.m.

The relevant extract from Proposed MA No. 3 reads as follows (*proposed MA in red*):

"Objectives GDK OP7

- To support the development and delivery of a comprehensive project for this area, which provides for the reconfiguration of this junction to remove the staggered junction and provides for access to the lands to the west, and which delivers significant public realm improvements such that pedestrian / cyclist and public transport uses are prioritised, and the creation of a public park / plaza **of at least 1,600sqm** in this area."⁵

It is respectfully submitted that the scale of plaza proposed (1,600 sq.m) is excessive having regard to the surrounding context of Kilcoole Main Street, and that Kilcoole Town does not warrant a public plaza of the size outlined in the draft LPF. Public plazas should be proportionate to the population it serves and existing context.

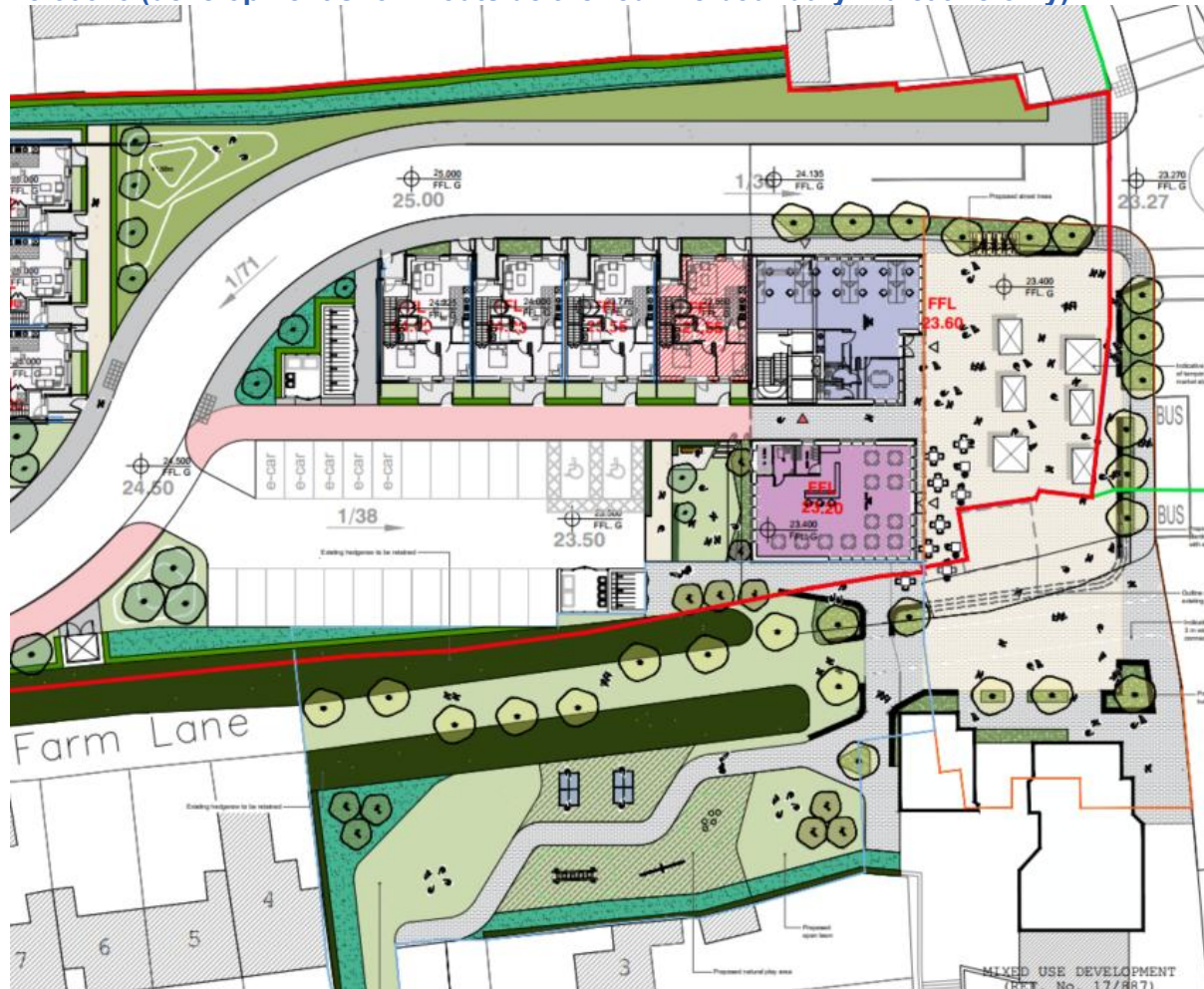
Our client fully acknowledges Wicklow County Council's strategy for the regeneration of Main Street, which includes the provision of a public plaza. This is reflected in planning application Reg. Ref.: 25/60623 which provides for the new town square / plaza area of c. 977 sq.m (including 385 sq.m within the application red line boundary) at the location indicated in the 'AP9: Bullford Action Plan', under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 (2013 LAP), which is consistent with that indicated in the Draft LPF. Based on the above,

Under the proposal under planning application Reg. Ref.: 25/60623, the proposed plaza will serve as a focal point for Phase 1 of the development and the wider community. The design

⁵ Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 7

allows for future expansion of the plaza through the closure of Farm Lane, and connectivity to existing plaza at The Brook development to the south by the Local Authority, as demonstrated in Figure 3.2.

Figure 3.2: Indicative Town Square / Plaza fronting Main Street proposed under Ref.: 25/60623 (development shown outside the red line boundary indicative only)



Source: Studio Glasu

Including the town square / plaza within proposed under the current application, the area at the existing 'The Brook' plaza, Monteith Park green space and the section of Farm Lane proposed to be closed providing for a new park (of c. 1,325 sq.m), the total area of town square and public park is c. 2,302 sq.m.

It is therefore respectfully submitted that the specific area of the proposed plaza set out under Proposed Material Amendment No.3 (1,600 sq.m) be omitted from the text of Objectives GDK OP7, that the text be amended to confirm that removal of staggered junction means the closure of Farm Lane to Main St and that the 1,600 sq.m area includes all improvements to the public realm including the area at the existing 'The Brook' plaza, Monteith Park green space and the closed section of Farm Lane.

The scale of the proposed plaza has been carefully considered to ensure appropriate integration with the surrounding built form and streetscape. It is designed to be functional, activated by adjacent uses, and deliverable at an early stage of development. Importantly, it represents a more sustainable and viable solution in terms of long-term maintenance and management, compared to the larger plaza envisaged in the draft LPF.

Best practice in placemaking supports the creation of flexible, multi-functional public spaces rather than large, underutilised areas. This is particularly relevant in the context of the current proposal, which already includes generous provision of open space, green corridors, and play areas in close proximity, ensuring a balanced mix of amenities that better reflect the needs of the emerging community.

It is therefore respectfully submitted that the specific area of the proposed plaza set out under Proposed Material Amendment No.3 (1,600 sq.m) be omitted from the text of Objectives GDK OP7, that the text be amended to confirm that removal of staggered junction means the closure of Farm Lane to Main St and that the 1,600 sq.m area includes all improvements to the public realm including the area at the existing 'The Brook' plaza, Monteith Park green space and the closed section of Farm Lane.

