

	<h1>Greystones-Delgany & Kilcoole LPF Variation No.4</h1>
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Who are you:	Agent
Name:	Mr. Liam O'Meara
Reference:	GDKLPF-121349
Submission Made	June 18, 2025 12:17 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 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART A Strategy

- A.3 Factors influencing future development options

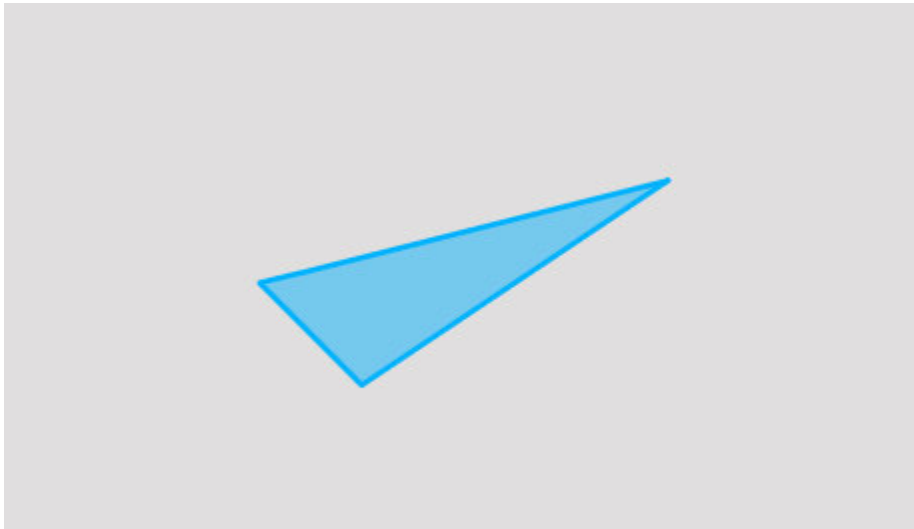
Local Planning Framework PART B Settlement Specific Objectives.

- B.2 Residential Development
- B.7 Infrastructure, including transport and flooding

Please select which town you want to comment on:

Greystones/Delgany

Map



Map data © OpenStreetMap contributors, Microsoft, Facebook... Powered by Esri

Site Description:

Upload a File (optional)

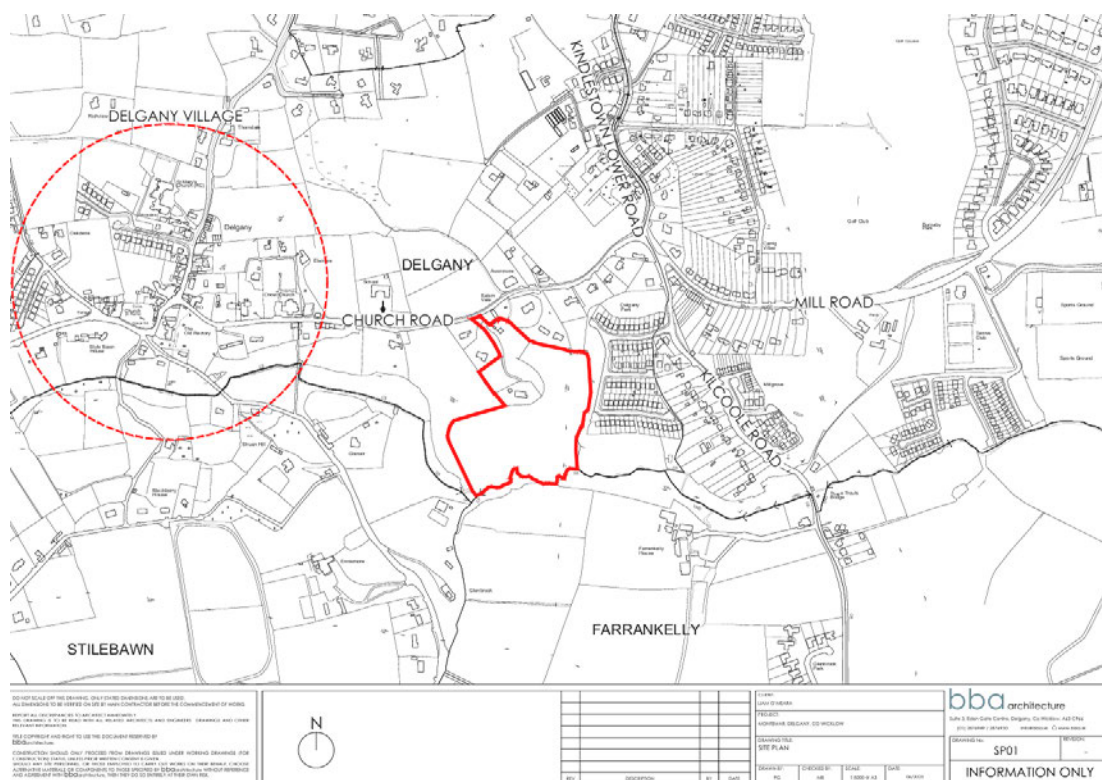
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Delgany, Co. Wicklow.

