



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

Who are you:	Agent
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## Topic

LAP - Proposed Material Amendments No 5 Submission

## Submission

See attached submission

## Topic

LAP - Proposed Material Amendments No 6 Submission

## Submission

See attached submission

## Topic

LAP - Proposed Material Amendments No 18 Submission

## Submission

See attached submission

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LAP - Proposed Material Amendments No 19 Submission

## Submission

See attached submission

### Topic

LAP - Proposed Material Amendments No 26 Submission

### Submission

See attached submission

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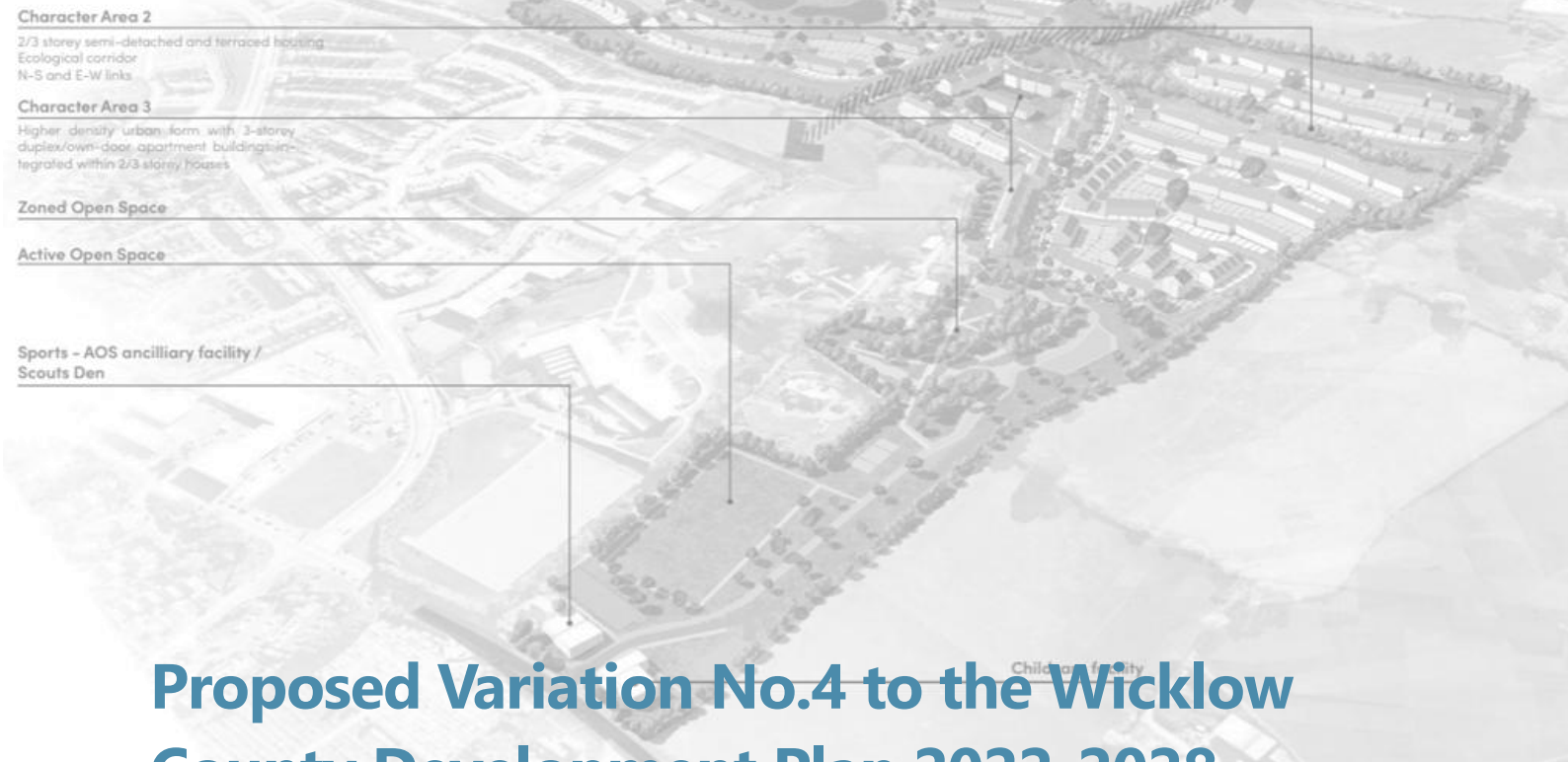
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# Proposed Variation No.4 to the Wicklow County Development Plan 2022-2028 draft Greystones – Delgany & Kilcoole Local Planning Framework – Material Amendments

Submission on behalf of Cairn Homes Properties Ltd



November 2025

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## EXECUTIVE SUMMARY

Cairn Homes welcomes the preparation of the proposed Variation no. 4 to the Wicklow County Development Plan (WCDP) 2022-2028 in relation to the Greystones, Delgany and Kilcoole Local Planning Framework (GDKLPF) Material Alterations stage. This will provide an important framework for the development of the town up to the expiry of the County Development Plan in 2028. Cairn Homes has an important stake-holding in the sustainable development of the LPF area and in particular its implementation. This submission principally addresses Material Amendments affect landholdings in the ownership of Cairn Homes at Coolagad.

This submission is made subsequent to the publication of the Government's Housing Strategy ***Delivering Homes, Building Communities*** on 12<sup>th</sup> November. The Plan is aligned with the First Revision to the National Planning Framework (NPF), published in April 2025, and to the updated Economic and Social Research (ESRI) Institute research that projects the population of Ireland will increase to approximately 5.74 million by 2031.

The Government has set out a target in the *Programme for Government* of a minimum of **300,000 new homes**; the significant majority of the required funding will come from investment by the private sector to support homeownership and a well-functioning private rental market.

Given the current conditions in the housing market and the recent changes focusing on planning, infrastructure and regulatory reform, coupled with the suite of changes set out in this Plan, it is anticipated that the market will move to a rapid activity phase over the next two years.

The number one **Key Enabler** set out in ***Delivering Homes, Building Communities*** is Zoning **Sufficient Land**. Having regard to **Housing Growth Requirements**, the Ministerial Guidelines issued under the Planning and Development Act in July 2025 with updated *Housing Growth Requirements* for each local authority. This means that local authorities must ensure that the relevant share of the national projections are reflected in their city and county development plans.

### Strategic Issues - Material Amendments to County Development Plan Strategy

**Requested Amendment 1:** While the LPF has been amended to refer to the *NPF Implementation Housing Growth Requirements – Guidelines for Planning Authorities, July 2025*, section 3.5 *Zoning* of the LPF does not use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan.

The LPF should clarify that planning applications on all residential zoned and serviced lands, irrespective of tiering will be considered for development pursuant to the revised ESRI growth targets for the County in accordance with National Policy Objective 11 and the *NPF Implementation Housing Growth Requirement Guidelines*.

We refer to the recent Office of Planning Regulator's (OPR) submission to the Arklow Draft LPF and Variation no. 5 of the CDP (12/11/2025). The OPR now confirms that a Tiered phasing strategy is not necessary at this point in the Development Plan's life up to 2028. The OPR recommends rezoning Residential Phase 2 lands as Phase 1 to ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirement.

## Material Amendments to Draft LPF

**Proposed Amendment No. 2:** It is requested that the phasing strategy set out under '*Housing Targets & Extant Permissions*' is simplified to provide for an RN1 zoning only, Or alternatively the thresholds applicable to the release of Tier 2 lands are omitted. ie.

Permission will not only be considered during the lifetime of this LPF for RN2 lands unless ~~where the following conditions are satisfied:~~ *where it can be demonstrated that the lands are serviceable and capable of delivering housing within the lifetime of the plan in accordance with the sequential test.*

~~At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);~~

~~It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.~~

**Proposed Amendment No. 3:** It is requested that the phasing strategy set out under *Housing Objective GDK 16* is simplified to provide for an RN1 zoning only, or to require that applications on RN2 lands address the Sequential Test only with the omission of qualifying criteria. The introduction of new Priority 1 lands in Kilcoole as part of the amendments further reinforces the case for the release of all Tier 2 lands, within Greystones given it is a higher order settlement i.e. a 'Self-Sustaining Growth Town' in contrast to Kilcoole which is a 'Self-Sustaining Town'.

### **Proposed Amendment No. 4:**

Cairn Homes is committed to providing high quality amenities and community facilities at Coolagad. The Masterplan for the site includes a creche and community buildings, a sports pitch and neighbourhood park. However, The Material Amendments to the SL04 text seeks the provision of specific pitches and facilities which would compromise the masterplan and significantly affect the potential to implement residential development in this location.

The technical analysis prepared by MCORM architects as part of this submission illustrates that the SLO's proposed text changes to require a "separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m)" cannot be accommodated within the Active Open Space or Amenity zoned land within SL04.

No other AOS area in the LPF has been burdened with such impractical playing pitch requirements. The policy is arguably discriminatory through its application to Cairn's lands only. Whilst Cairn have a proven track record of delivering high quality social and community amenities (including soccer pitch at Archers Wood, Greystones), the revised SLO objective needs to be reconfigured.

To inform Officials and Members of the Council, we include illustrations of what a playing pitch of 90m x 145m in size looks like on a plan and the impact it would have on the Masterplan for SL04 which is primarily to deliver new residential development.

The SLO's proposed text changes also require a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 600sqm. Whilst Cairn do not oppose the principle of this use, the scale of it is considered disproportionate to the size of the development. Cairn

suggest that smaller figure is used in the objective and the detailed design and size of the facility is agreed at the pre-planning application stage with the planning authority and other key stakeholders.

We note that the Social Infrastructure Audit accompanying the draft LPF it does not stipulate specific pitches or hall size for Coolagad.

The SLO's proposed text change to require that '*No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use*', is overly restrictive, compromises the efficient phasing of development and is counter to the proper planning and sustainable development of the area.

It is submitted all proposed Material Amendments to the Draft LPF for SL04 should be rejected and redrafted as follows

*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; at a minimum a ~~separate full size (i.e. 90m x 145m) multi-sport all-weather pitch~~, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m), which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings*

*Community facilities, including a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 300sqm ~~600sqm~~ shall be provided within the SLO area in the first phase of development to meet the needs of the new and existing resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out. This community services audit should take into account and explicitly respond to the analysis and recommendations set out in the Social Infrastructure Audit accompanying the LPF.*

**Proposed Amendment No. 5:** The LPF 'Introduction' to Special Local Objectives (SLOs) has been amended to ensure that masterplans are serviceable and no development prejudices or unduly constrains another parcel. It should be clarified that masterplan details should be 'agreed prior to submission of a planning application' to allow sufficient flexibility at detailed design stage.



# 1. INTRODUCTION

## 1.1 Background

MacCabe Durney Barnes has prepared this submission on behalf of **Cairn Homes Properties Ltd (“Cairn Homes”)** of 45 Mespil Road, Dublin 4, D04 W2F1 in response to proposed Material Amendments of variation no. 4 to the Wicklow County Development Plan (WCDP) 2022-2028 in relation to the Greystones, Delgany and Kilcoole Local Planning Framework (GDKLPF). Cairn Homes made a detailed submission on the Draft Greystones – Delgany and Kilcoole LPF 2024-2030 in June 2025.

Cairn Homes has 3 lands banks in the plan area as indicated in the Figure below. Given that this submission is restricted to the consideration of material amendments only, this submission now only refers to strategic policy issues and the lands at **Coolagad** (c24.8 ha.) located to the north of Greystones, close to Templecarrig. The principal access for these lands is via the R761. These lands are located broadly to the west and rear of Templecarrig School, Naíonra na gCloch Liath and the Greystones Educate Together School and of the Waverly residential estate and broadly north of the Seagreen residential estate.



**Figure 1 Cairn Homes sites in Greystones-Delgany & Kilcoole**

This submission is made subsequent to the publication of the Government’s Housing Strategy **Delivering Homes, Building Communities** on 12<sup>th</sup> November. The Plan is aligned with the First Revision to the National Planning Framework (NPF), published in April 2025, and to the updated Economic and Social Research (ESRI) Institute research that projects the population of Ireland will increase to approximately 5.74 million by 2031.

The Government has set out a target in the *Programme for Government* of a minimum of **300,000 new homes**, the significant majority of the required funding will come from investment by the private sector to support homeownership and a well-functioning private rental market.

Given the current conditions in the housing market and the recent changes focusing on planning, infrastructure and regulatory reform, coupled with the suite of changes set out in this Plan, it is anticipated that the market will move to a rapid activity phase over the next two years.

The number one **Key Enabler** set out in *Delivering Homes, Building Communities* is **Zoning Sufficient Land**<sup>1</sup>. Having regard to **Housing Growth Requirements**, the Ministerial Guidelines issued under the Planning and Development Act in July 2025 with updated *Housing Growth Requirements* for each local authority. This means that local authorities must ensure that the relevant share of the national projections are reflected in their city and county development plans. Many Local Authorities are now proactively responding to these government initiatives to accelerate housing supply. Several Authorities, for example Cork City, Cork County, South Dublin and Laois have invited expressions of interest from landowners to identify suitable land for rezoning. Others such as Kildare and Meath have commenced Variations to lift all restrictions on Tier 2 lands. In this context, the approach taken with regard to the Greystones LPF seems anomalous when there was a clear opportunity to reflect Government policy to remove restrictions on zoned and serviceable land.

## 1.2 Report Structure

This report is structured as follows:

### **PART A: County Development Plan Amendments**

Submission 1: Proposed Material Alterations to Part A of Proposed Variation No. 4 – proposed changes to Volume 1 of the Wicklow County Development Plan 2022-2028

### **PART B: LPF Amendments**

Submission 2 - Proposed Material Alteration No. 5 - Housing Targets & Extant Planning Permissions

Submission 3 – Proposed Material Alteration No. 6 - HOUSING OBJECTIVE GDK16

Submission 4 – Proposed Material Alteration No. 19 – Amend MAP NO. 1 LAND USE ZONING and amend Specific Local Area Objective SLO 4 – COOLAGAD

Submission 5 – Proposed Material Alteration No. 18 SPECIFIC LOCAL OBJECTIVES (SLOs) INTRODUCTION

Submission 6 – Proposed Material Alteration No. 26 SLO 12 – BELLEVUE HILL

### **Conclusions**

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<sup>1</sup> Delivering Homes, Building Communities 2025-2030 Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness

## **1.3 Masterplan Submission and Specialist Input**

This submission on the GDKLPF 2025 has been prepared as part of multi-disciplinary team. A key issue identified in the Material Amendments report is the specification of particular pitches and facilities on AOS lands at Coolagad. The attached technical note by MCORM sets out the impact of the Council's proposed policies for the landbank, and illustrates quite starkly that the new policies set out in the Amended LPF are incompatible with the masterplan and zoning designations for the area.

- Masterplan Vision and Strategy MCORM Architects

It is informed by professional inputs from:

- KFLA Landscape Architects, and
- Barrett Mahony Consulting Engineers

## 2. PART A: WICKLOW COUNTY DEVELOPMENT PLAN

### 2.1 Submission 1: Proposed Material Alterations to Part A of Proposed Variation No. 4 – proposed changes to Volume 1 of the Wicklow County Development Plan 2022-2028

#### Requested Amendment 1:

While the LPF has been amended to refer to the NPF Implementation Housing Growth Requirements – Guidelines for Planning Authorities, July 2025, section 3.5 Zoning does not use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan. The LPF should clarify that planning applications on all residential zoned and serviced lands will be considered for development pursuant to the revised ESRI growth targets for the County in accordance with National Policy Objective 11.

#### 2.1.1 Wicklow County Development Plan - Volume 1, Chapter 3

##### Proposed Material Alteration No. 1

##### Volume 1, Chapter 3 of the Wicklow County Development Plan 2022-2028

##### Amend Part A:2: Local Area Plans (LAPs) & Local Planning Frameworks (LPFs)

The Wicklow County Development Plan is proposed to be amended by insertion of the green text below.

~~This table shows that the majority of current LAPs have a surplus of zoned land having regard to the revised 2031 targets set out in the NPF Roadmap and the RSES for the EMRA.~~

*Upon adoption of this County Development Plan in 2022, the amount of zoned land in pre-existing LAPs exceeded the amount of land needed to meet the Core Strategy 2031 housing targets for each of the towns set out in this County Development Plan (as detailed in Table A of the Core Strategy).*

*In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in 'Development Plans – Guidance for Planning Authorities' (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF.*

*In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LAP/ LPF, with flexibility in the zoning provisions to ensure that (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise and (b) the LAPs/ LPFs do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation with particular regard to the new housing targets for County Wicklow set out in the 'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities' issued by the Minister under Section 28 of the Planning & Development Act (July 2025).*

*Prior to the adoption of new LAPs / LPFs reflecting the targets set out in this plan, in the assessment of applications for new housing development (or mixed use development of which housing forms a significant component) the Council will strictly adhere to the compact growth, sequential development and phasing principles set out in this plan.*

### 2.1.2 Cairn Submission

This submission raises a fundamental concern regarding the failure to apply the National Planning Framework First Revision, April 2025 and *NPF Implementation Housing Growth Requirements – Guidelines for Planning Authorities, July 2025*, which requires Planning Authorities to vary development plans immediately to align the zoning provisions with the population and housing targets set out in the Revised NPF.

Policy and Objective 3 of the NPF Implementation: Housing Growth Requirements states:

*“It is a policy and objective of these Guidelines **that planning authorities should use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan.** Where a planning authority is undertaking a development plan review under the Act of 2000 or preparing a new development plan under the Act, a parallel process of varying the current adopted development plan, as appropriate, should be undertaken. The policies and objectives of these Guidelines should not be reflected in Local Area Plans without also being reflected within the relevant development plan.” (our emphasis)*

The Revised NPF sets out an increased national housing delivery target of 50,000 units per annum, up from 25,000 in 2018. This represents a material change in national planning policy with directed implications for counties within the Eastern and Midlands Regional Assembly area, including Wicklow. The 2020 Housing Supply Targets, Adopted Development Plan Targets are shown in the context of the new annual Housing Targets between 2025 to 2034 and 2035 to 2040 for Wicklow are shown below. This significantly increases the annual housing requirements for the County and negates the need for differentiating between tier 1 and tier 2, while taking into account infrastructural constraints.

**Table 1: New Housing Targets (Source: NPF Implementation Guidance)**

Local Authority	Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual Housing Growth Requirement to 2034	New Annual Housing Growth Requirement 2035-2040
<b>Wicklow Co. Co.</b>	745	1,411	2,068	931

The revised housing targets for Wicklow County Council between 2025 and 2034, result in an increased demand of 47% of units than the annual housing requirements adopted in the Wicklow County Development Plan 2022-2028. Apply and referring to the current core strategy is at odds with the current NPF.

Based on the above, adopting the draft LPF in advance of revising and varying the County Development Plan, risks misalignment of the plan with national policy. The approach taken with regard to the Greystones LPF seems anomalous when there was a clear opportunity to reflect Government policy to remove restrictions on zoned and serviceable land.

The basis upon which residential land zoning is currently quantified remains linked to the outdated Core Strategy, which does not yet reflect the revised annual housing requirements nor the additional provision required to address the urgent need for housing.

While references are inserted of the *NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities* under Variation No. 5 of the CDP, there is unfortunately a failure by Wicklow County Council to implement these guidelines in accordance with the steps specified in these guidelines, which have been issued



by the Minister under s.28 of the Planning and Development Act, 2000 (as amended). In fact, through the phasing approach adopted in the plan, it is obstructive to the achievement of the existing Core Strategy goals.

It is Cairn's submission that this policy does not reflect the intent or spirit of the NPF Implementation Guidelines (2025) or the Development Plan Guidelines (2022).

Given that the Draft LPF is conceived to be implemented within the life of the current Wicklow County Development Plan 2022-28, the adoption of tiered approach to zoning is not appropriate. It is important that the plan recognises and address a legacy of under provision of housing. It is respectfully submitted that a phased or tiered approach designed for a 6 year plan is irrelevant for a 2 year implementation window. This position has been accepted by the OPR in its recent submission on the draft Arklow LPF (Variation No. 5 of the CDP,12/11/2025).

The recent report by Goodbody research<sup>2</sup> demonstrates that actual activation and housing completion rates are far below the 75% rate of all zoned land which the County Development Plan presumes will be delivered in a 6-year period. WCC secured only 20% activation of zoned land over the last LAP period. The reasons lands remain inactive are multi layered and complex and can relate to viability issues, lack of infrastructure, LAP phasing, title constraints, environmental issues etc. However, the point remains that the draft LAP needs to ensure there is adequate provision for zoned and serviced sites that are likely to come forward during the lifetime of the plan.