3.2.1 Summary of Submission Request No. 2- Proposed Material Alteration No. 3

Based on the above, to ensure the delivery of an appropriately sized town square / plaza within the proposed OP7 lands, this submission requests that Proposed Material Alteration No. 3 be amended to align with both the Phase 1 proposal currently under consideration by Wicklow County Council under Reg. Ref.: 25/60623 and the overarching masterplan for the lands as it relates to the provision of a town square / plaza fronting Main Street.

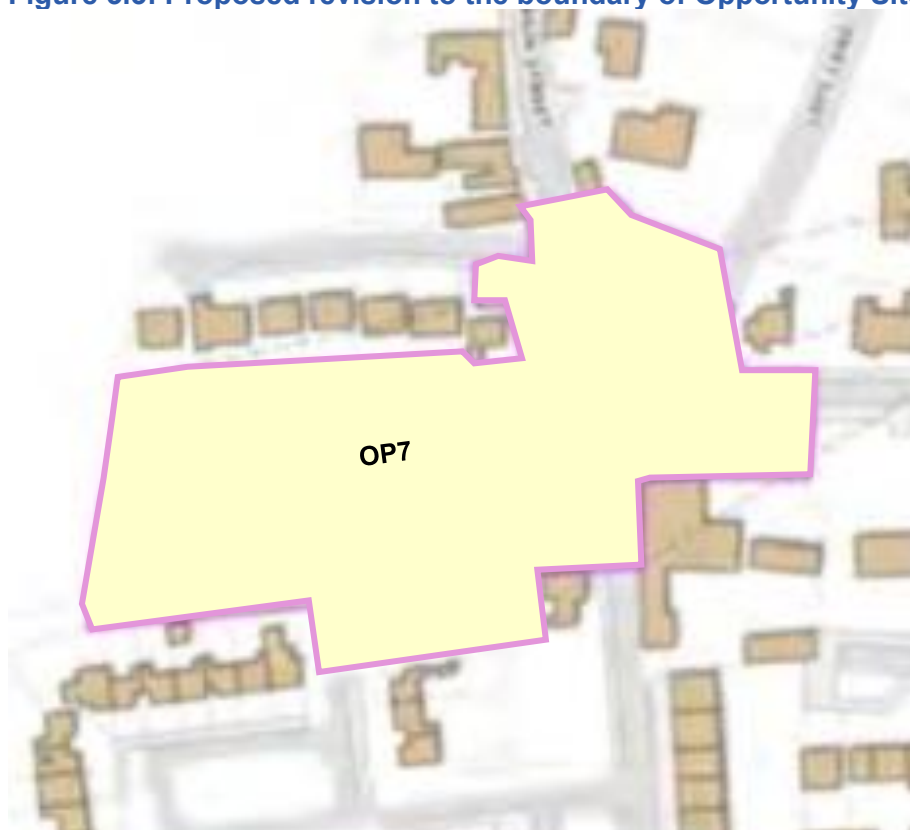
It is respectfully submitted that the proposed inclusion of a specific area (1,600 sq.m) from the text of OP7 should be removed, so that the Draft LPF is aligned with the current proposal as it relates to the provision of a plaza. It is considered that the current proposal is appropriate having regard to the surrounding built form and streetscape and future use and maintenance. In this regard the proposed design provides for a flexible multi-functional space at an appropriate scale, which is overlooked by residential and commercial / community floorspace, connected to the proposed adjoining open space to the west.

It is therefore respectfully submitted that the specific area of the proposed plaza set out under Proposed Material Amendment No.3 (1,600 sq.m) be omitted from the text of Objectives GDK OP7. We also ask that the text be amended to confirm that removal of staggered junction means the closure of Farm Lane to Main Street.

If the above is not acceptable to the Planning Authority, we ask that at a minimum the text of OP7 confirm that the 1,600 sq.m plaza area relates to the total area of the plaza provided when all improvements to the public realm, the area at the existing 'The Brook' plaza, Monteith Park green space, and the section of Farm Lane to be closed, are included.

In the above context it is suggested that the boundary of OP7 be increased southwards, as set out in Figure 3.3 below.

Figure 3.3: Proposed revision to the boundary of Opportunity Site 7- Kilcoole Centre



Source: Proposed Material Alterations To Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) (extract) with JSA overlay

In addition to the above, this submission also requests that the Draft LPF incorporate greater flexibility overall in respect to the development of OP7, given that the lands are appropriately located, serviceable, and sequential to existing development, and proposes a minor alteration of the text of GDK7 to provide for same.

The requested amendments to MA No. 3 are set out in the text box below, followed by the suggested alteration of the text of GDK7 (*MA- proposed text in red and text to be deleted in blue with a strikethrough, Submission request- proposed text in green and text to be deleted in purple with a strikethrough*):

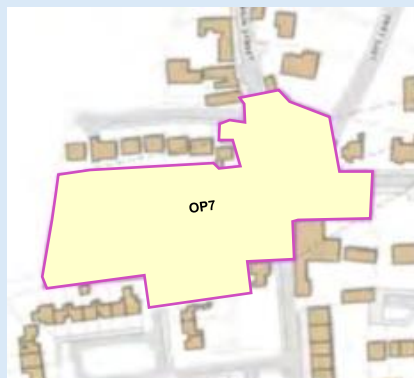
SUMMARY OF SUBMISSION REQUEST NO. 2

Amend boundary of OP7 as follows:

Change from:



Change to:



*“Amend Opportunity Site **OP7 Kilcoole Centre** as follows:*

Objectives GDK OP7

(Option 1)

- *To support the development and delivery of a comprehensive project for this area, which provides for the reconfiguration of this junction to remove the staggered junction and provides for access to the lands to the west, and which delivers significant public realm improvements such that pedestrian / cyclist and public transport uses are prioritised, and the creation of a public park / plaza **of at least 1,600sqm** in this area;*

(Or Option 2)

- *To support the development and delivery of a comprehensive project for this area, which provides for the reconfiguration of this junction to remove the staggered junction, **the closure of Farm Lane** and provides for access to the lands to the west, and which delivers significant public realm improvements such that pedestrian / cyclist and public transport uses are prioritised, and the creation of a public park / plaza of at least 1,600sqm in this area, **when all improvements to the public realm, the area at the existing 'The Brook' plaza, Monteith Park green space and the closed section of Farm Lane are included.***
- *To support the development of sites for mixed use development including commercial, retail, retail services, residential, community and cultural uses;*
- *Higher density development that makes the best use of this serviced urban land, will be expected;*
- *High quality frontage onto all streets will be required, that provides for passive supervision and connectivity to the street.*
- *Access to lands on the west side of the Main Street shall make provision to service future development lands to the west (zoned RN2).*
- *Any development to the west of the Main Street in the OP shall make provision for a town centre public car park of a size to be determined in consultation with the Local Authority.”*

GDK7

*“To promote Kilcoole town centre as the priority location within the settlement of Kilcoole (above edge of centre or peripheral location, even where zoned) for new residential, retail / retail services, community, cultural and employment development, through the development of vacant or underutilised sites and via the reconfiguration / redevelopment of existing low density development, while at all times respecting the character and heritage of the town centre. In particular, to support the development of opportunity sites **generally** in accordance with the specific criteria set out for each identified area within this LPF.*

3.3 PROPOSED MATERIAL ALTERATION NO. 23A– AMEND MAP NO. 1 LAND USE ZONING AND ADD NEW SPECIFIC LOCAL OBJECTIVE: SLO 9-DARRAGHVILLE

Proposed MA No. 23A introduces a new SLO (proposed SLO 9 – Darraghville) on lands immediately contiguous to the northern portion of our client’s lands which were designated as SLB under the 2013 LAP.

