



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

Who are you:	Group
Name:	Greystones Tidy Towns
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Submission to Wicklow County Council

From: Greystones Tidy Towns

Re: Proposed Material Alterations to Variation No. 4 – Draft Greystones–Delgany & Kilcoole Local Planning Framework (LPF)

Date: 21 November 2025

Community Perspective and Strategic Concerns

Greystones Tidy Towns Committee welcomes the opportunity to comment on the Proposed Material Alterations (PMAs) to **Variation No. 4 of the Wicklow County Development Plan**. As a local community group committed to sustainability, biodiversity, and civic wellbeing, we are deeply concerned that the revised LPF remains disproportionately focused on housing and development-led zoning—often at the expense of environmental integrity, climate resilience, and inclusive community infrastructure.

We acknowledge the urgency of Ireland’s housing challenges. However, planning must be guided by the full spectrum of **Sustainable Development Goals (SDGs)**, not dominated by short-term metrics or market-led zoning pressures. The LPF must serve the long-term interests of people and planet—not just property portfolios.

Specific Opposition to Proposed Material Alteration No. 26

We strongly oppose PMA No. 26, which proposes to rezone the Bellevue Hill GAA site from unzoned rural land to Active Open Space (AOS) and include it within the urban boundary. This site is not urban in character and lies within a sensitive ecological corridor adjacent to the Glen of the Downs SAC, Natura 2000 site ([code IE0000719](#)). Rezoning would violate the precautionary principle and the County Development Plan’s own biodiversity commitments

may trigger Appropriate Assessment Screening under Article 6(3) of the Habitats Directive and Part XAB of the Planning and Development Act.

Public submissions to date have highlighted:

- The presence of the Brown Trouts Stream and native wet woodland, which are poorly mapped and ecologically significant.
- The site's role as a wildlife corridor linking Bellevue Woods and Kindlestown Wood.
- The risk of urban encroachment into protected [buffer zones](#).
- Unauthorised tree felling, which underscores the need for stronger enforcement and ecological safeguards.

We understand that zoning decisions do not determine planning outcomes, and that development may proceed under rural zoning if aligned with planning objectives. However, changing the zoning to urban sets a precedent that is inappropriate for this ecologically sensitive rural area. If any development is proposed, the stream and wet woodland should be zoned as Open Space 2 for Nature, with binding protections. These features form part of a vital ecological corridor and must be safeguarded regardless of zoning.

SDG Alignment

The LPF revisions show mixed alignment with the SDGs:

- **SDG 11 (Sustainable Cities):** Compact growth and phasing principles are improved, but speculative land banking remains a risk.
- **SDG 10 (Reduced Inequalities):** Affordable and cost-rental housing objectives are introduced, but lack enforceable delivery mechanisms.
- **SDG 15 (Life on Land):** Green infrastructure objectives are expanded, yet enforcement and mapping remain weak—especially around Bellevue Hill.
- **SDG 13 (Climate Action):** Flood risk and drainage updates are welcome, but must be publicly accessible and climate-adaptive.

- **SDG 3 (Good Health and Wellbeing):** Community infrastructure is better phased, but contingent on developer cooperation.

Institutional Engagement and Infrastructure Planning

We note that the only non-community submission to date has come from a transport authority. While transport infrastructure is essential to sustainable development, it must not be treated solely as a technical enabler of zoning expansion. In ecologically sensitive areas such as Bellevue Hill, transport planning must be integrated with biodiversity protection, community access, and climate resilience. We respectfully urge Wicklow County Council to ensure that ecological and community perspectives are given **equitable and proportionate weight** in shaping infrastructure priorities, particularly where they intersect with protected landscapes and wildlife corridors.

Recommendations

Greystones Tidy Towns respectfully requests that **Proposed Material Alteration No. 26 be rejected**, *unless* ecological protections are guaranteed and the site is excluded from the urban boundary. This site is ecologically sensitive, adjacent to the Glen of the Downs SAC, and contains native wet woodland and the Brown Trouts Stream—features that warrant protection, not urban designation.

We ask that the stream and wet woodland be **zoned as Open Space 2 for Nature**, in recognition of their ecological value and role within the wider wildlife corridor linking Bellevue Woods and Kindlestown Wood.

We understand that other planning mechanisms fall outside the scope of this variation process. However, we note the following priorities for future planning and implementation:

- Conduct SDG-aligned planning audits for all Specific Local Objectives and zoning changes, with public access to biodiversity and infrastructure assessments.
- Introduce independent oversight for pre-development activity, including tree felling and land clearance.

- Embed participatory design processes for parks, childcare, and civic spaces, ensuring community ownership and stewardship.
- Ensure flood resilience and drainage plans are publicly accessible and climate-adaptive.

These recommendations reflect the values of stewardship, transparency, and long-term sustainability that underpin the County Development Plan and the SDGs.

Conclusion

Greystones Tidy Towns urges Wicklow County Council to adopt a more balanced, SDG-aligned approach to planning—one that places biodiversity, community resilience, and climate adaptation on a proportionate and equitable footing with housing delivery.

Sincerely,

Greystones Tidy Towns Committee