	<h1>Greystones-Delgany &amp; Kilcoole LPF Variation No.4</h1>
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<b>Who are you:</b>	Agent
<b>Name:</b>	John Spain Associates on behalf of Brookhampton Limited
<b>Reference:</b>	GDKLPF-165507
<b>Submission Made</b>	June 20, 2025 5:17 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.1 Introduction
- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole
- A.3 Factors influencing future development options
- A.4 Overall strategy

## Local Planning Framework PART B Settlement Specific Objectives.

- B.1 Town Centre Regeneration
- B.2 Residential Development

- B.5 Community development, including schools, and active open space
- B.6 Heritage, biodiversity and green infrastructure
- B.8 Land Use Map and Zoning
- B.9 Specific local objectives (SLOs)

Please select which town you want to comment on:

Kilcoole

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24159- GDK LPF-Proposed Variation No. 4 Submission Final.pdf, 3.25MB

'Variation No.4',  
Administrative Officer,  
Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow Town,  
A67 FW96

Date: 20<sup>th</sup> June 2025  
Reference: PT/YM JN 24159

Dear Sir/Madam,

**RE: SUBMISSION IN RESPECT OF THE PROPOSED VARIATION NO. 4 TO THE WICKLOW COUNTY DEVELOPMENT PLAN 2022 – 2028 (RELATED TO THE DRAFT GREYSTONES – DELGANY & KILCOOLE LOCAL PLANNING FRAMEWORK 2025-2031) IN RELATION TO LANDS AT BULLFORD, KILCOOLE, CO. WICKLOW.**

## **1.0 INTRODUCTION AND RELEVANT CONTEXT**

On behalf of our client, Brookhampton Limited, Collegefort, Carpenterstown Road, Castleknock, Dublin 15, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission to the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 in relation to lands at Bullford, Kilcoole, Co. Wicklow.

Our client Brookhampton Limited, who have delivered a significant number of developments across the Dublin and Wicklow areas and is committed to delivering sustainable medium density residential development in the Wicklow area over the coming years, are the owners of a landbank within the boundary of the draft Greystones-Delgany and Kilcoole Local Planning Framework 2025-2031 (Draft LPF 2025) which will form part of the Wicklow County Development Plan 2022-2028 when adopted into the County Development Plan via the variation procedure set out under Section 13 of the of the Planning & Development Act 2000 (as amended).

Our client is currently experiencing a short-fall in residential permissions to implement for various planning related reasons, and welcomes the preparation of the new LPF for the area, which provides an opportunity to ensure that much needed housing and commercial development can be delivered on their lands, for the benefit of the overall Kilcoole area, which is designated a Level 4 settlement ('self-sustaining town') in the County settlement hierarchy.

## **1.1 BACKGROUND / RELEVANT CONTEXT**

The lands the subject of this submission are located at Bullford, Kilcoole, west of Kilcoole town centre and the existing built-up area with two sections of frontage onto the Main Street, as indicated in Figure 1.1. Under the Greystones-Delgany and Kilcoole Local Area Plan 2013 – 2019 (2013 LAP), the southern portion of the lands (c. 10 ha.) was zoned residential (R22, c.

6.7 ha.), town centre (TC, c. 2.9 ha.) and open space (OS), and was subject to AP9 designation, and the northern portion was designated as Strategic Land Bank (SLB), as demonstrated in the extract from the Greystones-Delgany and Kilcoole Local Area Plan 2013 – 2019 Map A at Figure 2.1. The residential zoned lands were identified for medium density (22 units per ha. maximum), under the 2013 LAP.<sup>1</sup>

**Figure 1.1: Aerial Photograph of Bullford, Kilcoole with the approximate subject landholding identified in red.**



Source: Google Earth

Our client has faced challenges in trying to secure planning permission for development on the subject lands, mainly due to concerns raised by the Planning Authority and An Bord Pleanála in respect to density concerns, infrastructural capacity in the area to cater for additional development, and the requirement for infrastructure on third party lands.

In summary, Wicklow County Council (WCC) refused planning permission under Reg. Ref.: 22/15 on the 1<sup>st</sup> of September 2022, for a residential development of 56 no. houses, internal roads, car parking, pedestrian and cycle paths, public open space and all associated site and infrastructural works to facilitate connections to public services, on the southern portion of our client's overall landholding. The refusal reasons included inter alia insufficient density of development on the site resulting in under-utilisation of centrally located lands, failure to provide an appropriate mix of house types, and it not being demonstrated that the proposed road infrastructure would have sufficient capacity to cater for the development of the remainder of the AP9 zoned lands.

The decision was the subject of a first party appeal to An Bord Pleanála (ABP), and the Board upheld the Council's decision and refused permission under ABP 314724-22 on the 9<sup>th</sup> of

<sup>1</sup> Greystones – Delgany and Kilcoole Local Area Plan 2013-2019, pg. 16 & pg. 55

February 2024 for 2 no. reasons, which related to density and unit mix (relating to the provision of primarily two-storey semi-detached houses and the suburban type layout), and junction and capacity assessment, respectively.

WCC also refused planning permission under Reg. Ref.: 23/2 on the 23<sup>rd</sup> of February 2023, for a discount foodstore (Lidl) and 3 commercial / retail units on the eastern part of the subject landholding, which are zoned for Town Centre purposes, for reasons including *inter alia* size of the proposed retail unit in the context of the existing medium sized convenience stores in Kilcoole, single storey design, protection of the Kilcoole Town Centre Character Area; and development of the access to the wider AP9 lands would be premature pending the determination by the planning/roads authority of a road layout for the area.

A new application for a discount foodstore (Lidl) is currently under consideration by WCC under Reg. Ref.: 2460545. A decision on the application is pending following a Further Information request issued by WCC on the 31<sup>st</sup> of October 2024, relating to *inter alia* design of house types, access, parking and traffic queries, signage and boundary treatments, connections to public lighting and services, which was responded to on the 30<sup>th</sup> of April 2025.

The above applications were preceded by an SHD application under ABP Ref. No. 302552-18, which was refused on the 13<sup>th</sup> of December 2018 for reasons of prematurity due to deficiencies in Irish Water infrastructure, failure to demonstrate that the SHD would not impact on The Murrough SPA/SAC, and the provision of a small number of residential units on open space zoned lands. However, the Board did not have any fundamental concerns in respect to the quantum, layout and mix of development proposed in the context of the LAP provisions.