VARIATION NO. 4 of the COUNTY DEVELOPMENT PLAN 2022-28.

The overall site (including the existing dwelling) has a gross site area of c.5.4 hectares. As identified in the site location map, it is c.560 metres from Delgany village centre, c.320 metres from Mill Rd. and public transport (bus) links and opposite Delgany National School. The links include bus services to the Dart station and Dublin city centre.

SITE LOCATION MAP.



DETAILS of the SUBMISSION.

It is not stated why the zoning of the majority of the site has been changed from R5 to OS2. It is assumed that this has been influenced by the extent of the floodplain of the Three Trouts stream and the contours of parts of the site, which are considered to create steep banks. The description of the OS2 zoning objective, in section 12.1, is to –

“To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along water courses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.”

PART A- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-28. (CDP)

In the preamble to the LPF, in Section 3.5 of Part A, it is stated that the amount of zoned housing land shall take into account the zoning principles set out hereunder, as well as those set out in Development Plans- Guidelines for Planning Authorities 2022..... and any other guidelines in place at the time of the adoption of the LPF.

Land use zoning provision will be made on the basis of providing enough housing land to meet the prevailing core strategy population and housing targets of the CDP at the time of adoption, with flexibility to ensure that-

- (a) the targets can be achieved in the event of unforeseen impediments in the development of certain lands arising and
- (b) the LPF does not have to be formally amended to reflect any changes in the core strategy or population/ housing targets that may arise.

It is evident that, given the imminent ministerial guidelines to zone more land for residential development, that a surplus of suitably located and serviced land should be zoned in the LPF for residential development. This section of Part A concludes with affirmation that the Council will adhere to the principles of compact growth, sequential development and phasing.

PROPOSED LOCAL PLANNING FRAMEWORK.

In Section A2 of the Framework it is stated that there are three strategic goals that inform and shape the LFP. One of these is Place Making which involves the creation of sustainable communities, to include housing, sustainable mobility and healthy town centres. The focus ... in respect of further residential development will be on **infill development and the consolidation of the built-up area.**

Section A 2.4 – Population and Housing Development Strategy.

It is stated that there will no quantitative restriction on the number of units that may be delivered within the built-up envelope of towns.

Section A3 - Factors Influencing Future Development Options.

A key consideration is to ensure that new residential development is or can be accessed and serviced by sustainable and active transportation modes. Greenfield lands should be serviced or serviceable, with footpaths and cycleways, be within 30 minutes (2.5 km) walk time of the Dart station and within 15 minutes walk time of an existing or committed bus service. Reference is made to the Consolidated Map in Appendix 6 of the Framework, which depicts the 2.5 km catchment. The entrance to the subject site is within same. The entire site is well within 15 minutes walk time of existing bus services along Mill Road (in reality less than 5 minutes).

It is further noted that undeveloped sites in Delgany are assessed in pages 31-32 of the Framework. It is evident that all of the sites studied are more peripheral than the subject site, are further removed from the village centre and lack transport links. The development of these sites would lead to sprawl into the rural area. Yet, in the proposed LPF, they are proposed to be zoned for residential purposes.

Section A4 - Development Strategy

Key parameters for future development include compact growth, developments that will generate a minimum number of car journeys and increase instances of walking, cycling and the use of public transport. The strategy for Greystones- Delgany will be the promotion of consolidation and infill. In the zoning of land RN1- New Residential Priority 1, undeveloped land closest to the centre and public transport will be given priority.

Given all of the above it is evident that the subject site is ideally located and suited to residential development. It is not understood why it is proposed to completely remove the residential zoning from the subject slice. It readily meets all of the criteria outlined which has informed residential zonings and is much more suitable in these respects than most of the other sites that have been proposed to be zoned for residential purposes. It is appreciated that the zoning of lands for residential development is informed by the Core Strategy Housing and Population targets. Targets based on information and data which are out of date.