Before turning to Proposed MA No. 23A, we note Proposed MA No. 18 relates to proposed amendments to the introductory text relating to the Specific Local Objectives (SLOs). MA No. 18 proposes the inclusion of additional text requiring masterplans and individual applications within SLOs to show the proposed overall roads and infrastructure layout for the entire SLO area. The relevant text extract is as follows (*proposed MA in red*):

“Amend **INTRODUCTION** as follows:

“In particular, both masterplans and individual applications within SLOs shall show the proposed overall roads and infrastructure layout for the entire SLO area to ensure that all land parcels within the SLO are serviceable and no development prejudices or unduly constrains the development on another parcel.”⁶

Proposed MA No. 23A proposes that the zoning objective of c. 8 ha. of lands located outside the settlement / Draft LPF boundary immediately north of our client’s lands at Bullford (identified in the draft LPF 2025 as “SLO 9 – Darraghville”) be amended to unzoned to the RN1 ‘New Residential – Priority 1’.

Proposed MA No. 23A reads as follows and includes the map extracts at Figure 3.4.

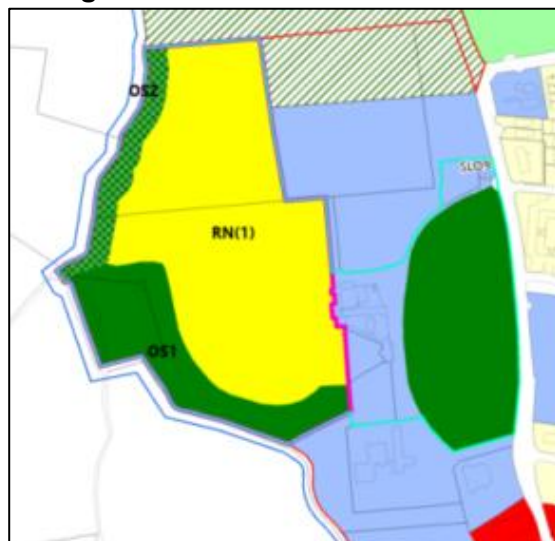
“Amend zoning of land at Kilcoole measuring c. 8ha from unzoned outside the settlement/LPF boundary to RN1 ‘New Residential – Priority 1’ (c. 5.69ha), OS1 ‘Open Space (c. 1.7ha) and OS2 ‘Natural Areas’ (c. 0.6ha).”⁷

Figure 3.4: Proposed MA No. 23A

Change from:



Change to:



Source: Proposed Material Alterations To Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) (extract)

⁶ Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 25

⁷ Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 35

The proposed new SLO and the associated RN1 designation will support the delivery of much needed housing in the Kilcoole area.

Consideration of previous SLB lands under the 2013 LAP

While our client supports Propose MA No. 23A, our client is concerned that the evolving planning framework under MA No. 23A has failed to consider the future development of the adjoining lands to the south.

In this regard, MA No. 23A introduces a new SLO (proposed SLO 9 – Darraghville) on lands immediately contiguous to the northern portion of our client's lands which were designated as SLB under the 2013 LAP, this submission respectfully requests that the Draft LPF make provision for southward connections from the proposed SLO 9, however the text of SLO 23A makes no reference to future coordination with the lands to the south.

It is submitted that the Draft LPF should consider future development of proposed SLO 9– Darraghville in the context of the previous SLB lands under the 2013 LAP, and SLO 5- Bulford and provide for connections which would facilitate integration with the former SLB lands. This would provide for the future residential development on the SLB lands, and ensure that the coordinated development of the sequential lands to the west of Main Street.

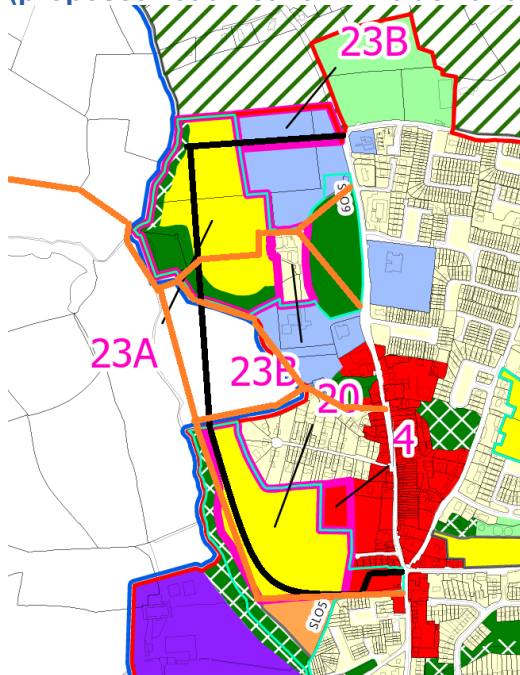
The SLB designation under the 2013 LAP was originally intended to facilitate long-term residential development, subject to appropriate infrastructure and sequential planning. The introduction of proposed SLO 9 in the Draft LPF represents a significant opportunity to activate and coordinate development across the sequential lands to the west of Kilcoole Main Street.

In this context, the provision of southward connections from SLO 9 is essential to ensure permeability and connectivity between the newly designated SLO lands and the previous SLB lands, facilitate integrated infrastructure delivery, including roads, and utilities, and promote a cohesive urban form, thereby avoiding fragmented development and ensuring that future residential areas are well-connected to Main Street and surrounding amenities, in accordance with the principles of sustainable and compact development.

As outlined above, Proposed MA No. 18 introduces additional text requiring that masterplans and individual planning applications within SLOs demonstrate the proposed overall layout of roads and infrastructure across the entire SLO area. This requirement highlights the importance of ensuring that development on any one parcel does not prejudice or unduly constrain the future development potential of adjoining lands.

Thus, it is respectfully submitted that the Draft LPF should include specific text SLO 9 demonstrating future connections to the adjoining lands to the south (previous SLB lands under the 2013 LAP) and onwards to SLO 5, thereby enabling the coordinated and sustainable development of the wider area in line with national and local planning policy objectives. Suggested indicative locations for the wider connections are shown on the extract from Proposed MA No. 23 at Figure 3.5 below.