It is also noted that following the SHD application, a subsequent SHD application in 2019 (under ABP Ref. No. 304348) did not proceed past Stage 2, following the issuing by ABP of an opinion that the proposal required further consideration pertaining to infrastructural constraints and unit mix.

However, notwithstanding the above issues, the principle of a residential development on the subject lands is supported by ABP and the Planning Authority, as evidenced under the S.247 consultations that took place in respect of a proposed residential development that is currently being prepared in respect of the southern part of the landholding in 2024, which included a new masterplan for the area designed to be consistent with the zoning provisions under the 2013, with c. 1.902 ha of Town Centre zoned land (within the proposed masterplan / application site boundary- including the new access road), 4.97 ha of R-22 residential zoned lands, and 1.611 ha of Open Space of zoned land. The new application seeks to respond to the issues raised under the previous applications and the guidance provided by the Planning Authority and APB, and includes potential future connections to the adjoining lands to the south.

We note that the concerns in respect to prematurity due to Irish Water constraints are now resolved, as evidenced by the IW COF letter which accompanied the most recent application under WCC Reg. Ref.: 22/15.

We note that under the Wicklow County Development Plan 2022-2028, Kilcoole is classified under "Small Towns and Villages" under which a graduated density standard of between 30 – 40+ units per ha in centrally located sites to 20-35 dwellings per ha in edge of centre sites is applicable. The Sustainable and Compact settlements Guidelines, 2024 indicates that the density range for the subject lands in Kilcoole would be to 'Respond to existing context' for the town centre zoned lands and 25-40 dph for the remainder of the lands, under the 'Suburban / Urban Extension' category.



Thus, while our client supports the preparation of a Local Planning Framework for Kilcoole, this submission seeks that the above issues be addressed under the Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 process, by suggesting a number of proposed amendments to the Draft LFP 2025. The proposed amendments align with our clients realistic expectation for the subject lands based on recent discussions with the planning Authority, coupled with the revised national housing targets set out in the National Planning Framework First Revision (Revised NPF).

The proposed amendments are summarised briefly below in this section of the submission, the location of the subject landholding and relevant planning context information are provided in Section 2, and the detail in support of each recommendation is provided in Section 3. The relevant planning history details are included at Appendix 1.

## 1.2 SUMMARY OF KEY ISSUES / SUBMISSION REQUESTS

In the context of the above and a review of the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 this submission requests amendments to the Draft LPF 2025 being proposed under Variation No. 4 to the Wicklow County Development Plan 2022 – 2028.

In preparation of this submission, John Spain Associates and Studio Glasú Landscape Architects have undertaken a detailed assessment of the Draft LPF 2025, to ascertain the implications of Variation No. 4 as proposed on the development potential of the subject landholding in the short, medium and long term.

Based on this review, the key issues raised in this submission are as follows:

### ITEM 1- PREMATUREITY OF THE DRAFT LPF

**This submission requests that the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, be postponed, or at a minimum, that no restrictive zoning changes—such as the proposed RN2 (New Residential Priority 2) zoning and SLO5 Bulford local objective proposed on the subject lands, be adopted until the Core Strategy and Housing Strategy of the Development Plan have been formally updated in line with the Revised National Planning Framework 2025.**

The Draft LPF 2025 is being advanced prior to the statutory variation of the Wicklow County Development Plan 2022–2028 to align with the Revised National Planning Framework (NPF), April 2025. The updated NPF has doubled national housing delivery targets to 50,000 units per annum, necessitating a fundamental reappraisal of residential land supply across growth settlements such as Kilcoole.

Advancing the LPF in the absence of an updated Core Strategy and residential land use zoning in the County Development Plan with the population and housing targets set out in the Revised NPF raises serious concerns regarding the robustness and longevity of the land use framework now proposed.

In light of the Revised NPF, the Planning Authority should set new housing targets for Kilcoole, allowing for the zoning of additional residential lands as set out below, otherwise the variation would be contrary to legislation which requires the County Development Plan to align with the NPF, as revised in this case.

Thus, this submission requests that the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, be postponed, or at a minimum, that no restrictive zoning changes—such as the proposed RN2 (New Residential Priority 2) zoning and SLO5 Bulford local objective proposed on the subject lands, be adopted until the Core Strategy and Housing Strategy of the Development Plan have been formally updated.

## ITEM NO. 2- REQUEST FOR RN1 DESIGNATION FOR PREVIOUS R22 LANDS

**This submission requests that our client's lands which were zoned for residential development (R22) under the 2013 LAP be designated as 'RN1 – New Residential Priority 1' lands under the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025 (Draft LFP) in light of the urgent and increasing need to identify residential land following the Revised NPF 2025.**

Under the Draft LFP the Planning Authority proposes that our client's lands which were zoned for residential development (R22) under the 2013 LAP be designated 'RN2 – New Residential Priority 2'.

The implication of the RN2 zoning is that the lands cannot be brought forward for development until at least 75% of the RN1 (New Residential Priority 1) lands have been activated.

The subject lands are serviceable centrally located, sequential lands, located within walking and cycling distance of public transport and key community infrastructure, and represent a logical and sustainable opportunity for future phased residential development in line with compact growth and transit-oriented development principles.

As outlined above, our client intends to submit a planning application for residential development on the subject lands in the near future, on the clear understanding that the Planning Authority supports residential development on the subject lands based on extensive consultations under the previous applications, and recent pre-planning consultations carried out under S.247 of the Planning and Development Act, 2000 (as amended).

Thus, this submission requests that these lands be brought forward as 'RN1 – New Residential Priority 1' lands under the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025 (Draft LFP) in light of the urgent and increasing need to identify residential land following the Revised NPF 2025.

Please refer to Figure 3.2 in Section 3 which provides an alternative Draft LPF 2025 Map 1- (Land Use Zoning Objectives), with our client's lands and the extent of the requested RN1 zoning identified.