Reference is made to **the Development Plan Guidelines for Planning Authorities 2022**. A more feasible approach to land use zoning is advocated in Section 4.4.1 *“It is policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new plan under preparation, **should not be subject to de-zoning**”*.

The Section goes on to refer to the potential for phasing of zoned and serviced land with a preferred sequence of development for such sites.

*“However, phasing should be applied where there is a sound planning rationale for doing so, based on factors such as site location, the availability or proximity of, or capacity to provide, off site services, facilities or infrastructure. This should also be viewed in the context of the urgent needs to increase housing supply. Phasing may not be necessary where the planning judgement is that unconstrained zoned and serviced housing sites are of broadly equivalent merit for development purposes in a particular settlement or area at the planning making stage. In all cases, whether phasing is applied or not, **development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan from coming forward**”*.

Section 4.4.3. of the Guidelines states

“In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential....than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable through inactivity to avoid restricting the supply of new housing development on a particular landholding or site.”

Given the location of the site, it's proximity to the village centre, bus services etc and that it's development constitutes infill development, it is considered that the flexibility advocated in the Guidelines should be applied in the consideration of this submission. Section 4.4.3. would indicate that it is possible to zone the subject site for residential development, particularly when it's location also meets the proper planning and sustainable development requirements.

FLOODING.

Examination of the Appendices to the proposed framework, in particular Appendix 3-Strategic Flood Risk Assessment, includes several maps the flood plain of the Three Trouts Stream, which borders the subject site. The appendix refers to Section 28 Guidelines - “the Planning System Guidelines and Flood Risk Management Guidelines for planning authorities 2009”. It also refers to a clarification of advice regarding the Guidelines, issued in 2014, (circular PL2/2014). Planning authorities must strike a fair balance between avoiding flood risk and facilitating necessary development... and ensuring that appropriate measures are taken to reduce flood risk to an acceptable level for those developments that have to take place for reasons of the of the proper planning unsustainable development in areas at risk of flooding.

As set out in previous paragraphs, the subject site meets all of the criteria for proper planning and sustainable development, referenced above. Nevertheless, the proposed LPF makes no attempt to strike the fair balance advocated in the circular.

Appendix 4 beginning on page 17, assesses 9 sites that are zoned residential-the subject site is identified as (vii) Delgany- Three Trouts. Map 4 C of the Appendix- Flood Risk- Potential Future Scenario - depicts the areas and the extent of potential future flood risk. Having regard to this map, it is evident that the majority of the subject site will not be affected by the predicted future extent of flooding. The extent of the Future Flood Risk area is overlaid on the subject site in the map, below. It is clear that the removal of the entire area of New Residential zoning to mitigate against a perceived flooding risk is unnecessary.

This then leaves the issue of “steep banks” which are included in the description of the OS2- natural areas zoning objective.

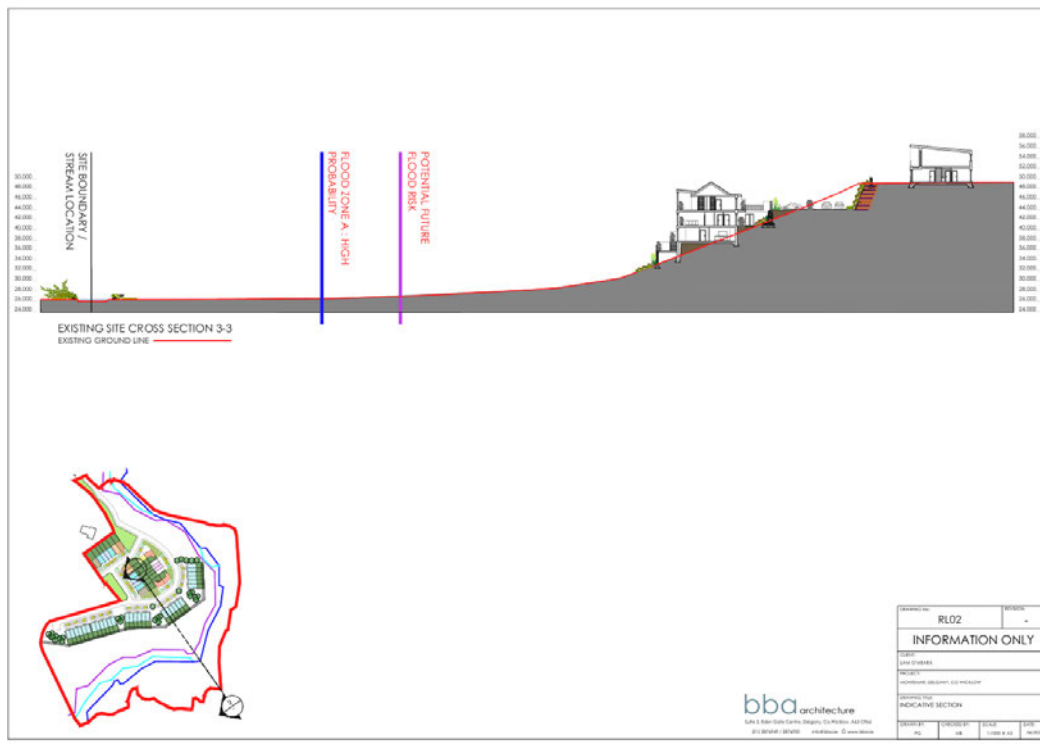
The subject site has now been surveyed for this submission. Details are included in the figure below, along with identification of recorded and predicted flood levels.