We highlight that other local authorities have published proposed Development Plan Variations for Consultation that address this very issue. Kildare Co.Co. is proposing to lift the Tier 2 Restriction. While Cork City are maintaining a 'Tier 2' Zoning, it is not linked to thresholds for Tier 1.

The LPF should clarify that planning applications on all residential zoned and serviced lands will be considered for development pursuant to the revised ESRI growth targets for the County, in line with NPO 11 of the National Planning Framework which states:

*Planned growth at a settlement level shall be determined at development plan making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.*

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<sup>2</sup> Goodbody (September 2024) Residential land availability, an assessment of residential land provision in Ireland

### 3. PROPOSED MATERIAL ALTERATIONS TO PART B OF PROPOSED VARIATION 4 – THE DRAFT GREYSTONES- DELGANY AND KILCOOLE LOCAL PLANNING FRAMEWORK 2025

#### Proposed Amendment No. 2:

It is requested that the phasing strategy set out under 'Housing Targets & Extant Permissions' is simplified to provide for an RN1 zoning only, or to require that applications on RN2 lands address the Sequential Test only with the omission of qualifying criteria.

#### 3.1 Submission 2 - Proposed Material Alteration No. 5 - Housing Targets & Extant Planning Permissions

The Material Amendments to the Draft LPF proposes to revise the text for 'Housing Targets & Extant Planning Permissions' as indicated in red below.

##### Proposed Material Alteration No. 5

Amend **Housing Targets & Extant Planning Permissions** subsection as follows:

##### **Housing Targets & Extant Planning Permissions**

Having regard to the Core Strategy and population / housing targets provided therein for Greystones – Delgany and Kilcoole, there is capacity within the lands zoned TC, VC, RE (all located in the serviced, built up envelope) and lands zoned RN1 to meet current targets.

In order to ensure a long term supply of zoned land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this LPF, **with particular regard to the new housing targets for County Wicklow set out in the 'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities' issued by the Minister under Section 28 of the Planning & Development Act (July 2025),** this LPF also provides for additional zoned serviced / serviceable residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'. Permission will **not only** be considered during the lifetime of this LPF for RN2 lands **unless where** the following conditions are satisfied:

- At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.

##### 3.1.1 Cairn Submission

In Cairn's submission to the Draft LFP in June, it was highlighted that the phasing strategy of lands for RN1 and RN2 was overly restrictive and the 'hard transition' of 75% (development initiated) was an inoperable constraint.

We note the Office of Planning Regulator's (OPR) submission to the Arklow Draft LPF and Variation no. 5 of the CDP dated 12/11/2025. The OPR has come around to agree with our position that a Tiered phasing strategy is not necessary at this point in the Development Plan's life up to 2028:

*The proposed Variation to provide a development framework for Arklow up until 2028, including the zoning of lands for housing, is being carried out alongside a future Variation to implement the Housing Growth Requirements. The Office would therefore encourage the Planning Authority to reconsider the need for phasing at this point in time, and instead review and rezone, where otherwise appropriate, Residential Phase 2 lands as Phase 1 in order to provide flexibility in delivery of sites and to facilitate the ongoing pipeline for housing delivery and to meet the housing growth requirements as set out in the Housing Growth Requirements.*

### **Recommendation 1 - Residential zoned land**

*Having regard to the need to provide sufficient housing lands and growth for Arklow and the provision of new homes at locations that can support compact growth and sustainable development, and in particular to:*

- NPO 3, NPO 9 of the NPF;
  - RPO 3.1, RPO 3.2 of the RSES;
  - the policies and objectives of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements); and
  - section 6.2.3 of the Development Plans, Guidelines for Planning Authorities (2022),
- the Office recommends that the Planning Authority:

*(i) reviews the zoning objective for the proposed Residential Phase 2 lands with a view to rezoning as Residential Phase 1 lands that can support compact growth and sequential development and are serviced or serviceable within a reasonable period of time, to ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements.*

The Greystones-Delgany & Kilcoole LPF operates within the same time framework as the Arklow LPF (i.e. within the life of the CDP 2022-28). Therefore, the same logic outlined by the OPR above, applies equally to Variation No.4. In this context, it should be noted that Arklow is a lower order ‘Self-Sustaining Town’ in the RSES compared to Greystones which is a ‘Self-Sustaining Growth Town’, yet Arklow has a far higher allocation of Residential lands (50ha RN1 & 58 ha RN2) than Greystones (5.8RN1 & 31 ha RN2).

We note from the transcript of Wicklow County Council’s meeting of 6<sup>th</sup> October 2025, that many members were of the view that there should no RN2 in Greystones, and were only reluctant to adopt this measure as they were concerned the OPR would seek to discipline such a zoning strategy.

Given that the phasing strategy is the subject of a material amendment, it is submitted that is allowable to adopt a simplified zoning strategy for Greystones in accordance with OPR’s recommendations for Arklow. It is submitted that the Council should rezone RN2 lands as RN1.

It the Council considers that the complete nullification of the RN2 zoning is not practical, then it is submitted the bullet points should be omitted and policy should simply clarify the development proposals on RH2 lands will be assessed in accordance with the Sequential Test:



### Housing Targets & Extant Planning Permissions

Having regard to the Core Strategy and population / housing targets provided therein for Greystones — Delgany and Kilcoole, there is capacity within the lands zoned TC, VC, RE (all located in the serviced, built up envelope) and lands zoned RN1 to meet current targets.

In order to ensure a long term supply of zoned land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this LPF, **with particular regard to the new housing targets for County Wicklow set out in the 'NPF Implementation: Housing Growth Requirements — Guidelines for Planning Authorities' issued by the Minister under Section 28 of the Planning & Development Act (July 2025)**, this LPF also provides for additional zoned serviced/ serviceable residential lands, over and above that needed to meet current targets, zoned 'RN2 — New Residential Priority 2'. Permission will not only be considered during the lifetime of this LPF for RN2 lands unless ~~where the following conditions are satisfied:~~ **where it can be demonstrated that the lands are serviceable and capable of delivering housing within the lifetime of the plan in accordance with the sequential test.**

~~— At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);~~

~~— It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.~~

## 3.2 Submission 3 - Proposed Material Alteration No. 6 - HOUSING OBJECTIVE GDK16

### Proposed Amendment No. 3:

It is requested that the phasing strategy set out under Housing Objective GDK 16 is simplified to provide for an RN1 zoning only, or to require that applications on RN2 lands address the Sequential Test only with the omission of qualifying criteria. The increase of Priority 1 lands in Kilcoole, whilst simultaneously not making any changes to Greystones is contrary to the Wicklow County Development Plan 2022-2028 Settlement Hierarchy, where Greystones is identified as a higher order 'Self-Sustaining Growth Town' in contrast to Kilcoole which is a 'Self-Sustaining Town'

The proposed Material Amendments to the Housing Objective Draft GDK 16 is the same as set out under 'Housing Targets & Extant Planning Permissions' as discussed above.

### Proposed Material Alteration No. 6

Amend **HOUSING OBJECTIVE GDK16** as follows:

#### Objective GDK16

Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will ~~not~~ **only** be considered for RN2 Priority 2 lands ~~unless-where~~ the following conditions are satisfied:

- At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.

### 3.2.1 Cairn Submission

Cairn's position on GDK 16 is consistent with the submission on 'Housing Targets & Extant Planning Permissions'. As we have maintained throughout the consultation process, the approach to phasing is overly rigid and not appropriate given that this is a Variation to the Development Plan, and not a standalone LAP with its own 6 year life span.

If the Council considers that the complete nullification of the RN2 zoning is not practical, then it is submitted the bullet points should be omitted and policy should simply state:

#### Objective GDK16

Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission ~~not~~ will **only** be considered for RN2 Priority 2 lands ~~unless-where~~ **it can be demonstrated that the lands are serviceable and capable of delivering housing within the lifetime of the plan.**

~~—At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);~~

~~It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.~~

In Greystones there is only one site at Charlesland zoned RN1 that could be considered housing lands of scale. There is no logic in tying the development of Coolagad to the implementation of a single land bank in public sector ownership.

**Table 1: Draft LPF Zoning RN1 for Greystones**

Location	Status	Zoning / Priority	Comments
<b>Greystones - Charlesland</b>	Local Authority scheme in design	RN1	In design for 2+ years. Dependent on central government funding and on procurement procedures.
<b>Greystones Mill Road</b>	Development Permitted	RN1	
<b>Greystones Three Trouts SLO7</b>	No permission	RN1	Zoned residential for 20 years without any development forthcoming.

Whilst Cairn has no issue with the identification of additional Priority 1 lands in Kilcoole, it would seem entirely logical to ensure all available and serviceable housing land which was zoned in previous iterations of the Greystones LAP and zoned, albeit tier 2 on the draft LPF would also be made available for immediate housing delivery particularly where Greystones is identified as a higher order centre, i.e. a 'Self-Sustaining Growth Town' in contrast to Kilcoole which is a lower order centre or 'Self-Sustaining Town'.

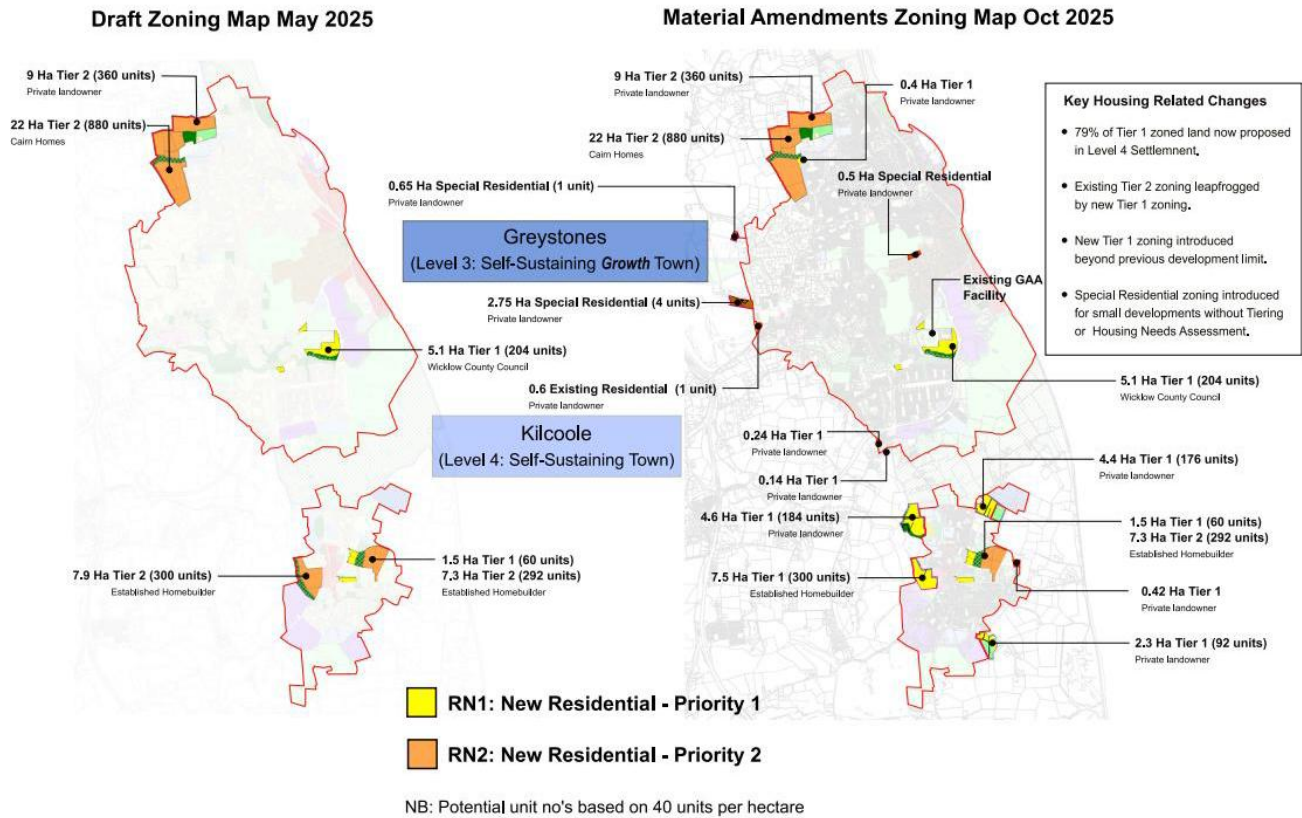


Figure 2 Distribution of RN1 & RN2 lands in Greystones and Kilcoole

### 3.3 Submission 4 - Proposed Material Alteration No. 19 – Amend MAP NO. 1 LAND USE ZONING and amend Specific Local Area Objective SLO 4 - COOLAGAD

#### Proposed Amendment No. 5:

Cairn Homes is committed to providing high quality amenities and community facilities at Coolagad. The Masterplan for the site includes a creche and community buildings, a sports pitch and neighbourhood park. However, The Material Amendments to the SL04 text seeks the provision of specific pitches and facilities which would compromise the masterplan and significantly affect the potential to implement residential development in this location.

The technical analysis prepared by MCORM architects as part of this submission illustrates that the SLO's proposed text changes to require a "separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m)" cannot be accommodated within the Active Open Space or Amenity zoned land within SL04.

No other AOS area in the LPF has been burdened with such impractical playing pitch requirements. The policy is arguably discriminatory through its application to Cairn's lands only. Whilst Cairn have a proven track record of delivering high quality social and community amenities (including soccer pitch at Archers Wood, Greystones), the revised SLO objective needs to be reconfigured.

To inform Officials and Members of the Council, we include illustrations of what a playing pitch of 90m x 145m in size looks like on a plan and the impact it would have on the Masterplan for SL04 which is primarily to deliver new residential development.

The SLO's proposed text changes also require a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 600sqm. Whilst Cairn do not oppose the principle of this use, the scale of it is considered disproportionate to the size of the development. Cairn suggest that smaller figure is used in the objective and the detailed design and size of the facility is agreed at the pre-planning application stage with the planning authority and other key stakeholders.

We note that the Social Infrastructure Audit accompanying the draft LPF it does not stipulate specific pitches or hall size for Coolagad.

The SLO's proposed text change to require that 'No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use, is overly restrictive, compromises the efficient phasing of development and is counter to the proper planning and sustainable development of the area.

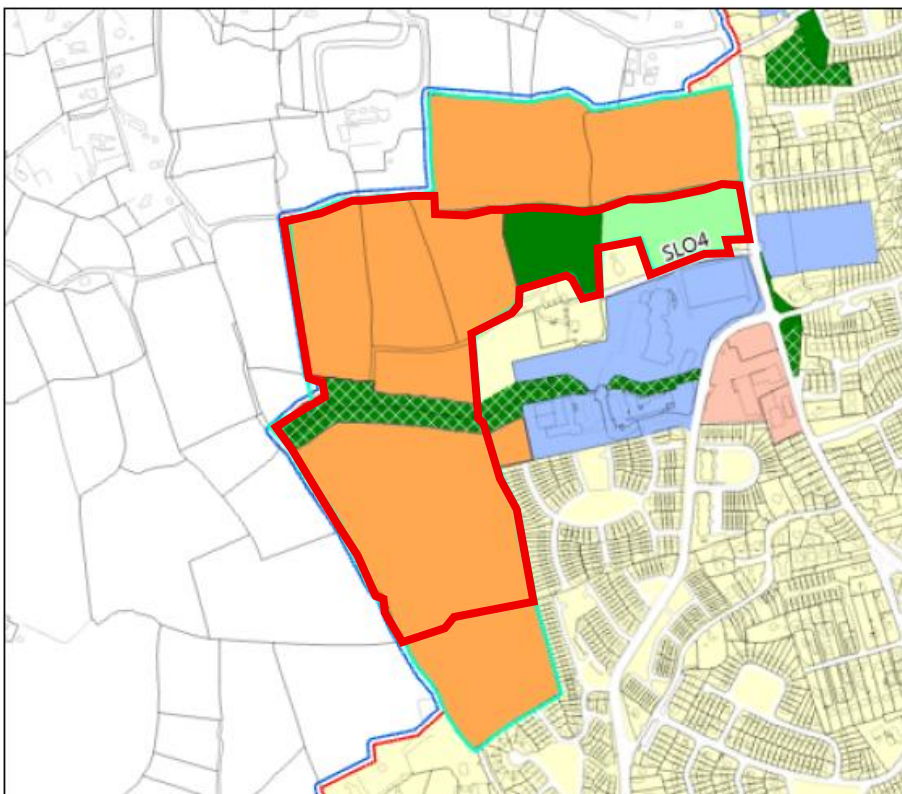
It is submitted all proposed Material Amendments to the Draft LPF for SL04 should be rejected and redrafted to omit reference to a separate full size (i.e. 90m x 145m) multi-sport all weather pitch and to require a community facility of minimum 300 sq.m. instead of 600 sq.m

### 3.3.1 Overview

This section is focussed on the lands in the ownership of Cairn which have been earmarked as SLO 4 in the Amended GDK draft LPF. The Cairn lands at Coolagad, Greystones are shown in the figures below. This section should be read in conjunction with the technical note prepared by MCORM Architects, KFLA Landscape Architects and Barrett Mahony Consulting Engineers.

The Cairn lands total 24.8 ha. They are located to the north of Greystones, close to Templecarrig. The principal access for these lands is via the R761. These lands are located broadly to the west and rear of Templecarrig School, Naíonra na gCloch Liath and the Greystones Educate Together School and of the Waverly residential estate and broadly north of the Seagreen residential estate.

The Cairn lands forms part of a larger landbank referred to as SLO 4 – Coolagad, which totals approximately 37.7 ha. Of this 31 ha is zoned for residential development.



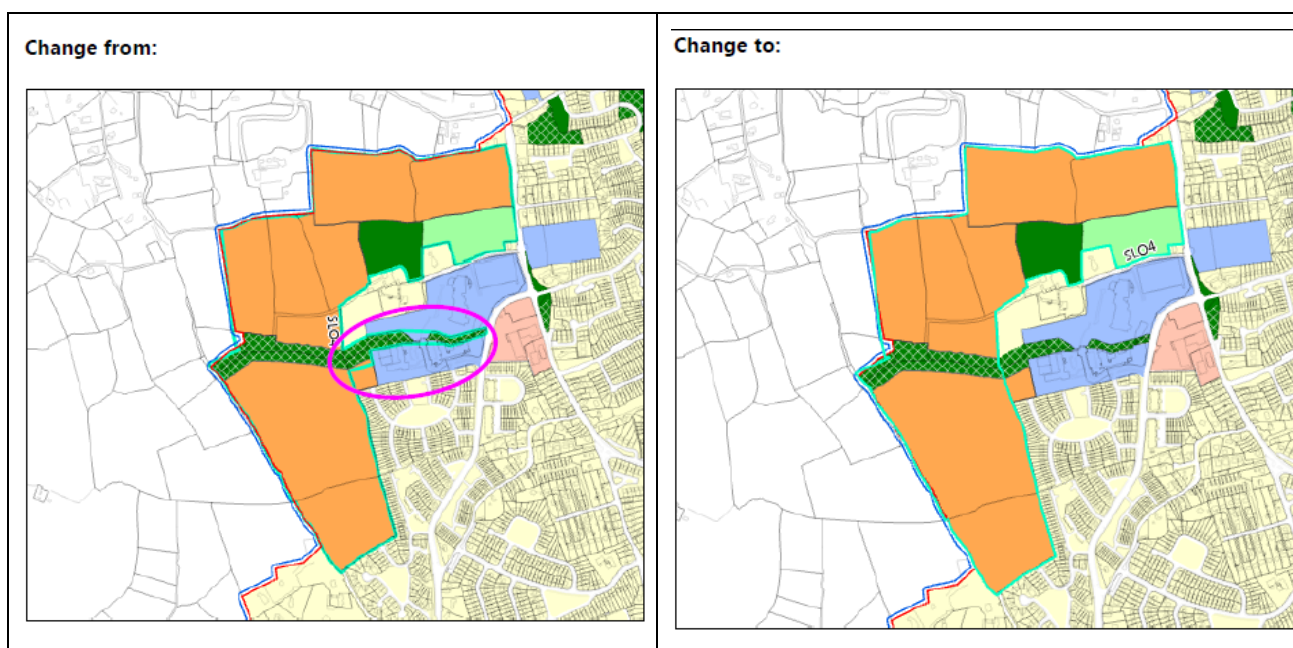
**Figure 3: Cairn Lands in Coolagad (outlined in red)**

### 3.3.2 Draft GDK LPF

#### B.8 Zoning and Land Use

The Material Amendments to the LPF provides for the following mapping change at SLO4:





The proposed change to the boundary of the SLO4 are relatively minor and no further comment is made. However, the Material Amendments to the SLO4 text provide for significant changes which are highly problematic and affect the potential to implement development in this location.

