



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

Submission Details

Ref	VAR7-232624
Who Are You?	Private Individual
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Proposed Variation Parts

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

Write your observations here:

I am making a submission regarding GSD 2 – Charlesland / the proposed amendment to SLO3, with particular focus on the proposed 16.5-hectare Woodland Park.

While I welcome the provision of substantial public open space, I believe SLO3 should contain stronger and more specific requirements to ensure that the OS1 lands are delivered as a genuine landscaped, tree-rich and biodiverse public park, rather than predominantly open grassland. I also raise concerns regarding protection of existing mature trees and natural features, and the wording governing the timing and completion of the Woodland Park.

Please see the attached PDF, which contains my full submission, observations and proposed amendments to SLO3.

Upload a File (optional)

Charlesland_SLO3_Public_Consultation_Submission.pdf, 0.03MB

Submission on Proposed Variation No. 7

Wicklow County Development Plan 2022-2028
GSD 2 - Charlesland / Amendment to SLO3

I wish to make an observation regarding the proposed amendment to SLO3 relating to the former Charlesland Golf Club lands.

I welcome the fact that the proposed variation seeks to secure a substantial area of publicly accessible open space as part of the future development of these lands, including **16.5 hectares of OS1 Open Space to be developed as a Woodland Park**, together with OS2 Natural Areas and substantial areas for community sporting facilities.

However, I am concerned that the proposed wording of SLO3 is not sufficiently specific about the **quality, character and landscaping of the proposed Woodland Park**.

The rezoning of these lands represents a unique and probably unrepeatable opportunity to provide Greystones with a substantial, high-quality public park. Greystones-Delgany has grown considerably and is planned to accommodate further population growth. A park of approximately 16.5 hectares would therefore represent an extremely important piece of long-term public infrastructure for the town.

The Development Plan should ensure that this land becomes a **genuine landscaped town park**, rather than simply land designated as open space.

1. The requirements for the Woodland Park should be strengthened

The proposed SLO3 states that residential development must be accompanied by the concurrent development of a Woodland Park on the OS1 lands. However, the minimum requirements currently specified for the park appear to be limited primarily to woodland paths and trails and an outdoor amphitheatre.

This contrasts with the very detailed requirements elsewhere in SLO3 for the AOS lands, where the number, size and type of pitches, courts, sports facilities and community buildings are specified.

I strongly support that level of certainty for the sporting facilities. I believe **equivalent certainty should be provided regarding the character and quality of the Woodland Park**.

In particular, describing the area as a "Woodland Park" should be supported by explicit requirements for substantial tree planting, landscaping and biodiversity enhancement. Otherwise, there is a risk that the requirement could technically be satisfied by providing paths through predominantly open grassland with relatively limited planting.

Greystones needs a proper town park: a place with substantial tree cover, woodland, attractive walking routes, natural areas, seating and places for informal recreation, providing an amenity for people of all ages as well as meaningful habitat and biodiversity.

The experience of Greystones Marina Park demonstrates the importance of defining the required landscape quality at plan-making stage. While that area provides valuable public open space, its predominantly open grass character and limited tree cover is not the model that should be

followed for a 16.5-hectare Woodland Park at Charlesland. The Development Plan should provide sufficient certainty now that the Charlesland park will develop into a genuinely landscaped, tree-rich public park rather than simply an area of maintained grassland.

2. Retention and strengthening of biodiversity provisions

I also consider it important that the strong environmental protections applying to these lands are retained.

In particular, the principle expressed in the existing SLO3 that:

"Natural biodiversity areas, mature trees and flood management zones shall be maintained throughout the area and in particular along the Three Trouts Stream, the size and layout of which shall be determined following ecological and site specific flood risk assessment"

should continue to be clearly reflected in the revised SLO.

I acknowledge that the proposed SLO3 contains substantial new provisions concerning ecological assessment, Biodiversity Enhancement Management Plans, protection of watercourses and riparian buffers. These are welcome.

However, these requirements should complement rather than substitute for an explicit objective to **retain existing mature trees and valuable natural landscape features wherever possible** and to integrate these features into the Woodland Park and wider open-space network.

The existing golf course already contains established trees, hedgerows, water features and other mature landscape elements. These should, where ecologically and practically appropriate, form the foundation of the new park rather than the site being cleared and subsequently landscaped from scratch.

3. Clarity regarding completion and delivery of the Woodland Park

I welcome the proposed requirement linking occupation of residential development to the delivery of the associated community, sporting and open-space infrastructure. This is important to ensure that public amenities are delivered alongside housing rather than deferred indefinitely.

