

	<h1>Greystones-Delgany & Kilcoole LPF Variation No.4</h1>
---	---

Who are you:	Private Individual
Name:	Julia Davies
Reference:	GDKLPF-144907
Submission Made	June 20, 2025 2:54 PM

Local Planning Framework PART A Strategy

- A.4 Overall strategy

Local Planning Framework PART B Settlement Specific Objectives.

- B.8 Land Use Map and Zoning

Please select which town you want to comment on:

Greystones/Delgany

[Upload a File \(optional\)](#)

GDKLPF Submission 2006.pdf, 3.3MB

Variation No.4,
Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town

Date: 20th June 2025

Re: Invitation for submissions and observations regarding the draft Greystones/Delgany & Kilcoole Local Planning Framework 2025

Dear Sir/Madam,

We welcome the invitation for submissions and observations regarding the draft Greystones/Delgany & Kilcoole Local Planning Framework (LPF) 2025 that is being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 and their associated Reports.

As co-owners of the subject lands, located at Blackberry Farm, Delgany, Co.Wicklow, we thank you for taking the time to consider this submission.

If you would like to further discuss the topics raised in this correspondence, we are available to meet with the Executive of the Council at your earliest convenience.

Yours faithfully.

On behalf: co-owners

Please note that past and current national and local policy documents that are widely available on the internet, including but not limited to The National Framework Policy, The Wicklow County Development Plan, the Greystones/Delgany & Kilcoole Local Area Plans and the draft Greystones/Delgany & Kilcoole Local Planning Framework 2025, and have been researched and referred to within this document.

Area Definition:

1. The “Band of Land” (henceforth referred to as band of land) caught between Delgany Village, the Glen of the Downs and the M11/N11 (Fig 1*)
2. The “Subject Lands” (henceforth referred to as subject lands) caught between Delgany Village and the M/N11 road (Fig 2, Fig 3*)

Submission Request:

1. We request that the band of land be included in the Greystones/Delgany and Kilcoole LPF 2025 boundary to allow for this area to obtain much needed attention (Fig 1*).
2. We request that the subject lands be consolidated into their surroundings (Fig 4*) with land zoned:
 - Residential (RN2) Alongside provisions for zoning for public use (PU/MU/OS/Tourism)

With due consideration given to the needs of this area for proper investment and sustainability which includes housing, better infrastructure, access to public spaces and improved access to public transport, in accordance with the Greystones/Delgany & Kilcoole development strategy, with national policy for better land use and with the call for suitable land for housing.

*Reference: Maps –

Fig 1 – The “Band of Land” located on the Zoning Objectives Map – draft GD&K LPF 2025

Fig 2 – The “Subject Lands” located on the Zoning Objectives Map – draft GD&K LPF 2025

Fig 3 – The Subject Lands located beside ‘Barry’s Bridge’ and on West Blackberry Lane

Fig 4 – Vision for zoning of subject lands

Reason:

In line with GDK-15, “The priority for housing growth shall be the existing built-up area of the settlements, on lands zoned ‘town centre’, ‘’, ‘mixed use’ and ‘existing residential’. Development shall extend outwards from the centres of Greystones, *Delgany* and Kilcoole with *undeveloped land closest to the centre and public transport routes given priority*”.

Band of land

- This area can no longer be logically described as ‘rural’
- Caught between a busy transport network and ‘a Level 3 ‘Large Growth Town II’
- It has, today, a significant population, with a busy road network that calls for proper attention within the Greystones/Delgany & Kilcoole LPF 2025.
- Without due attention within this LPF, this band of land is at risk of becoming a ‘no-man’s land with no safe infrastructure, safe access to public transport or access to open spaces.

Subject lands

- Surrounded today by busy roads, housing and a huge increase in the local population
- Rendered unworkable as a viable operating far, livestock at risk of attack by suburban dogs
- Fly-tipped, vandalised, scrutinised, coveted, and trespassed

We submit this on the basis that the band of land, including the subject lands, is:

- Adjacent to Greystones-Delgany, designated a “Level 3 'Large Growth Town II' and an area of Existing Residential developments and an existing transport infrastructure
- Sandwiched between Greystones-Delgany and the M/N11 road, and “under-utilised”, “infill” opportunities that extend “outwards from” Delgany Village - it is not peripheral
- Existing Residential where the efficient use of the subject lands through a ‘sequential approach’ with zoning to residential would be in harmony and contiguous to the area
- Adjacent to suitable transport infrastructure and serviced by “high quality transport links to Dublin and the surrounding towns”, with Wicklow/Dublin bus links (within 15 minutes’ walk time of an existing or a committed bus service), and close to the DART/rail line
- Surrounded by areas of huge population growth, locally and within the Delgany/Greystones area, including housing, roads, public transport and infrastructure, which has rendered the subject lands unviable for agriculture
- Serviceable, where the subject lands offer suitable landscape for residential development alongside access to the natural environments, including walking routes and features of interest and could be put to better land use providing much needed services for both the local population living here and commuting to Dublin/Wicklow and visitors alike
- Within the catchment area of Dublin where investment through “more ‘out of centre’ housing sites (zoned ‘New Residential - Priority 2’ RN2)” can be “considered where ... housing / community facilities / open space schemes ... can be well connected to the existing built-up area”.
- In need of attention “in order to ensure that overall housing and population targets can be delivered” under the recently passed National Planning Framework to identify land suitable for housing for Dublin
- Suitable for land use for residential development in line with the subject land’s surroundings and within the Greystones-Delgany & Kilcoole area “where land may be zoned for new residential development outside of the existing built-up envelope”, “in order to ensure ... that overall housing and population targets can be delivered”
- Offer, by virtue of their location, significant potential to invest in community infrastructure and healthier placemaking by expanding the housing offer, allowing accessibility to natural amenities, improving infrastructure and public transport convenience and, generally, opening opportunities for better and more efficient land use for the benefit of permanent residents and visitors alike.

Vision: Reference Map page 11

The **band of land** offers opportunities for better and more efficient land use for the benefit of permanent local residents, new residents and to encourage long stay visitors, as follows:

- Invest in community infrastructure and healthier placemaking for the community
- Expand the housing offer
- Improve public transport convenience
- Improve local infrastructure
- Provide access to natural amenities
- Invest in tourism related development

The **subject lands** offer suitable land for use for residential development within the Greystones-Delgany & Kilcoole area, where “Land may be zoned for new residential development outside of the existing built-up envelope”, “to ensure ... that overall housing and population targets can be delivered” as follows:

- “RS: To protect, provide and improve residential amenities” where investment is needed in community infrastructure, services and amenities
- “RN2: To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement after the activation of Priority 1 lands”, such as those already activated in the adjacent Delgany/Greystones area. And “To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities”.

In the event of the subject lands being zoned to residential RN2 alongside public space, investment can be made to open-up parts of land, currently private, to the now large local population and to visitors

With respect to directives outlined in the Wicklow County Council policies to make provisions for public spaces as per “residential zoning objectives”, and in this draft LPF that “new community facilities ... be provided in tandem with the development of significant new residential developments and new neighbourhoods”, and to identify green infrastructure, a managed consolidation of the subject lands by zoning to Residential RN2 alongside investment for public services, would open opportunities for further zoning for community amenities, including but not limited to:

- “Mixed Use”: “The redevelopment of the lands has the potential to add to the services and public amenities” and “to allow for new urban spaces along with a pedestrian...” and to provide amenities to better serve the area in line with the current policies for healthy placemaking for the benefit of residents and visitors alike

- “Public Utility” for Improved infrastructure for “Active and Sustainable Travel”:
 - with “appropriately scaled and located car parking”, park-and-ride facilities and feeder buses “particularly for access to public transport but also to encourage carpooling” and bike hire, safe bike parking... and “supporting the development and delivery of bus service enhancement projects”
 - Improved access to public transport with safer routes to public transport, road lighting and improved pedestrian and bike paths through necessary investments in infrastructure along West Blackberry Lane for residents and visitors alike, and along the Glen Road (R762) at ‘Barry’s Bridge’,
 - “facilitating the improvement of the existing road network” on West Blackberry Lane and the Glen Road (R762) at Barry’s bridge, and “to enhance safety for all users...”, “Ensuring that vehicular and pedestrian environments can be used by all people, regardless of their age, size, disability or ability”.
- Amenity Open Areas: “facilitate opportunities for the development of new high quality amenity open areas” including but not limited to “new sports pitches, casual walking / cycling areas, playgrounds / outdoor gyms, dog parks etc”, and access to walking routes such as The Glen of the Downs at ‘Barry’s Bridge’ and to areas, currently private, located nearby
- “Tourism: To provide for tourism related development” Services for tourism or an ‘aire de service’ including facilities for camping, camper van parking and tourist information and other services and amenities to encourage longer dwell time for visitors to the area

Observations regarding Blackberry Lane:

Observation 1:

We believe the current draft Greystones/Delgany & Kilcoole LPF includes a note to describe Blackberry Lane that could be misleading to readers as it does not accurately describe Blackberry Lane in its entirety. We believe a more correct description would show that Blackberry Lane has, in fact, the following two very different topographies:

1. *East Blackberry Lane* – on the Delgany Village side (see Fig 2 above):

The current draft Greystones/Delgany & Kilcoole LPF includes a note describing Blackberry Lane as: “a rural road” which is “extremely narrow and two cars cannot pass”. This description is only correct where it describes the side of Blackberry Lane that meets Delgany village, that is East Blackberry Lane.