Amend SLO4 text as follows:

#### SLO 4 - COOLAGAD

These SLO lands are located at Templecarrig Lower, Coolagad and Kindlestown Upper in north Greystones, on a site approximately 37.7 ~~39~~ha in size. This area may be developed for a mix of uses including residential, community and open space, 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 existing schools, community infrastructure, transport services, recreational amenity areas and retail in the north Greystones area;
- A total area of c. 31 ~~27~~ha is zoned for new housing development which shall be divided into a number of distinct character areas / estates, 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. In designing the development of residential areas attention shall be paid to mitigating the visual impact of the development on the higher lands and maintaining views towards Kindlestown Hill, from the R761 and the Greystones coast. Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site. In this regard, building height and density shall reduce as landscape elevation increases.
- Open space shall be provided with each phase of development as follows:
  - A minimum of 1.6ha per 400 houses as fully serviced playing pitches, courts etc
  - A minimum of 0.6ha per 400 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.
  - 0.2ha per 400 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; at a minimum a separate full size (i.e. 90m x 145m) multi-sport all

- weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m), which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.
- The lands identified as OS2 along a watercourse shall be reserved in as natural a condition as possible with appropriate undeveloped buffer zones. Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least 25m along each side free from development. Road / cycleway / footpath crossings over / through the OS2 corridor shall be minimised to that absolutely necessary for access; any such crossing shall be via a clean span bridge over the watercourse that maintains its natural character.
  - Community facilities, including a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 600sqm shall be provided within the SLO area in the first phase of development to meet the needs of the new and existing resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out. This community services audit should take into account and explicitly respond to the analysis and recommendations set out in the Social Infrastructure Audit accompanying the LPF.
  - Green links shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods
  - No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use.

### 3.3.3 Cairn Submission

#### Community Infrastructure

The amended draft LPF now seeks the provision **of a multi-functional full fitted indoor space of at least 600 sqm**, to be provided at the entrance of the Cairn lands along the R761.

We note that the Draft LPF was informed by social infrastructure audit for the to provide the evidence-base to sound planning policy. At the outset, the SIA states the

***'LPF area appears to be well served by community buildings and services. However, public consultation revealed a number of groups such as Greystones Cancer Support and the Greystones Arts Collective) who have either no permanent base or are using inadequate facilities. It is necessary therefore that the LPF supports and makes provision for the development of additional community spaces that may be suitable for a range of users and uses. In this regard, the provision of new community facilities is particularly promoted in SLO4 (Coolagad), SLO5 (Bullford) and SLO6 (Ballydonarea), as well as in any possible redevelopment of Charlesland golf course under SLO3'.***

On foot of this, the draft plan included the following wording ***'Community facilities shall be provided within the SLO area to meet the needs of the new resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out'***

The proposed material alterations now specify a community centre of 600 sqm. This requirement is not based on the SIA or any evidence base, and is completely arbitrary in nature.

Table 7.1 – Community Facilities Hierarchy Model of the Wicklow CDP 2022-2028 set out the different types of facilities expected in a Level 2 – Settlement such as Greystones. We note that the floorspace of facilities are not quantified. A review of benchmarking standards indicates that 600 sq.m. is more aligned with district and town level facilities rather than a neighbourhood scale.



**Table 2 Community Centre Hierarchy Model**

Level	Catchment Area	Typical Size Range	Functions & Facilities
<b>Neighbourhood</b>	~5,000–10,000 residents	300–400 sq.m.	Small meeting rooms, multipurpose hall, basic kitchen, youth/senior activities
<b>District</b>	~15,000–30,000+ residents	600–1,000+ sq.m.	Sports hall, multiple activity rooms, offices, café, library, health services
<b>Regional</b>	Entire municipality or city	1,500+ sq.m.	Large event spaces, specialized services, co-working, cultural venues

Sources: Fingal Co. Co. CDP, Dublin City Council CDP, Landcom Community Centre Guidelines, CoPilot AI

Furthermore, we would note that there has been no change in the baseline or assumptions that went into the LPF SIA that explain the specification. The size is excessive and unjustified given the needs identified by the Council's own SIA. It is unclear from the Council's SIA who should manage or operate the prospective facility. We note the following proposed material alterations which will further enhance the community offer in Greystones – Kilcoole:

- Proposed material alteration no. 4 to GDK OP8 to include the provision of community / cultural uses
- Proposed material alteration no. 20 which requires a 600 sqm community building.
- Proposed material alteration no. 23B which now includes 1 ha of CE 'Community and Education' zoning.

Cairn Homes is committed to providing a community facility on its lands as evidenced by the planning history of the site and looks forward to engaging with the Council on this particular matter. It should be noted that Cairn have a track record of delivering community buildings/rooms in Greystones including a room above the creche in Hawkins Wood and the recently permitted pavilion building at Archers Wood playing pitch (recently handed to WCC) which will be constructed in 2026. However, we would respectfully request that the LPF caters for more flexibility in the format and size of this facility to that it can be sized appropriately and the management of same can be considered in more detail. The following wording- is suggested:-

#### Requested Amendment 6

*Community facilities, including a multi-functional fully fitted indoor space (e.g. suitable for indoor sports / recreation, arts / cultural, and social / community use) of at least 300sqm ~~600sqm~~ shall be provided within the SLO area in the first phase of development to meet the needs of the new and existing resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out. This community services audit should take into account and explicitly respond to the analysis and recommendations set out in the Social Infrastructure Audit accompanying the LPF.*

### Active Open Space

We refer to the amendments seeking the provision of a 'separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a ranger of uses) and an all-weather 7-a-side pitch (60m x 40m)'.

Again, these specific requirements are not based on the Council's own SIA. Under section 3.5.1, the SIA identifies a shortfall of 13.85 ha of type A open space (outdoor play space such as pitches, courts and sports grounds) and 3.7 ha of type C equipped play space (such as playground and MUGAs). In table 3.17 of the SIA, the Council identifies new outdoor sport and recreation lands with an allocation of 2.35 ha of Type A open space and 2 ha of Type B open space in Coolagad. The figures presented in table 3.17 of the SIA shows a proposed provision of Type A open space of 28.6 ha, so an excess 14.75 ha of Type A lands across the overall settlement. We note that on foot of proposed material alterations, AOS zoning has been reduced by 4.4 ha in Lott Lane, but increased by 12.5 ha in Bellevue Hill giving a total proposed provision of 41.1 ha in Greystones only. This is almost three times over the deficit identified by the Council.

We also refer to policy CPO 7.40 of the CDP which states:

*'Facilities for sports shall normally be located on designated active open space, close to towns or villages where they are easily accessed by sustainable mobility options. All efforts shall be made to locate new sports facilities close to existing community facilities, schools or areas of dense residential development. The Council may consider providing sites for these purposes or may be prepared to make financial or other assistance available, subject to reasonable access being made available to the public and to reasonable safeguards for the continued use of the land as open space'.*

In the material alterations, the amendments now specify the format and size of the active open space facilities. This appears to have been inserted by Councillors without any analysis of the size of the pitches relative to the AOS designation on the site.

### **It is not possible to accommodate such a facility within the lands zoned for active open space.**

In order to provided clarity on the implications of this policy, Cairn has commissioned MCCORM Architects to prepare a technical analysis to illustrate what the pitches of this scale would actually look like on a site plan. and also illustrate the challenging gradients on the land which make it extremely difficult to deliver.

It is clear that it would not be possible to accommodate the 90 x 145 m pitch as per the material alteration. A total of 2.35 of lands have been zoned for active open space in landbank, exclusively on the Cairn landholding. The illustrations by MCCORM show that the site can accommodate 98 x 54m all weather pitch and mixed use sports court (see Site Constraints in Response to LPF Material Amendments by MCORM) without issues.

The larger pitch cannot be accommodated on the lands owing to the environmental sensitivities. We refer to 'Site Constraints in Response to LPF Material Amendments' by MCORM, which shows the issues associated with the development of such pitch on the subject lands in different locations. There are issues relating to access, archaeology, topography, environmental sensitivities and residential amenities associated with the development of a pitch of that size on elevated lands.

We have modelled the provision of the pitch on different parts of the lands. Commentary can be found below.

	Zoning	Ownership	Environment	Topography	Access	Residential Amenities
<b>Option 1</b>	Zoned OS	Multiple landowners	Impact on stream, Waterlogged area (wetland) with associated fauna and flora) Light pollution Visual Impact likely	Significant cut and fill needed	Cuts access off	Negative impact on proposed and existing
<b>Option 2</b>	Zoned RN2	One landowner	Impact on tree line Light pollution Visual Impact likely	Significant cut and fill needed	Access to southern landbank constrained	Negative impact on proposed
<b>Option 3</b>	Zoned RN2	Two landowners	Light pollution Visual impact likely	Significant cut and fill needed	No issue	Negative impact on proposed
<b>Option 4</b>	Zoned RN2	Two landowners	Impact on archaeology Impact on stream	Significant cut and fill needed	No issue	Negative impact on proposed
<b>Option 5</b>	Zoned RN2	One landowner	Light pollution	Significant cut and fill needed	No issue	Negative impact on existing and proposed

As can be seen in the above matrix and material prepared by MCORM and Barrett Mahony Consulting Engineers, the provision of the larger pitch would be met with significant issues, some of which would significantly hamper the development potential of the Cairn landholding.

The SLO's proposed text changes to require a "separate full size (i.e. 90m x 145m) multi-sport all weather pitch", has evidently not been considered in detail as it simply cannot be physically accommodated within the landholding

The SLO's proposed text change to require that '*No units may be occupied in any phase until the community infrastructure associated with that phase is completed and available for public use*', is overly restrictive, compromises the efficient phasing of development and is counter to the proper planning and sustainable development of the area. We have sought to illustrate the ill-conceived nature of this objective through a series of diagrams which illustrate the monumental impact on residential delivery in the 'Site Constraints in Response to LPF Material Amendments' by MCORM.

Requested Amendment:

*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; at a minimum a ~~separate full size (i.e. 90m x 145m) multi-sport all weather pitch, mixed use all weather sports courts (suitable in size and finish for a range of uses) and an all-weather 7-a-side pitch (60m x 40m),~~ which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.*

### 3.4 Submission 5 – Proposed Material Alteration No. 18 SPECIFIC LOCAL OBJECTIVES (SLOs) INTRODUCTION

**Proposed Amendment No. 6:**

The LPF 'Introduction' to Special Local Objectives (SLOs) has been amended to ensure that masterplans are serviceable and no development prejudices or unduly constrains another parcel. It should be clarified that masterplan details should be 'agreed prior to submission of a planning application' to allow sufficient flexibility at detailed design stage.

#### 3.4.1 Draft GDK LPF

Cairn's land holding at Coolagad in the north of Greystones is included in SLO4. Material Alteration No.18 sets out an introduction to the policy approach for all SLOs, and has been amended in red as highlighted below.

**Proposed Material Alteration No. 18**

Amend **INTRODUCTION** as follows:

The purpose of an SLO is to guide developers as to the aspirations of the LPF regarding the development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where the lands are zoned for 'mixed use' to give more detail on the development objective of these lands. A masterplan for the entire SLO area may be required to be submitted as part of the first application within the SLO. **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.**

For a number of the SLOs concept sketches are shown in this LPF. These are conceptual only, did not include complete site surveys/analysis, and should not be taken as a definitive guide as to the acceptability or otherwise of any access points, road layouts or building positions/designs Any application for permission on said lands must conform to all standards and requirements of the Planning Authority, as set out in this LPF and the Wicklow County Development Plan.

#### 3.4.2 Cairn Submission

Cairn Homes has commissioned MCORM architects to prepare a detailed masterplan of the SLO4 lands. This masterplan is consistent with the planning authority's zoning plan. However, several of the measures set out

with regard to SLO4 actually undermine the detailed design and land designations that have previously been agreed with the planning authority.

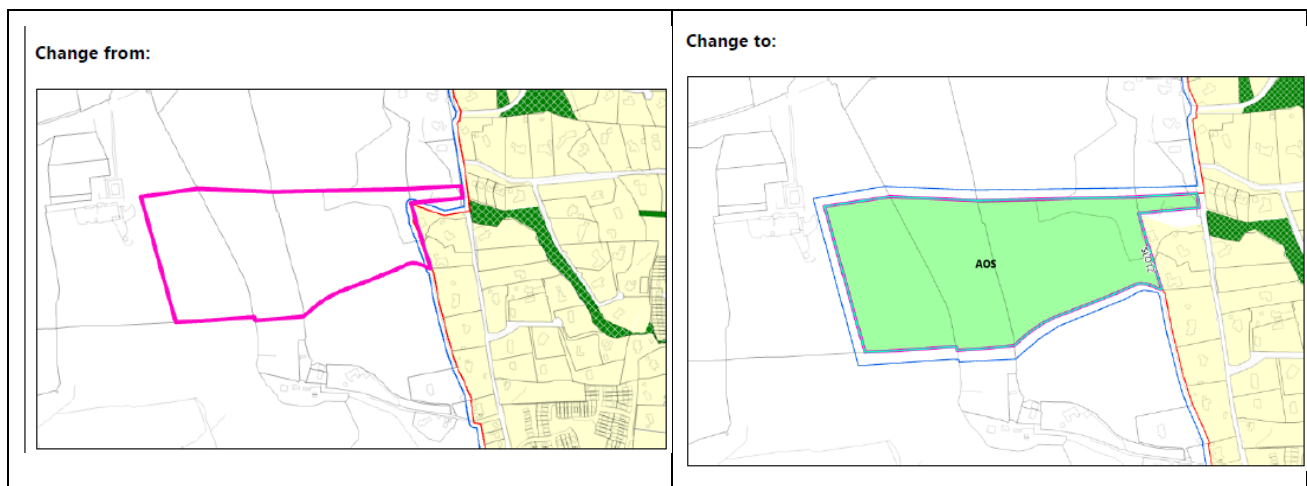
It should be clarified that masterplan details should be *'agreed prior to submission of a planning application'* to allow sufficient flexibility at detailed design stage.

### 3.5 Submission 6 – Proposed Material Alteration No. 26 SLO 12 – BELLEVUE HILL

**No Amendment Requested:** This Material Alteration refers to new SLO 12 at Bellevue Demesne for 12.5ha AOS. Wicklow County Council did not impose any specific requirements on the composition of the AOS, and it is submitted this should applied equally and fairly to all AOS areas.

#### 3.5.1 Overview

We note that the Council has also proposed as part of the material alteration to include AOS lands in Bellevue Hill (SLO 12) which would increase further the quantum of lands allocated to Type A open space as shown below.



#### 3.5.2 Cairn Submission

This proposed alteration comes additional to proposed rezoning in the new SLO 13 – Coolagad East which would include 0.9 ha of AOS lands. We note that the Council has also proposed as part of the material alteration to include AOS lands in Bellevue Hill (SLO 12) which would increase further the quantum of lands allocated to Type A open space. As stated in the preceding section, this adds a further 12.5 ha to the proposed AOS provision in Greystones.

The specific requirements for this land holding (playing pitch types etc) have been reserved for a detailed design stage. It is Cairn's submission that this is fair and reasonable and should be applied equally to all lands.

## 4. CONCLUSION

Cairn Homes welcome the opportunity to provide input to the Greystones – Delgany & Kilcoole draft Local Planning Framework and Variation No.4 of the Wicklow County Development Plan 2022-28.

The preparation of the LPF from Issues paper, through draft stage to Material Amendments has progressed amidst a rapidly evolving strategic planning context.

The publication of the Government’s Housing Strategy ***Delivering Homes, Building Communities*** on 12<sup>th</sup> November, built on the First Revision to the National Planning Framework (NPF), published in April 2025, and to the updated Economic and Social Research (ESRI) Institute research that projects the population of Ireland will increase to approximately 5.74 million by 2031.

The Government has set out a target in the *Programme for Government* of a minimum of **300,000 new homes**. The significant majority of the required funding will come from investment by the private sector to support homeownership and a well-functioning private rental market. It is anticipated that the market will move to a rapid activity phase over the next two years. The number one **Key Enabler** set out in ***Delivering Homes, Building Communities*** is **Zoning Sufficient Land**.

In Cairn’s submission to the Draft LFP in June, it was highlighted that the phasing strategy of lands for RN1 and RN2 was overly restrictive and the ‘hard transition’ of 75% (development initiated) was an inoperable constraint.

We note the Office of Planning Regulator’s (OPR) submission to the Arklow Draft LPF and Variation no. 5 of the CDP dated 12/11/2025, which now agrees with our position that a Tiered phasing strategy is not necessary at this point, where the Development Plan’s life up to 2028. Therefore, all constraints to implementation of zoned lands must be reviewed and amended as appropriate as part of this current process.

It is submitted that the planning authority’s objectives can be achieved with a more general wording to the phasing strategy policies that clarifies that “Permission will not only be considered during the lifetime of this LPF for RN2 lands ***where it can be demonstrated that the lands are serviceable and capable of delivering housing within the lifetime of the plan in accordance with the sequential test.***

It is vital that the policy for SLO4 is reviewed in line with the requested amendments set out in this submission, to ensure that pitch requirements (which cannot be accommodated) and the wording of community facility objectives do not undermine the masterplan for the Coolagad.

It is Cairn’s intention to bring forward a new LRD planning application at Coolagad in the coming months, and that this should be made in the context of a supportive and robust planning policy as set out in the LPF. It is Cairn’s intention to work in close cooperation with the planning authority to bring forward this high-quality scheme that is greatly needed for the county and town. The amendments advocated in this submission will ensure these new proposals can be dealt with by the planning authority in a more efficient and equitable manner.

Cairn Homes will continue to work with Wicklow County Council to bring forward development proposals with associated infrastructure and amenity investments.



