



Proposed Variation No. 7 to the Wicklow County Development Plan Submission Report

Submission Details

Ref	VAR7-111905
Who Are You?	Private Individual
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Proposed Variation Parts

Topic	Part 1: Proposed Variation to town / settlement zoning maps and, where relevant, proposed new or amended site specific policy objectives.
Submission	1. Level 3: Greystones-Delgany

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Susan Variation No 7.docx, 0.03MB

To: Forward Planning & Heritage
Wicklow County Council

Re: Proposed Variation No. 7 to the Wicklow County Development Plan 2022–2028
– Charlesland / SLO3, Greystones–Delgany

Submitted by: Susan Moran

Address: [REDACTED]

Date: 17/09/2026

1. Introduction

I wish to make a submission in relation to Proposed Variation No. 7 to the Wicklow County Development Plan 2022–2028, and in particular the proposed changes affecting the Charlesland SLO3 lands.

I recognise the acute need for additional housing and understand the national and local policy context within which Wicklow County Council is considering additional residential zoning.

My submission is therefore not based on opposition to housing development in principle.

My concern is that a major change in the use and intensity of the Charlesland lands must only occur where the necessary transport, access, drainage, wastewater, environmental, recreational and community infrastructure has first been properly assessed and where existing residential communities are adequately protected.

Of particular concern to residents of Seabourne is the possibility that an established residential estate could become a vehicular access or through-route serving a substantial new development.

I ask Wicklow County Council either to retain the existing zoning until these matters have been satisfactorily addressed or, should residential zoning proceed, to amend SLO3 to include clear and enforceable safeguards dealing with the matters outlined below.

2. Vehicular access and protection of existing residential estates

The existing SLO3 objective is important in this regard.

It recognises existing access via Woodlands Road and Charlesland Sports Park/Ballynerrin roundabout and states that further access points from the Charlesland dual carriageway are expected. It specifically identifies routes via the Kilfernoc and Glen roundabouts as being supported.

I consider this to be the appropriate strategic approach to vehicular access.

The Charlesland distributor-road network was designed to accommodate significant traffic movements. By contrast, Seabourne is an established residential environment whose internal roads serve homes and residential traffic.

Using Seabourne as a primary access or through-route for a substantial new residential development would fundamentally alter the character and function of the estate and could introduce additional:

- through traffic;
- peak-hour congestion;
- conflict between vehicles, pedestrians and cyclists;
- road-safety risks to children and other vulnerable road users;
- noise and disturbance;
- pressure on parking and internal junctions; and
- deterioration in residential amenity.

I therefore request that the revised SLO3 contain an explicit objective along the following lines:

“Primary vehicular access to new residential development within SLO3 shall be provided from the Charlesland distributor-road network, including through appropriate access from the Kilfernoc, Glen and/or Ballynerrin roundabouts. Existing residential estates, including Seabourne, shall not function as primary or through vehicular routes serving the new development. Connections with existing residential areas should principally provide for appropriate pedestrian, cycle and, where demonstrated to be necessary, emergency access.”

This would not prevent sustainable connectivity between existing and future communities. On the contrary, I support well-designed walking and cycling connections.

However, pedestrian and cycle permeability should not automatically mean unrestricted vehicular permeability through existing residential estates.

I ask the Council to make that distinction explicit at Development Plan stage rather than leaving it unresolved until a future planning application.

3. Transport and traffic assessment

Before land currently planned predominantly for active open-space use is committed to significant residential development, the likely scale of traffic generation should be properly assessed.

A comprehensive transport assessment should consider, at minimum:

- projected residential population and dwelling numbers;
- peak-hour vehicle movements;
- capacity at the Ballynerrin, Kilfernoc, Glen and other relevant junctions;
- the interaction with existing Charlesland traffic;
- school-related traffic;

- access to the N11 and surrounding regional and local roads;
- public-transport capacity;
- pedestrian and cycle movements;
- emergency access; and
- the cumulative impact of other planned development in the Greystones–Delgany area.

Any decision on principal access routes should follow such an assessment and should not be based simply on the geographical convenience of connecting new roads through established estates.