INDICATIVE RESIDENTIAL LAYOUT.



The levels indicated in blue and purple are those indicated on maps 4 B and C in Appendix 3 of the LPF. Also, in the figure below is a cross section through part of the site on which a potential residential development is envisaged.

INDICATIVE LOCATION AND DESIGN of DWELLING on SITE SLOPE.



The section clearly shows that it is possible to provide said dwellings without undue impact on the existing slopes or steep banks. Development of houses on such slopes is typical of many sites in Wicklow. Indeed, there are several examples in proximity to the subject site. These include Archers Wood on the opposite side of the Three Trouts stream, and which included 4/5 storey apartment blocks. A few hundred metres to the west of the site is Priory Gate. This is a development of three dwellings constructed on foot a planning permission in 2001. The site slopes were greater than exist on the subject site, at 12 metres from road level to the southern site boundary. A design and engineering solution, similar to that shown on the map/diagram above, was considered acceptable. It is submitted that bespoke engineering solutions for housing on lands such as this are readily available.

Obviously, same would be subject of detailed engineering and design assessments as part of any planning application. For now, it is considered that it is demonstrated that a sizeable area of the site can accommodate much needed residential development.

SUMMARY

In summary, it is submitted that the subject site meets all of the necessary requirements for compact and sustainable residential development by reason of location, as an infill development, as serviced land close to the village centre, close to a primary school and close to high-quality public transport links.

PROPOSED ZONING.

It is now put to the Council that the majority of the subject site can be developed for residential purposes on land that will not be affected by future flooding nor hindered by the contours of the “steep banks”. The indicative layout shown above for a residential development is for information purposes and would be refined as part of any planning application for development. The expansive

area between the residential footprint and outer extremities of the floodplain can be landscaped to improve the residential amenity for residents and visitors. The remaining lands can be zoned as an area of natural open space, to include the floodplains and the slopes on the site. These areas can be included in any future planning application and be left in a natural state or modified for recreational or landscape purposes to include walks, seating areas etc. The zoning proposal set out in this submission is shown in the map below.

CONCLUSION.

It is considered that the subject site can readily be zoned for both residential development and natural area open space. As can be seen in the above map, the latter will cover the extent of future flooding and the area of slopes that does not accommodate proposed dwellings. The above assessment clearly shows that the majority of the site can be developed for residential purposes without any impact from future flooding levels and can also incorporate much of the “steep banks”. Subsequent to the above any planning application for the residential development of the site can be readily permitted as a sustainable form of residential development compliant with national guidelines and development plan policies providing compact growth on serviced land, in close proximity to public transport and the village centre of Delgany. Details of design, layout etc., flood risk assessment, landscaping all to be subject of a future planning application.


It is noted that it is proposed to de-zone substantial areas of land that were/are zoned for residential development in the previous/current Local Area Plan. The lands affected include strategic land banks, low density edge of centre and infill developments in the town centre. Depending on the range of densities particular to any one site it is considered that the total area of land to be de-zoned could readily accommodate several hundred dwellings.

This being so greatly increases the need to re-zone the subject site as proposed. A site that meets the planning criteria for residential development.

Finally, the Council is asked to note that Mr. O’Meara has agreed terms with Niall Molloy of NMOL Holdings, founder of Echelon Data Centres and financial backer of Beakonshaw Limited to develop residential lands. Accordingly, if the zoning of the subject site is re-instated, as proposed in this submission, the lands will be developed. This submission is being put forward by parties committed to the development of the lands and is not speculative in nature.