Appendix 1



Figure 4: Cairn Lands in Coolagad



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## COOLAGAD, GREYSTONES WICKLOW

SITE CONSTRAINTS IN RESPONSE TO LPF  
MATERIAL AMENDMENTS

NOV 2025

**M'CORM**  
ARCHITECTURE  
AND URBAN DESIGN

**Contact**

**T:** 01 478 8700

**W:** [mccorm.com](http://mccorm.com)

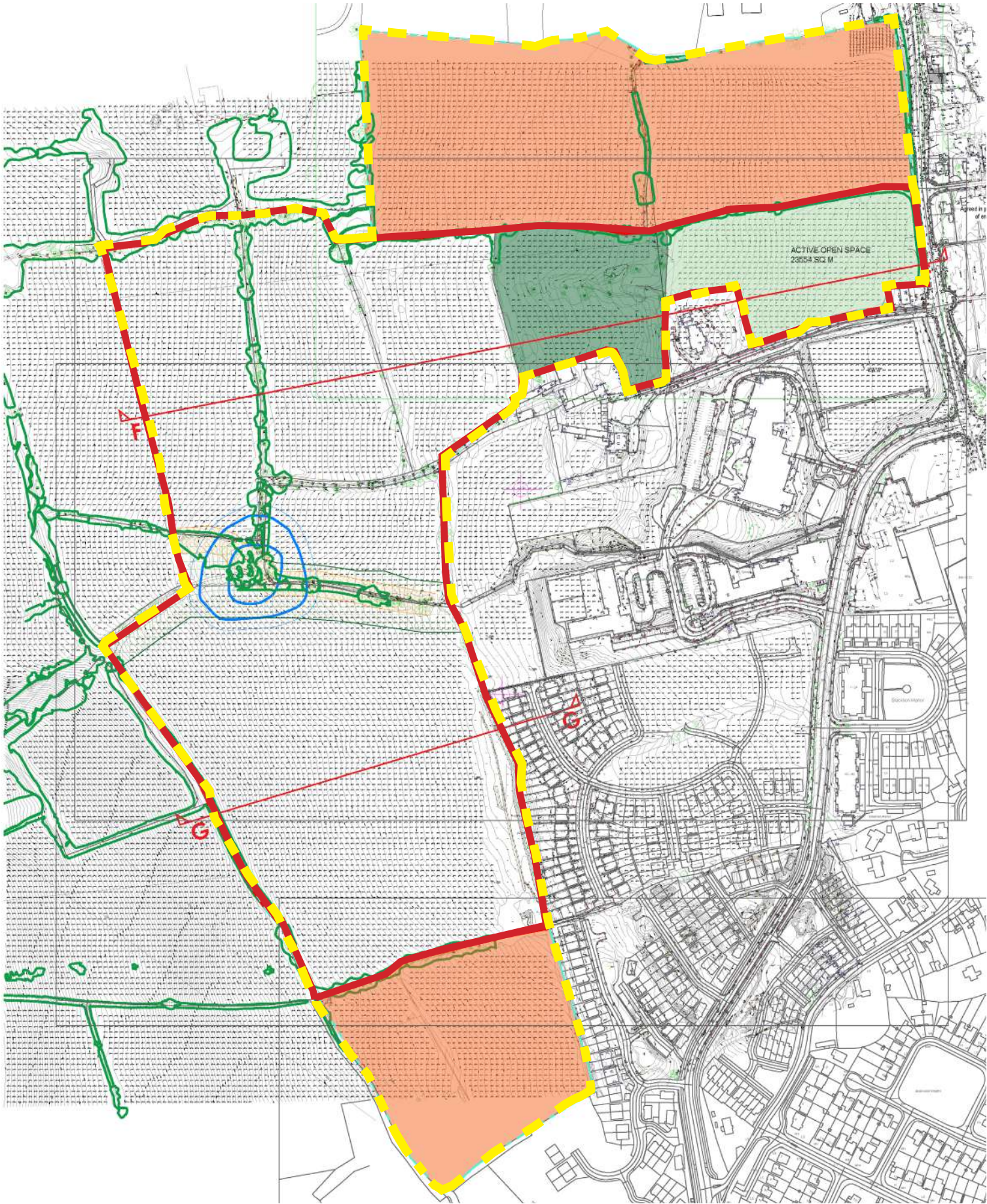
**Dublin**

No 1 Grantham Street,  
Dublin 8. D08 A49Y

**Tullamore**

Block 6, Central Business Park,  
Tullamore, Co. Offaly. R35 F8KO



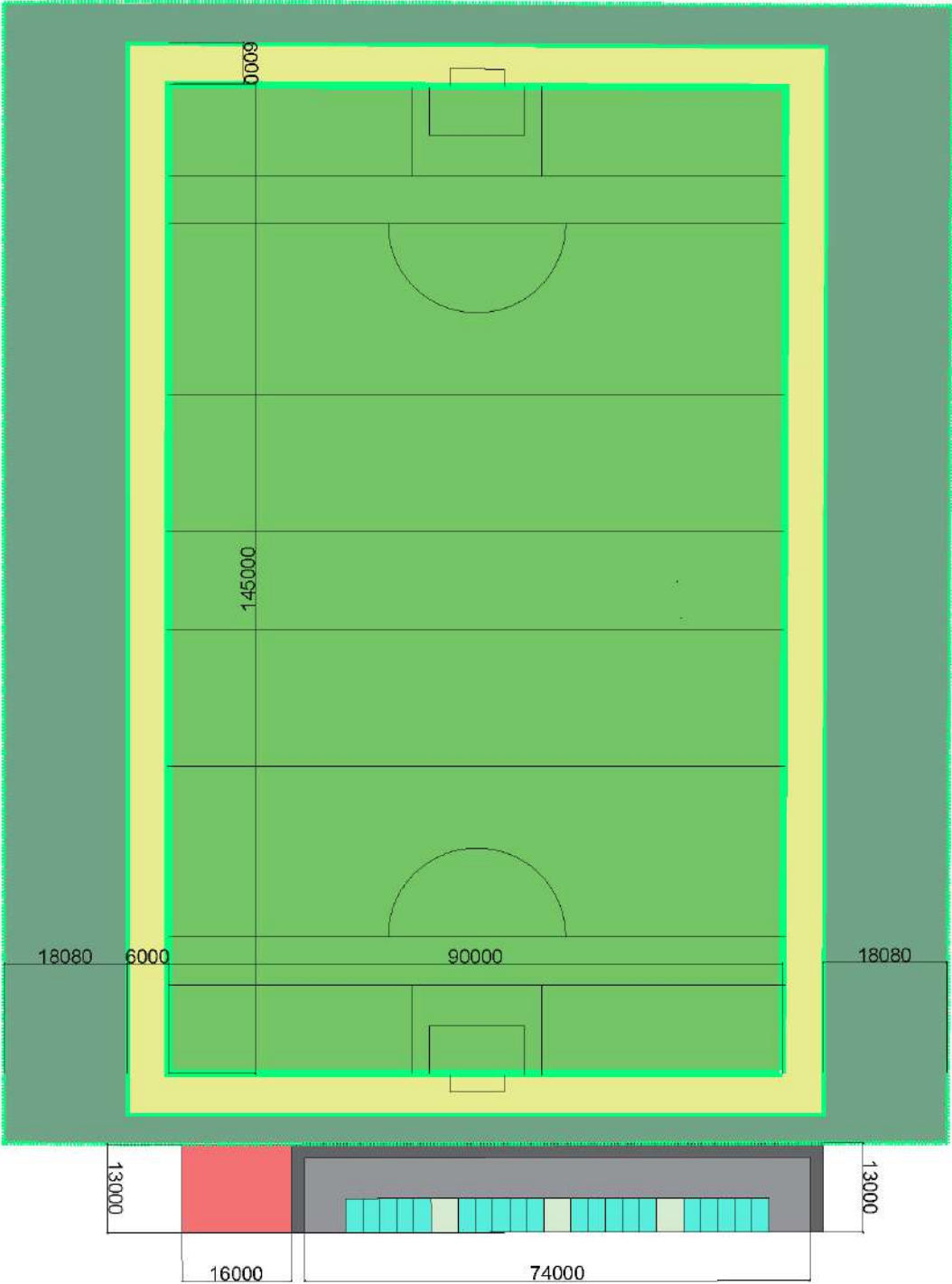


LEGEND

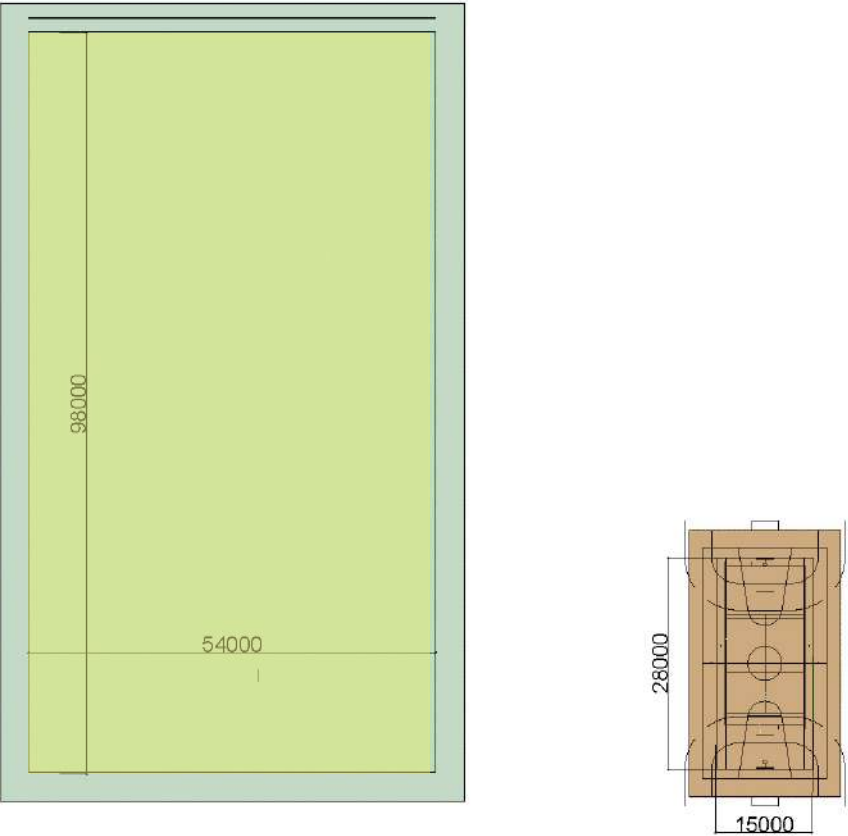
- Indicates SLO4 Zoned Lands
- Indicates Application Boundary (26Ha)
- Archeology Area (34ha)
- Zoned Open Space (2.0ha)
- Active Open Space (2.3ha)
- SLO4 Zoned Lands Owned by Others (c. 12.1ha)
- Riparian Strip (1.63ha)
- Retained Hedgerow

00. EXISTING SITE CONSTRAINTS





THIS SLIDE ILLUSTRATES THE CONTEXT OF PROVIDING A PITCH OF 90M X 145M. IT SHOULD BE NOTED THAT SUCH A PITCH REQUIRES A CIRCULATION SPACE (C. 6M) OUTSIDE THE END AND SIDE LINES TOGETHER WITH SPACE FOR CUT AND FILL TO ACHIEVE A LEVEL PLAYING SURFACE. IN ADDITION, ACCOMMODATING A PLAYING PITCH IN A RESIDENTIAL AREA WILL NECESSITATE PARKING PROVISION (WE ASSUMED 20 SPACES MINIMUM) AND A SMALL PAVILION FOR STORAGE AND CHANGING ROOMS ETC.



GAA SIZED PITCH TO BE ACCOMMODATED ON SLO4 LANDS (PROPOSED MATERIAL ALTERATIONS)

- 1** 90M X 145 M MULTI PURPOSE ALL WEATHER PITCH  
NTS @ A3

- 2** 98M X 54M M MIXED USE ALL WEATHER PITCH  
NTS @ A3

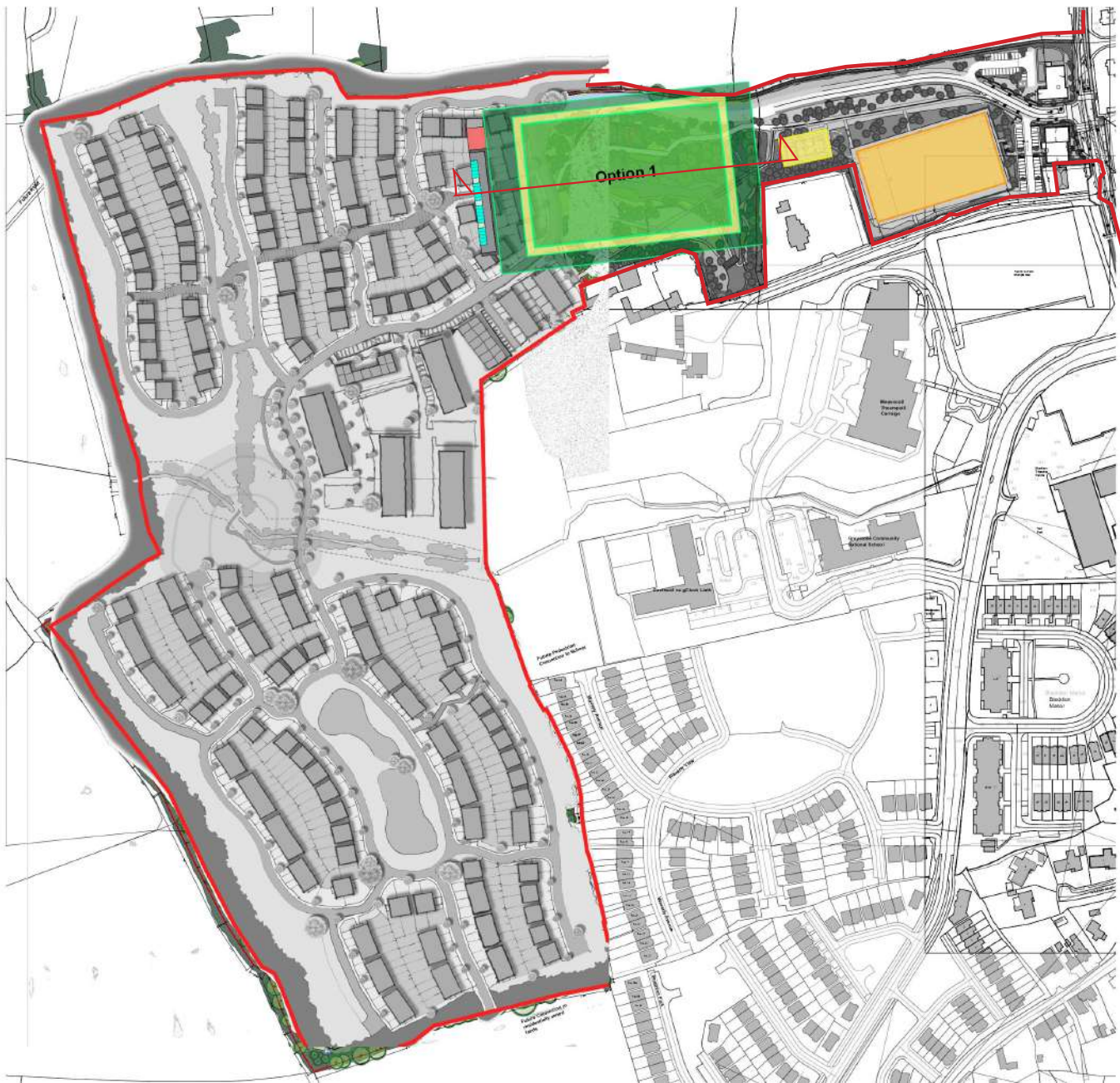
- 3** 28M X 15M M MIXED USE ALL WEATHER PITCH  
NTS @ A3

PITCHES THAT HAVE BEEN PREVIOUSLY PROPOSED BY CAIRN TO SATISFY LAP ACTION PLAN (AP1) WHICH STATED: "A MINIMUM OF 4HA OF LAND SHALL BE PROVIDED FOR ACTIVE OPEN SPACE INCLUDING PUBLIC PARK, MUGA AND PLAYGROUND, IN ACCORDANCE WITH THE REQUIREMENTS OF THE COMMUNITY AND ENTERPRISE SECTION OF THE COUNCIL"

GIVEN THE SITE CONSTRAINTS, THIS IS THE MAXIMUM SIZED PITCH THAT CAN BE ACCOMMODATED ON THE AMENITY ZONED LAND.

- 90 X 145 MULTI PURPOSE ALL WEATHER PITCH
- 6M BUFFER FOR SPECTATORS AND ASSOCIATED PATH ROUTE
- 1:4 SLOPE ALONG THE PERIPHERY
- CLUBHOUSE/CHANGING ROOMS
- ASSOCIATED PARKING FOR PITCHES (C.20 NO)

01. CONTEXT OF LPF PROPOSED PITCH REQUIREMENTS VERSUS PREVIOUS LAP REQUIREMENTS



Site Impacts

Ecological/Biodiversity/Environmental

This location is in a sensitive area with existing vegetation and watercourses which would be significantly disturbed and result in fragmentation of natural habitats and Ecosystems.

Light Pollution from flood lights has shown to impact the circadian rhythm of flora and fauna impacting breeding, feeding and migration pattern, similarly associated noise pollution from said pitch can negatively impact the foraging and movement patterns bats, owls, moths, and other nocturnal species. This is particularly important due to its location near existing mature hedgerows.

Runoff from synthetic turf can carry microplastics , rubber crumb and heavy metals into streams and ground water , this is particularly pertinent for this location because of its location near a wet land area.

Access

This location is **unattainable** because the pitch and ancillary spaces spread over the only access road into the site , blocking access and land locking the est of the landbank.

Ownership

This location is **unattainable** because the pitch and ancillary spaces will extend beyond the applicants ownership.

Topographical

This location would require **significant cut and fill** operations which may culminate in slope instability , the additional use of embankments and gabion walls will bring with it a negative visual impact.

APPROXIMATE ASSOCIATED AREAS

ALL WEATHER PITCH SQM	13050 SQM
BUFFER SQM	2950 SQM
1:4 SLOPE SQM	7386 SQM
CLUB HOUSE SQM	208 SQM
ASSOCIATED PARKING SQM	310 SQM
TOTAL SQM	2.39 HA