2. *West Blackberry Lane/Drummin* – at the M/N11 side (see Fig 2 above):

The current draft Greystones/Delgany & Kilcoole LPF 2025 excludes a description of the side of Blackberry Lane leading onto the M/N11 junctions, where the subject lands are located, West Blackberry Lane, which can no longer be justifiably described as a ‘rural road’ and which, in fact, is wide with good gradients and presents a very different and more adequate topography to that described in the draft Greystones/Delgany & Kilcoole LPF 2025.

In reality, West Blackberry Lane, lined with residential properties, is already a working two-way road with good gradients and sufficient capacity, adjacent to, overlooking and feeding onto a network of roads and public transports.

It should be noted that, instead of being excluded, West Blackberry Lane, at the M/N11, should actually be included as it needs investment and attention with local amenities and safer infrastructure; and that withholding a proper placemaking strategy for this settlement by omitting it from the new Greystones/Delgany & Kilcoole LPF could be potentially damaging to the existing community and the safety of its permanent residents and visitors, and therefore inconsistent with Wicklow County Council's policy for healthier placemaking.

Observation 2:

We believe that describing the area of Blackberry Lane in this draft LPF 2025, noting that the draft LPF mainly alludes to the East Blackberry Lane, on the Delgany village side, as being "considered locally to be one of archaeological and historical significance, as a possible location of Viking battle in 1022" could misinform readers.

This draft does state that "there are no national monument records affecting this area", but presenting a motion based on "considered locally" for making zoning and planning decisions without archaeological findings or historical evidence may create a precedent to exclude this area, and others, from a much needed healthy placemaking strategy including housing and safer infrastructure for its residents with respect to the new Greystones-Delgany & Kilcoole LPF.

Conclusion:

We request that the “Band of Land” (Fig 1), an area of Existing Residential, be properly integrated into the new Greystones/Delgany & Kilcoole Local Planning Framework 2025, and subsequently, that the “Subject Lands” (Fig 2) be consolidated into their surroundings through zoning RN2 with provision for public services, taking into consideration the creation of sustainable communities which includes housing, sustainable mobility, healthy town centres and economic development, and to the recent call for suitable land for housing.

Suitable use of the subject lands through RN2 development and subsequent investment would help make provisions for improved infrastructure, amenities and services for residents and visitors alike, consistent with the guidelines of the planning authority’s policies on Healthy Placemaking within the county.

Caught between a busy transport network and a “Level 3 'Large Growth Town II', this band of land cannot logically be described as ‘rural’. The subject lands, located within this band, between West Blackberry Lane and The Glen Road (R762), and adjacent to the M/N11, have been rendered unworkable as a viable operating farm by development of the surrounding areas; encased today by housing, an increase in local residents and busy roads, this family-owned land is fly-tipped, vandalised, scrutinised, coveted, and trespassed. Moreover, West Blackberry Lane, itself, can no longer be described as a ‘rural road’ as it is, today, a working two-way road lined with residential properties that feeds into a busy transport network.

However, proper consolidation of this Existing Residential settlement into the Greystones/Delgany & Kilcoole LPF 2025, and of the subject lands by zoning to Residential with investment in public spaces, would allow for suitable land use and proper use of infill opportunities to better serve the needs of this growing commuter catchment belt.

