

	<h1>Greystones-Delgany &amp; Kilcoole LPF Variation No.4</h1>
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Who are you:	Agent
Name:	Brendan Buck MIPI
Reference:	GDKLPF-164339
Submission Made	June 20, 2025 4:49 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

## Local Planning Framework PART A Strategy

- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole

## Local Planning Framework PART B Settlement Specific Objectives.

- B.2 Residential Development
- B.3 Economic Development
- B.8 Land Use Map and Zoning

### Write your observations here:

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - have been appointed by Mr Paul Brady of Ballycrone, Kilcoole, Co. Wicklow to make this submission on his behalf to Wicklow County Council for consideration as part of advertised Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 (Consultation Phase). The attached submission pertains to lands owned by Mr Brady at Ballycrone, Kilcoole, County Wicklow. Submissions are invited from the Friday 9th May and close on Friday 20th June 2025 (midnight). This submission is lodged prior to this deadline.

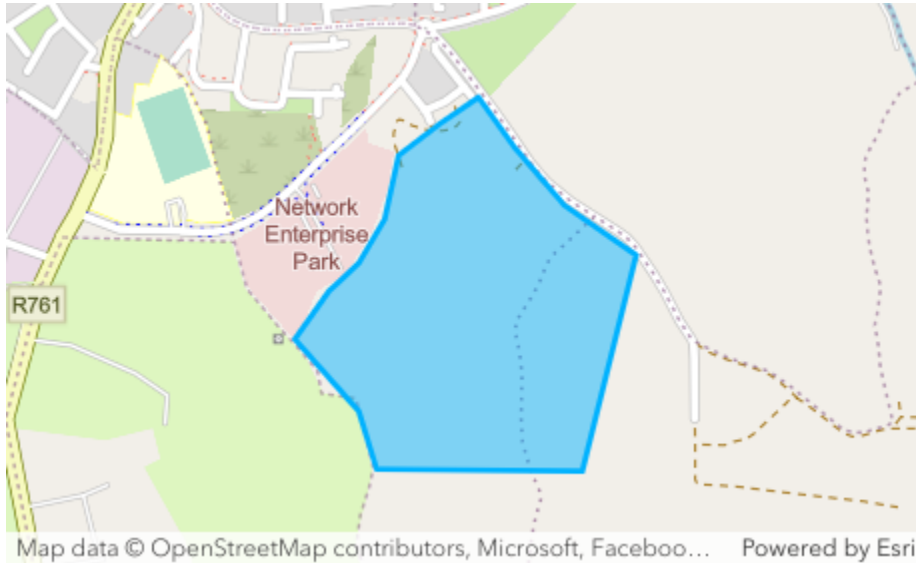
### Please select which town you want to comment on:

Kilcoole

### Observation relevant to the settlement:

Submission to the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028. Submission requests: (1) Lands shown as zoned 'E' – 'Employment' (adjoining Network Enterprise Park) be amended to reflect existing field boundaries requiring alterations to the areas of lands zoned 'E' (also to facilitate the zoning of lands RN1). (2) The lands adjoining the completed Ballycrone Manor residential scheme be zoned 'RN1: New Residential - Priority 1' to allow the extension of that estate and to make efficient use of its existing service connections and to use the planned road access into these lands which forms part of that development. Submission produced for and on behalf of Mr Paul Brady of Ballycrone, Kilcoole, County Wicklow.

## Map



## Site Description:

Please refer to the attached submission.

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## Upload a File (optional)

BPS Final Greystones, Delgany & Kilcoole LPF Submission - for Paul Brady - 20.6.2025.pdf, 4.82MB



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**SUBMITTED VIA THE WCC CONSULTATION PORTAL<sup>1</sup>**

Greystones-Delgany & Kilcoole LAP Officer,  
Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow Town,  
A67 FW96.

20 June 2025

Dear Sir/Madam,

***Submission to the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028. Submission requests: (1) Lands shown as zoned 'E' – 'Employment' (adjoining Network Enterprise Park) be amended to reflect existing field boundaries requiring alterations to the areas of lands zoned 'E' (also to facilitate the zoning of lands RN1). (2) The lands adjoining the completed Ballycrone Manor residential scheme be zoned 'RN1: New Residential - Priority 1' to allow the extension of that estate and to make efficient use of its existing service connections and to use the planned road access into these lands which forms part of that development.***

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - have been appointed by Mr Paul Brady of Ballycrone, Kilcoole, Co. Wicklow to make this submission on his behalf to Wicklow County Council for consideration as part of advertised<sup>2</sup> Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 (Consultation Phase).

This submission pertains to lands owned<sup>3</sup> by Mr Brady at Ballycrone, Kilcoole, County Wicklow.

Submissions are invited from the Friday 9th May and **close on Friday 20th June 2025** (midnight). This submission is lodged prior to this deadline.

If you require any further details, please contact BPS using the details supplied on this letterhead.

With best wishes,

*Brendan Buck*

**Brendan Buck MIPI  
Managing Director  
BPS Planning & Development Consultants LTD**

Encl: LAP submission report.

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

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

<sup>3</sup> We confirm that Mr Brady owns the lands described below and which are the subject of this submission. Documentary proof of this can be provided on request.



Planning & Development  
Consultants

## Submission to the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 (Consultation Phase)

Submission to the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028. Submission requests:

- (1) Lands shown as zoned 'E' – 'Employment' (adjoining Network Enterprise Park) be amended to reflect existing field boundaries requiring alterations to the areas of lands zoned 'E' (also to facilitate the zoning of lands RN1).
- (2) The lands adjoining the completed Ballycrone Manor residential scheme be zoned 'RN1: New Residential - Priority 1' to allow the extension of that estate and to make efficient use of its existing service connections and to use the planned road access into these lands which forms part of that development.

Submission produced for and on behalf of Mr Paul Brady of Ballycrone, Kilcoole, County Wicklow.

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## 1.0 Introduction

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants – have been appointed by Mr Paul Brady of Ballycrone, Kilcoole, Co. Wicklow to make this submission on his behalf to Wicklow County Council for consideration as part of advertised<sup>1</sup> Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 (Consultation Phase).