## ITEM NO. 3- GREATER FLEXIBILITY FOR RN2 LANDS

**This submission requests that greater flexibility be provided in respect of the phasing of 'RN2' lands to allow for consideration of development on 'RN2' where the lands are appropriately located, serviceable, and sequential to existing development. In this regard the development of RN2 lands should not be dependent on the activation of RN1 lands, and should be permissible in advance of the statutory variation of the Wicklow County Development Plan 2022–2028 required to align the Core Strategy with the targets set out in the Revised NPF.**

Should an 'RN1' designation not be deemed appropriate at this time, this submission requests that greater flexibility be provided in respect of the phasing of 'RN2' lands particularly where lands (such as the subject lands at Bullford) are centrally located, sequential lands.

Under the Draft LFP 2025 Housing Objective GDK16, planning permission will not be considered for Priority 2 residential lands (RN2) unless at least 75% of Priority 1 new residential lands (RN1) lands have been activated and it can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.

The potential consequence of Housing Objective GDK16 is that the delivery of much needed housing on appropriately located, serviceable, sequential lands with clear development potential could be significantly delayed, or indeed delayed indefinitely, should the lands designated as RN1 (which our client has no control over) not be activated. We note that the lands to the eastern side of Kilcoole town propose as RN1 lands were, like our client's lands, also designated R22 under the 2013 LAP, and have not to date been activated, thus there is no certainty that these lands will be activated in the short term.

Thus, submission requests that greater flexibility be provided in respect of the phasing of 'RN2' lands to allow for development of 'RN2' lands be considered where lands are available, serviceable, centrally located and sequential. The development of RN2 lands should not be dependent on the activation of RN1 lands, and should be permissible in advance of the statutory variation of the Wicklow County Development Plan 2022–2028 required to align the Core Strategy with the targets set out in the Revised NPF.

#### ITEM 4- REQUEST FOR RN2 DESIGNATION FOR PREVIOUS SLB LANDS

**This submission requests that our client's lands which were zoned for long term residential development (SLB) under the 2013 LAP be included within the boundary of the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025 (Draft LFP) and be designated as 'RN2 – New Residential Priority 2' lands to ensure that the future development potential of the lands is not prejudiced, and that the requirements of the lands are considered in the context of the anticipated housing demand and the targeted delivery of strategic infrastructure.**

The northern part of our client's landholding which was included within the boundary of the 2013 LAP and zoned for long term residential development (SLB- Strategic Land Bank) has been excluded from the boundary of the Draft LPF 2025, and are proposed to form part of the rural area of the County, the effect of which will prejudice the future development potential of the lands.

These lands are contiguous to the lands referred to above and offer an opportunity for logical, plan led and sustainable future phased residential development in line with compact growth and transit-oriented development principles. The lands are located within walking and cycling distance of public transport and key community infrastructure. It is submitted that WCC need to identify the subject lands for future development under the Variation No. 4 process, to provide for the long-term development potential of the subject lands having regard to the location and investment in strategic infrastructure and services.

Should RN2 designation not be deemed appropriate at this time, this submission requests that at a minimum the lands be included within the boundary of the Draft LFP 2025, and the existing SLB land use zoning be retained in full. This would avoid prejudicing the long-term strategic planning of Kilcoole and allow for a coordinated, evidence-led review of zoning in line with the forthcoming Core Strategy variation and Revised NPF requirements.



Thus, this submission requests that our client's lands which were zoned for long term residential development (SLB) under the 2013 LAP be included within the boundary of the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025 (Draft LFP) and be designated as 'RN2 – New Residential Priority 2' lands to ensure that the future development potential of the lands is not prejudiced, and that the requirements of the lands are considered in the context of the anticipated housing demand and the targeted delivery of strategic infrastructure.

Please refer to Figure 3.4 in Section 3 which provides an alternative Draft LPF 2025 Map 1- (Land Use Zoning Objectives), with our client's lands and the extent of the requested RN2 zoning identified (including the RN1 lands based on the above section).

#### ITEM 5- REQUEST FOR AMENDMENTS TO SLO 5 BULFORD

**This submission requests that Draft SLO 5 Bulford be amended to align more closely with the current masterplan proposals prepared for our client's lands, particularly in respect of the type, location and quantum of open space to be provided. This request is based on a design team review of the SLO5 lands which identified several site-specific constraints (including existing topography and the linear configuration of the ecological buffer zone along the river) which established that there is insufficient flat, developable land within SLO5 to accommodate full-size, fully serviced pitches in accordance with draft SLO5.**

Our client's lands to the west of and adjoining Kilcoole Main Street which are zoned in the Draft LPF for 'TC – Town Centre', 'RN2 – New Residential Priority 2' (relates to the lands which this submission requests be reclassified as RN1 lands) and 'OS2 – Natural Areas' (c. 10 ha.) under the Draft LPF are identified in the Draft LPF as SLO5.

Our client welcomes SLO5 in so far as it provides for a development framework for the subject lands which provides for a mix of uses including residential, community, commercial, retail / retail services and open space. As outlined above, our client is preparing an application for residential development on the southern part of the subject lands, including the lands adjoining Kilcoole Main Street, and including an upgraded junction at Mains Street - Sea Road. A masterplan providing for high quality pedestrian and cycling links to the town centre, adjoining residential areas and existing transport services, will be included with the application in accordance with Draft SLO5.

However, a review of SLO5 by the design team (including Darmody Architects, Studio Glasu Landscape Architects, and 2HQ Engineers), has established that the cumulative impact of the requirements of SLO5 as it relates to open space provision are overly onerous and that it would be difficult to meet all the open space requirements under the Draft LPF due to site constraints related to ecological features and topography, and thus this submission seeks that this be addressed under the Variation No. 4 process.

As evidenced by the Landscape Review of the Greystones-Delgany and Kilcoole Local Planning Framework (LPF) prepared by Studio Glasu attached at Appendix 3, there is insufficient flat, developable land to accommodate full-size, fully serviced pitches within the SLO5 lands. It is considered that the open space requirements are overly aspirational and note that no site surveys/analysis were undertaken as part of the preparation of the Draft LPF.

Similarly, while the requirement for character areas within SLO5 are reasonable, it is considered that the requirement for the scheme to be divided into into a least two distinct character areas / estates "*either side of a central green area*" is unnecessarily specific and overly onerous and will serve to constrain development on the lands.

Thus, this submission requests that SLO 5 Bullford be amended to provide for more flexibility and to align more closely with the current masterplan proposals prepared for our client's lands, particularly in respect of the type, location and quantum of open space to be provided.