We believe that including the subject lands in the new LPF and zoning them to ‘RN2 – New Residential Priority 2’ with provision for investment in public spaces, is not only logical with regards their location between Delgany village and the M/N11, but also in line with the call for the Greystones/Delgany & Kilcoole LPF to respond to the National Planning Framework on residential objectives on the basis that the subject lands can provide for:

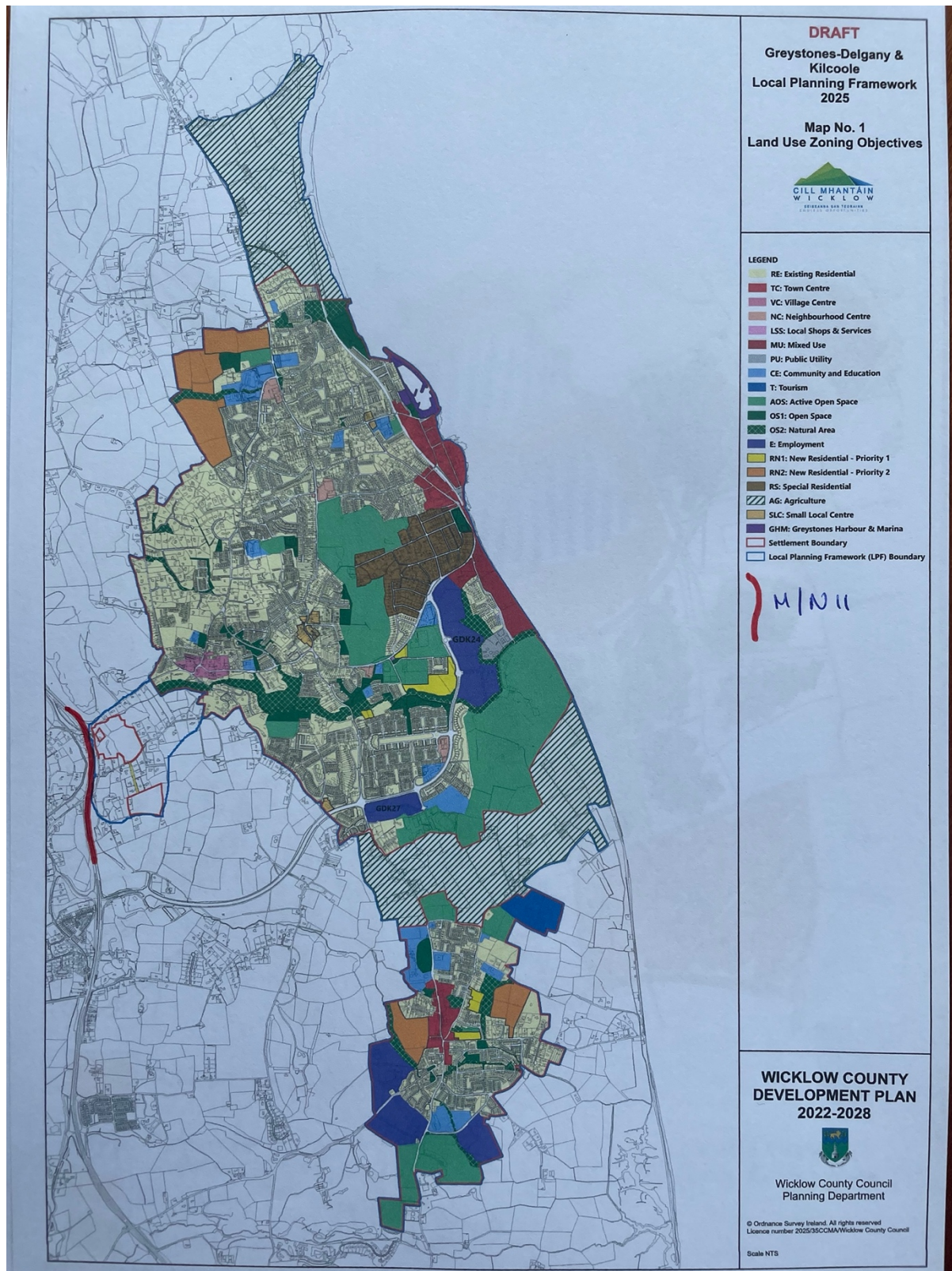
- “additional zoned residential lands, over and above that needed to meet current targets, zoned ‘RN2 – New Residential Priority 2’”, and
- “a long-term supply of zoned residential land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this LPF”

Alongside much sought-after land-to-build-on close to Greystones, Delgany and Dublin, residential development of the subject lands would allow for investment into infrastructure, amenities and services, including parking for access to and increased use of public transport; access to green spaces, walking routes and features of interest; safer access to public transport, including road lighting, pedestrian and bike paths; and services for longer dwell time for visitors to the area, all in accordance to the strategies for healthier placemaking as outlined in this draft LPF 2025.