This submission pertains to lands owned<sup>2</sup> by Mr Brady at Ballycrone, Kilcoole, County Wicklow.

Submissions are invited from the Friday 9th May and **close on Friday 20th June 2025** (midnight). This submission is lodged prior to this deadline.

## 2.0 Summary

This submission is made in respect of our client's lands located to the south end of Kilcoole. The relevant areas of these lands are outlined in Figs. 8, 11, and 13 of this submission.

Our client acknowledges and respects the proposed zoning of an area of his lands adjoining Network Enterprise Park as 'E' – 'Employment' in Map No. 1 'Land Use Zoning Objectives' of the advertised Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025. The planning authority has recognised that Network Enterprise Park needs to expand. This submission asks for an amendment regarding this proposed zoning.

His lands are also located to the south of lands currently zoned 'RE' – 'Existing Residential' which have been developed as the, now completed, Ballycrone Manor development. The Ballycrone Manor development is designed such that the adjoining lands in our client's ownership can form an extension to the now existing estate – there is a gate at the end of an estate access road which opens into the lands – and the developer of the estate has encouraged the making of this submission. There have been few housing developments built in Kilcoole in recent years with the Ballycrone Manor development likely the main provider of new houses in a quality scheme. This submission asks the planning authority to consider allowing an extension to the Ballycrone Manor development in the same way as the Network Enterprise Park is to be allowed to expand.

This submission therefore proposes:

1. Lands shown as zoned 'E' – 'Employment' be amended to reflect existing field boundaries requiring alterations to the areas of lands zoned 'E' (also to facilitate the zoning of lands RN1).
2. The lands adjoining the completed Ballycrone Manor residential scheme be zoned 'RN1: New Residential - Priority 1' to allow the extension of that estate and to make efficient use of its existing service connections and to use the planned road access into these lands which forms part of that development. There are two options open to the planning authority as regards allowing the Ballycrone Manor residential scheme to be extended:

*Option A:* Fields adjoining the Ballycrone Residential Estate could be developed to provide approx. 40-55 houses.

*Option B:* A larger area of land including the Option A lands – owned by our client – could be zoned allowing the estate to significantly increase in size.

Our client's total landholding is larger than that included in this submission. The division of the submitted area of lands between 'E' and 'RN1: New Residential - Priority 1' would represent an appropriate expansion of Kilcoole at this location.

It is acknowledged that this submission would require the Settlement Boundary and the Local Planning Framework (LPF) Boundary to be revised. However, this would be justified in achieving the proper expansion of Network Enterprise Park and Ballycrone Manor housing development whose existing and proposed extents would otherwise be restricted for many years by the emerging LPF.

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

<sup>2</sup> We confirm that Mr Brady owns the lands described below and which are the subject of this submission. Documentary proof of this can be provided on request.

### 3.0 Location of Brady lands

Kilcoole is situated in the north of County Wicklow and located approximately 35 km from Dublin and 5 km south of Greystones. It is a commuter town with close proximity to rail based public transport and Dublin Bus services.

The subject lands are located to the south of the town. The area is developing rapidly with new housing and employment/enterprise estates to the north and west and a new school to the north. Since 2013, the demand for housing has far outstripped supply.

The lands are located to the south of Cooldross Lane. The lane has been upgraded as part of a number of housing and enterprise developments including the Ballycrone Manor residential scheme. It is now a local distributor road of good quality (see below).

The south and southwest areas of Kilcoole have traditionally comprised the location of employment lands (E1, E2, and E3). The proposed zoning would provide additional R22 zoned lands alongside lands already zoned and part developed for same 'and' which are sited close to areas of employment to reduce commuting, etc.

The subject lands located to the south of the area of the town which comprises of significant residential and employment uses would appear to be an appropriate area for the future expansion of Kilcoole.

This submission is made in respect of lands to the south end of Kilcoole of which a part is shown as proposed to be zoned 'E' – 'Employment' in Map No. 1 'Land Use Zoning Objectives' of the advertised Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025.

The lands are also located to the south of lands which are currently zoned 'RE' – 'Existing Residential' which have been developed as the, now completed, Ballycrone Manor development. The Ballycrone Manor development is designed such that the adjoining lands in our client's ownership can form an extension to the now existing estate – there is a gate at the end of an estate access road which opens into the lands – and the developer of the estate has encouraged the making of this submission.

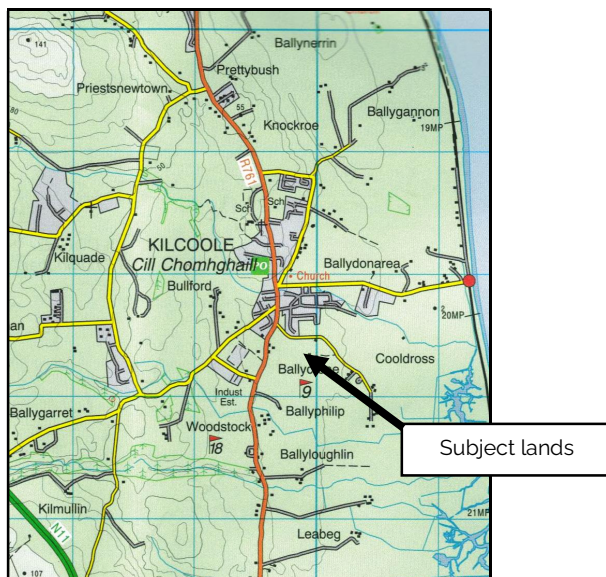


Fig. 1: Location map regarding the subject lands (Source: Ordnance Survey<sup>3</sup>)

<sup>3</sup> This map is reproduced from a submission prepared by BPS for our client during the drafting of the previous LAP.