Figure 3.5: Suggested indicative connections from proposed SLO 9 – Darraghville (proposed road network in black and pedestrian/ cycle network in orange)



Source: Proposed Material Alterations To Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) (extract) with JSA overlay

3.3.1 Summary of Submission Request No. 3- Proposed Material Alteration No. 23A

Based on the above, to ensure the coordinated delivery of residential development across the sequential lands to the west of Kilcoole Main Street, this submission requests that Proposed Material Alteration No. 23A be amended to provide for connections southward from proposed SLO 9 to the previous SLB lands, and SLO 5.

The requested amendments to MA No. 23A are set out in the text box below (*MA- proposed text in red and text to be deleted in blue with a strikethrough, Submission request- proposed text in green and text to be deleted in purple with a strikethrough*):

SUMMARY OF SUBMISSION REQUEST NO. 3

“Add new text for SLO9 as follows:

SLO 9 – Darraghville

This SLO is located in the townland of Kilcoole and measures c. 11.8ha. This SLO is comprised of:

- c. 4.6ha zoned RN1 ‘New Residential – Priority 1’.*
- c. 5.5ha zoned OS1 ‘Open Space’.*
- c. 0.6ha zoned OS2 ‘Natural Areas’.*
- c. 1ha zoned RE ‘Existing Residential’.*
- c. 0.2ha zoned CE ‘Community & Education’.*

Any development proposal shall comply with the County Development Plan, this Local Planning Framework and the following:

- Vehicular Access to this SLO shall be via the under construction roadway servicing the future location of St. Catherine’s School. This vehicular access*

*should serve new residential development in the SLO area and existing agricultural uses to the north. **Pedestrian, cycling & vehicular connections to the adjoining lands to the south should be provided.***

- *Primary pedestrian and cyclist **only** access shall be provided from Kilcoole Main Street/R761 through lands zoned OS1 'Open Space' to the east of Darraghville House, leading past the house through lands zoned RN1 'New Residential – Priority 1' and connecting to the mass path, alongside a range of other pedestrian and cyclist routes through the lands."*

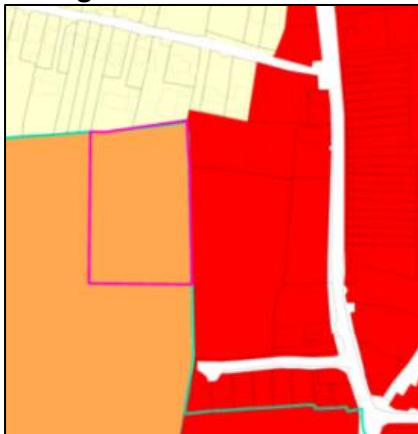
3.4 PROPOSED MATERIAL ALTERATION NO. 4- OP8 KILCOOLE WEST

Our client welcomes Proposed Material Alteration (MA) No. 4, which increases the area of proposed OP8 Kilcoole West – 'The Molly's' to provide for additional TC (Town Centre) zoned lands. Proposed MA No. 4 reads as follows and includes the map extracts at Figure 3.6 and Figure 3.7.

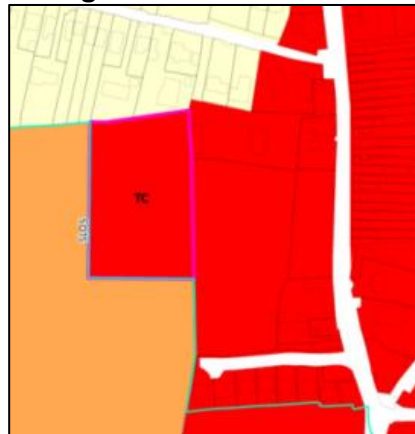
*"Amend zoning of land measuring c. 0.65ha from RN2 'New Residential Priority 2' to TC 'Town Centre'."*⁸

Figure 3.6: Proposed MA No. 4

Change from:



Change to:



Source: Proposed Material Alterations To Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) (extract)

Figure 3.7: Proposed MA No. 4

Change from:



Change to:



Source: Proposed Material Alterations To Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) (extract)

⁸ *Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 8*

The proposed increase in the TC designation will provide for higher density mixed-use development in an accessible location within Kilcoole Town Centre, which will benefit from the established transport, services and infrastructure, and contribute to the creation of a viable, vibrant, and compact urban neighbourhood.

Proposed restriction on standalone retail or residential blocks within TC-zoned lands

However, our client is seriously concerned with the overly prescriptive and onerous nature of the proposed amendment of Objectives GDK OP8 as it relates to development within the TC lands, which introduces new restrictions precluding standalone retail or residential blocks, as follows (*proposed MA text in red*).

“Objectives GDK OP8

- *To support the development of these lands for mixed use development including commercial, retail, retail services, residential, community and cultural uses; in this regard, a ‘single’ use e.g. retail only or residential only will not be permitted and any commercial uses shall be accompanied by both residential and community / cultural uses;*
- *Higher density development with no or limited car parking, that makes the best use of this serviced urban land, will be ~~expected~~ required on these lands. In particular, any ground level commercial or retail development proposed shall include upper floors of residential use.”⁹*

It is considered that the proposed text is unnecessary, overly prescriptive and onerous. Its implementation would significantly constrain the development potential of the TC-zoned lands and is likely to result in avoidable delays in delivering urgently needed housing and supporting retail and community infrastructure within the proposed TC zoned lands.

Our client fully recognises the need for the provision of residential development in tandem with retail and other uses within the TC zoned lands, as demonstrated in the planning application for a mixed use development under Reg. Ref.: 24/60545, which is currently the subject of an appeal to An Coimisiún Pleanála under ACP Ref. No.: L27.323073, and which includes a discount foodstore (Lidl), a café and residential units.

It is considered that imposing a blanket restriction that precludes retail only or residential only blocks would increase development complexity and cost, potentially undermining overall project viability. Also, it is submitted that the proposed text fails to consider potential conflicts between commercial activity and residential amenity (such as noise, odours, and operational impacts) noting that some degree of separation between uses would provide for better residential amenity for future residents.

Furthermore, it is considered that the Draft LPF text, as originally proposed, provides a balanced and appropriate framework for the development of TC zoned lands and should be retained in its original format

It is therefore respectfully submitted that the Proposed Material Amendment outlined above be omitted from the Draft LPF. This will ensure that the Draft LPF 2025 provides for the development of the TC zoned lands for mixed use development that is viable and deliverable.

Should the requirement for residential use above all ground level commercial or retail development be retained in the Draft LPF, this submission requests that the Draft LPF provide for a more viable development format within the TC zoned lands, including a building height

⁹ *Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 9*

range of up to 6 storeys, which would accommodate both the requirements of a foodstore operator in terms of building height and the requirement for residential accommodation overhead.