## **ITEM NO. 6- REQUEST FOR AMENDMENTS OPPORTUNITY SITES 7 AND 8**

**This submission requests that the text relating to the Opportunity Sites 7 and 8 be amended to align more closely with the current proposals, particularly in relation to density, provision of access to the lands to the west and frontage onto Main Street. The current proposal provides for the development of the TC lands and the adjoining lands to the west (which are sequential to the existing and built up town centre area) including access to the lands to the west, Main Street – Sea Road junction upgrades, and public realm improvements (i.e. the plaza), at an appropriate density.**

Under the Draft LFP our client's lands at Kilcoole Main Street are identified as OP7 (Kilcoole Centre) and OP8 (Kilcoole West- The Mollys), as shown in Section S, Figure 3.7 and Figure 3.8, respectively.

It is considered that the requirement for high density development as set out under Draft GDK OP7 and GDK OP8 conflicts with the density requirements for Kilcoole as set out in the Development Plan and the Sustainable and Compact settlements Guidelines, 2024.

In this regard we note that under the Development Plan the expectation for Kilcoole is graduated density standard of between 30 – 40+ units per ha in centrally located sites to 20-35 dwellings per ha in edge of centre sites. Under the Compact settlements Guidelines, 2024 the density range for the subject lands TC lands is to 'Respond to existing context', and 25-40 dph for the remainder of the lands, under the 'Suburban / Urban Extension' category.

In addition, in the context of the as per the current masterplan, in the interests of sustainable development of serviced available development lands which are close to existing public transport and services, it is considered that access through the OP lands to the lands to the west should not be restricted.

Thus, this submission requests that the text relating to the Opportunity Sites 7 and 8 be amended to align more closely with the current proposals, which provides for the development of the TC lands and the adjoining lands to the west, which are serviceable, available, development lands which are close to existing public transport and services, including access to the lands to the west, Main Street – Sea Road junction upgrades, and public realm improvements (i.e. the plaza), at an appropriate density.

## **2.0 SITE LOCATION AND CONTEXT**

### **2.1 SITE LOCATION AND DESCRIPTION**

Our client's lands, excluding the lands identified as SLB (Strategic land Bank under the 2013 LAP), comprise a landbank of c. 10 ha. which was zoned residential (R22, c. 6.7 ha.), town centre (TC, c. 2.9 ha.) and open space (OS), under the 2013 LAP', which has now expired, and were subject to AP9 designation. The application site is located west of and immediately adjacent to Kilcoole town centre and the existing built-up area, and includes two sections of frontage onto Main Street (the R761). As illustrated by Figure 1.1 above, the site is sequentially the most suitable location to cater for the growth of the town.

The majority of the overall site is currently in agricultural use. An existing car park is located in the east of the site adjoining Main Street. The site is bounded by agricultural lands to the west and south. Existing residential developments are located along the site's northern and eastern boundaries. The Kilcoole Stream forms the site's western boundary. Site elevation varies, with levels rising from south to north.

Vehicular access to the site is currently achieved via Farm Lane, a laneway off Main Street. The site is served by Dublin Bus route 84 (Blackrock to Newcastle) and is located approximately 1.8 km west of Kilcoole railway station, and 4 km south of Greystones DART station.

## 2.2 LAND USE ZONING

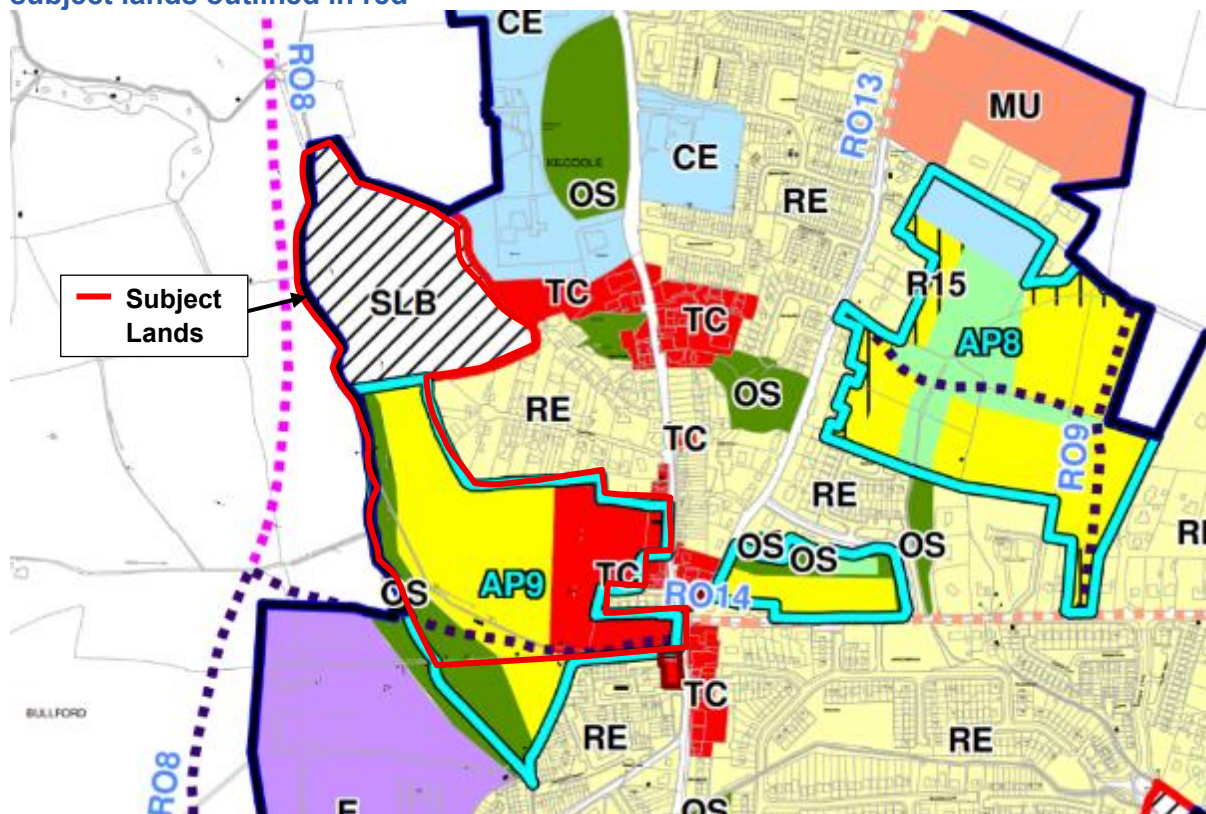
The subject lands were zoned residential (R22), town centre (TC) and open space (OS) under the previous Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 (2013 LAP) and subject to AP9 designation, as shown in the extract from the 2013 LAP zoning map extract at Figure 2.1. In addition, the northern portion of our client's lands are identified as a Strategic Land Bank.