Maps:

Fig 1 – The “Band of Land” located on the Zoning Objectives Map – draft GD&K LPF 2025

This band of land is a residential area sandwiched between Delgany village and the M/N11



The subject lands are located at Drummin East, between Delgany Village and the M/N11:

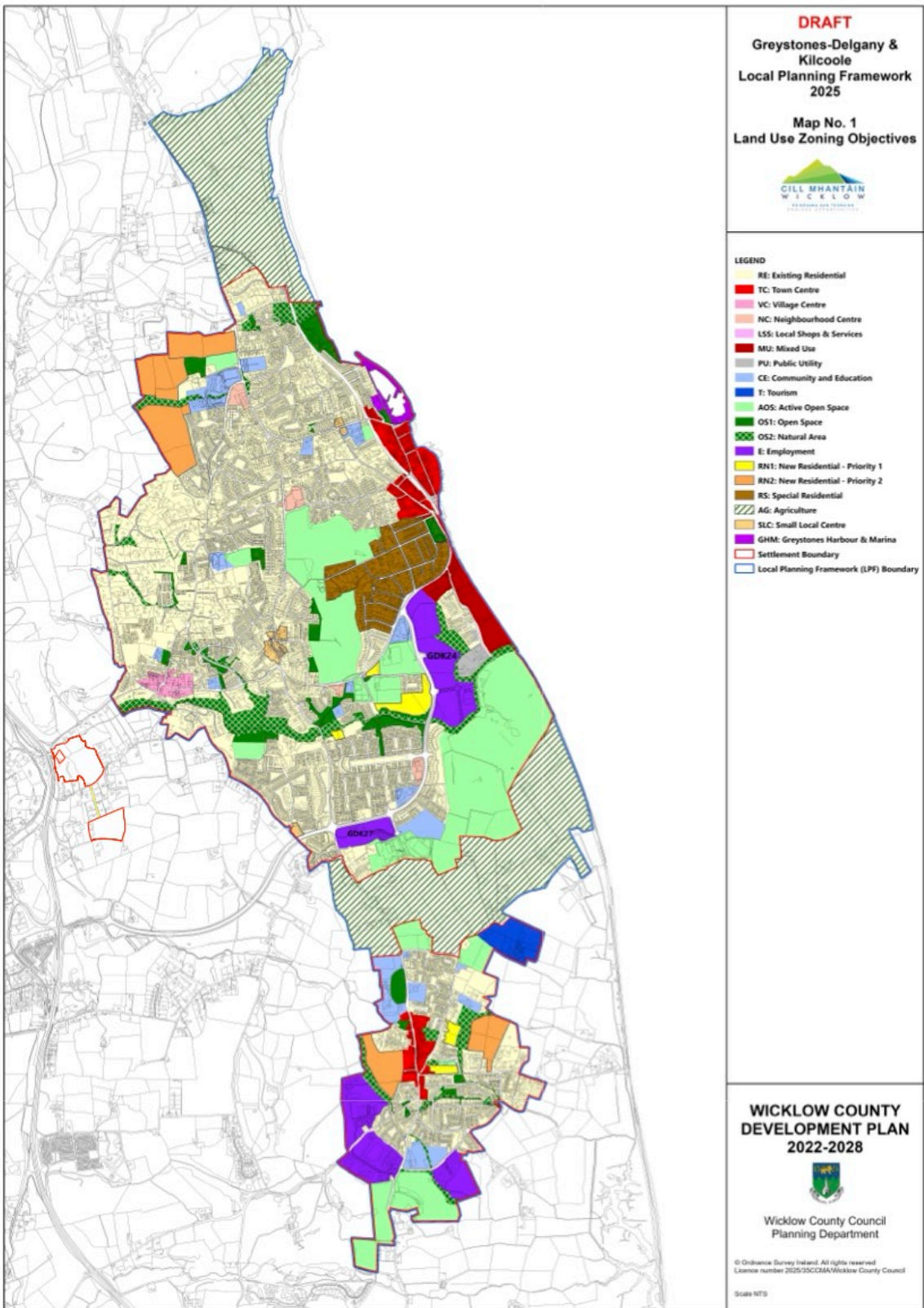


Fig 3 – The Subject Lands located beside ‘Barry’s Bridge’ and on West Blackberry Lane*

Split into two sites - Site A and Site B - both with ample road frontage:

- Site A: Located at Drummin East, at the west end of an existing road and housing, with appropriate road frontage onto West Blackberry Lane* (adjacent to M/N11)
- Site B - south: located at Drummin East, adjacent to M/N11, with appropriate road frontage onto West Blackberry Lane*, and bounded by existing housing
- Site B – north: located at Drummin East, adjacent to M/N11, with appropriate road frontage onto Glen Road (R762), at ‘Barry’s Bridge’, and direct access onto the M/N11 junction northbound
- Site B – west: located at Drummin East, adjacent to M/N11, and running along the R762 towards the M/N11 junction southbound and behind existing housing