Proposed additional requirements for outdoor spaces and a furnished pocket park

Our client has also raised significant concerns in relation to the introduction of additional requirements requiring the inclusion of additional outdoor community spaces, including a furnished pocket park, as follows (MA- proposed text in red and text to be deleted in blue with a strikethrough, Submission request- proposed text in green and text to be deleted in purple with a strikethrough):

“High quality frontage onto all streets and open spaces will be required, that provides for passive supervision and connectivity to the street. Any development of these lands shall include the development of an outdoor community meeting space / pocket park and the highest quality and design, including appropriate park furniture and seating.”¹⁰

It is considered that the above proposed text under MA No. 4 is again overly onerous and disproportionate. Its implementation would likely result in unnecessary additional costs, both in terms of construction and long-term maintenance, and through the reduction in achievable density on the TC zoned lands. It is submitted that the proposed introduction of additional outdoor space / pocket park would reduce achievable residential density, and would be inefficient use of serviced TC zoned lands, contrary to the principles of compact growth and efficient land use.

The TC-zoned lands represent a strategically important location for delivering mixed-use development and urgently needed housing. Imposing prescriptive design requirements that compromise density and increase costs risks delaying delivery and diminishing the overall sustainability of the town centre. Such measures would also lead to inefficient use of serviced lands.

In this context, we respectfully submit that the Draft LPF text, as originally proposed, provides a balanced and appropriate framework for guiding development within the TC zoned lands. Retaining the original wording will ensure flexibility, promote viability, and support the timely delivery of housing and supporting infrastructure in accordance with national and local policy objectives.

It is therefore respectfully submitted that the Proposed Material Amendment outlined above be omitted from the Draft LPF. This will ensure that the Draft LPF 2025 provides for the development of the TC zoned lands for mixed use development that is viable and deliverable.

Omission of car parking

Our client has also raised significant concerns in relation to the restrictions on car parking within OP8, as follows (MA- proposed text in red and text to be deleted in blue with a strikethrough, Submission request- proposed text in green and text to be deleted in purple with a strikethrough):

“Higher density development with no or limited car parking, that makes the best use of this serviced urban land, will be expected required on these lands.”

Having regard to Kilcoole’s designation as a Level 4 settlement (‘self-sustaining town’) within the County settlement hierarchy, it is considered that the above text should be amended to

¹⁰ Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 9

provide for car parking adjacent to retail uses. The majority of residents and visitors rely on private vehicles for access to shops, services, and community facilities. In the absence of adequate public parking provision, there is a significant risk to the viability of the town centre retail uses. Accordingly, the inclusion of a public car park within the development framework is essential to support the functionality and vitality of Kilcoole, ensuring that future growth aligns with the practical needs of the community and the objectives of sustainable town centre development.

3.4.1 Summary of Submission Request No. 4- Proposed Material Alteration No. 4

Based on the above, to ensure the Draft LPF text provides a balanced and appropriate framework for guiding development within the TC zoned lands, this submission requests that Proposed MA No. 4 be removed, and that the text of Objectives GDK OP8 revert to the original wording as set out under the Draft LPF, which it is considered provides a balanced and appropriate framework for guiding development within the TC zoned lands, and that the text be updated to provide for appropriate car parking adjacent to commercial uses.

The requested amendments to MA No. 2 are set out in the text box below (MA- proposed text in **red** and text to be deleted in **blue** with a strikethrough, Submission request- proposed text in **green** and text to be deleted in **purple** with a strikethrough):

SUMMARY OF SUBMISSION REQUEST NO. 4

“Amend written objectives as follows:

Objectives GDK OP8

- To support the development of these lands for mixed use development including commercial, retail, retail services, residential, community and cultural uses; ~~in this regard, a ‘single’ use e.g. retail only or residential only will not be permitted and any commercial uses shall be accompanied by both residential and community / cultural uses;~~
- Higher density development ~~with no or limited car parking,~~ that makes the best use of this serviced urban land, will be ~~expected~~ **required on these lands.** ~~In particular, any ground level commercial or retail development proposed shall include upper floors of residential use.~~
- High quality frontage onto all streets **and open spaces** will be required, that provides for passive supervision and connectivity to the street. ~~Any development of these lands shall include the development of an outdoor community meeting space / pocket park and the highest quality and design, including appropriate park furniture and seating;~~
- While access into these lands may be via a direct access onto Main Street (R761) any such access point shall not provide a through route to lands beyond this site, in particular lands to the west of this site.”¹¹

¹¹ Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 9

3.5 PROPOSED MATERIAL ALTERATION NO. 16- LOCAL TRANSPORT PLAN

MA No. 16 introduces a new requirement for a Local Transport Plan (LPT) for Greystones Delgany and Kilcoole. Proposed MA No. 16 reads as follows (*proposed MA text in red*):

“GDK XX

In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Greystones-Delgany and Kilcoole LPF and integrate its provisions into the LPF as appropriate.”¹²

Our client welcomes MA No. 16 as it relates to the preparation of a Local Transport Plan (LPT) for Kilcoole to guide future development within the boundary of the Draft LPF and ensure that essential roads infrastructure is delivered in a coordinated manner to serve the existing and future development within the Draft LPF area.

However, our client is concerned that development within the boundary of the Draft LPF could be delayed pending adoption of the LPF.

To unlock appropriately zoned lands and facilitate the delivery of much needed housing within the boundary of the Draft LPF, it is essential that planning applications are assessed on their merits in the interim period, and will not be considered premature pending the adoption of the LTP. Thus, this submission requests that the LPF confirm that planning applications within the Draft LPF boundary will not be considered premature pending the adoption of the LTP.

3.5.1 Summary of Submission Request No. 5- Proposed Material Alteration No. 16

Based on the above, to avoid delays in the delivery of much needed housing, this submission requests that Proposed MA No. 16 be updated to confirm that planning applications will be assessed on their merits in the period before the adoption of the Local Transport Plan for Greystones Delgany and Kilcoole.

The requested amendments to MA No. 2 are set out in the text box below (*MA- proposed text in red and text to be deleted in blue with a strikethrough, Submission request- proposed text in green and text to be deleted in purple with a strikethrough*):

SUMMARY OF SUBMISSION REQUEST NO. 5

“GDK XX

In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Greystones-Delgany and Kilcoole LPF and integrate its provisions into the LPF as appropriate.

In advance of the adoption of the Local Transport Plan (LTP), planning applications will be assessed on their merits, having regard to the overall objectives of the LPF, and development will not be considered premature pending agreement of the Greystones-Delgany and Kilcoole LTP.”

¹² Proposed Material Alterations to Proposed Variation No. 4 of the Wicklow CDP/ Draft LPF, pg. 23

3.6 OTHER MATTERS

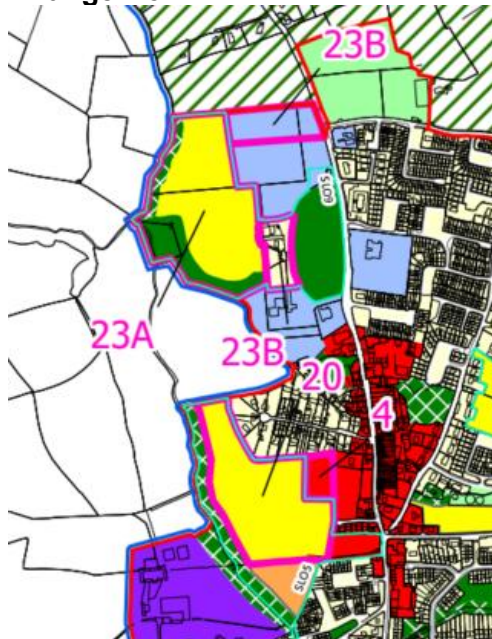
In addition to the above, while acknowledging that this matter may be outside the scope of the current stage of the consultation process, we ask that in planning for the future development of the County consider the potential of the northern portion of our client's lands to accommodate additional housing growth.