The LAP lists the aims of the respective zoning objectives as follows:

- **R22** – *‘To provide for the development of sustainable residential communities up to a maximum density of 22 units per hectare and to preserve and protect residential amenity.’*
- **TC** – *‘To protect, provide for, and improve the development of a mix of town centre uses including retail, commercial, office and civic use, and to provide for ‘Living Over the Shop’ residential accommodation, or other ancillary residential accommodation. To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and promote urban design concepts and linkages between town centre activity areas.’*
- **OS** – *‘To preserve, provide for and improve public and private open space for recreational amenity and passive open space.’*

It is submitted that the lands, which are sequential to the existing and built up town centre area, are ideally positioned within the boundary of the Draft LPF 2025 to contribute to the delivery of town centre facilities and sustainable residential development within the Kilcoole area in the short-term.

**Figure 2.1: Greystones-Delgany and Kilcoole LAP 2013-2019 zoning map (extract), with subject lands outlined in red**



Source: Greystones, Delgany & Kilcoole LAP 2013-2019, Map a land Use Zoning Objectives (extract)

As elaborated on in the following sections, the Revised NPF housing targets confirm that the number of new homes required to be provided has been vastly under-estimated, and it is respectfully submitted that this needs to be addressed in the draft LPF 2025. This public consultation stage provides an important opportunity for the Planning Authority to reflect the more up-to-date position of identified population growth and housing needs in 2025 following the publication of the Revised NPF. It is essential that this population growth is reflected in the quantum of zoned residential lands made available to provide for new family homes within the boundary of the Draft LPF lands.

### 3.0 SUBMISSION REQUESTS

Having regard to the foregoing zoning and planning history, and emerging national and regional policy, particularly the Revised National Planning Framework (NPF) and the need to plan for an annual housing output of 50,000 units, this submission sets out the following key requests in respect of our client's lands at Bulford, Kilcoole.

These requests are made to ensure the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 (Draft LPF 2025) responds appropriately to national housing targets, provides for the development of sequential lands, and strategically located landbanks for future use, and maintains flexibility pending the statutory review of the Wicklow County Development Plan (CDP) 2022–2028.



### 3.1 ITEM NO. 1- PREMATUREITY OF THE DRAFT LPF

#### **SUBMISSION REQUEST NO. 1**

**This submission requests that the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, be postponed, or at a minimum, that no restrictive zoning changes—such as the proposed RN2 (New Residential Priority 2) zoning and SLO5 Bulford local objective proposed on the subject lands, be adopted until the Core Strategy and Housing Strategy of the Development Plan have been formally updated.**

This submission raises a fundamental concern regarding the prematurity of progressing Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025 (Draft LFP) under the proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 (Development Plan) prior to the statutory variation of the County Development Plan required to align with the National Planning Framework First Revision, April 2025 (Revised NPF), which is required to align the Core Strategy and residential land use zoning in the County Development Plan with the population and housing targets set out in the Revised NPF.

The Revised NPF anticipates a population increase to approximately 6.1 million by 2040, with a high migration scenario projecting up to 6.3 million. To accommodate this growth, the framework sets an ambitious target of delivering an average of 50,000 new homes annually, aiming to reach 60,000 per year by 2030, up from 25,000 in 2018 (i.e. a doubling of the previous targets). This represents a material change in national planning policy with direct implications for counties within the Eastern & Midland Regional Assembly (EMRA) area, including Wicklow, and particularly for Kilcoole, a Self-Sustaining Town located within the influence of the Dublin Metropolitan Area.

Under the Revised NPF there is a clear need to identify and zone additional land for future residential development in suitable locations (such as the Kilcoole area), in order to address the ongoing housing crisis / emergency, and Wicklow County Council will need to identify significant new areas for housing to assist in meeting a proportion of this growth in the County, working with the Minister for Housing, Local Government and Heritage (the Minister) to commence the process of updating the Core Strategy and to identify, unlock, and zone additional land in the County for residential development to ensure that the quantum of residential zoned land can accommodate the targets set out in the Revised NPF.

In this regard we refer to the letter of the 16<sup>th</sup> of May 2025 from the Minister to the Chief Executives of all City and County Councils (a copy of which is included at Appendix 2) which states that ***“Providing for the housing needs of our people is this Government’s top priority.”***, that ***“it is clear that we need to urgently accelerate our delivery of housing and this must be done at all levels of Government.”***<sup>2</sup> (emphasis added).

The Minister’s letter highlights the level of urgency required in to address the matter, stating that all Development Plans ***“must now be reviewed and updated to align with the Revised Framework as quickly as possible”***<sup>3</sup> (emphasis added).

The Minister letter requests that Planning Authorities make it an absolute priority to prepare for the review of the Development Plans required to reflect the revised housing targets set out in the NPF first Revision. In this regard the Minister’s letter requests that Planning Authorities

<sup>2</sup> Minister for Housing, Local Government and Heritage letter to County Councils, 16<sup>th</sup> May 2025

<sup>3</sup> Minister for Housing, Local Government and Heritage letter to County Councils, 16<sup>th</sup> May 2025



identify suitable lands to accommodate the level of residential development required, having regard to deliverability and the availability of services, as a matter of urgency.

Based on the above, adopting the Draft LPF 2025 in advance of this statutory alignment:

- Risks misalignment with national and regional policy,
- Undermines the role of Kilcoole in delivering strategic housing supply, and
- Prejudices the long-term potential of serviceable, well-located landbanks such as the subject lands at Kilcoole.

Given that the purpose of the LPF is to guide development in the area, it is essential that the LPF takes a long-term strategic view and provides for the development potential of short and long term serviceable lands, such as the subject lands at Bulford Kilcoole, which we note were zoned R22 (residential) and SLB (Strategic Land Bank) the 2013 LAP.