The Council is respectfully asked to change the proposed zoning of the northern section of that part of the site proposed to OS2 to site RNI- New Residential Priority 1. (2.3 ha). The balance of the site (to the south with floodplains, steep slopes) to remain zoned OS2- Natural Area (1.99 ha), as indicated on the map below. The area zoned RE- Existing Residential to remain as is (1.11ha).

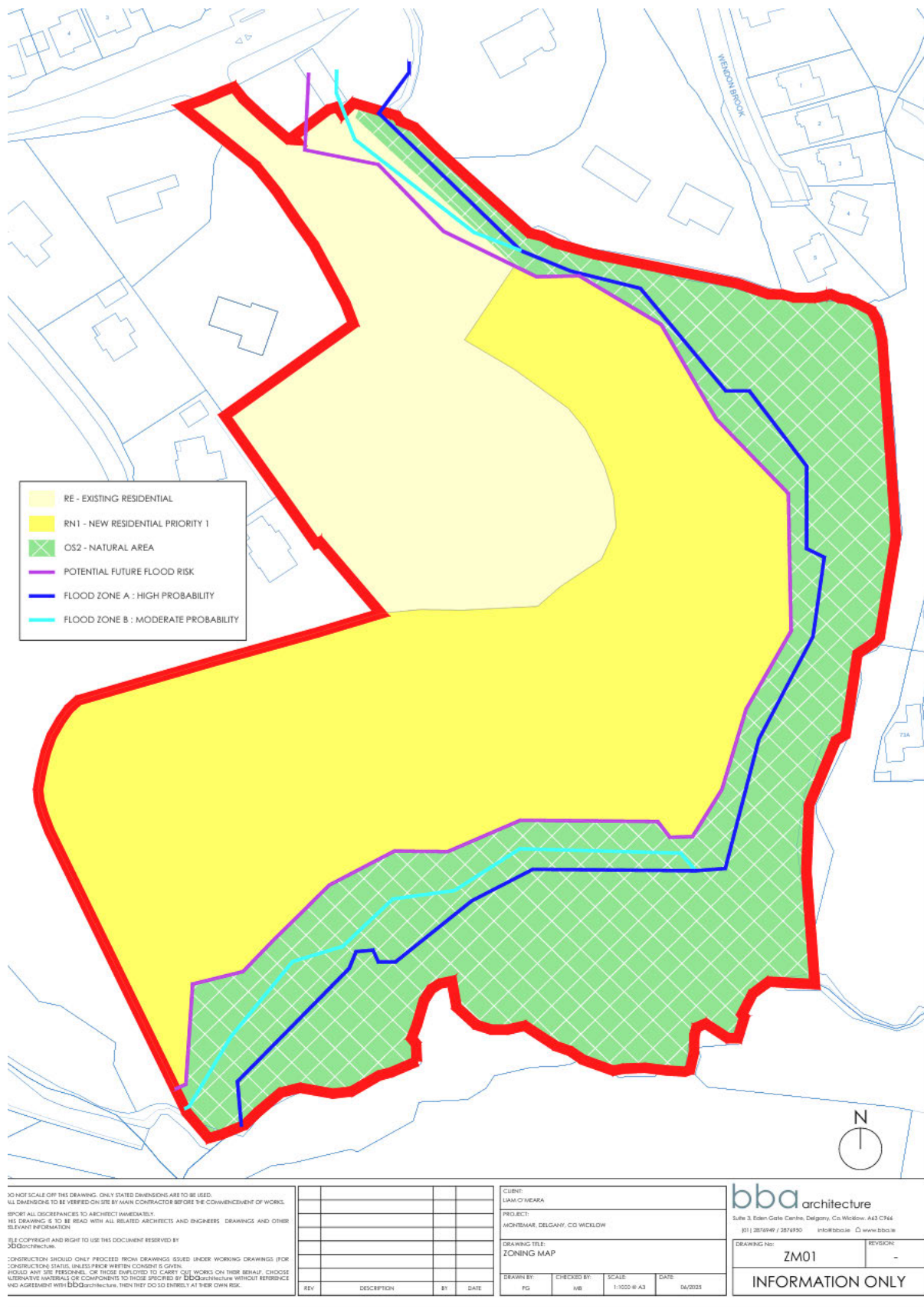
Yours sincerely,



B.A.(Hons), M.Sc. MRTPI.

Chartered Town Planner.

17th June 2025.



PROPOSED LAND-USE ZONING MAP.