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



Fig. 3: Location of the subject lands (Source: Google Earth)

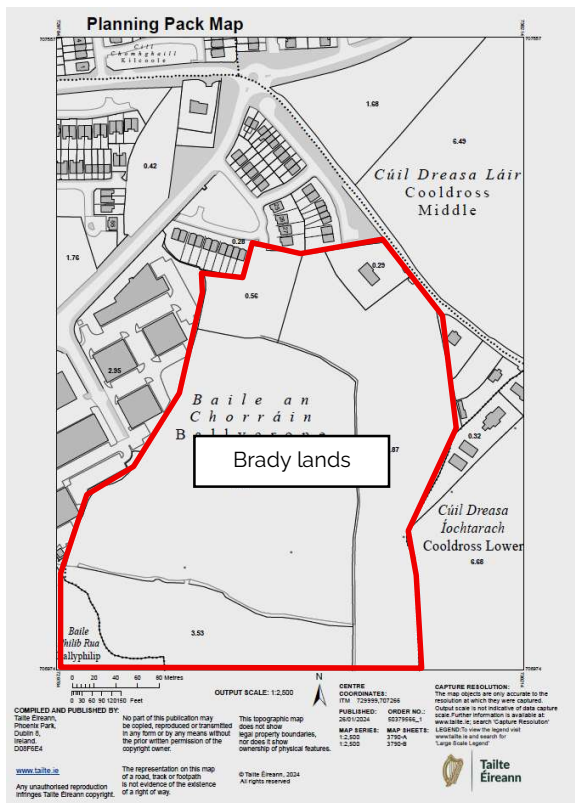


Fig. 4: OS Map of the subject lands (Source: OS Planning Pack, BPS 26/1/2024)



Fig. 5: Ballycrone Manor residential scheme to the north of the subject lands (Source: Google Streetview)





Fig. 6: Employment development adjoining the subject lands (Source: Google Streetview)

## 5.0 Proposed planning status of the Brady lands

Map No. 1 'Land Use Zoning Objectives' of the advertised Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 indicates the following as regards our client's lands:

- An area of his lands adjoining Network Enterprise Park as 'E' – 'Employment' in Map No. 1 'Land Use Zoning Objectives' of the advertised Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 (see Fig. 7).
- The remainder of his lands are shown as being located both outside of the Settlement Boundary and the Local Planning Framework (LPF) Boundary (see Fig. 7).

Our client's proposals would require the amendment of Map No. 1.

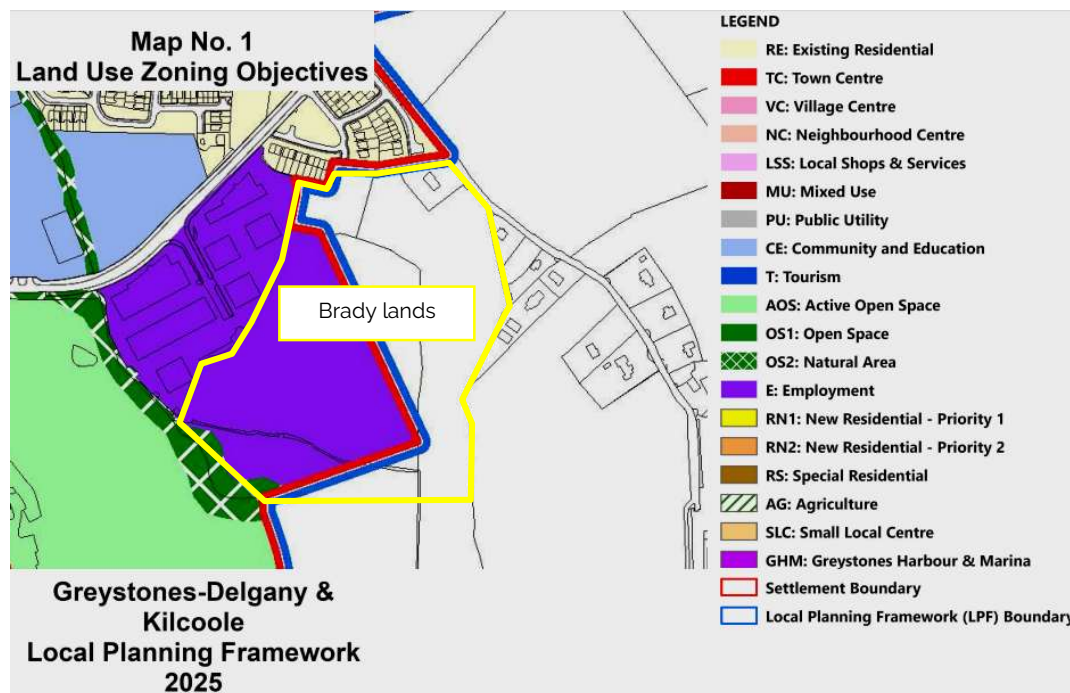


Fig. 7: Excerpt from the Map No. 1 'Land Use Zoning Objectives' of the advertised Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025

## 6.0 Planning status of adjoining/surrounding lands

To the northwest of these lands a development of employment or enterprise units has been constructed (see Figs. 2 and 6) called Network Enterprise Park.

To the north, there is residential development named Ballycrone Manor which is fully occupied.

To the west of these lands is the Kilcoole Golf Club (which is now permanently closed).

To the south and east of these lands are lands sited outside of the LFP boundary.

## 6.1 Planning applications on adjoining lands

The significant permissions which adjoin the subject lands are as follows. They provide for light industrial blocks directly to the northwest on E2 zoned lands and for 'Residential development' to the north on RE zoned lands:

1. **04/20:** 7 No. Light Industrial Blocks, all comprising mezzanine storage and ancillary office accommodation, comprising Block A totals 1860 sqm. of floor area and comprises 4 No. Office Units & 7 light industrial units comprising of enterprise units, Block B totals 1200 sqm. of floor area and comprises 4 no light industrial units, Block C totals 1343 sqm. of floor area and comprises 3 light industrial units, Block D totals 1368 sqm. of floor area and comprises 3 light industrial units, Block E totals 4379 sqm. of floor area and comprises 4 office units and 7 light industrial units, Block F totals 3402 sqm of floor area and comprises 16 light industrial units, Block G totals 1200 sqm of floor area and comprises 4 Light industrial units. All of the above together with associated car parking, sewage treatment works and site development works and the construction of a portion of the proposed Western distributor road as per County Development Plan from R761, together with all associated works. Address: Ballycrone, Kilcoole, Co. Wicklow. Decision: Grant of planning permission.
2. **04/1533:** 32 two storey dwellings with site ancillary work including pumping station. Proposal consists of 8 x 2 bedroom, 20 x 3 bedroom, 4 x 4 bedroom dwellings. Address: Ballycrone, Kilcoole, Co. Wicklow. Decision: appealed to An Bord Pleanála which granted planning permission, under reg. ref. PL 27.216106.
3. **05/2978:** Permission sought for minor revisions to facades & internal layouts to previously granted planning permission 04/20, comprising of 7 no. light industrial units. Address: Ballycrone, Kilcoole, Co. Wicklow. Decision: Grant of planning permission.
4. **151019:** Extension to ref. 10/2612 (revised layout, house types and sites to house No.s 29 to 35 inclusive, and proposed extra 4 No. two storey dwellings with revised site boundaries all with connection to services and site ancillary works). Decision: Grant extension of duration. Date: 24/11/2015.
5. **181127:** Extend the appropriate period of a permission - 13/8757 - retention and completion of six partially constructed two storey dwellings and proposed construction of two x 2 storey semi detached dwellings and four detached 2 storey dwellings with connection to services as previously granted under planning ref. no. 04/1533 and ancillary site works including roads, footpaths and civil works. Decision: Grant extension of duration. Date: 30/11/2018.
6. **201305:** revised layout, house types and sites to house Nos. 29 to 35 inclusive, and proposed extra 3 No. two storey dwellings with revised site boundaries all with connection to services and site ancillary works. Decision: Grant extension of duration. Date: 19/2/21.
7. **22191:** Construction of 2 no. three bedroom, two storey, semi detached dwellings and all ancillary site and services works. Decision: Grant planning permission. Date: 21/04/2022.

Our client's own home adjoins the site and was granted permission under planning permission, reg. ref. 953109.

## 7.0 Zoning amendments/zonings sought by Mr Brady

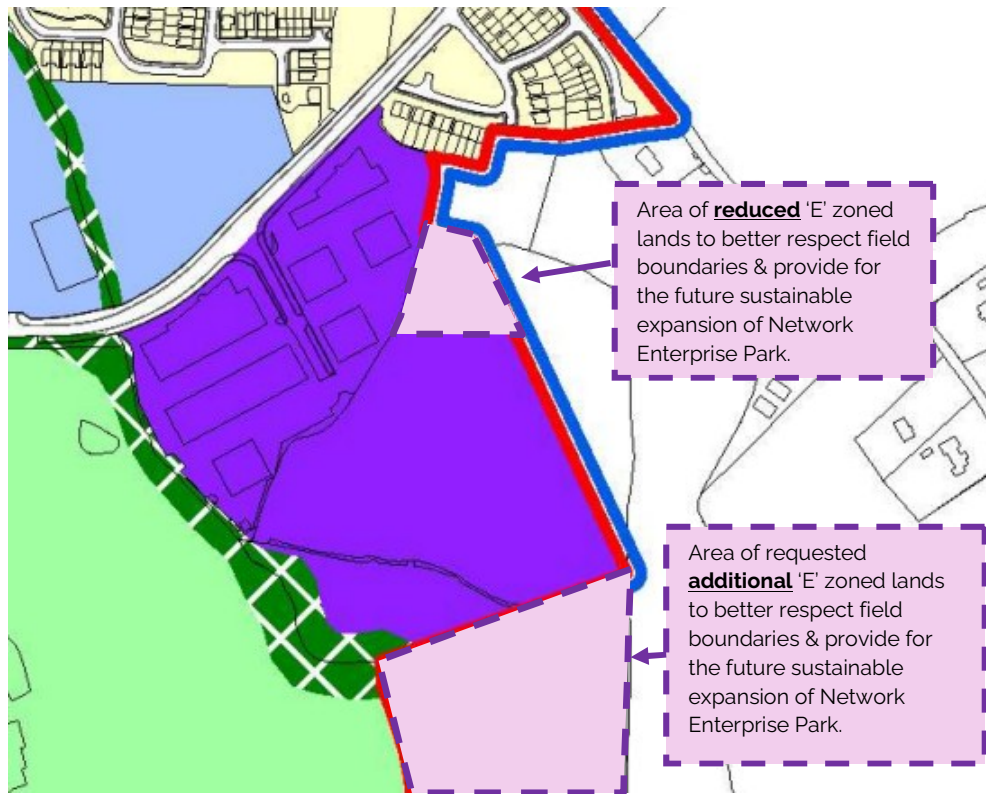
This submission proposes:

1. Lands shown as zoned 'E' – 'Employment' be amended to reflect existing field boundaries requiring both a reduction in one area of the proposed 'E' zoned lands and increase in the area of lands zoned 'E' to the south (see Fig. 8).

BPS respectfully notes that the Wicklow County Development Plan 2022-2028 and the draft LPF each set out aims and objectives for the protection of heritage features and the protection of existing hedgerows, trees, and the biodiversity therein. Respecting field boundaries and protecting hedgerows would require the zoning of some additional lands 'E' but we submit that this is justified. The boundaries of an extended Network Enterprise Park would fit better into the landscape by being developed in this manner.

As noted above, our client respects and appreciates the zoning of any of his lands 'E'; however, in discussions with elected members, he has been advised to requests these reasonable amendments.

BPS notes how ideally – as Fig. 8 shows – the 'E' zoning would be amended to the east to respect the field boundary and extended further south. We have stopped short of recommending the 'E' zoning pass any further south this as we anticipate this to be a larger area than the planning authority would consider. Perhaps the entire field could be zoned, and a future planning application could be required to provide a significant tree buffer to the south and/or offer a large SuDS wetland area (or some other open space and visual screening type landscaping).