Advancing the LPF in the absence of an updated Core Strategy and residential land use zonings raises serious concerns regarding the robustness and longevity of the land use framework now proposed. In light of the Revised NPF the Planning Authority should set new housing targets for Kilcoole, allowing for the zoning of additional residential lands as set out below, otherwise the variation would be contrary to legislation which requires the Development Plan to align with the NPF, as revised in this case.

We therefore request that Variation No. 4 and the Draft LPF 2025 be postponed, or at a minimum, that no restrictive zoning changes—such as the proposed RN2 (New Residential Priority 2) zoning and SLO5 Bulford local objective proposed on the subject lands, be adopted until the Core Strategy and Housing Strategy of the Development Plan have been formally updated.

Under Section 20(3)(d)(ii)(II) of the Planning and Development Act 2000 (as amended), the Planning Authority is entitled to defer the adoption of the Draft LPF where a material policy change justifies it:

*“(ii) Following consideration of the manager’s report under subparagraph (i), the local area plan shall be deemed to be made, amended or revoked, as appropriate, in accordance with the recommendations of the chief executive as set out in his or her report, 6 weeks after the furnishing of the report to all the members of the authority, unless the planning authority, by resolution—*

*(II) decides not to make, amend or revoke, as the case may be, the plan.”*

In this context, it is critical that Wicklow County Council ensures that the LPF 2025 does not pre-empt decisions that rightfully belong within the scope of the forthcoming Core Strategy variation.

The subject lands at Bulford Kilcoole are serviced spatially sequential lands, strategically positioned within walking and cycling distance of Kilcoole Town, adjacent to existing bus corridors and strategic road infrastructure and close to schools, neighbourhood services, and existing community amenities.

These attributes make the lands ideally suited to contribute to compact, transit-oriented growth in accordance with Revised NPF and Regional Spatial and Economic Strategy (RSES) principles. Premature downzoning or restriction of these lands through the LPF process would conflict with the intent of the Revised NPF and RSES, undermine their eligibility for short term residential development, thereby jeopardising the Council’s capacity to respond to population and housing demand.

Accordingly, this submission requests that the LPF process be realigned with national planning timelines and that the long-term strategic value of the Bulford lands be preserved through policy flexibility and the avoidance of restrictive reclassification at this stage.

Thus, this submission requests that the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, be postponed, or at a minimum, that no restrictive zoning changes—such as the proposed RN2 (New Residential Priority 2) zoning and SLO5 Bulford local objective proposed on the subject lands, be adopted until the Core Strategy and Housing Strategy of the Development Plan have been formally updated.

### 3.2 ITEM NO. 2- REQUEST FOR RN1 DESIGNATION FOR PREVIOUS R22 LANDS

#### **SUBMISSION REQUEST NO. 2**

**This submission requests that our client's lands which were was zoned for residential development under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 be brought forward as 'RN1 – New Residential Priority 1' lands under the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025 (Draft LFP), as shown in Figure 3.2 (Proposed alternative Draft LPF 2025 Map 1- Land Use Zoning Objectives, with client's lands and extent of the requested RN1 zoning identified.)**

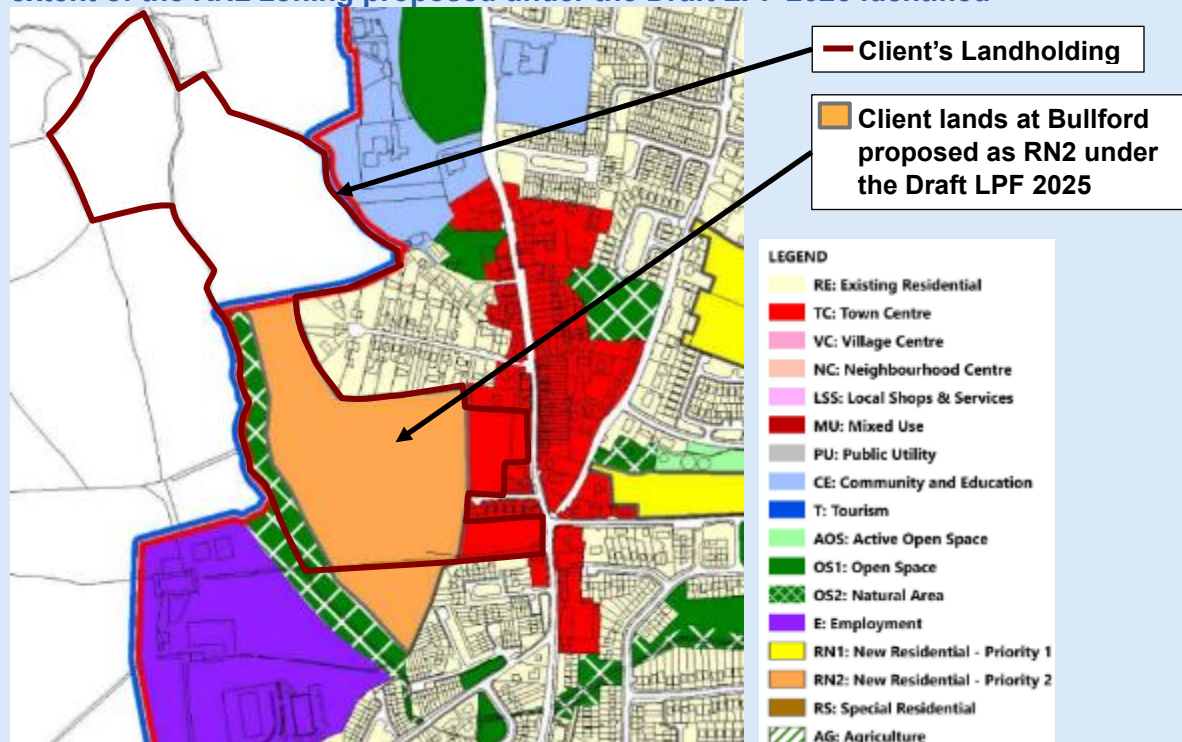
Under the Draft LFP the Planning Authority proposes that these lands be designated 'RN2 – New Residential Priority 2', as demonstrated in the extract from Map No. 1 Land Use Zoning Objectives of the Draft LPF 2025 at Figure 3.1. The implication of the RN2 zoning is that the lands cannot be brought forward for development until at least 75% of the RN1 (New Residential Priority 1) lands have been activated.