*Reference: Observations on Blackberry Lane – Section 2, page 7

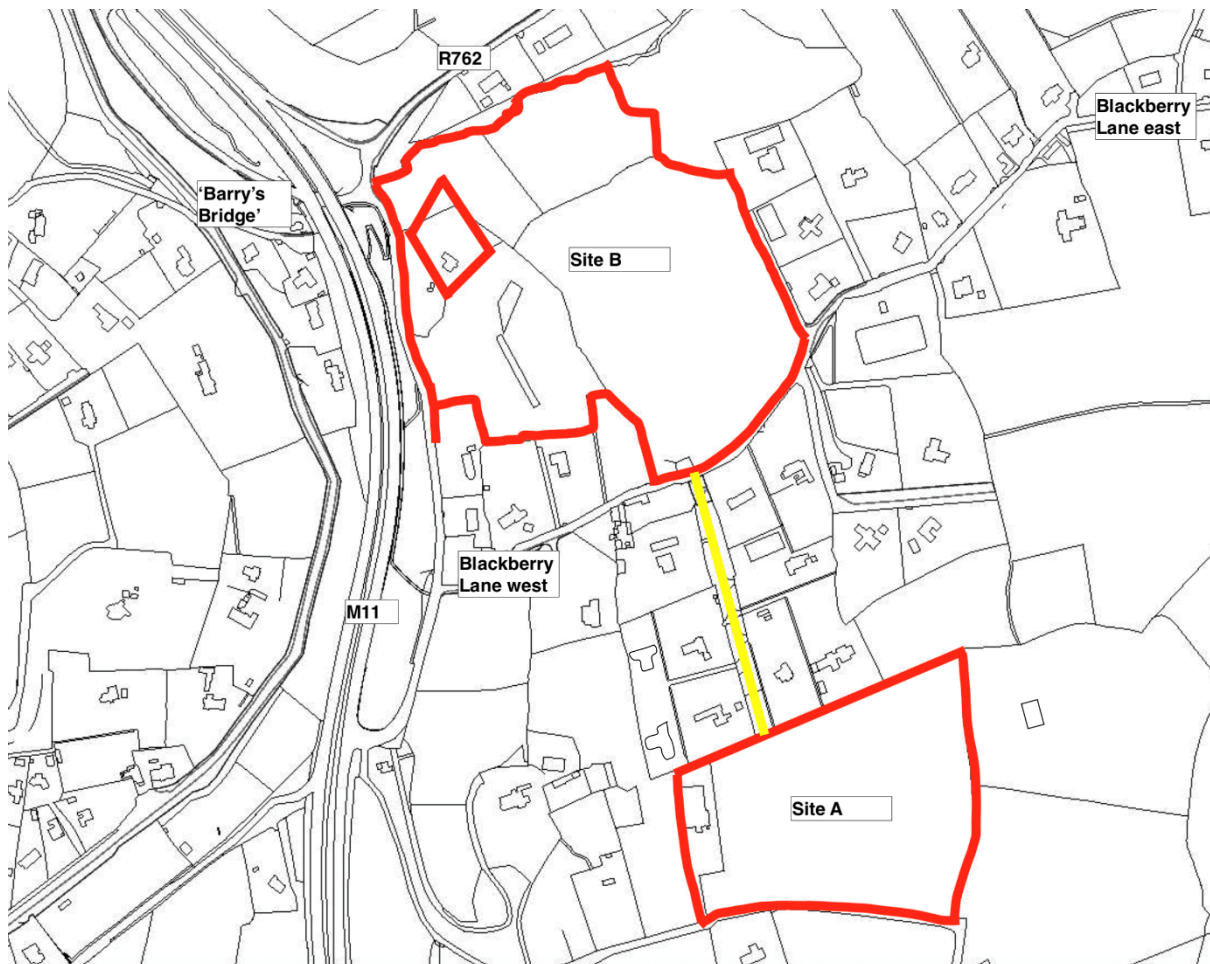


Fig 4 – Vision for zoning of subject lands:

By virtue of their location, the subject lands can provide suitable land for residential development alongside opening opportunities for better and more efficient land use for the benefit of permanent residents and tourists/visitors alike, including investment for improved infrastructure, new accesses to natural amenities, improved access to public transport and services to increase dwell time.