*Fig. 8: Requested amendments to the proposed 'E' zoning of Mr Brady's lands to reflect existing field boundaries and allow a better distribution of 'E' and RN1 zoned lands*



*Fig. 9: Existing field boundaries pertaining to the field proposed to be part re-zoned 'E'*



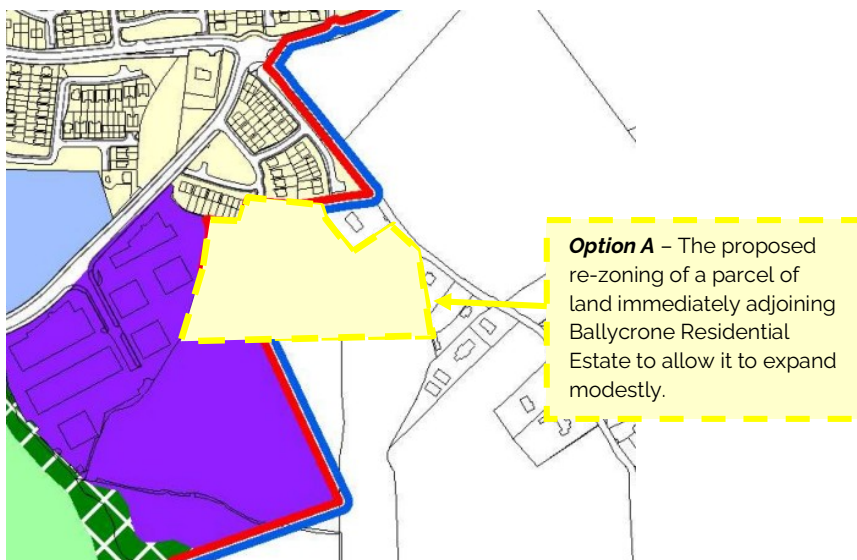


**Fig. 10: Existing field boundaries pertaining to the field proposed to be part re-zoned 'E'**

2. The lands adjoining the completed Ballycrone Manor residential scheme be zoned 'RN1: New Residential - Priority 1' to allow the extension of that estate and to make efficient use of its existing service connections and to use the planned road access into these lands which forms part of that development. There are two options open to the planning authority as regards allowing the Ballycrone Manor residential scheme to be extended:

**Option A:**

The areas of land immediately adjoining Ballycrone Residential Estate which could be developed to provide approx. 40-55 houses. The total area of Option A is approx. 2.618ha. of which, within a future development, some area would be required for roads, footpaths, open space and tree buffers to adjoining lands. This area immediately adjoins the existing and available road gateway (see Fig. 11) sited between the residential estate and our client's lands. With respect, this re-zoning would make good sense, and this submission is made following discussions between our client and the developer of that scheme. A planning application could be made in short order and housed delivered quickly thereafter. This is a modest request for an infill zoning between what will be the 'E' zoned and to the west and the 'RE' lands to the north.



**Fig. 11: Option A as regards zoning fields immediately adjoining Ballycrone Residential Estate 'RN1: New Residential - Priority 1'**



**Fig. 12: Option A – the extent of lands which could be zoned 'RN1: New Residential - Priority 1' to provide a modest extension to Ballycrone Residential Estate**

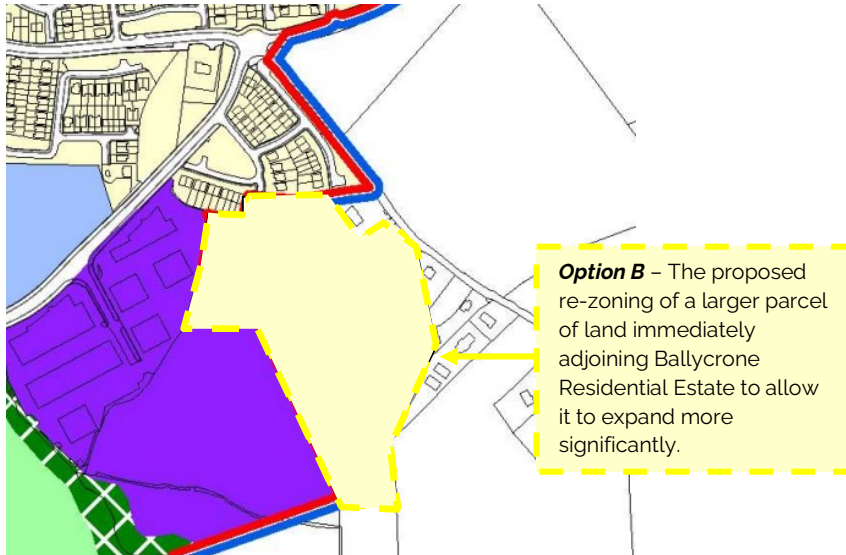
### **Option B:**

A larger area of land – 3.9ha. – all owned by our client, including the Option A lands, and all to be sited adjoining 'E' zoned lands (whose extent would be modified set out above), could be zoned 'RN1: New Residential - Priority 1' allowing the Ballycrone Residential Estate to significantly increase in size.

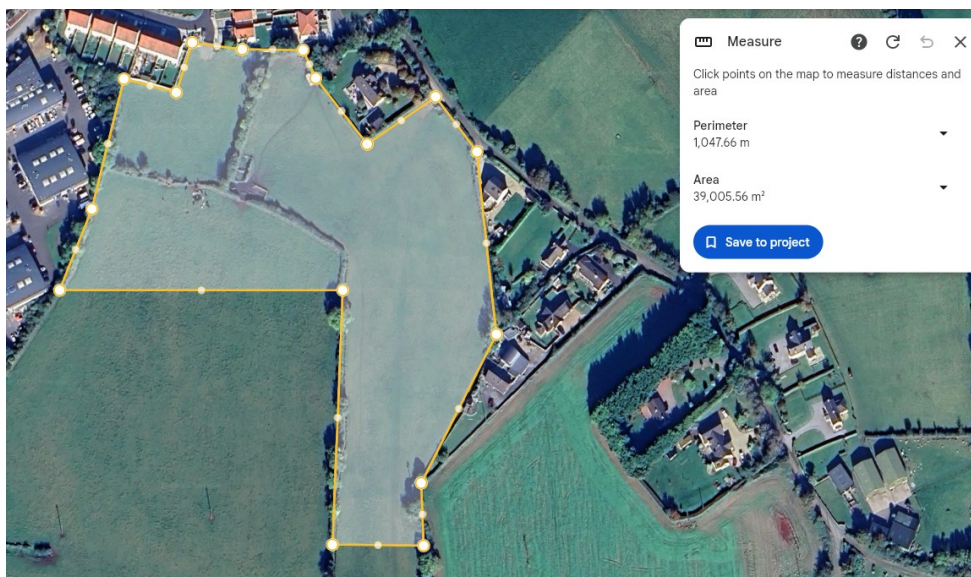
We have included all lands which would adjoin the proposed 'E' zoned lands to the east. Clearly the extend of land could be reduced.