4. Infrastructure capacity and infrastructure-first development

I note that SLO3 has previously been classified as serviced in infrastructure assessments.

However, the use previously envisaged for much of SLO3 was predominantly Active Open Space. Residential development represents a fundamentally different intensity of land use in terms of water demand, wastewater generation, surface-water runoff and traffic movements.

I therefore ask the Council to demonstrate that infrastructure capacity has been reassessed specifically against the scale of residential development now envisaged.

This should include consultation with the relevant infrastructure providers and clear information regarding:

- potable water capacity;
- wastewater network capacity;
- wastewater treatment capacity;
- storm-water infrastructure;
- electricity and other utilities where relevant; and
- transport infrastructure.

Where upgrades are necessary, they should be identified at Development Plan/masterplan stage and tied to clear development phases.

Housing should not be occupied in advance of the infrastructure required to support it.

5. Loss of Active Open Space and sporting/recreational capacity

The existing Local Planning Framework identified the Charlesland lands as having significant potential for sporting, recreational and community use.

The Council has previously recognised capacity pressures on existing sporting clubs and expressed an aspiration that Charlesland could accommodate a wider range of sporting and social/community activities.

The proposed change therefore represents more than simply the redevelopment of a former golf course. It potentially alters land which formed part of the area's longer-term strategy for addressing recreational and sporting needs.

I ask the Council to quantify:

1. how much land currently identified for Active Open Space would be lost or altered;
2. what sporting and recreational capacity had previously been expected from those lands;
3. what equivalent facilities will replace that capacity; and
4. when those facilities will be delivered relative to residential construction.

Any residential development of SLO3 should provide substantial, usable and publicly accessible active open space in addition to passive landscaped areas.

Open space that is principally required for flood attenuation, ecological protection or drainage should not automatically be counted as a substitute for playing pitches, sports facilities and genuinely usable recreational land.

6. Biodiversity, the Three Trouts Stream and ecological connectivity

The Charlesland lands contain important green infrastructure, including watercourses, hedgerows, mature vegetation and habitats associated with the Three Trouts Stream.

I support the existing principle that natural biodiversity areas, mature trees and flood-management areas should be retained and protected.

Any revised SLO3 should strengthen rather than dilute these protections.

I request:

- comprehensive ecological surveys before the detailed masterplan is finalised;
- protection and enhancement of existing hedgerows, treelines and wildlife corridors where practicable;
- a substantial development-free riparian corridor along the Three Trouts Stream and other relevant watercourses;
- minimisation of road crossings through ecological corridors;
- protection against inappropriate lighting of sensitive habitats;
- appropriate construction-phase protections;
- a long-term Biodiversity Enhancement and Management Plan; and
- ecological connectivity between the Charlesland lands and surrounding green infrastructure.

These matters should inform the layout of the development from the outset rather than being addressed after roads and development parcels have already been determined.

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7. Surface water and flood risk

I acknowledge that residential areas may be capable of being located outside the highest-risk flood zones.

My concern is therefore not simply whether individual houses are positioned within a designated flood zone.

The more significant issue is the cumulative effect of converting substantial areas of permeable land into roofs, roads, driveways and other hard surfaces.

The Council should require a site-wide Surface Water Management Strategy addressing:

- existing drainage patterns;
- increased runoff generated by development;
- attenuation requirements;
- Sustainable Drainage Systems;
- water quality;
- the Three Trouts Stream;
- downstream impacts;
- climate-change allowances; and
- long-term ownership and maintenance of drainage infrastructure.

Drainage and flood-management areas should be planned on a site-wide basis rather than on a piecemeal application-by-application basis.

8. Schools, childcare and community infrastructure

Any substantial new residential community will generate additional demand for schools, childcare, healthcare, recreation and community facilities.

Existing residents are concerned that housing delivery has often proceeded more rapidly than supporting community infrastructure.

I therefore request that the Council establish the likely population generated by the proposed zoning and identify the resulting requirements for:

- primary and secondary education;
- childcare;
- community meeting space;
- sports and recreation;
- healthcare;
- public transport; and
- local services.

Required facilities should be incorporated into the masterplan and subject to binding phasing requirements.

The purpose should be to create a properly functioning community rather than simply maximise the number of residential units that can be accommodated on the site.