For context, as outlined above our client's lands are located west of Kilcoole town centre and the existing built-up area, with two sections of frontage onto the Main Street, as indicated in the aerial photo at Figure 1.1 in Section 1. Under the Greystones-Delgany and Kilcoole Local Area Plan 2013 – 2019 (2013 LAP), the southern portion of the lands (c. 10 ha.) was zoned residential (R22, c. 6.7 ha.), town centre (TC, c. 2.9 ha.) and open space (OS), and was subject to AP9 designation, as demonstrated in the extract from the Greystones-Delgany and Kilcoole Local Area Plan 2013 – 2019 Map A at Figure 2.1 in Section 2. The residential zoned lands were identified for medium density (22 units per ha. maximum), under the 2013 LAP.<sup>4</sup>

In light of the urgent and increasing need to identify residential land following the Revised NPF 2025, this submission proposes that the 'RN2 – New Residential Priority 2' designation proposed by the Planning Authority under the Draft LFP 2025 be replaced with 'RN1 – New Residential Priority 1' in respect of the lands previously zoned residential (R22) under the 2013 LAP, as shown in Figure 3.2.

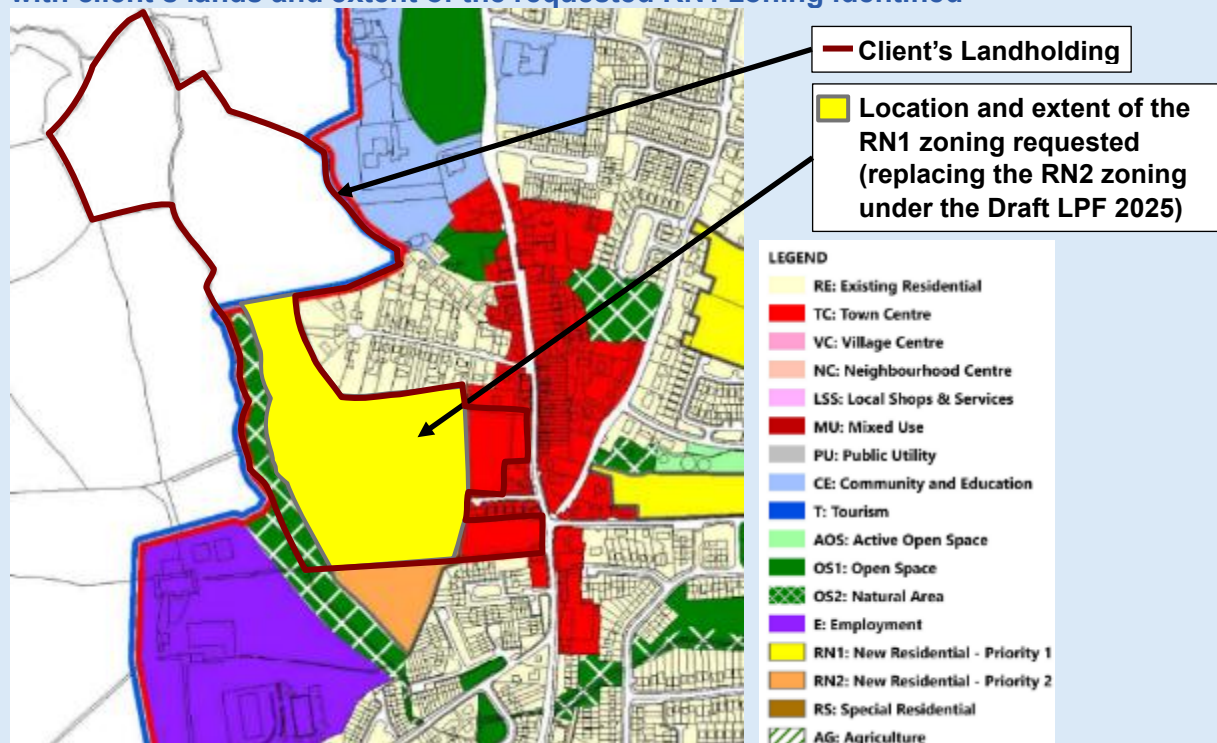
<sup>4</sup> Greystones – Delgany and Kilcoole Local Area Plan 2013-2019, pg. 16 & pg. 55

**Figure 3.1: Draft LPF 2025 Map 1 (Land Use Zoning Objectives), with client's lands and extent of the RN2 zoning proposed under the Draft LPF 2025 identified**



Source: Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025

**Figure 3.2: Proposed alternative Draft LPF 2025 Map 1- Land Use Zoning Objectives, with client's lands and extent of the requested RN1 zoning identified**



Source: Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025

The above request reflects the strategic potential of the subject lands and the need for Wicklow County Council to facilitate plan-led, and infrastructure-supported pattern of growth, consistent with national and regional policy, which are well-located within walking and cycling distance of existing public transport and key community infrastructure, serviceable, and offer a logical and sustainable opportunity for future phased residential development in line with compact growth and transit-oriented development principles.

In this regard we highlight that the subject lands are sequential to the existing and built up town centre area, and are ideally positioned within the boundary of the Draft LPF 2025 boundary to contribute to the delivery of sustainable residential development in the short-term, in tandem with the town centre facilities that will be delivered on the adjoining TC (Town Centre) lands to the east, as follows:

- The lands are contiguous to the built-up area of Kilcoole and integrated within the existing urban footprint;
- The lands are located within walking and cycling distance of the town centre, and public bus corridors;
- The lands are immediately proximate to key Kilcoole Town Centre which includes retail and community infrastructure, and employment nodes;
- The lands are serviceable by existing infrastructure, with potential for future upgrades as part of planned investment in active travel, drainage, and utility services.

The Revised NPF housing targets outlined above confirm that the number of new homes required to be provided has been vastly under-estimated, and it is respectfully submitted that this needs to be addressed in the draft LPF 2025. This public consultation stage provides an important opportunity for the Planning Authority to reflect the more up-to-date position of identified population growth and housing needs in 2025 following the publication of the Revised NPF. It is essential that this population growth is reflected in the quantum of zoned residential lands made available to provide for new family homes within the boundary of the Draft LPF lands.