This is an opportunity to sustainably extend this area of Kilcoole with employment lands sited alongside serviced residential lands. These lands could provide a significant increase in residential development all accessed through an existing housing estate.

Regarding context, there are already dwellings sited to the east of these lands which extend along Sherlock's Lane. This proposal would integrate these better into the LPF and into Kilcoole.



**Fig. 13: Option B as regards zoning fields immediately adjoining Ballycrone Residential Estate 'RN1: New Residential - Priority 1' and' adjoining lands proposed to be zoned 'E'**



**Fig. 14: Option B – the extent of lands which could be zoned 'RN1: New Residential - Priority 1' to provide a large extension to Ballycrone Residential Estate**

Our client's total landholding is larger than that included in this submission. The division of the submitted area of lands between 'E' and 'RN1: New Residential - Priority 1' would represent an appropriate expansion of Kilcoole at this location.

It is acknowledged that this submission would require the Settlement Boundary and the Local Planning Framework (LPF) Boundary to be revised. However, this would be justified in achieving the proper expansion of Network Enterprise Park and Ballycrone Manor housing development whose existing and proposed extents would otherwise be restricted for many years by the emerging LPF.

## 8.0 Planning and development basis for proposed zoning

Having been requested to visit this the subject lands and to suggest reasons why they should be further zoned for 'E' or 'RN1: New Residential - Priority 1', we submit the following grounds.

### 8.1 The zonings would support the compact growth of Kilcoole

Mr Brady supports a vision for Kilcoole of medium to fast paced growth. In order to achieve such growth, there is a need for housing development to meet demand. There has been very little house building in Kilcoole in recent years with Ballycrone Housing Estate being the most well-known supplier of a small number of new dwellings. Mr Brady's lands, located adjacent to existing lands zoned RE, would be appropriate for residential zoning as part of the ongoing growth of Kilcoole.

The Network Enterprise Park has been a success story for Kilcoole and provides significant employment opportunities. These proposals provide for the further development of the estate such that its employment generating benefits can be expanded sustainably.

The two proposals together would provide for new houses alongside new jobs.

### 8.2 The location of the lands justify their zoning and or proposed re-zonings

Kilcoole is designated as a Level 4, 'Self-Sustaining Town', i.e. towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.

Table 1B 'Wicklow Core Strategy for Kilcoole' states:

*Level 4 settlements are designated 'Self Sustaining Towns' described as 'towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining'.*

*These towns range in size (as per the Census of population in 2022) from c. 2,000 to 4,500 persons. Population growth in Level 4 towns overall is targeted to be in the 20%-25% range between 2016 and 2031, with variation in future growth rates between towns in the level due to developments already underway in some towns.*



*Economic Development Strategy The towns will aim to become more self-sustaining by concentrating on local enterprise and employment growth and catch-up facilities. This will include attracting investment in a mixture of 'people' and 'product' intensive industries that will generate new employment opportunities and improve the jobs ratio*

### **Regarding employment**

WCC has already proposed to expand the Network Enterprise Park with more lands zoned 'E'. Our client is merely asking that this zoning be modestly expanded to respond to its context. Having visited Kilcoole and walked around the town and its environs, the southern and southwestern end of the town is that where employment uses have been traditionally located, including at Renmore and Bulford Business Parks with 10 and 13 industrial units respectively within each of these business parks and Network Enterprise Park adjoining our client's lands. These employment hubs require homes for workers. Our client's lands offer an appropriate location to also provide adjoining homes.

Section A2.5 'Economic Development & Employment' of the Draft LPF states: "Depending on their degree of accessibility, scale of population / workforce and market catchment, and the availability of support services, the Level 4 towns such as Kilcoole have varying roles to play in acting as attractors for foreign and local investment". Network Enterprise Park needs to expand such that Kilcoole can play this role.

Section A2.5 further states:

*... the strategy for economic development will be based around: a) providing a land-use framework for each town, which makes the Council's requirements and expectations with respect to the location and type of new employment generating development abundantly clear; b) supporting and facilitating, to the highest degree possible (subject to environmental and other relevant planning considerations) all forms of employment generation and in particular, to encourage employment and commercial uses as a key activity in the town / village centres; c) a focus on 'placemaking' to create attractive and sustainable communities, with high quality services and public realm, to create attractive places to live, work, visit and invest.*

The current proposal is a sustainable one for appropriate contextual considerations to be included in deciding the final extent and boundaries of 'E' zoned lands adjoining Network Enterprise Park.

Section A2.5 further states:

*An established measure of the employment 'health' of a settlement is a measure called the 'jobs ratio'. This is the relationship between the number of resident workers and the number of jobs in any defined area. It is the aim of the County Development Plan to increase the County's job ratio to 70% by 2031, which will require some locations to exceed this level, and even to exceed 100%, in order to counter balance areas such as smaller settlements and rural areas, that would be unlikely to reach such a high level of employment*

This proposal aims to ensure jobs are provided alongside housing development which aligns with WCC planning policy.

These proposals would require slight and justified amendments to Table 6.6 'Employment Zonings' of the Draft LPF (see Fig. 15).