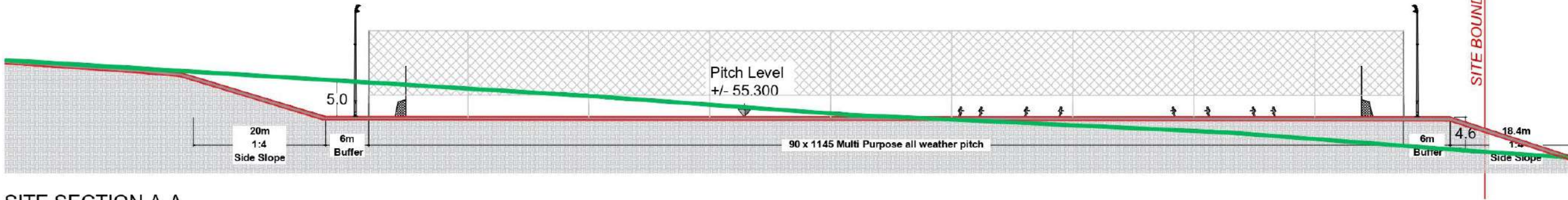
RESIDENTIAL YIELD IMPACT

APPROXIMATE RESIDENTIAL ZONING AREA  
NEEDED TO ACCOMMODATE GAA PITCH AND  
ANCILLARY SPACES

2.39 HA

APPROXIMATE NUMBER OF HOMES LOST TO  
ACCOMMODATE GAA PITCH AND ANCILLARY  
SPACES

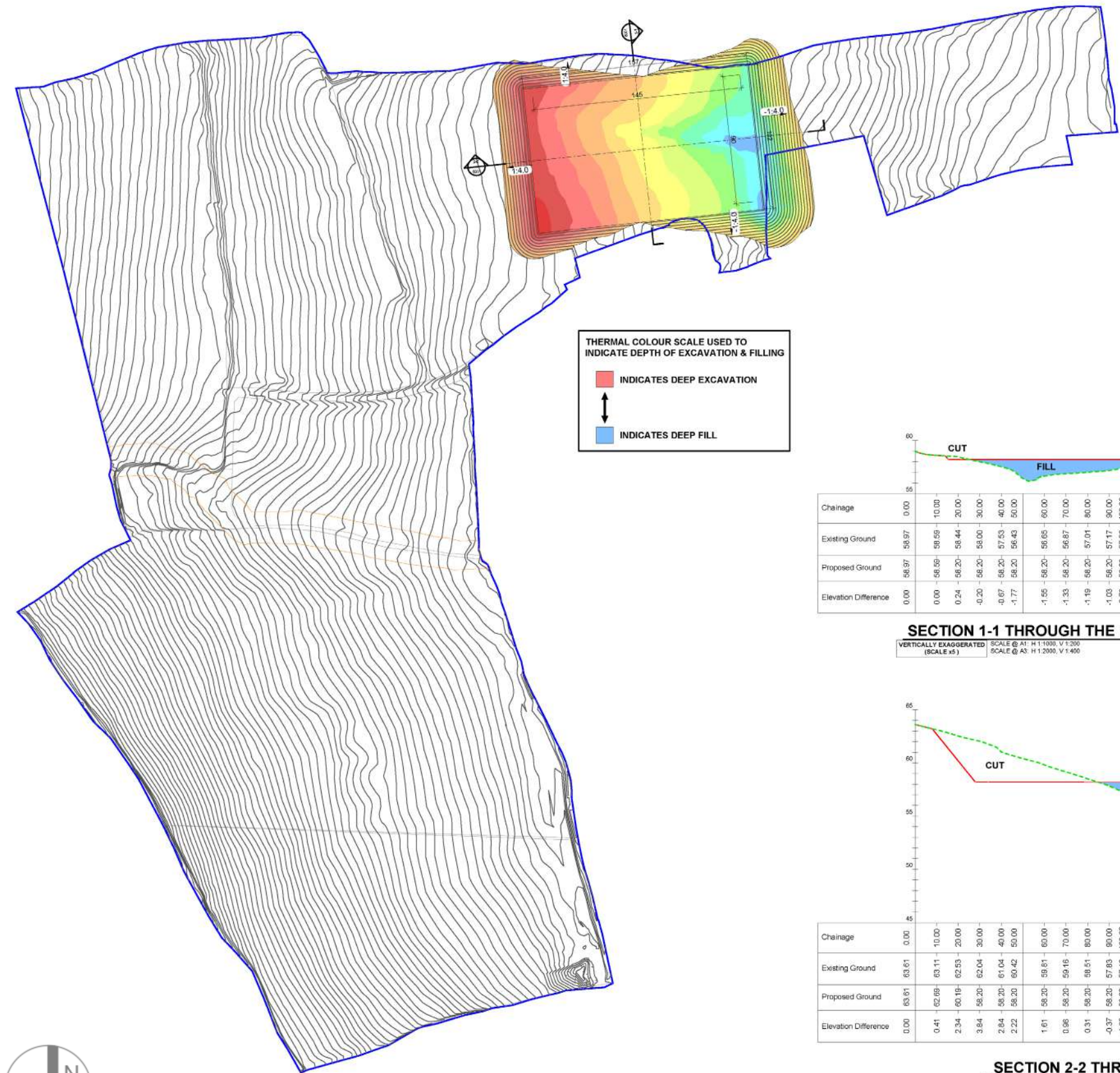
12 HOMES LOST



SITE SECTION A-A

02 OPTION 1 - MULTI PURPOSE ALL WEATHER PITCH

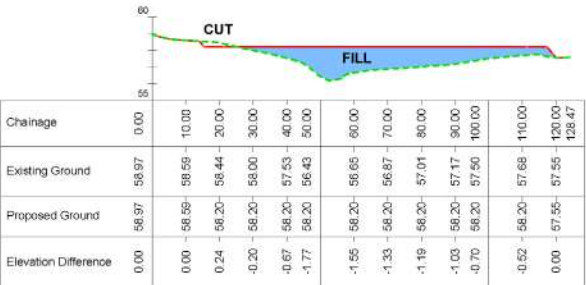




**THERMAL COLOUR SCALE USED TO INDICATE DEPTH OF EXCAVATION & FILLING**

INDICATES DEEP EXCAVATION

INDICATES DEEP FILL

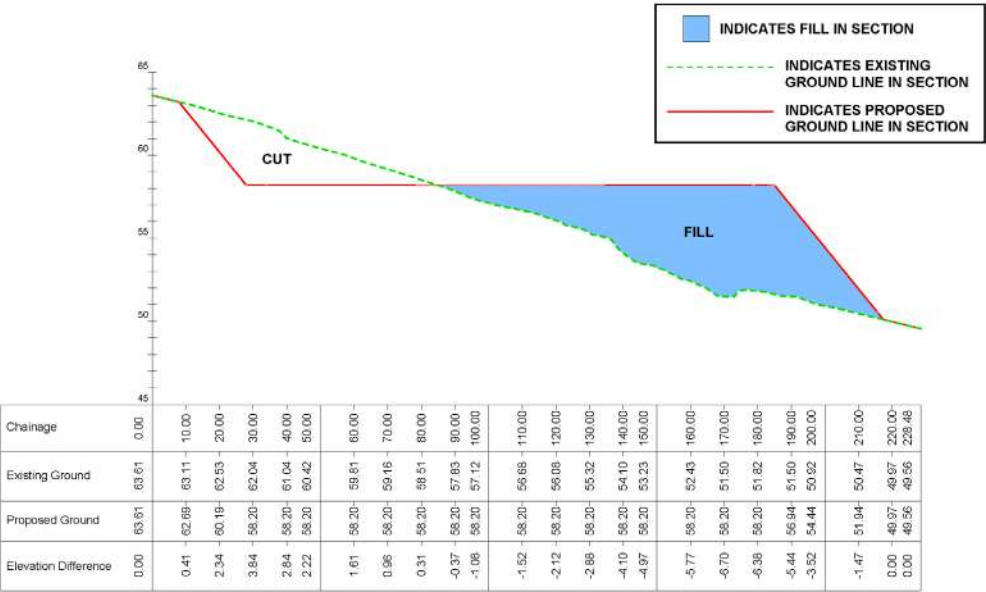


**SECTION 1-1 THROUGH THE PITCH**

VERTICALLY EXAGGERATED (SCALE x5)

SCALE @ A1: H 1:1000, V 1:250

SCALE @ A3: H 1:2000, V 1:400



**SECTION 2-2 THROUGH THE PITCH**

VERTICALLY EXAGGERATED (SCALE x5)

SCALE @ A1: H 1:1000, V 1:250

SCALE @ A3: H 1:2000, V 1:400

**3D VIEW**

1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERS & ARCHITECTS DRAWINGS FIGURED DIMENSIONS ONLY (NOT SCALING) TO BE USED. WHERE A CONFLICT OF INFORMATION EXISTS OR IF IN ANY DOUBT - **ASK**.
2. CONSULTANTS TO BE INFORMED IMMEDIATELY OF ANY DISCREPANCIES BEFORE WORK PROCEEDS.



**MULTI-SPORTS ALL-WEATHER PITCH-OPTION 1**

SCALE @ A1: 1:1500

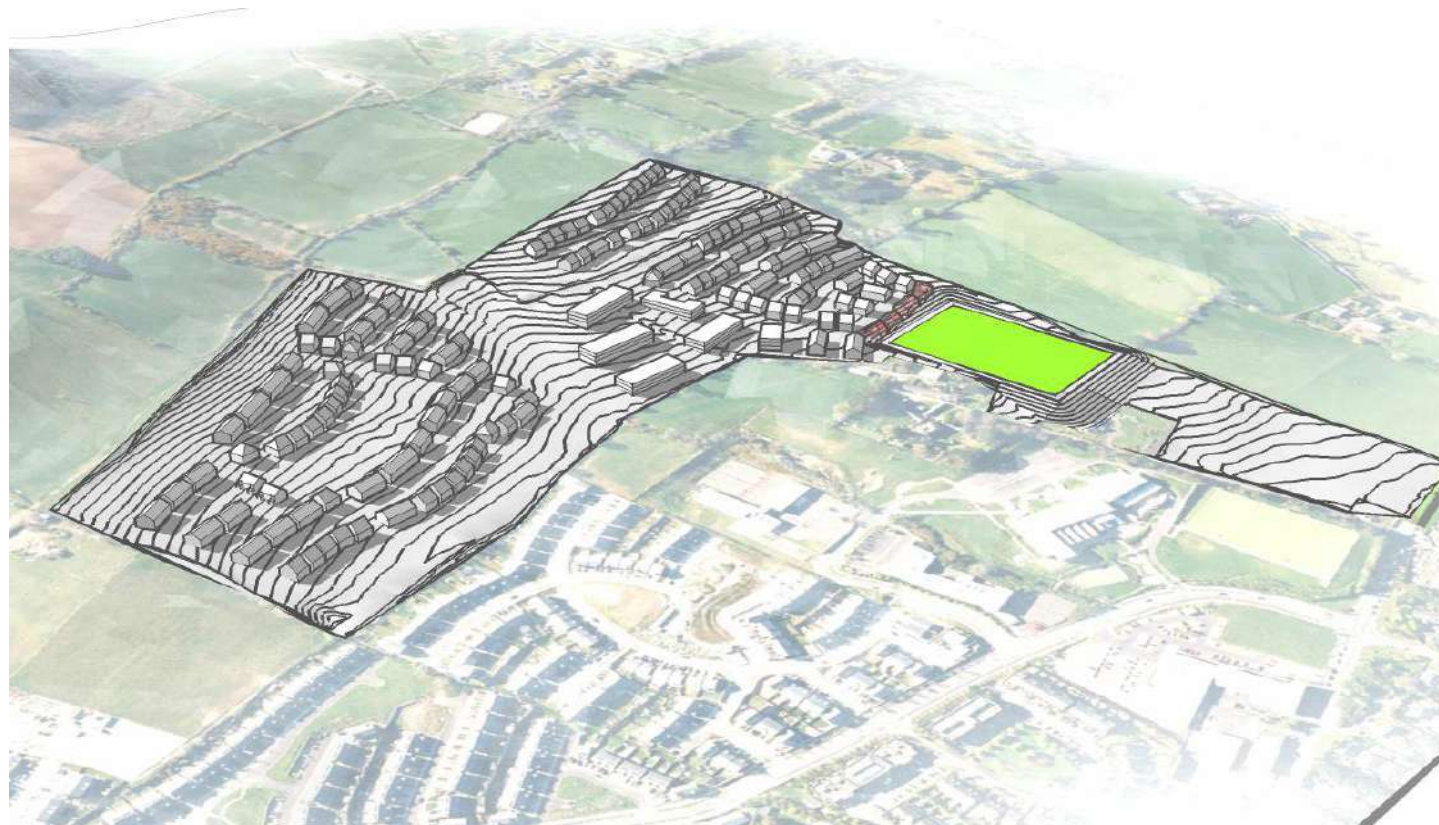
SCALE @ A3: 1:3000

P1	14.11.25	DRAFT ISSUE FOR COMMENT		PS
ISSUE	DATE	DESCRIPTION		BY
Project Engineer: POD		Project Director: BM		
BM STAGE				
PRELIMINARY				
		Dublin Office: Sandwich House, 55-54 Lower Sandwiche Street, Dublin 2, Ireland. Tel: (01) 677 3030 Fax: (01) 677 3164 London Office: 12 Mill Street, London E81 2AY, United Kingdom Tel: (0044) 084 5413 2722		
DARRETT MAHONY		Structural, Project Management E-mail: bmcc@bmcc.ie Web: www.bmcc.ie		
		The Institution of Structural Engineers		
Consulting Engineers, Civil				International Institution of Structural Engineers
CLIENT				
CAIRN HOMES PROPERTIES LTD.				
PROJECT TITLE			BM PROJECT No	
COOLAGAD, GREYSTONES			25.280	
MODEL	REFERENCE	SUITABILITY		REVISION
	25280-BMD-M3-C-PROPOSED SURFACE	S0		P01
DRAWING TITLE				
MULTI-SPORTS ALL-WEATHER PITCH				
OPTION 1				
DRAWING REFERENCE		STATUS		REVISION
25280-BMD-00-ZZ-DR-C-8001		S0		P1

02. OPTION 1 - MULTI PURPOSE ALL WEATHER PITCH - EARTHWORKS MODELING



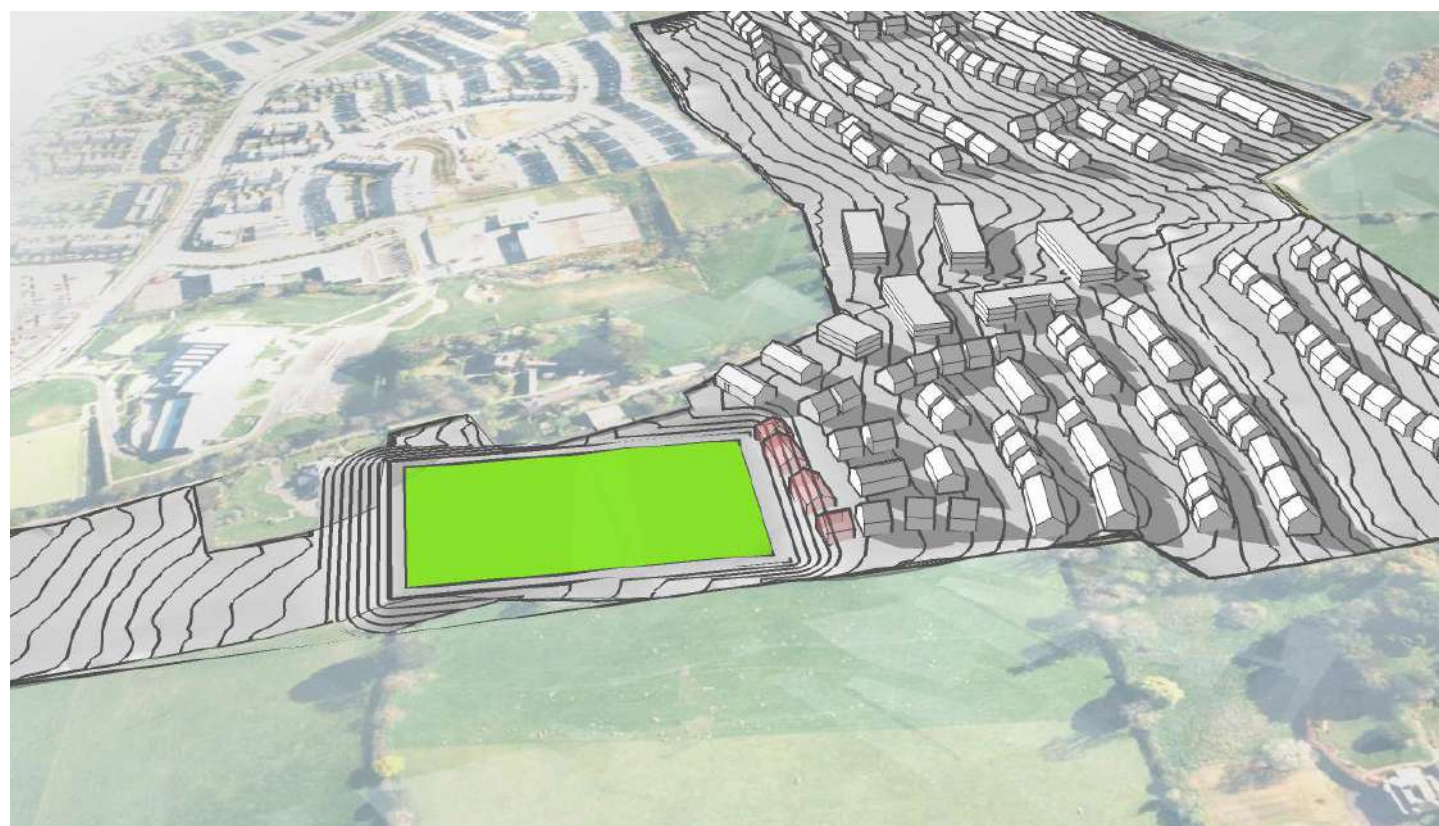
**\*\* 3D Views do not include club house & associated parking**



VIEW 1 - OVERALL AERIAL IMAGE VIEW FROM THE SOUTH EAST



VIEW 2 - VIEW FROM THE SOUTH EAST



VIEW 3 - VIEW FROM THE NORTH

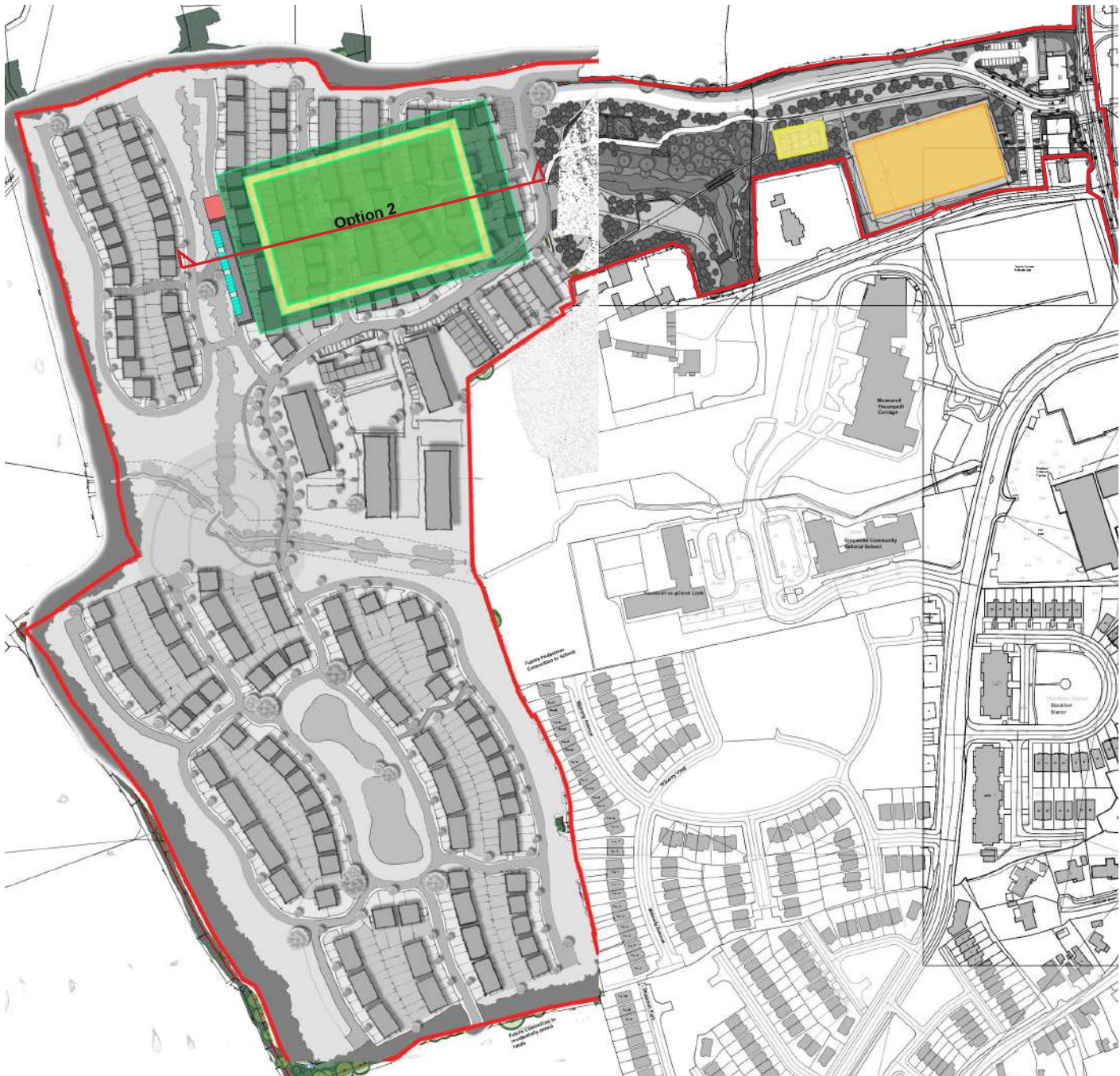


VIEW 4 - VIEW FROM THE EAST

02. OPTION 1 - MULTI PURPOSE ALL WEATHER PITCH - 3D SKETCH MODELING

COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT





Site Impacts

Ecological/Biodiversity/Environmental

Significant disturbance and fragmentation of natural habitats and Ecosystems in this location. This option would necessitate the removal of tree and hedge line which would cause significant harm to biodiversity.

Light Pollution from flood lights has shown to impact the circadian rhythm of flora and fauna impacting breeding, feeding and migration pattern, similarly associated noise pollution from said pitch can negatively impact the foraging and movement patterns bats, owls, moths, and other nocturnal species. This is particularly important due to its location near existing mature hedgerows.

Runoff from synthetic turf can carry microplastics , rubber crumb and heavy metals into streams and ground water , this is particularly pertinent for this location because of its location near a water course.

Access

Locating a facility like this in the middle of a housing estate is not considered appropriate. This location would significantly impact the permeability of cars and people through to the southern part of the land holding and result in conflict with residents and visitors parking.