These lands (marked 'D' on the aerial photo at Figure 2.1) were designated as Strategic Land Bank (SLB) under the Greystones-Delgany and Kilcoole Local Area Plan 2013 – 2019 (2013 LAP), as demonstrated in the extract from the Map A of the 2013 LAP at Figure 2.4, and are immediately south of and contiguous to the lands designated under Proposed Material Alteration No. 23A as "SLO 9 – Darraghville" (marked 'E' on the aerial photo at Figure 2.1) and proposed as "RN1: New Residential- Priority 1" zoned lands, as demonstrated in the extract from the Draft Land Use Zoning Map at Figure 2.2.

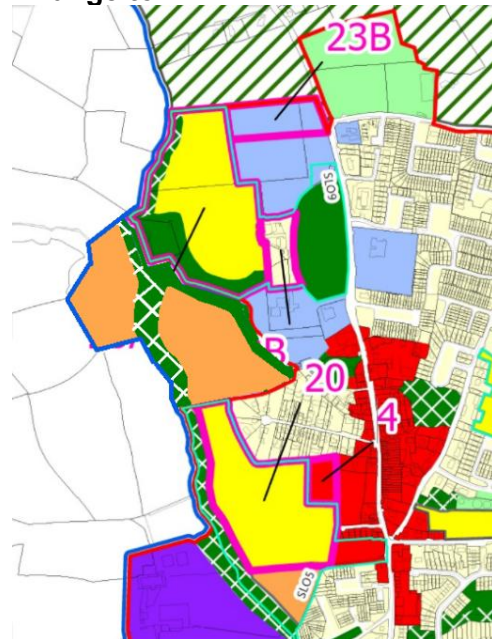
It is considered that the previous SLB lands could be included as new residential zoned lands, under the LPF, RN 1 or RN2 as demonstrated in Figure 3.8 below.

Figure 3.8: Proposed alteration of Map No. 1 - Proposed Altered Land Use Zoning Objectives

Change from:



Change to:



Source: Proposed Material Alterations To Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) (extract)

The above is particularly relevant in the current housing shortfall across the County and the urgent requirement to provide for residential development in sustainable locations, having regard to the Government's new housing plan "Delivering Homes, Building Communities, 2025-2030" which was published on the 13th November 2025, which aims to speed up the delivery of new homes and tackle homelessness. The plan targets the construction of 300,000 homes, including 72,000 social homes and 90,000 affordable housing supports, and encourages the private sector to play a key part in delivery.

The above reflects the NPF Implementation: Housing Growth Requirements Guidelines (July 2025), which follow from the Revised NPF April 2025, and which require planning for an average of approximately 55,000 new homes per annum nationally between 2025 and 2034.

As outlined above, under Appendix 1 of the NPF Implementation: Housing Growth Requirements (July 2025), Wicklow's annual housing target is revised from 745 no. units (under the 2020 Housing Supply Target) to 2,068 no. units for the period 2025–2034. Thus, there is a requirement to zone enough land across the County to cater for a minimum of c 23,473 no. homes over the next 13 year period i.e. the period covering the next Development Plan (2027-2033) and the lifespan of the new 10 year Development Plan period (10 years x 2,068, plus an additional 3 years at 931), increasing to c. 35,210 new homes when additional provision up to 50% is factored in (10 years x 2,068+ 50% headroom, plus an additional 3 years at 931 + 50% headroom).

The LPF represents an opportunity to proactively address housing shortage in the County, and thus it is considered that all available lands that can contribute to housing growth in the County in the short term should be considered.

3.6.1 Summary of Submission Request No. 6- Other Matters

Based on the above, while acknowledging that this matter may be outside the scope of the current stage of the consultation process, this submission requests that in planning for the future development of the County consider the potential of the northern portion of our client's lands to accommodate additional housing growth, noting that these lands were previously designated as SLB under the 2013 LAP and are contiguous to the proposed SLO 9 – Darraghville lands.

In the context of the and the urgent requirement to provide for residential development in sustainable locations, having regard to national policy, is considered that the LPF presents a significant opportunity to proactively address the housing challenge in the County, and in this context we highlight that these lands are available to contribute to housing growth

4.0 CONCLUSION

Our client, Brookhampton Limited, generally welcomes the Proposed Material Alterations to the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, and we take this opportunity to make a submission on the Proposed Material Alterations to the Draft LPF.

As has been set out above, the subject lands at Bullford, Kilcoole, present an important opportunity to deliver much-needed residential development and it is submitted that the new Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 should provide an appropriate and flexible planning framework for the delivery of same.

We respectfully request that the recommendations set out within this submission are considered when finalising the Proposed Material Alterations to the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 in relation to lands at Bullford, Kilcoole, Co. Wicklow.

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

Yours sincerely,



John Spain Associates

APPENDIX 1- RELEVANT PLANNING HISTORY

Subject Lands

WCC REG. REF.: 2560623

An application was submitted to WCC for a Phase 1 residential development of 99 no. residential units and 2 no. commercial / community units (for Class 1- Shop, Class 2- Office / Professional Services, or Class 10- Community Use or Restaurant / Café use) on the southern part of our client's lands at Bullford, Kilcoole, Co. Wicklow.

The proposed development was described as follows in the public notices submitted with the application:

"The development will consist of the construction of 99 no. residential units and 2 no. commercial / community units (for Class 1- Shop, Class 2- Office / Professional Services, or Class 10- Community Use or Restaurant / Café use). The 99 no. residential units will consist of 71 no. houses, 20 no. duplex apartments and 8 no. apartments, to be provided as follows:

- 6 no. 2-bed houses
- 59 no. 3-bed houses
- 6 no. 4-bed houses
- 10 no. 2-bed duplex apartments
- 10 no. 3-bed duplex apartments
- 4 no. 1-bed apartments
- 2 no. 2-bed apartments
- 2 no. 3-bed apartments

The 8 no. apartments are provided within 1 no. 3-storey apartment block (Block A). The 20 no. duplex apartments are provided in 2 no. 3-storey duplex apartment buildings (Block B and Block C) and comprise 2 storey duplex apartments over ground floor apartments. Balconies / private terraces are provided for all apartments / duplex apartments. The houses are 2 storeys in height. The commercial / community units are located at the ground floor of Block A with associated signage zones.

A total of 179 no. car parking spaces are proposed. The development includes 104 no. cycle parking spaces (72 no. long term and 32 no. short term visitor spaces) for the apartments, duplex apartments and commercial / community units. Bin and bicycle storage areas are located within the ground floor of the apartment block, and external bin and bicycle stores are proposed for the duplex apartments and terraced houses. Bin and bicycle storage for the houses is provided on-curtilage.