This is justified having regard to proposed 'Employment Objectives' GDK 21, 23, and 25 which state:

*To facilitate and support all forms of employment creation on appropriately zoned land in Greystones-Delgany and Kilcoole and to promote the intensification of activities at existing suitable employment locations especially where this can mitigate long distance commuting, subject to the proper planning and sustainable development of the area and compliance with all other objectives of the County Development Plan and this LPF.*

*To protect employment zoned land from inappropriate development that would undermine future economic activity or the sustainable development of such areas*

*To support the continued operation and further development of Bulford Business Park, Kilcoole Industrial Estate and **Network Enterprise Park** as key employment hubs within the area [emphasis added].*

**Table 6.6 Employment Zonings**

Existing / Developed Employment Lands		
Town	Location	Approx Area (Ha)
Greystones-Delgany	Greystones Enterprise Centre (GRID) Charlesland	1
	Mill Road – Charlesland (Procap)	2.5
Kilcoole	Bulford Business Park	5.5
	Network Enterprise Park	3.5
	Kilcoole Industrial Estate	10
Undeveloped Employment Lands		
Town	Location	Approx Area (Ha)
Greystones-Delgany	Charlesland (west of GRID)	5.5
	Mill Road – Charlesland (former IDA)	20
Kilcoole	Network Business Park (south)	4.5
	Bulford Business Park ( north)	7

**Fig. 15: Excerpt from Table 6.6 'Employment Zonings' of the Draft LPF**

#### Regarding housing provision

Tables 2.1 and 2.2 of the Draft LPF indicate that Greystones-Delgany and Kilcoole will need approximately 2240 new homes built between now and 2031. 287 of these must be in Kilcoole. Population growth is exceeding all targets and is expected to rise in Kilcoole by 602 persons up to 2031, but housing supply is not keeping up with demand. Wicklow County Council is required to identify and reserve an appropriate amount of land in the best locations to meet this housing target. These homes must be provided for in a sustainable manner, aligning with the provisions of the Core Strategy of the County Development Plan, and having regard to established and sustainable settlement patterns and the natural environment. The subject lands on which our client has requested a 'RN1: New Residential - Priority 1' zoning are appropriately sited adjacent to existing lands zoned RE. There are many sites around Kilcoole which could be zoned RE, but few are as well positioned as Mr Brady's lands. The subject lands are located within walking distance of the full range of infrastructure, services and amenities including the town centre. Dublin Bus and Iarnród Éireann mainline trains serve Kilcoole within walking distance of these lands.

Section A.24 of the Draft LPF states: "In order to ensure however that overall housing and population targets can be delivered, land may be zoned for new residential development outside of the existing built up envelope, subject to the amount of zoned land not exceeding 70% of the total housing target for that settlement." The current proposal would achieve this.

Section A.24 also aims "To require that new residential development represents an efficient use of land and achieves the highest density possible, subject to the reasonable protection of existing residential amenities and the established character of existing settlements. The current proposal would achieve this.

**Table 2.1 Population growth targets Greystones-Delgany and Kilcoole 2028 and 2031**

Town	2016 Census	Q2 2028 Target	2031 Target	Growth 2016-2031
Greystones-Delgany	18,140	21,727	22,081	3,941
Kilcoole	4,239	4,778	4,841	602

**Table 2.2 Housing growth targets Greystones-Delgany and Kilcoole 2028 and 2031**

Town	2016 Census	Q2 2028 Target	2031 Target	Growth 2016-2031
Greystones-Delgany	6,766	8,549	8,719	+1,953
Kilcoole	1,451	1,708	1,738	+287

**Fig. 16: Tables 2.1 and 2.2 of the Draft LPF**

### 8.2.1 The need for additional residential zoned lands in Kilcoole

In making this submission, our client has regard to the County Development Plan and to development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives anticipated for Kilcoole.

This submission has considered also the zoning principles set out hereunder as well as the guidance set out in 'Development Plans – Guidance for Planning PART A - iii Authorities' (DoHLGH 2022).

We submit that the proposed residential zonings included in this submission are 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.

This submission adheres to the compact growth, sequential development and phasing principles set out in the Draft LPF.

### 8.3 These lands can be serviced

There would not appear to be any infrastructural constrain which would prevent the zoning of these lands for development. Employment and residential developments can be served by road, mains water, surface water, foul water and electricity infrastructure.

#### 8.3.1 Road access is available for expanding the Ballycrone Estate

The evolving distributor road network in this area has already been determined by existing developments and planning permissions.

These lands can be accessed via the Cooldross Lane/Holywell Avenue roundabout and through the Ballycrone Manor residential scheme where a future entrance into our client's lands already exists (see Figs. 17 and 18).



*Fig. 17: Road access from Cooldross Lane/Holywell Avenue roundabout through Ballycrone Manor residential scheme to the north of the subject lands (Source: Google Maps)*



*Fig. 18: Existing road access and entrance planned, built and in place through Ballycrone Manor residential scheme to the north of the subject lands (Source: Google Streetview)*



The roads network in the area has significantly developed and matured since the existing LAP was adopted. The pertinent planning permissions are now over 20+ years old, and this is an increasingly mature urban area which needs additional employment and housing lands. See:

1. Planning Authority Ref. 03/8346 (An Bord Pleanála Ref. 27.204542) has determined the northern side of the upgraded road.
2. Planning Authority Ref. 04/216, An Bord Pleanála Ref. 27.210720 has determined the location and layout of the proposed roundabout and the alignment of the new distributor road to the north-east. This permission includes provision for the construction of the greater part of the roundabout.
3. Pleanála Ref. 27.204542) has determined the northern side of the upgraded road. Of particular importance Planning Authority Ref. 04/216, An Bord Pleanála Ref. 27.210720 has determined the location and layout of the proposed roundabout and the alignment of the new distributor road to the north-east. This permission includes provision for the construction of the greater part of the roundabout.
4. Planning Authority Ref. 04/1533, An Bord Pleanála Ref. PL 27.216106 provides for the completion of the south-west part of the roundabout and a part of the proposed distributor road.

As Figs. 19 to 21 show, the subject lands would be served by distributor roads with footpaths and cycle lands. These roads are fully completed.

It is submitted that the subject lands can be accessed in a manner which would be in keeping with the proper planning and sustainable development of this area of Kilcoole.



**Fig. 19: The quality of the Cooldross Lane carriageway with footpaths and cycle lanes on both sides (Source: Google Streetview)**



**Fig. 20: The quality of the Cooldross Lane/Holywell Avenue roundabout with footpaths and cycle lanes on both sides (Source: Google Streetview)**



**Fig. 21: The quality of the access road toward the Ballycrone Manor residential scheme with footpaths and cycle lanes on both sides (Source: Google Streetview)**

### 8.3.2 Waste water services infrastructure is in place

Kilcoole's growth was restricted for many years by limited public wastewater treatment capacity in the mains system serving the town. This situation had existed for as much as 15 years and was reflected in County Development Plan proposals for the growth of population at Kilcoole back when the existing LAP was adopted.