Topographical

This location would require **significant cut and fill operations** which may culminate in slope instability , the additional use

APPROXIMATE ASSOCIATED AREAS

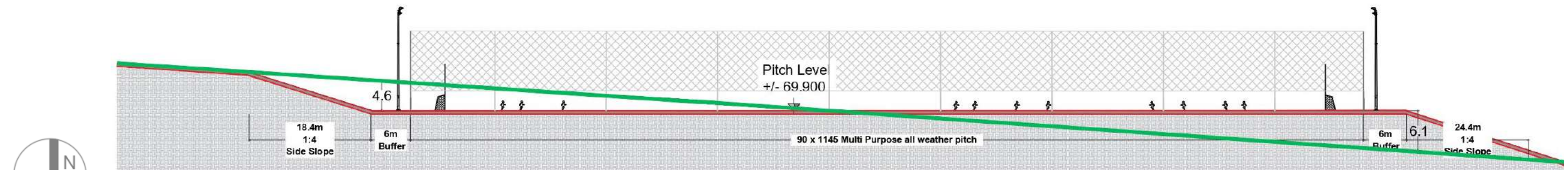
ALL WEATHER PITCH SQM	13050 SQM
BUFFER SQM	2950 SQM
1:4 SLOPE SQM	7456 SQM
CLUB HOUSE SQM	208 SQM
ASSOCIATED PARKING SQM	310 SQM
TOTAL SQM	2.39 HA

RESIDENTIAL YIELD IMPACT

APPROXIMATE RESIDENTIAL ZONING AREA  
NEEDED TO ACCOMMODATE GAA PITCH AND  
ANCILLARY SPACES

APPROXIMATE NUMBER OF HOUSES LOST TO  
ACCOMMODATE GAA PITCH AND ANCILLARY  
SPACES

2.39 HA  
86 HOUSES LOST

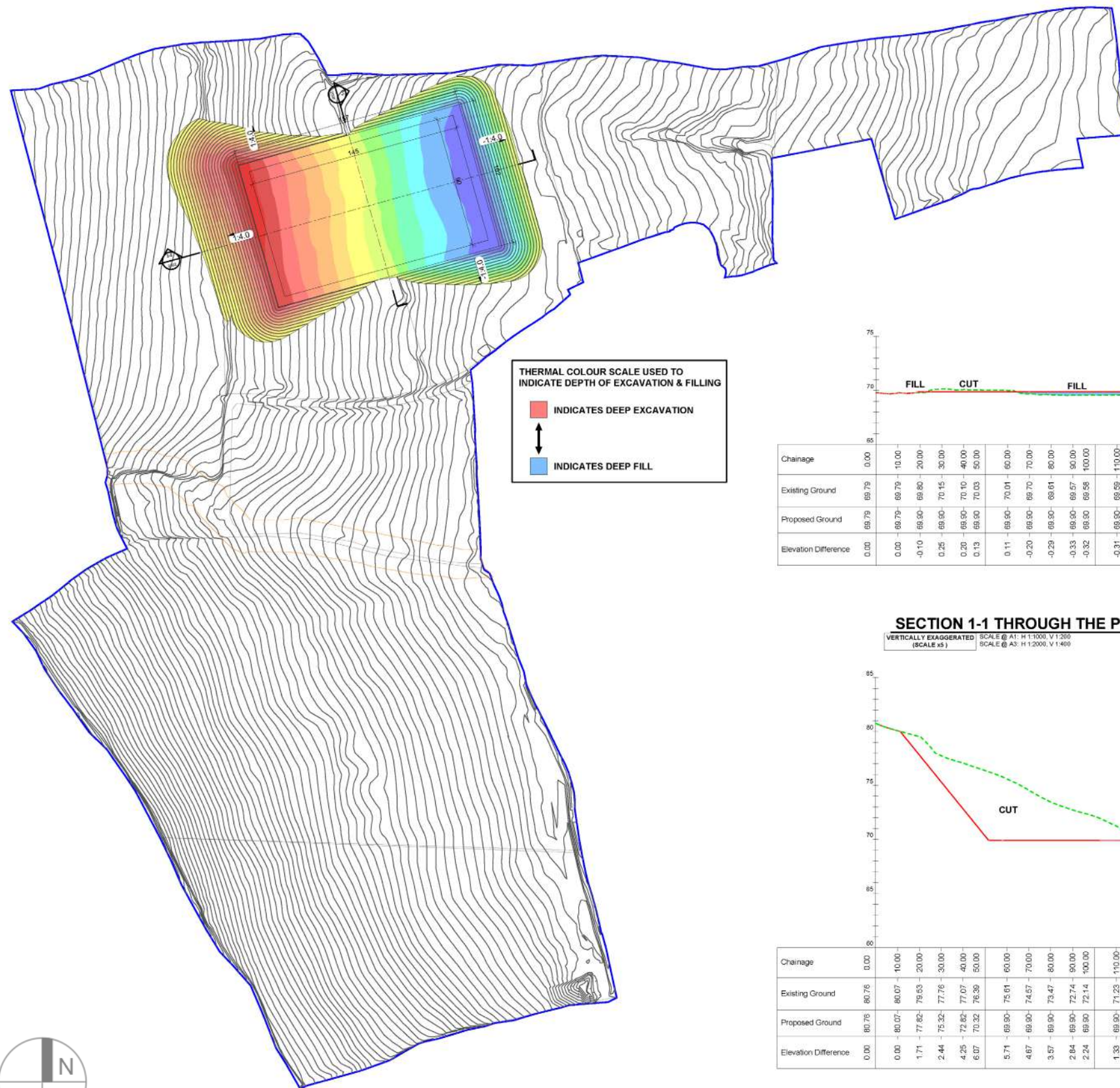


SITE SECTION B-B

03. OPTION 2 - MULTI PURPOSE ALL WEATHER PITCH

COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT

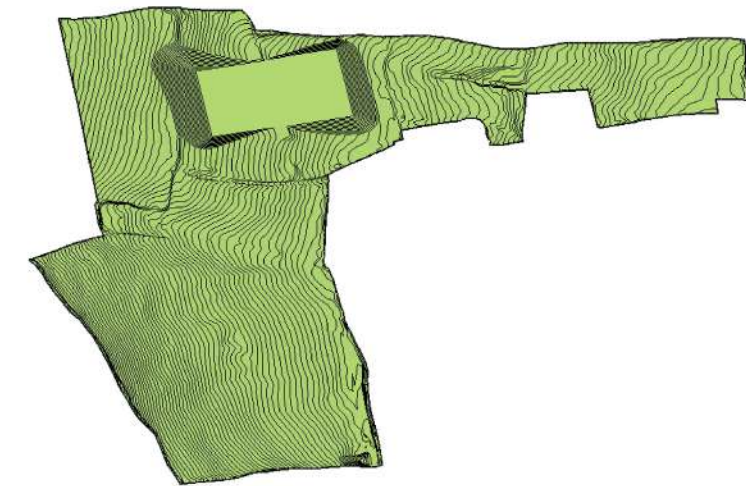




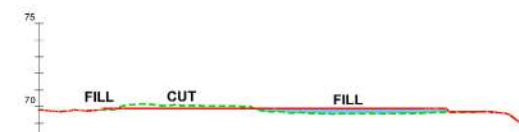
SCALE @ A1: 1:1500  
SCALE @ A3: 1:3000



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2. CONSULTANTS TO BE INFORMED IMMEDIATELY OF ANY DISCREPANCIES BEFORE WORK PROCEEDS.

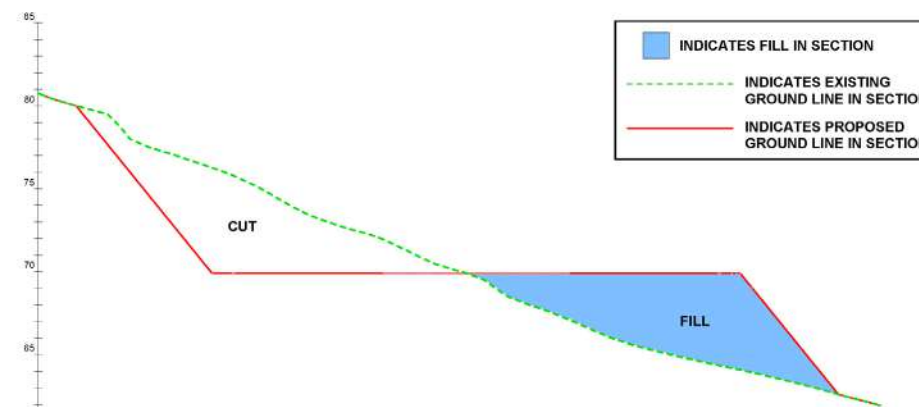


### 3D VIEW

[illegible]

## SECTION 1-1 THROUGH THE PITCH

VERTICALLY EXAGGERATED (SCALE x5)	SCALE @ A1: H 1:1000, V 1:200 SCALE @ A3: H 1:2000, V 1:400
--------------------------------------	--

[illegible]

## SECTION 2-2 THROUGH THE PITCH

VERTICALLY EXAGGERATED (SCALE x5)	SCALE @ A1: H 1:1000, V 1:200 SCALE @ A3: H 1:2000, V 1:400
--------------------------------------	--

P1	14.11.25	DRAFT ISSUE FOR COMMENT		PS
ISSUE	DATE	DESCRIPTION		BY
Project Engineer: POD		Project Director: RM		
<div> <div>BM STAGE</div> <div>  <div> <p>Dublin Office: Sardeshkhani House, 52-54-Lower Sandeshkhani Street, Dublin 2, Ireland. Tel: (01) 677 3200 Fax: (01) 677 3184</p> <p>London Office: 12 Shaw Street, E1 6AN, United Kingdom Tel: (0044) 084 434 2722</p> </div> </div> <div> <p>Consulting Engineers, Civil, Structural, Project Management &amp; Survey. Email: <a href="mailto:bmce@bmce.ie">bmce@bmce.ie</a> Web: <a href="http://www.bmce.ie">www.bmce.ie</a></p> </div> <div>  <div> <p>The Institution of Structural Engineers</p>   <p>International Federation of Consulting Engineers</p> </div> </div> </div>				
<div> <div>CLIENT</div> <div>CAIRN HOMES PROPERTIES LTD.</div> </div>				
<div>PROJECT TITLE</div> <div>COOLAGAD, GREYSTONES</div>			<div>BM PROJECT No.</div> <div>25.280</div>	
MODEL	REFERENCE	SUITABILITY	REVISION	
	25.280-BMD-M3-C-PROPOSED SURFACE	S0	P01	
<div>DRAWING TITLE</div> <div>MULTI-SPORTS ALL-WEATHER PITCH</div> <div>OPTION 2</div>				
DATE	DRAWING REFERENCE	STATUS	REVISION	
	25.280-BMD-00-7Z-DR-C-0002	S0	P1	



**\*\* 3D Views do not include club house & associated parking**



VIEW 1 - OVERALL AERIAL IMAGE VIEW FROM THE SOUTH EAST



VIEW 2 - VIEW FROM THE SOUTH EAST



VIEW 3 - VIEW FROM THE NORTH

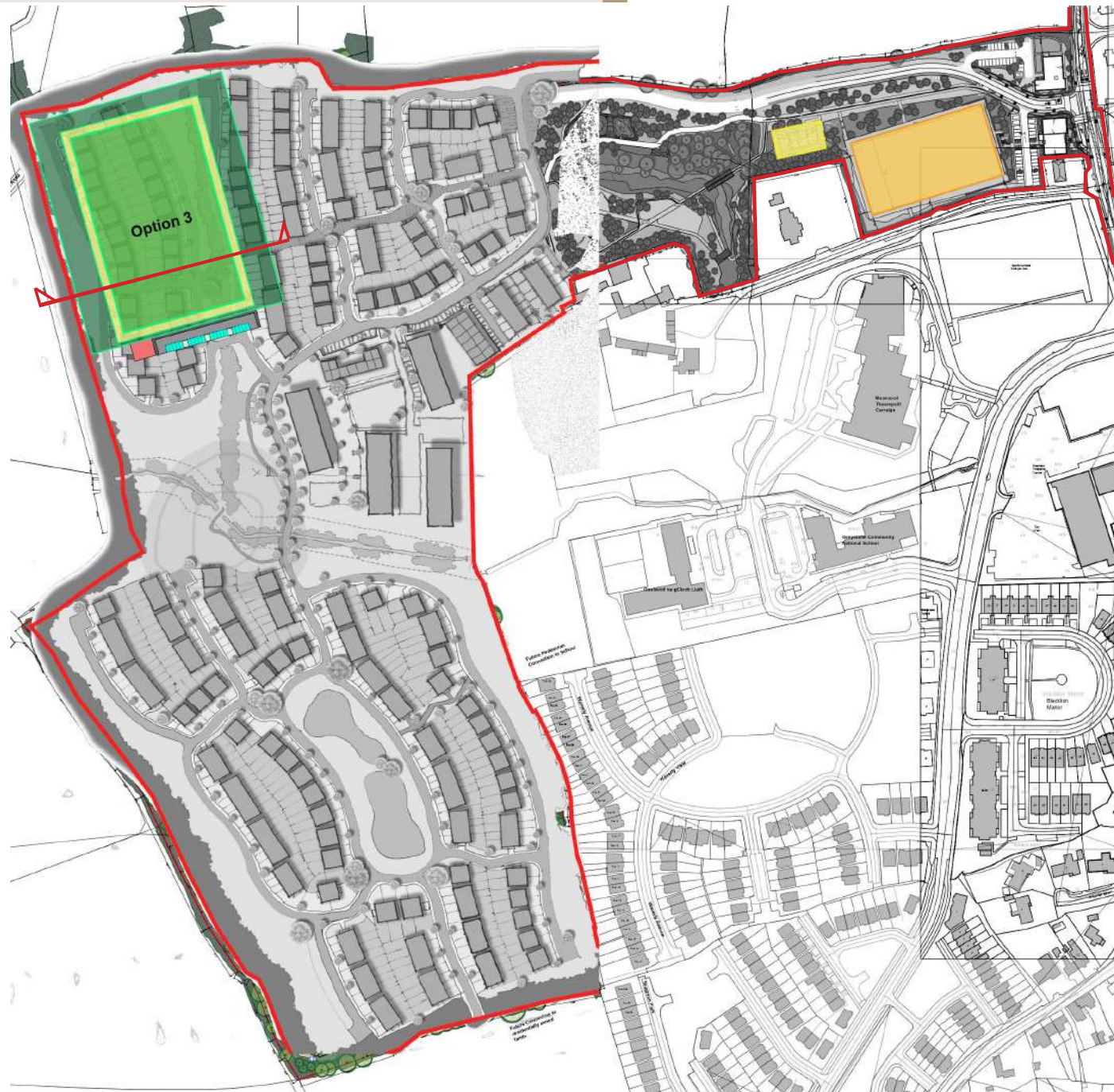


VIEW 4 - VIEW FROM THE SOUTH EAST

### 03. OPTION 2 - MULTI PURPOSE ALL WEATHER PITCH - 3D SKETCH MODELING

COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT





Site Impacts

Ecological/Biodiversity/Environmental

Disturbance and fragmentation of natural habitats and Ecosystems.

Light Pollution from flood lights has shown to impact the circadian rhythm of flora and fauna impacting breeding, feeding and migration pattern, similarly associated noise pollution from said pitch can negatively impact the foraging and movement patterns bats, owls, moths, and other nocturnal species. This is particularly important due to its location near existing mature hedgerows.

Runoff from synthetic turf can carry microplastics , rubber crumb and heavy metals into streams and ground water.

Ownership

This location would require the acquisition of additional land outside of the applicants ownership to deal with the topographical challenges.

Topographical

This location would require **significant cut and fill operations** which may culminate in slope instability , the additional use of embankments and gabion walls will bring with it a negative visual impact.

Residential Amenity

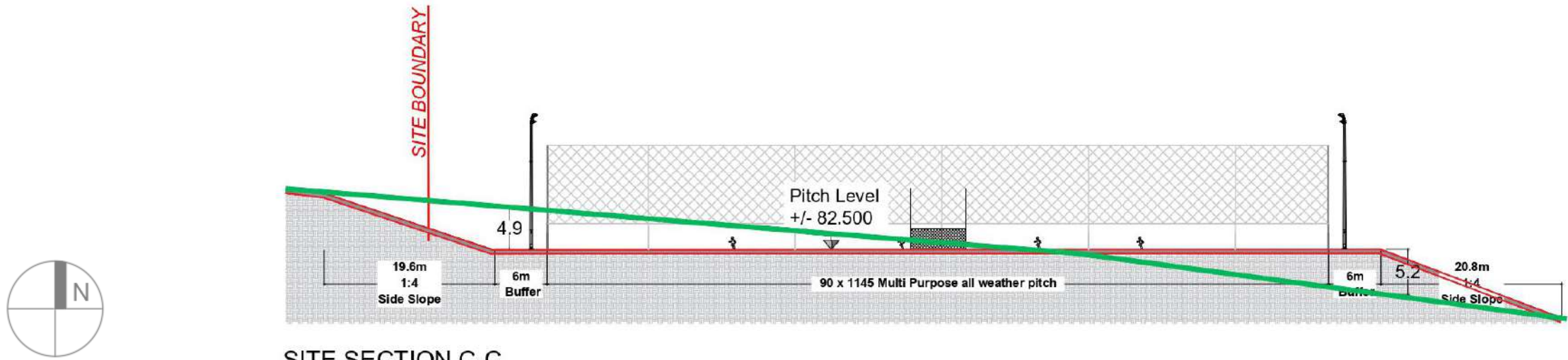
This location is the highest point on the site and would result in a significant visual impact for both residents within the site and surrounding areas.

APPROXIMATE ASSOCIATED AREAS

ALL WEATHER PITCH SQM	13050 SQM
BUFFER SQM	2950 SQM
1:4 SLOPE SQM	8433 SQM
CLUB HOUSE SQM	208 SQM
ASSOCIATED PARKING SQM	310 SQM
TOTAL SQM	2.49 HA

RESIDENTIAL YIELD IMPACT

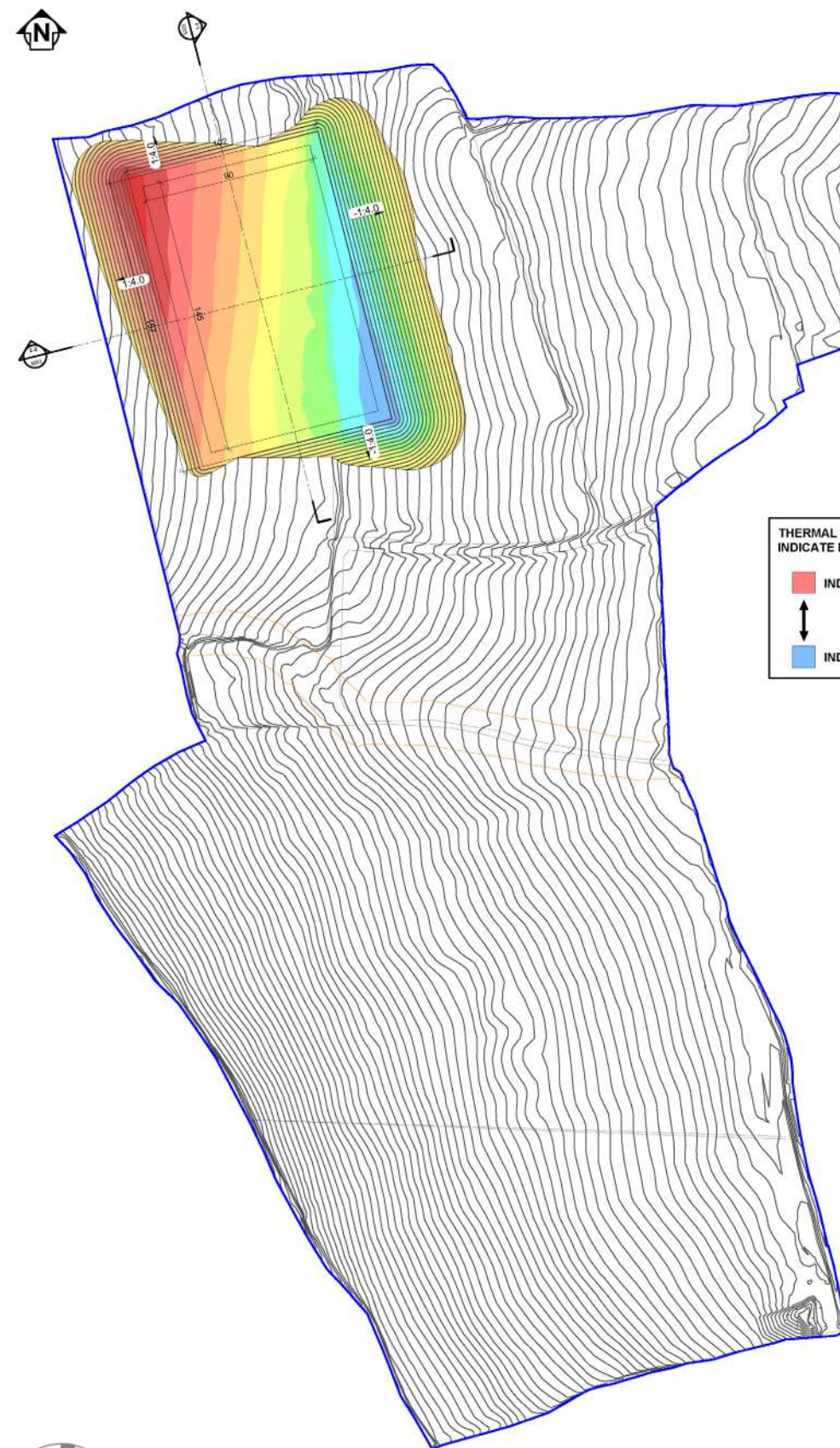
APPROXIMATE RESIDENTIAL ZONING AREA NEEDED TO ACCOMMODATE GAA PITCH AND ANCILLARY SPACES	2.49 HA
APPROXIMATE NUMBER OF HOUSES LOST TO ACCOMMODATE GAA PITCH AND ANCILLARY SPACES	46 HOUSES LOST