The proposal includes all associated internal roads, pedestrian and cycle paths, site and infrastructural works including foul and surface water drainage, attenuation tanks, provision of public and communal open space, boundary treatment, lighting, landscaping, green roof and PV panels and plant areas at roof level.

The proposal includes a vehicular entrance from Main Street, Kilcoole, with the associated upgrades / improvements to Main Street to facilitate this access, which requires the carrying out of works on local authority lands, which are external to the application site boundary, and which will be carried out through agreement with the local authority."

This application is currently the subject of a Further Information Request which was issued by WCC on the 2nd October 2025. The FI request includes 11 no. items related to the previous LAP, Core Strategy numbers, housing typology, coordination with adjoining lands, childcare

provision, external finishes, impact on residential amenity, private amenity spaces, traffic and transport, bicycle and bin storage, and surface water.

WCC REG. REF.: 22/15 & ABP Ref.: 314721-22

An application was submitted to WCC for a Phase 1 residential development of 56 no. units on the 12th of January 2022, which was subject to a Further Information request and a Clarification of the Further Information request, but ultimately refused permission by WCC for two no. reasons on the 1st of September 2022. The decision was the subject of a first party appeal to An Bord Pleanála (ABP), and the Board upheld the Council's decision and refused permission under ABP 314724-22 on the 9th of February 2024 for 2 no. reasons, which related to density and unit mix (relating to the provision of primarily two-storey semi-detached houses and the suburban type layout), and junction and capacity assessment, respectively.

The proposed development was described as follows in the public notices submitted with the application:

"The development will consist of the construction of 56 no. residential units, internal roads, car parking, pedestrian and cycle paths, public open space and all associated site and infrastructural works to facilitate connections to public services.

The 56 no. residential units will consist of:

- 7 no. 4-bed 2 storey end-terrace houses (Type A)
- 24 no. 3-bed 2 storey end-terrace houses (Type C)
- 20 no. 3-bed 2 storey mid-terrace houses (Type D and D1)
- 2 no. 2-bed 2 storey mid-terrace houses (Type D2)
- 3 no. 2-bed bungalows (Type G)

The associated site and infrastructural works include foul and surface water drainage, attenuation tanks, car parking spaces, 4 no. bicycle shelters, bin storage, an ESB substation and all associated development. The proposal includes a vehicular entrance from Main Street, Kilcoole, with the associated upgrades / improvements to Main Street to facilitate this access, which are external to the planning application site boundary, to be provided subject to agreement with the Planning Authority."

Figure A.1.4.1: Extract of Site Layout Plan, as submitted at CFI stage, for the above application, with the overall masterplan context shown for information purposes



Source: Planning Application WCC Reg. Ref.: 22/15

WCC Reg. Ref.: 24/60545 – Lidl and Commercial and Residential Application

An application was submitted to WCC for a mixed use development including a Discount Foodstore Supermarket, a Café and 5 no. two bed two storey dwellings at Main Street, Kilcoole, Co. Wicklow on the 9th September 2024. The proposed development was described as follows in the public notices submitted with the application:

“The construction of a mixed use (Discount Foodstore Supermarket anchored) development. The proposed development consists of:

- 1) A single storey (with mezzanine plant deck) Discount Foodstore Supermarket with ancillary off-licence use measuring c. 2,512 sqm gross floor space with a net retail sales area of c. 1,495 sqm;*
- 2) A single storey Café unit measuring c. 100 sqm (with external seating area);*
- 3) A terrace of 5 no. two bed two storey dwellings;*
- 4) An access road from Main Street serving the proposed development and providing links for future development on adjoining lands; and,*
- 5) Associated car parking (including electric car charging facilities), cycle parking, free standing and building mounted signage, trolley bay cover / enclosure, refrigeration and air conditioning plant and equipment, roof mounted solar panels, hard and soft landscaping, boundary treatments, electricity sub-station building, works and connections to water supply, wastewater and surface water infrastructure and utilities, and all other associated and ancillary development and works above and below ground level.*

This application is currently the subject of an appeal to An Coimisiún Pleanála under ACP Ref. No.: L27.323073. A decision from ACP is due on the 20th November 2025.

WCC Reg. Ref.: 23/3 – Lidl and Commercial Application at Main Street, Kilcoole

An application was submitted to WCC in January 2023 for a Lidl retail store and 3 commercial / retail units on the eastern part of our client’s landholding, as illustrated in Figure A.2 below, which are zoned for Town Centre purposes.

Figure A.1.4.2: Overall Masterplan for Client’s Landholding Submitted with Reg. Ref.: 23/3



On the 23rd of February 2023, Wicklow County Council (WCC) refused permission for construction of a part single part two storey discount food store supermarket with ancillary off-licence use, with a GFA of c. 2,393sqm gross floor space and net retail sales area of c. 1,430sqm, three single storey retail/commercial units (attached to the foodstore building), an access road from Main Street and provision of associated car parking, signage, landscaping, cycle parking, substation and all other associated and ancillary development.

WCC's decision to refuse permission was for 4 no. reasons, which can be summarised as follows:

- (1)(a-c) Having regard to the size of the proposed retail unit and the existing medium sized convenience stores in Kilcoole, the proposal would not accord with the retail strategy for the area and would be contrary to the Development Plan's Retail Hierarchy;*
- (2) The single storey design does provide for the requirements of Action Plan and would undermine compact growth in these town centre zoned lands;*
- (3) The development does not protect the historic and traditional rural character of Kilcoole Town Centre Character Area; and*
- (4) The development of the access to the wider AP9 lands would be premature pending the determination by the planning/roads authority of a road layout for the area and therefore to allow this development would endanger public safety by reason of traffic hazard. (Emphasis added)***

The Planner's Report for this application states that *"No action area has been agreed in respect of these lands; however, a draft action plan was put forward in 2017 which did not meet the criteria as it did not provide vehicular access as required for the AP lands and there were concerns with respect to land owner consent on the southern side."*

This further recent refusal for planning permission in respect to our client's overall landholding at Bullford, including reference to the development being premature pending road infrastructure provision for the wider AP9 lands, further demonstrates the difficulty our client has faced in bringing forward development on the lands, and noting that the Planning Authority has not sought to progress an Action Plan for AP9 with the various landowners.

ABP Ref.: 302552-18- SHD Application

Planning permission for a Strategic Housing Development was refused by An Bord Pleanála in an order dated the 14th December 2018. The development comprised the construction of 267 number residential units, five number retail units, four number office units, a childcare facility, an innovation hub facility including adjacent civic space, internal roads, car parking, pedestrian and cycle paths, public open space, and all associated site and infrastructural works to facilitate connection to all public services. An extract from the site layout plan accompanying the application is shown in Figure A.3.

Figure A.1.4.3: Site Layout from Previous SHD Application



The Board's decision to refuse was for 3 no. reasons for refusal, which are summarised below.