9. Requirement for a comprehensive masterplan

Given the size and strategic importance of SLO3, I strongly submit that development should not proceed through a series of disconnected planning applications.

A single comprehensive masterplan should first be prepared for the entire SLO3 area.

The masterplan should identify:

- principal vehicular accesses;
- internal road hierarchy;
- walking and cycling routes;
- public transport connections;
- housing areas and indicative densities;
- active open space;
- sports facilities;
- community facilities;
- schools/childcare requirements where appropriate;
- green and blue infrastructure;
- ecological corridors;
- the Three Trouts Stream buffer;
- surface-water management;
- utility infrastructure; and
- development phasing.

The masterplan should also demonstrate how the development integrates with existing communities without transferring disproportionate traffic or infrastructure impacts to them.

10. Development phasing

If residential zoning is adopted, infrastructure should precede or accompany housing rather than follow it.

I therefore request measurable phasing conditions within SLO3, including a requirement that appropriate strategic vehicular access from the Charlesland distributor-road network be operational before significant occupation of residential development.

Similarly, required drainage, wastewater, open-space and community infrastructure should be delivered at defined stages rather than being deferred until the final phases of development.

11. Existing property and access rights

The rezoning of land should not presume that access across privately owned or third-party lands will subsequently become available.

Any assessment of the developability of SLO3 should therefore be based on access arrangements that are legally and practically deliverable.

The Council should not rely upon a future vehicular connection through Seabourne, or any other existing residential development, unless the relevant legal rights have been clearly established and such a connection has independently been demonstrated to be appropriate on traffic, road-safety and residential-amenity grounds.

12. Requested amendments

In summary, I respectfully request that Wicklow County Council:

1. Does not adopt the proposed residential zoning of the relevant SLO3 lands in its present form unless the necessary infrastructure, transport and environmental safeguards are incorporated into the Development Plan.
2. Retains and strengthens the existing principle that strategic vehicular access should come from the Charlesland distributor-road network, including the Kilfernoc, Glen and Ballynerrin roundabouts.
3. Explicitly provides that Seabourne and other established residential estates will not operate as primary or through vehicular routes serving the new SLO3 residential development.
4. Requires a comprehensive Transport Assessment before principal access arrangements are finalised.
5. Requires a site-wide masterplan for SLO3 before piecemeal residential development is permitted.
6. Requires updated assessments of water, wastewater, drainage and transport capacity based specifically upon the proposed residential population.
7. Requires infrastructure-first phasing, including delivery of principal road access and essential services before substantial residential occupation.
8. Protects and enhances the Three Trouts Stream, riparian areas, mature vegetation, biodiversity corridors and other significant environmental features.
9. Requires a site-wide Surface Water Management Strategy addressing cumulative runoff and climate-change risk.
10. Ensures that any loss of Active Open Space is compensated by meaningful, usable sporting, recreational and community infrastructure.

11. Requires education, childcare, recreation and community provision to be assessed against the actual population likely to arise from the development and delivered in tandem with housing.

12. Ensures that the Development Plan does not rely on vehicular access over privately controlled lands unless the legal, planning, traffic and road-safety basis for that access has been established.

Conclusion

Residents recognise both the housing needs of County Wicklow and the strategic role Greystones will play in accommodating future population growth.

Good planning, however, requires more than identifying land on which houses can physically be constructed.

It requires the creation of sustainable communities, supported by infrastructure, transport, recreation, environmental protection and community services, while protecting the reasonable residential amenity of communities that already exist.

Charlesland SLO3 is a large and strategically important site. Decisions taken at this Development Plan stage are likely to shape this part of Greystones for decades.

I therefore ask Wicklow County Council to ensure that any rezoning is accompanied now—not at some unspecified point in the future—by clear and enforceable objectives concerning access, infrastructure, environmental protection, recreational provision and development phasing.

I request that the Development Plan make clear that Seabourne is not to become a primary vehicular access or through-route for the proposed development and that the established strategic road network should instead provide the principal vehicular access.

I respectfully request that the above matters be taken into account before Proposed Variation No. 7 is adopted.

Yours faithfully,

Susan Moran,

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