SITE SECTION C-C

04. OPTION 3 - MULTI PURPOSE ALL WEATHER PITCH








**MULTI-SPORTS ALL-WEATHER PITCH-OPTION 3**

SCALE @ A1: 1:1500  
SCALE @ A3: 1:3000

**THERMAL COLOUR SCALE USED TO INDICATE DEPTH OF EXCAVATION & FILLING**

 INDICATES DEEP EXCAVATION



 INDICATES DEEP FILL



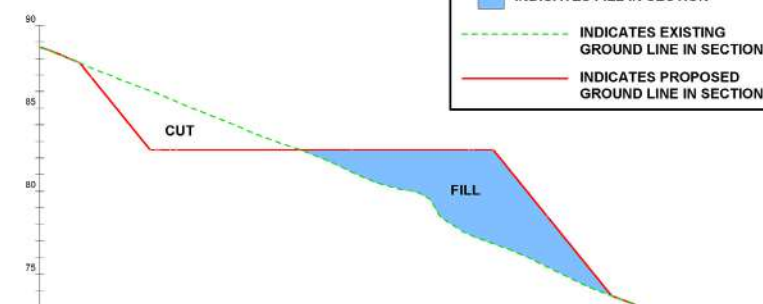
### 3D VIEW



	75	
Chainage	00	
Existing Ground	83.96	
Proposed Ground	83.96	
Elevation Difference	0.00	

### SECTION 1-1 THROUGH THE PITCH

VERTICALLY EXAGGERATED (SCALE x5)	SCALE @ A1: H 1:1000, V 1:200 SCALE @ A3: H 1:2000, V 1:400
--------------------------------------	--

[illegible]

## SECTION 2-2 THROUGH THE PITCH

VERTICALLY EXAGGERATED (SCALE x5)	SCALE @ A1: H 1:1000, V 1:200 SCALE @ A3: H 1:2000, V 1:400
--------------------------------------	--

- | NOTES |  |
|-------|--|
| 1.    | THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERS & ARCHITECT'S DRAWINGS FIGURED DIMENSIONS ONLY (NOT SCALING) TO BE USED. WHERE A CONFLICT OF INFORMATION EXISTS OR IF IN ANY DOUBT - <u>ASK</u> . |
| 2.    | CONSULTANTS TO BE INFORMED IMMEDIATELY OF ANY DISCREPANCIES BEFORE WORK PROCEEDS.  |

P1	14.11.25	DRAFT ISSUE FOR COMMENT		PENDING	
ISSUE	DATE	DESCRIPTION			BY
Project Engineer: POC			Project Director: BM		
BM STAGE					
<div style="text-align: center;"> <h1>PRELIMINARY</h1> </div>					
<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;">  <p><b>BARNETT MAHONY</b></p> </div> <div> <p><i>Dublin Office:</i>            Geylshill House, 30-54 Lower Gardineth Street, Dublin 2, Ireland.            Tel: (01) 877 3200 Fax: (01) 877 3164</p> <p><i>London Office:</i>            12 Mill Street, London SE1 3AV, United Kingdom            Tel: (0044) 084 6415 7722</p> <p>Consulting Engineers, Civil, Structural, Project Management E-mail: <a href="mailto:bm@bmce.ie">bm@bmce.ie</a> Web: <a href="http://www.bmce.ie">www.bmce.ie</a></p> </div> </div>					
		<i>The Institution of Structural Engineers</i>		 <p><i>International Association of Consulting Engineers</i></p>	
CLIENT					
CAIRN HOMES PROPERTIES LTD.					
PROJECT TITLE				BM PROJECT No.	
COOLAGAD, GREYSTONES				25.280	
INCELL	REFERENCE	SUITABILITY		REVISION	
	25280-BMD-M/3-C-PROPOSED SURFACE	S0		P01	
DRAWING TITLE					
M2-M3-TP3 ALL-WEATHER PITCH					
OPTION 3					
DWG	DRAWING REFERENCE			STATUS	REVISION
	25280-BMD-00-ZZ-DR-C-8003			S0	P1



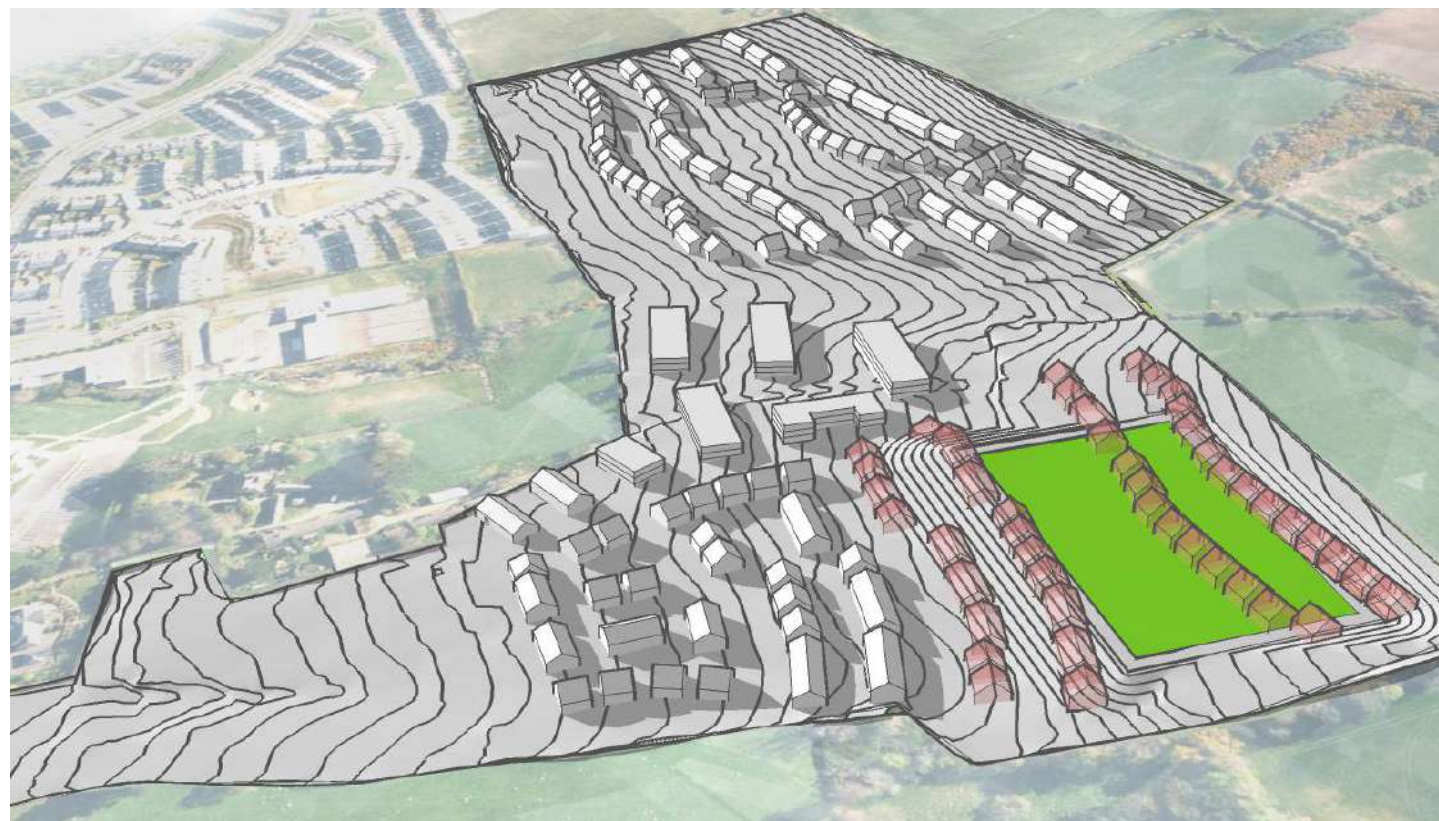
**\*\* 3D Views do not include club house & associated parking**



VIEW 1 - OVERALL AERIAL IMAGE VIEW FROM THE SOUTH EAST



VIEW 2 - VIEW FROM THE SOUTH EAST



VIEW 3 - VIEW FROM THE NORTH



VIEW 4 - VIEW FROM THE SOUTH EAST

#### 04. OPTION 3 - MULTI PURPOSE ALL WEATHER PITCH - 3D SKETCH MODELING

COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT





Site Impacts

Ecological/Biodiversity/Environmental

Significant disturbance and fragmentation of natural habitats and Ecosystems in this location. This option would necessitate the removal of tree line which would cause significant harm to biodiversity.

Light Pollution from flood lights has shown to impact the circadian rhythm of flora and fauna impacting breeding, feeding and migration pattern, similarly associated noise pollution from said pitch can negatively impact the foraging and movement patterns bats, owls, moths, and other nocturnal species. This is particularly important due to its location near existing mature hedgerows.

Runoff from synthetic turf can carry microplastics , rubber crumb and heavy metals into streams and ground water , this is particularly pertinent for this location because of its location near a water course.

This location falls within the riparian corridor, which has a 25m wide buffer zone either side of the Kilruddery Stream

Topographical

This location would require **significant cut and fill operations** which may culminate in slope instability , the additional use of embankments and gabion walls will bring with it a negative visual impact.

Archaeological

This location falls on an area of archaeological significance, the development of an all weather pitch in this location would cause ground disturbance and soil compaction potentially interfering any nearby archaeological deposits.

APPROXIMATE ASSOCIATED AREAS

ALL WEATHER PITCH SQM	13050 SQM
BUFFER SQM	2950 SQM
1:4 SLOPE SQM	6061 SQM
CLUB HOUSE SQM	208 SQM
ASSOCIATED PARKING SQM	310 SQM
TOTAL SQM	2.25 HA

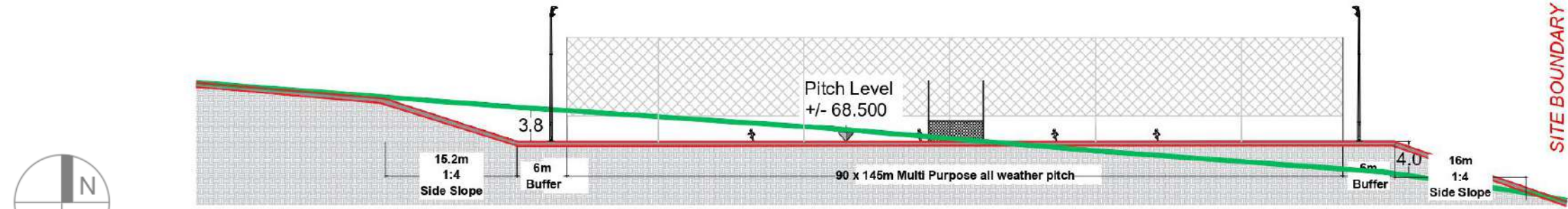
RESIDENTIAL YIELD IMPACT

APPROXIMATE RESIDENTIAL ZONING AREA NEEDED TO ACCOMMODATE GAA PITCH AND ANCILLARY SPACES

2.25 HA

APPROXIMATE NUMBER OF HOMES LOST TO ACCOMMODATE GAA PITCH AND ANCILLARY SPACES

192 APARTMENTS LOST  
12 DUPLEXES LOST

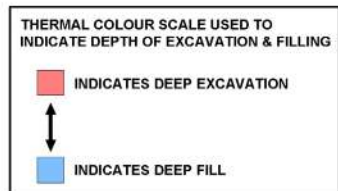


SITE SECTION D-D

05. OPTION 4 - MULTI PURPOSE ALL WEATHER PITCH

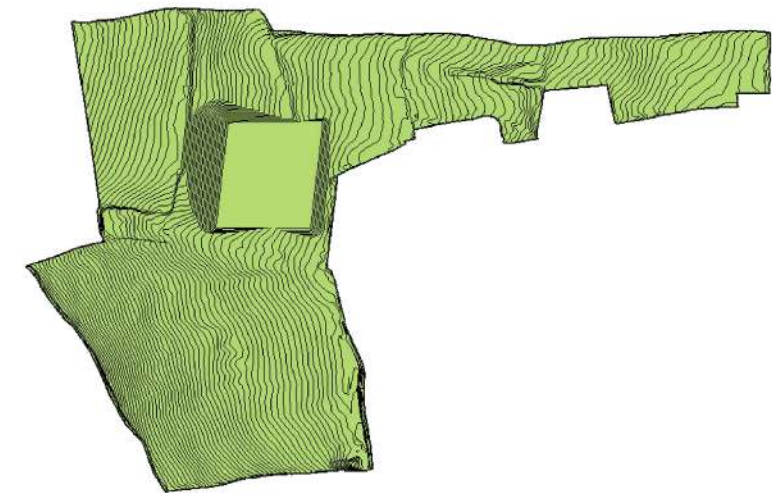
COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT





## NOTES

1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERS & ARCHITECTS' DRAWINGS. FIGURED DIMENSIONS ONLY (NOT SCALING) TO BE USED WHERE A CONFLICT OF INFORMATION EXISTS OR IF IN ANY DOUBT - ASK.
2. CONSULTANTS TO BE INFORMED IMMEDIATELY OF ANY DISCREPANCIES BEFORE WORK PROCEEDS.



P1	14.11.25	DRAFT ISSUE FOR COMMENT		PS
ISSUE	DATE	DESCRIPTION		BY
PROJECT ENGINEER: POD		PROJECT DIRECTOR: BM		
<div> <div>BM STAGE</div> <div>  <div> <p>Dublin Office: Sandwich House, 55-54 Lower Sandesh Street, Dublin 2, Ireland. Tel: (01) 677 3200 Fax: (01) 677 3184</p> <p>London Office: 12 Mill Street, London SE1 2NY, United Kingdom Tel: (02044) 084 6413 2722</p> <p>Consulting Engineers, Civil Structural Project Management E-mail: <a href="mailto:bm@bmce.ie">bm@bmce.ie</a> Web: <a href="http://www.bmce.ie">www.bmce.ie</a></p> </div> <div>    </div> </div> </div>				
<div> <div>CLIENT</div> <div>CAIRN HOMES PROPERTIES LTD.</div> </div>				
<div>PROJECT TITLE</div> <div>COOLAGAD, GREYSTONES</div>			<div>BM PROJECT No.</div> <div>25.280</div>	
NOEL	REFERENCE	SUITABILITY	REVISION	
	25.280-BMD-MS-3-PROPOSED SURFACE	S0	P01	
<div>DRAWING TITLE</div> <div>MULTI-SPORTS ALL-WEATHER PITCH</div> <div>OPTION 4</div>				
DWG	DRAWING REFERENCE	STATUS	REVISION	
	25.280-BMD-00-ZZ-DR-C-8004	S0	P1	