Uisce Eireann's website presently indicates that there is no issue with capacity in the Kilcoole WWTP (see Fig. 22). Connections are currently feasible.

Therefore, the zoning of additional lands to permit the growth of Kilcoole need no longer be restricted by existing wastewater capacity. In this context it would appear to be appropriate to consider zoning Mr Brady's lands.

water.ie/connections/developer-services/capacity-registers/wastewater-treatment-capacity-register/wicklow

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Home / Connections / Developer Services / Capacity Registers / Wastewater treatment capacity register / Wicklow

Region	County	Settlement	Wastewater Treatment Plant (WWTP)	Reg #	Indication of Available Capacity	WWTP Project Planned/Underway
EM	Wicklow	Bray	Shanganagh WWTP	D0038	• Green	
EM	Wicklow	Greystones	Greystones WWTP	D0010	• Green	
EM	Wicklow	Wicklow	Wicklow WWTP	D0012	• Green	
EM	Wicklow	Arklow	-	D0006	• Green	Yes^
EM	Wicklow	Blessington	Blessington WWTP	D0063	• Green	
EM	Wicklow	Kilcoole	Kilcoole WWTP	D0087	• Green	

**Fig. 22: Uisce Eireann's assessment of capacity in the Kilcoole WWTP (Source: Uisce Eireann, 19/6/2025)**

### 8.3.3 Public water is available

The public water supply serving the town is supplied by Dublin Corporation from the Vartry treatment works from an existing connection of the Dublin Corporation main at Kilpeddar. The service reservoir of 2.2 million litres is located at Priestnewtown and the town's water supply is adequate to cater for Kilcoole's anticipated demand. Therefore, the availability of water is not a constraint to the future development of Kilcoole.

It is submitted that were Mr Brady's lands zoned for development, they can be serviced with water.

## 8.4 Zoning these lands would provide certainty

Zoning gives a degree of certainty to residents, developers, etc. The LPF needs to provide landowners and developers in the town with a clear idea of the future shape of the town. Mr Brady suggests that the town be consolidated with the town's future shape in this case, taking in the north-eastern corner which has previously been left only partly zoned 'SLB' and left undeveloped.

## 8.5 No impacts would arise from the future development of these lands

The zoning of these lands would not appear to raise any impacts on any sensitive designations or on any adjoining properties.

These lands could be zoned without raising any objection. This would appear to provide a balance between the need for additional housing land and the need to prevent impacts.

### **8.5.1 These lands are not the subject of any sensitive designations**

While the subject lands adjoin or are sited in the 'Coastal Area – Area of Natural Beauty' under the WCDP 2022-2028, this designation is applied to approx. half of the area around the town of Kilcoole, with the other half zoned 'Corridor Area'.

The subject lands can reasonably be called peri-urban. Beyond this general landscape designation, these lands are not within, or within the vicinity of, any of the following amenity, landscape, environmental or other designations:

1. Natural Heritage Area,
2. Special Area of Conservation,
3. Special Protection Area,
4. Zone of Archaeological Protection,
5. Protected Structure,
6. Architectural Conservation Area,
7. Preserved views or prospects,
8. Tree Preservation Orders, etc.

The lands are suitable for residential use as now sought as they would connect into the existing housing estate to the north and can offer quality public and communal open spaces. The subject lands can also offer a landscaped boundary to lands that would remain outside of the LPF boundary.

### **8.5.2 No impacts on adjoining properties**

The zoning of these lands for housing would not impact on any adjoining properties and certainly no residential properties. The estate to the north has been planned to connect to these lands and, as such, they reasonably expect this to happen in due course.

Surrounding land is either owned by Mr Brady, is already developed for residential or employment use, or is part of the now closed Kilcoole Golf Club which is hidden behind heavy boundary landscaping.

### **8.5.3 No visual impact concerns arise**

The subject lands are not visible within the landscape. They are hidden behind existing employment development to the north and a golf club to the west. Other boundaries comprise of agricultural land for considerable distance.

The zoning of the subject lands for residential development would not have any discernible impact on the landscape, but would facilitate modern settlement and development needs.

### **8.6 The zoning would provide a hard edge to the south of Kilcoole**

The subject lands are located between employment/enterprise units to the west and the residential estate to the north. The lands are bisected by the proposed LPF boundary to the south.

The zoning of these lands and their future development into a housing development would provide a hard edge to Kilcoole at this location. An edge beyond which no further development would occur as no access would exist. The estate would be developed as a cul-de-sac as required.

## **9.0 Conclusion & recommendation**

Arising from the above analysis, it is the professional opinion of BPS, as an accredited firm of town planning consultants, that the subject lands should be zoned and/or re-zoned for development and that this re-zoning can be achieved in a manner which does not cause any significant adverse impacts on the environment, on the landscape, on adjoining and neighbouring developments, and on the proper planning and sustainable development of the area.

In light of the above, we recommend that:

1. Lands shown as zoned 'E' – 'Employment' be amended to reflect existing field boundaries requiring alterations to the areas of lands zoned 'E' (also to facilitate the zoning of lands RN1).
2. The lands adjoining the completed Ballycrone Manor residential scheme be zoned 'RN1: New Residential - Priority 1' to allow the extension of that estate and to make efficient use of its existing service connections and to use the planned road access into these lands which forms part of that development. There are two

options open to the planning authority as regards allowing the Ballycrone Manor residential scheme to be extended:

*Option A:* Fields adjoining the Ballycrone Residential Estate could be developed to provide approx. 40-55 houses.

*Option B:* A larger area of land including the Option A lands – owned by our client - could be zoned allowing the estate to significantly increase in size.

These zoning amendments are considered the most appropriate in light of the need for Kilcoole to reduce its dependency on commuters and to increase the availability of employment and residential zoned lands.

These zonings would be compatible with the Wicklow County Development Plan 2022-2028 and align with the aims and objectives of the emerging LPF.

*Signed:*

*Brendan Buck*

**BPS Planning Consultants LTD**  
Members of the Irish Planning Institute  
20 June 2025