- **Reason no. 1** relates to the lack of certainty in relation to the wastewater network capacity, pumping station capacity and the water storage requirements for the overall development, and the proposal being premature pending the existing deficiencies being addressed. It is apparent from the Inspector's Report that he was not comfortable recommending a grant of permission for 50 residential units and commercial floorspace, based on IW's confirmation of capacity in wastewater and water supply (see IW correspondence submitted with the application and their letter during the five weeks attached).
- **Reason no. 2** relates to the AA Screening Assessment and the deficiencies in the wastewater system, with the Board not being satisfied that the development would not adversely affect the integrity of Natura 2000 European sites. The Moore Group AA Screening Report had concluded that there would be no adverse impacts, however, the Board based on reason for refusal no. 1 were not satisfied this could be proven.
- **Reason no. 3** relates to the provision of residential units on open space zoned land. As noted above, the Planning Authority did not consider this aspect of the proposal to be a material contravention of the LAP noting in respect to Action Plan zoned lands that *'the position, location and size of the land use zonings shown on Map A within the action plan areas are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out below.'* The Inspector, whilst acknowledging this aspect of the scheme as a concern, did not recommend it as a reason for refusal.

As outlined in the above submission, the Irish Water capacity issues have been resolved and the recommendations for the new LAP would help address the other reasons for refusal.

Notwithstanding the reasons for refusal, the Inspector's Report considered several elements of the scheme to be acceptable, which we summarise below and which are of relevance to the Planning Authority's assessment of the Phase 1 application.

- **Residential Amenity** – The Inspector notes that the proposed development complies with all minimum standards in the Apartment Guidelines 2018. In terms of separation distances, the Inspector's Report states *"I am satisfied that the proposed development will provide an acceptable level of residential amenity for future occupants. In addition, I note the concerns expressed by observers, however the proposed development has been designed to preserve the residential amenities of nearby properties and subject to the amendments I have recommended, will enhance the residential amenities associated with the environs of Kilcoole."*
- **Public Open Space** – The Inspector's Report states that *"In broad terms, the quantum and approach to public open space is good."*
- **Urban Design and Building Heights** – The Inspector's Report states that *"The building heights proposed are not excessive and mirror existing two and three storey forms already found along Main Street. I am satisfied that in broad terms the Urban Design principles employed by the applicant are satisfactory and will result in a good urban form and an improved public domain."* The Inspector also states *"In general, I am satisfied that the urban design approach to repairing the streetscape of Kilcoole has been successfully achieved by the applicant. Subject to minor amendments, exclusively to do with finish material, I am satisfied that the retail, commercial and innovation hub will be a valuable addition to the urban form of the area. In this respect, I find that the proposal would broadly meet the requirements outlined in objective AP9 of the LAP and would improve the appearance of Main Street."*
- **Density** – The Inspector states *"Though the LAP looks for 22/Ha on these lands the increased density of 35 units per hectares broadly meets the density thresholds set out in Appendix A of the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities'. Given the context of the site, the availability of local services and public transport opportunities, I consider that the density proposed is within the acceptable levels provided for in national guidelines."*
- **Traffic and Transport** – Having regard to the existing road network the Inspector is *"satisfied that the proposed development will not lead to significant levels of traffic congestion in the area and will result in the development of zoned lands at more appropriate levels of residential density."*
- **Creche** - The Inspector's Report states *"Given the information provided by the applicant, the composition of the apartments and houses and likely demand for creche places, the proposed facility is acceptable"*.

ABP Ref.: 304348-19- SHD Pre-Application Request

In addition, updated proposals for the overall Bullford site were progressed as far as Stage 2 of the SHD process with An Bord Pleanála under ABP Ref.: 304348-19. However, a Stage 3 SHD application was not subsequently lodged. The Board's Opinion was issued on the 26th of June 2019 and includes two items requiring further consideration and twelve specific information items for the proposals to constitute a reasonable basis for an application. The two items requiring further consideration can be summarised as follows:

- **Item No. 1- Infrastructural Constraints-** The Board requested documentation at application stage to clearly address 1) issues of water and wastewater infrastructure

constraints in the network serving the proposed development, 2) the timelines involved in addressing the constraints relative to the construction and completion of the proposed development and 3) who will be carrying out any necessary works.

- **Item No. 2- Unit Mix-** The Board requested further consideration/justification of the proposed unit mix, particularly the extent of 3 bed and larger residential units, with regard to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Urban Design Manual and SPPR4 of the Building Height Guidelines.

The applicant did not subsequently proceed with a second SHD application for the lands.

Other Relevant Permissions

Wicklow County Council Reg. Ref.: 03/8544

On the 20th June 2003, permission was refused by WCC for the construction of a 206-unit residential development consisting of 44 no. 3-bed townhouses, 50 no. 2-bed townhouses, 22 no. 4-bed semi-detached houses, 18 no. 3-bed duplex townhouses, 72 no. 2-bed apartments and development works including a portion of a distributor road on site. An extract from the site layout plan accompanying the application is shown in Figure A.4.

Figure A.1.4: Extract from Site Layout Plan for refused application Reg. Ref.: 03/8544



WCC's reasons for refusing application Reg. Ref.: 03/8544 related to (a) the dangerous and inadequate junction with Main Street proposed, (b) no traffic impact assessment, (c) inadequate surface water drainage, (d) insufficient public and private open space, (e) inadequate variety of layout, pedestrian and cycle links and poor integration with existing development, (f) no provision for childcare facilities and (g) no Part V proposals. These issues have all been addressed in the SHD development proposals submitted, and subsequent phased applications, which incorporate the full landholding up to the Main Street.

Wicklow County Council Reg. Ref.: 98/8364

On the 29th May 1998, permission was refused by WCC for the construction of 6 no. residential and 2 no. retail units in a 2-storey block with attic conversion, car parking and associated works. The scheme was to be located in the northeast corner of the subject site, facing onto Main Street. WCC's reasons for refusal related to (a) prematurity pending upgraded sewerage facilities, (b) prematurity pending the determination by WCC of a road layout for the area, as the site was considered the only feasible route for a road to serve town centre zoned lands to the west, and (c) building height out of keeping with existing development.

ADJACENT LANDS

Wicklow County Council Reg. Ref.: 17887

On the 30th November 2017, WCC granted permission for the demolition of an existing building and construction of new town centre mixed use development on lands adjacent to the south-east of the application site. The mixed-use development will consist of a 3-storey building including 2 no. ground floor office units, a ground floor medical centre and 8 no. apartments, a hard and soft landscaped civic space, new pedestrian links and associated development works. An image extract from application is shown in Figure A.5.

Figure A.1.5: Image extract from approved application Reg. Ref.: 17887 showing mixed use building and civic space viewed looking south-west.



The proposed strategic housing development has been designed to integrate with approved development Reg. Ref.: 17887 to the south. Please refer to paragraphs 5.20 and 5.21 of this cover letter / planning report for further details and the overall site layout and landscape plans for details of the proposals which are partly on the applicant's landholding and partly on WCC lands, for which a condition can be attached requiring these public realm improvements to be implemented such to agreement with the Planning Authority.