**\*\* 3D Views do not include club house & associated parking**



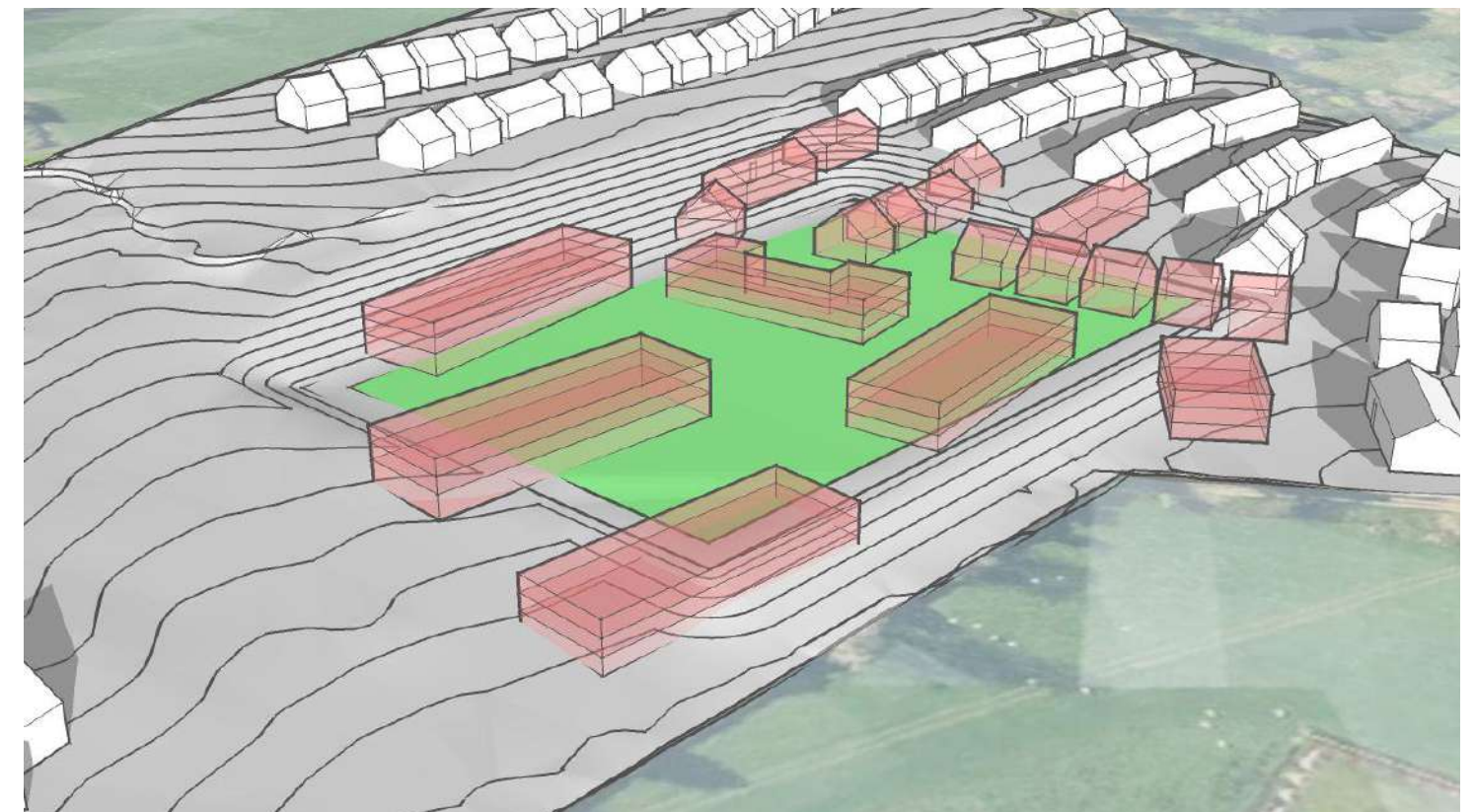
VIEW 1 - OVERALL AERIAL IMAGE VIEW FROM THE SOUTH EAST



VIEW 2 - VIEW FROM THE SOUTH EAST



VIEW 3 - VIEW FROM THE NORTH

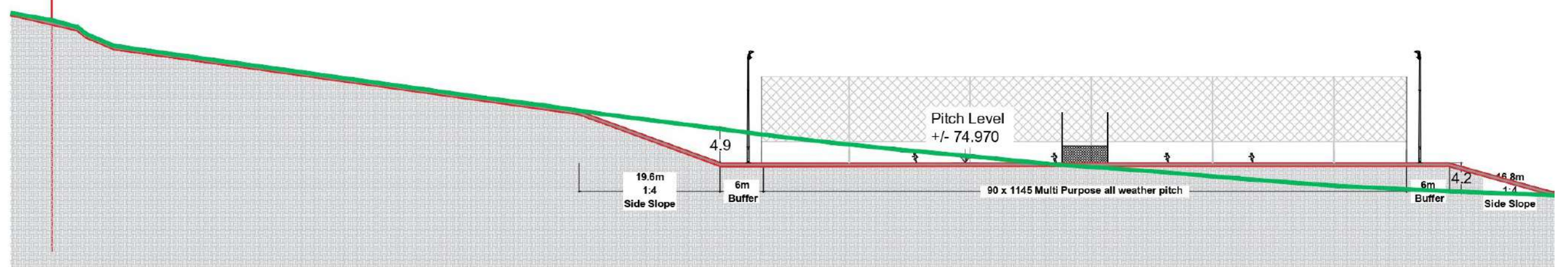
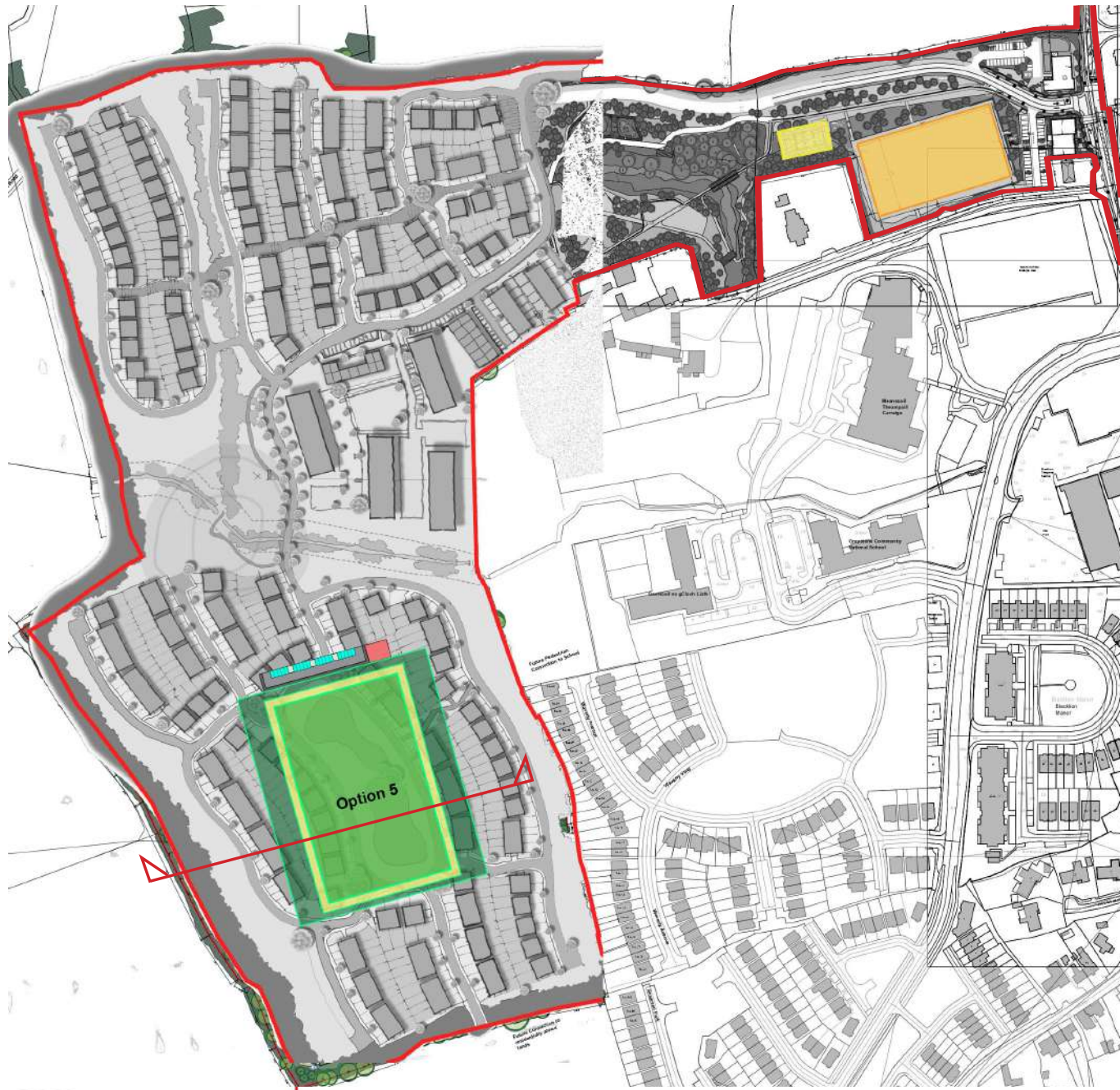


VIEW 4 - VIEW FROM THE EAST

05. OPTION 4 - MULTI PURPOSE ALL WEATHER PITCH - 3D SKETCH MODELING

COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT





SITE SECTION E-E

## 06. OPTION 5 - MULTI PURPOSE ALL WEATHER PITCH

COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT

## Site Impacts

## Ecological/Biodiversity/Environmental

Significant disturbance and fragmentation of natural habitats and Ecosystems in this location. This option would necessitate the removal of tree line which would cause significant harm to biodiversity.

Light Pollution from flood lights has shown to impact the circadian rhythm of flora and fauna impacting breeding, feeding and migration pattern, similarly associated noise pollution from said pitch can negatively impact the foraging and movement patterns bats, owls, moths, and other nocturnal species. This is particularly important due to its location near existing mature hedgerows.

Runoff from synthetic turf can carry microplastics , rubber crumb and heavy metals into streams and ground water , this is particularly pertinent for this location because of its location near a water course.

## Access

This location would significantly impact the permeability of cars and people to the SLO4 lands outside the ownership boundary.

## Topographical

This location would require **significant cut and fill operations** which may culminate in slope instability , the additional use of embankments and gabion walls will bring with it a negative visual impact.

## Residential Amenity

This location is close to the existing development , Waverly , light and noise pollution would significantly impact the residential amenity for the existing residents

### APPROXIMATE ASSOCIATED AREAS

ALL WEATHER PITCH SQM	13050 SQM
BUFFER SQM	2950 SQM
1:4 SLOPE SQM	7108 SQM
CLUB HOUSE SQM	208 SQM
ASSOCIATED PARKING SQM	310 SQM
TOTAL SQM	2.36 HA

## RESIDENTIAL YIELD IMPACT

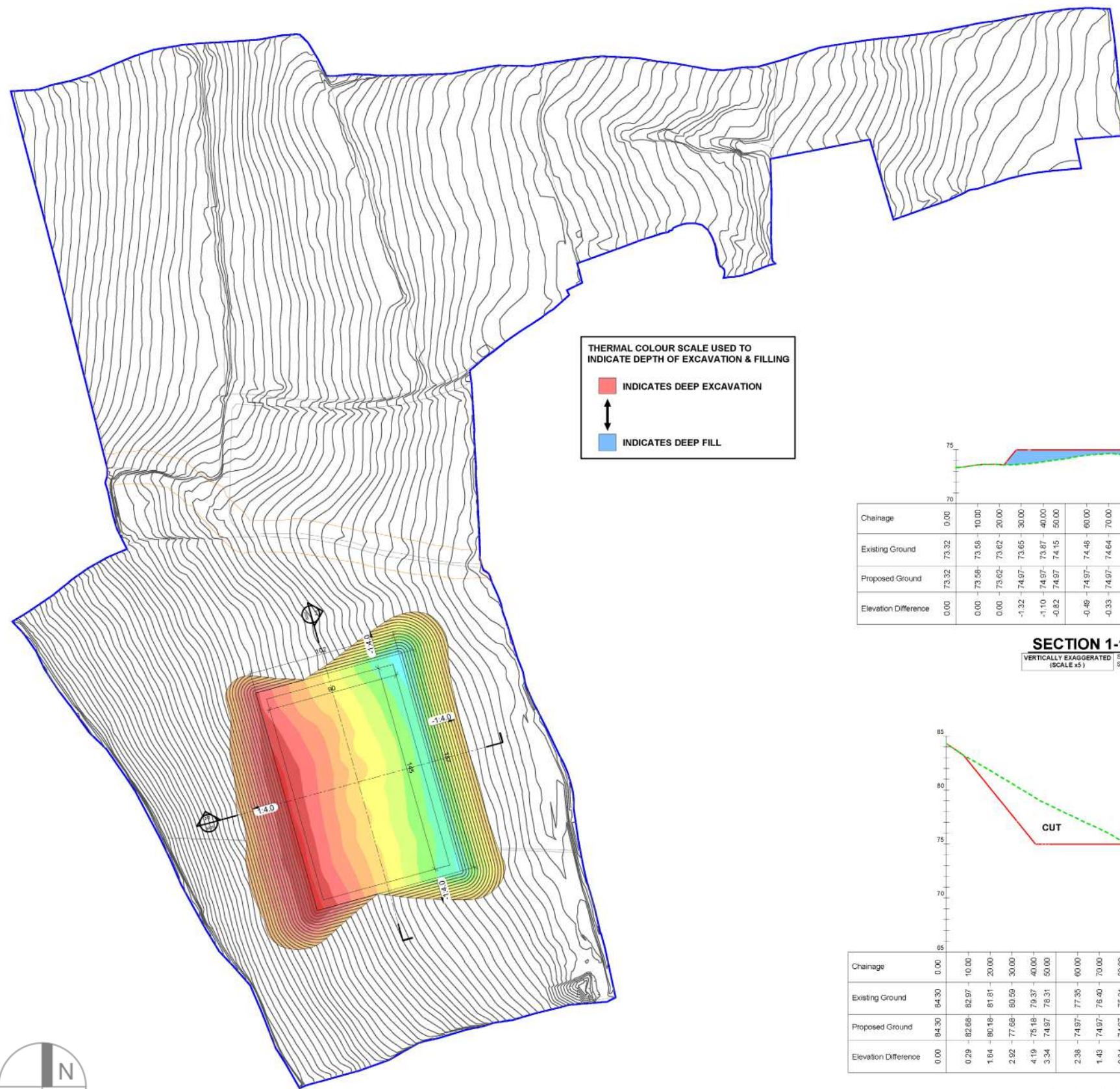
APPROXIMATE RESIDENTIAL ZONING AREA  
NEEDED TO ACCOMMODATE GAA PITCH AND  
ANCILLARY SPACES

36 HA

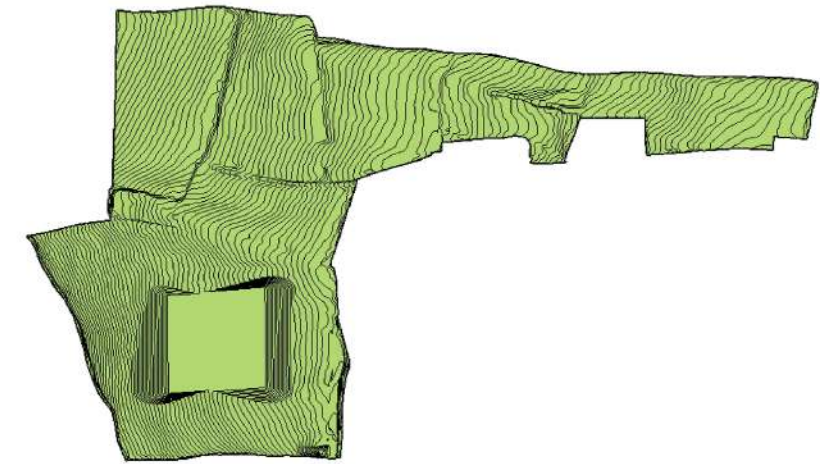
APPROXIMATE NUMBER OF HOUSES LOST TO  
ACCOMMODATE GAA PITCH AND ANCILLARY  
SPACES

## 45 HOUSES LOST





SCALE @ A1: 1:1500  
SCALE @ A3: 1:3000

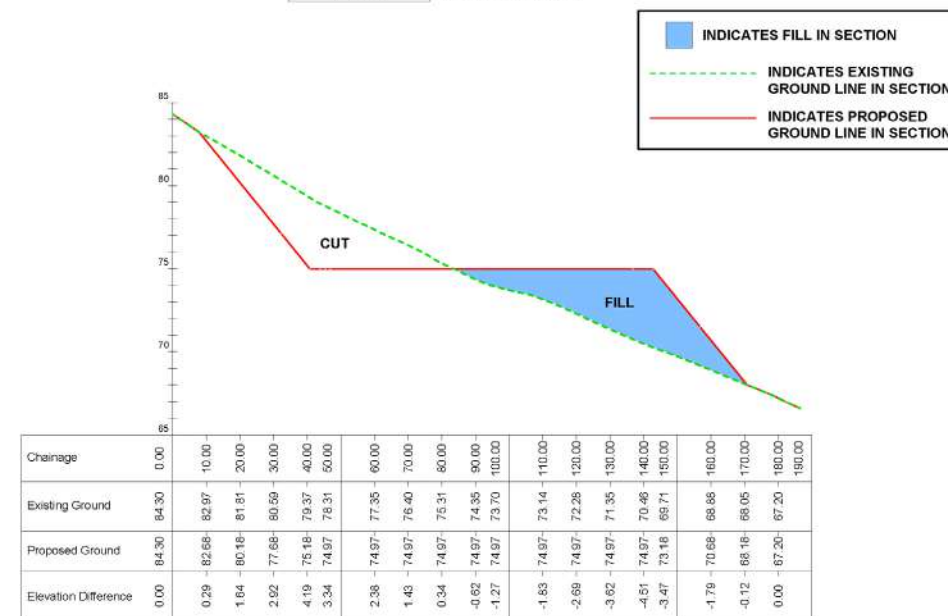


### 3D VIEW



## SECTION 1-1 THROUGH THE PITCH

VERTICALLY EXAGGERATED (SCALE x5)	SCALE @ A1: H 1:1000, V 1:200 SCALE @ A3: H 1:2000, V 1:400
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## SECTION 2-2 THROUGH THE PITCH

VERTICALLY EXAGGERATED (SCALE x5)	SCALE @ A1: H 1:1000, V 1:200 SCALE @ A3: H 1:2000, V 1:400
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P1	14.11.25	DRAFT ISSUE FOR COMMENT		IS
ISSUE	DATE	DESCRIPTION		BY
Project Engineer: POD		Project Director: BM		
BM STAGE				
<p align="center"><b>PRELIMINARY</b></p> <div>  <div> <p><i>Dublin Office:</i>  Sandwich House, 52-54, Lower Sandwich Street, Dublin 2, Ireland.  Tel: (01) 677 3200 Fax: (01) 677 3164</p> <p><i>London Office:</i>  12 Mabel Street, London SE1 3AY, United Kingdom  Tel: (0044) 080 5415 2722</p> <p>Consulting Engineers, Civil, Structural, Project Management E-mail: <a href="mailto:bmco@bmco.ie">bmco@bmco.ie</a> Web: <a href="http://www.bmco.ie">www.bmco.ie</a></p> </div> </div> <div>    </div>				
CLIENT				
CAIRN HOMES PROPERTIES LTD.				
PROJECT TITLE				BM PROJECT No.
COOLAGAD, GREYSTONES				<b>25.280</b>
MODEL	REFERENCE	SUITABILITY	REVISION	
	25.280-BMD-M3-PROPOSED SURFACE	S0	P01	
DRAWING TITLE				
MULTI-SPR-M3-3 ALL-WEATHER PITCH				
DRAWING 5				
DWG	DRAWING REFERENCE	STATUS	REVISION	
	<b>25280-BMD-00-ZZ-DR-C-8005</b>	<b>S0</b>	<b>P1</b>	



**\*\* 3D Views do not include club house & associated parking**



VIEW 1 - OVERALL AERIAL IMAGE VIEW FROM THE SOUTH EAST



VIEW 2 - VIEW FROM THE NORTH



VIEW 3 - VIEW FROM THE SOUTH

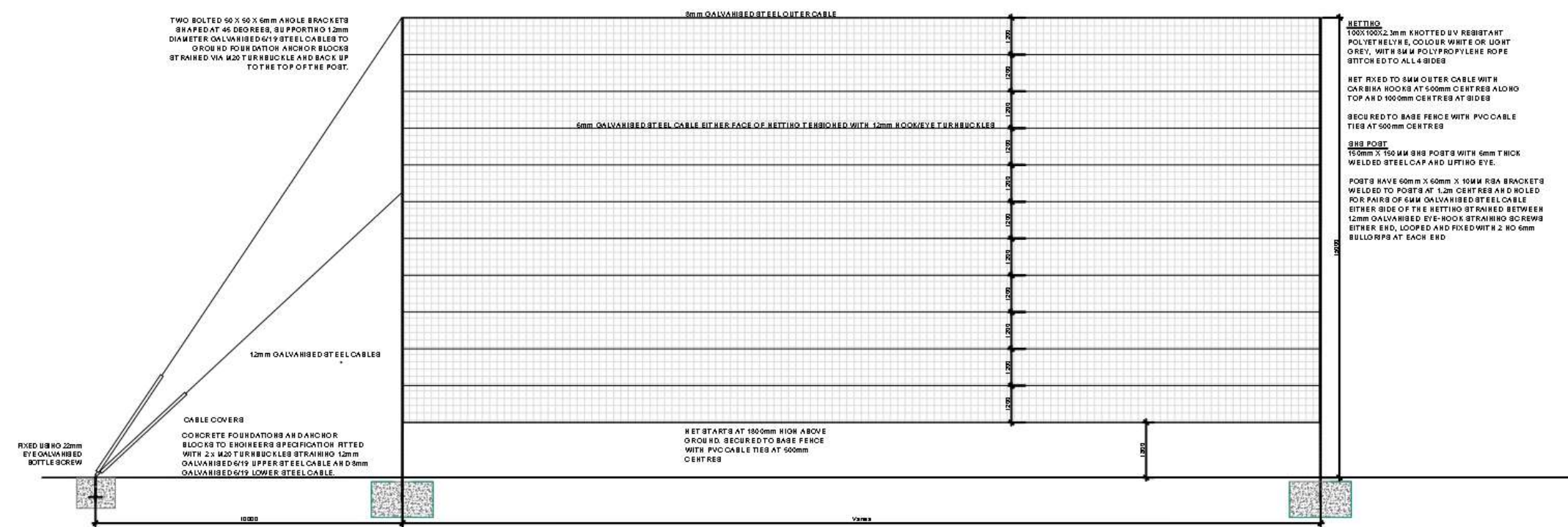


VIEW 4 - VIEW FROM THE EAST

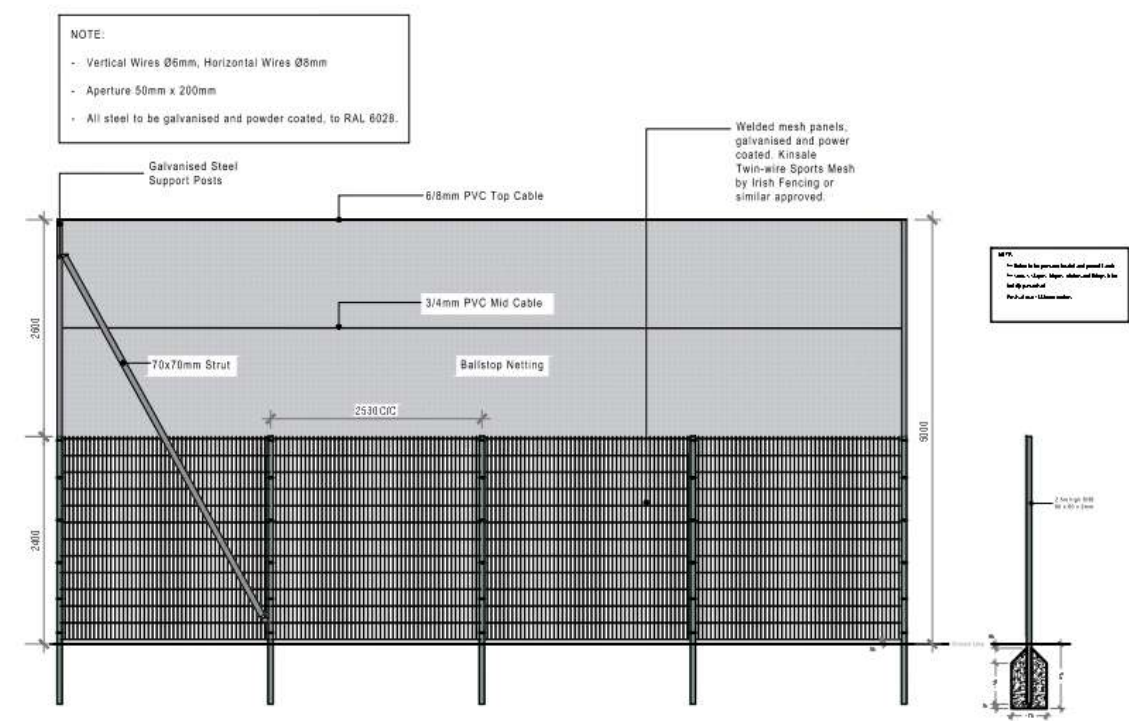
06. OPTION 5 - MULTI PURPOSE ALL WEATHER PITCH - 3D SKETCH MODELING

COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT





1) 15 Meter High Ball Net



2) 05 Meter High Mesh

07. SPORTS NET DETAIL

COOLAGAD , GREYSTONES | RESIDENTIAL DEVELOPMENT