However, the wording of SLO3 should distinguish clearly between the completion requirements applying to the **Woodland Park** and those applying to **community sports facilities**.

The proposed wording concerning completion refers to the relevant lands being fully developed and suitable for "community sports use", with references to matters such as drainage, lighting and car parking. These requirements are readily understandable in relation to pitches and other AOS sporting facilities, but they do not provide an appropriate or sufficiently clear test for determining when the Woodland Park itself has been satisfactorily delivered.

A separate completion standard should therefore be included for the OS1 Woodland Park. Before occupation of the relevant phase of residential development, the principal park infrastructure should be completed and the agreed landscape scheme substantially implemented, including paths, tree and woodland planting, biodiversity planting, seating and other agreed park facilities.

Importantly, completion should **not simply mean that paths have been constructed and a quantity of young trees planted immediately before adjoining houses are occupied**. The planning permission should include an enforceable landscape establishment and maintenance programme,

including replacement of failed trees and planting during an appropriate establishment period.

Where possible, the Woodland Park and its planting should be delivered **at the earliest practical stage of development**. Trees and woodland take many years to mature, and early planting would allow the park to establish while construction of the wider SLO proceeds.

4. Suggested strengthening of SLO3

I request that Wicklow County Council strengthen the Woodland Park provisions of SLO3 by including requirements along the following lines:

The OS1 lands shall be developed as a high-quality, publicly accessible Woodland Park providing a major public park and recreational amenity for Greystones-Delgany. The park shall be comprehensively designed and landscaped and shall include substantial woodland and native tree planting, retention and integration of existing mature trees and hedgerows wherever practicable, biodiversity-rich planting, accessible walking and cycling paths, informal recreation areas, seating, natural play opportunities and other appropriate park facilities.

A comprehensive landscape and park masterplan shall be agreed with the Planning Authority prior to development of the RN lands. The masterplan shall demonstrate the creation of a substantial tree canopy and woodland character and shall include a long-term planting, biodiversity, establishment, replacement and maintenance strategy.

Natural biodiversity areas, mature trees, hedgerows, watercourses and flood-management areas shall be retained and integrated throughout the open-space network, particularly along the Three Trouts Stream, informed by ecological assessment and site-specific flood-risk assessment.

The Woodland Park shall not consist predominantly of undifferentiated amenity grassland and shall be designed as a diverse, attractive and ecologically valuable public park.

The Woodland Park shall be subject to a separate delivery and completion standard from the AOS community sports facilities. The principal paths, landscaping, woodland and tree planting and agreed park facilities shall be substantially completed before occupation of the relevant phase of residential development, and arrangements shall be put in place for the establishment, maintenance and replacement of planting. The Woodland Park and associated planting shall be delivered at the earliest practicable phase of development.

5. Additional elements that should be secured

The Council should also consider specifying minimum requirements for:

- a substantial native woodland and tree-planting programme, supported by a measurable tree-canopy objective;
- retention of existing mature trees and hedgerows unless their removal is demonstrably necessary;
- a connected network of accessible surfaced and natural walking routes, including looped walks;
- seating, picnic areas and informal gathering spaces;
- natural play opportunities and/or a high-quality children's play area;
- wildflower meadow, wetland and other biodiversity areas where appropriate;
- public access from multiple surrounding neighbourhoods and connections to the wider walking and cycling network;

- appropriate lighting on principal routes while protecting ecologically sensitive areas;
- public toilets and/or other supporting facilities where appropriate; and
- a funded long-term landscape establishment and maintenance programme.

6. A once-in-a-generation opportunity for Greystones

I recognise the need for additional housing and welcome the proposal to provide substantial community and sporting infrastructure alongside residential development.

However, the proposed rezoning involves a very significant change in the use of the former Charlesland Golf Club lands. If development proceeds, the associated public benefits should therefore also be of a scale and quality appropriate to that change.

A 16.5-hectare public park is large enough to become one of Greystones' most important civic amenities. Combined with the adjoining OS2 natural areas, sports facilities and green links, it has the potential to create an exceptional green infrastructure network for the town.

The Development Plan will determine the framework within which this land is developed for decades to come. **It is much easier to establish clear requirements for a high-quality park now than to attempt to improve an inadequately landscaped open space after development has taken place.**

I therefore ask Wicklow County Council to retain the proposed OS1 and OS2 areas and strengthen SLO3 so that it provides an unambiguous commitment to the delivery of a **substantial, landscaped, tree-rich and biodiverse public park**, rather than simply an area of open space.