### 3.3 ITEM NO. 3- GREATER FLEXIBILITY FOR RN2 LANDS

#### **SUBMISSION REQUEST NO. 3**

**This submission requests that greater flexibility be provided in respect of the phasing of 'RN2' lands to allow for consideration of development on 'RN2' where the lands are appropriately located, serviceable, and sequential to existing development. In this regard the development of RN2 lands should not be dependent on the activation of RN1 lands, and should be permissible in advance of the statutory variation of the Wicklow County Development Plan 2022–2028 required to align the Core Strategy with the targets set out in the Revised NPF.**

Should an 'RN1' designation not be deemed appropriate at this time, this submission requests that greater flexibility be provided in respect of the phasing of 'RN2' lands particularly where lands (such as the subject lands at Bullford) are centrally located, sequential lands.

Under the Draft LFP 2025 Housing Objective GDK16, planning permission will not be considered for Priority 2 residential lands (RN2) unless at least 75% of Priority 1 new residential lands (RN1) lands have been activated and it can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.



The potential consequence of Housing Objective GDK16 is that the delivery of much needed housing on appropriately located, serviceable, sequential lands with clear development potential could be significantly delayed, or indeed delayed indefinitely, should the lands designated as RN1 (which our client has no control over) not be activated. We note that the lands to the eastern side of Kilcoole town propose as RN1 lands were, like our client's lands, also designated R22 under the 2013 LAP, and have not to date been activated, thus there is no certainty that these lands will be activated in the short term.

Thus, submission requests that greater flexibility be provided in respect of the phasing of 'RN2' lands to allow for development of 'RN2' lands be considered where lands are available, serviceable, centrally located and sequential. The development of RN2 lands should not be dependent on the activation of RN1 lands, and should be permissible in advance of the statutory variation of the Wicklow County Development Plan 2022–2028 required to align the Core Strategy with the targets set out in the Revised NPF.

### 3.4 ITEM NO. 4- REQUEST FOR RN2 DESIGNATION FOR PREVIOUS SLB LANDS

#### **SUBMISSION REQUEST NO. 4**

**This submission requests that our client's lands which were zoned for long term residential development (SLB) under the 2013 LAP be included within the boundary of the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025 (Draft LFP) and be designated as 'RN2 – New Residential Priority 2' lands, as shown in Figure 3.2 (Proposed alternative Draft LPF 2025 Map 1- Land Use Zoning Objectives, with client's lands and extent of the requested RN2 zoning identified (and RN1 lands based on the above section)).**

The northern part of our client's landholding which was included within the boundary of the 2013 LAP and zoned for long term residential development (SLB- Strategic Land Bank) has been excluded from the boundary of the Draft LPF 2025, and are proposed to form part of the rural area of the County, the effect of which will prejudice the future development potential of the lands.

These lands are contiguous to the lands referred to above and offer an opportunity for logical, plan led and sustainable future phased residential development in line with compact growth and transit-oriented development principles. The lands are located within walking and cycling distance of public transport and key community infrastructure. It is submitted that WCC need to identify the subject lands for future development under the Variation No. 4 process, to provide for the long-term development potential of the subject lands having regard to the location and investment in strategic infrastructure and services.

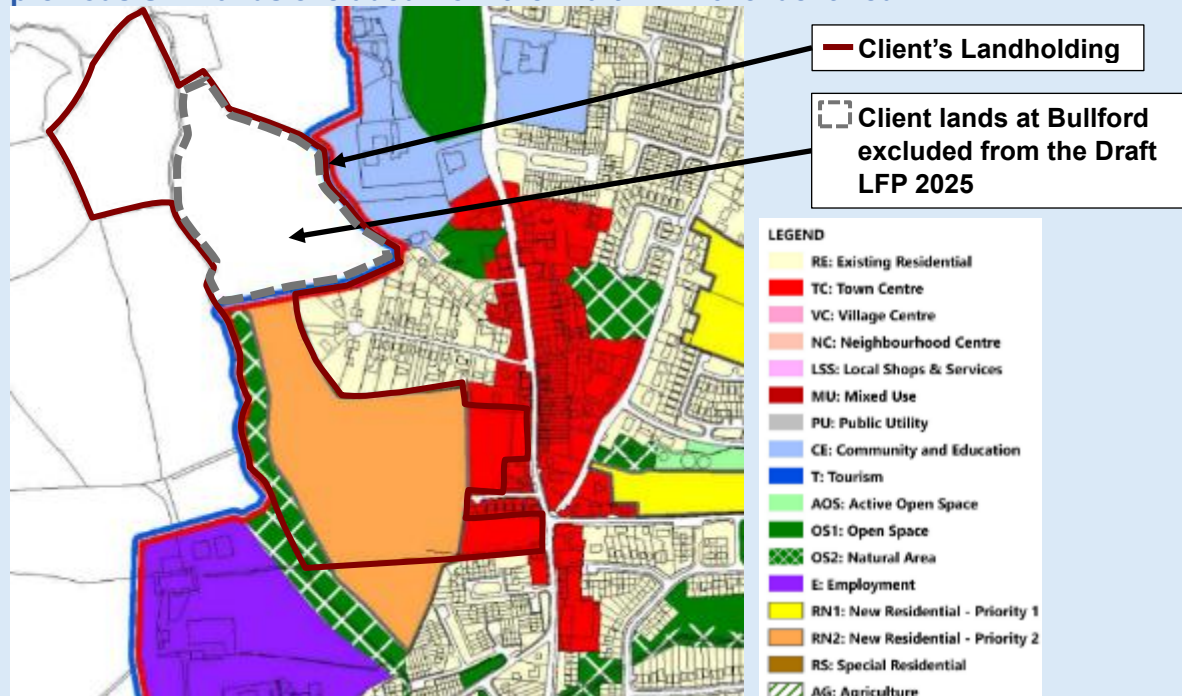
Should RN2 designation not be deemed appropriate at this time, this submission requests that at a minimum the lands be included within the boundary of the Draft LFP 2025, and the existing SLB land use zoning be retained in full. This would avoid prejudicing the long-term strategic planning of Kilcoole and allow for a coordinated, evidence-led review of zoning in line with the forthcoming Core Strategy variation and Revised NPF requirements.

Thus, this submission requests that our client's lands which were zoned for long term residential development (SLB) under the 2013 LAP be included within the boundary of the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025 (Draft LFP) and be designated as 'RN2 – New Residential Priority 2' lands to ensure that the future development potential of the lands is not prejudiced, and that the requirements of the lands are considered in the context of the anticipated housing demand and the targeted delivery of strategic infrastructure.



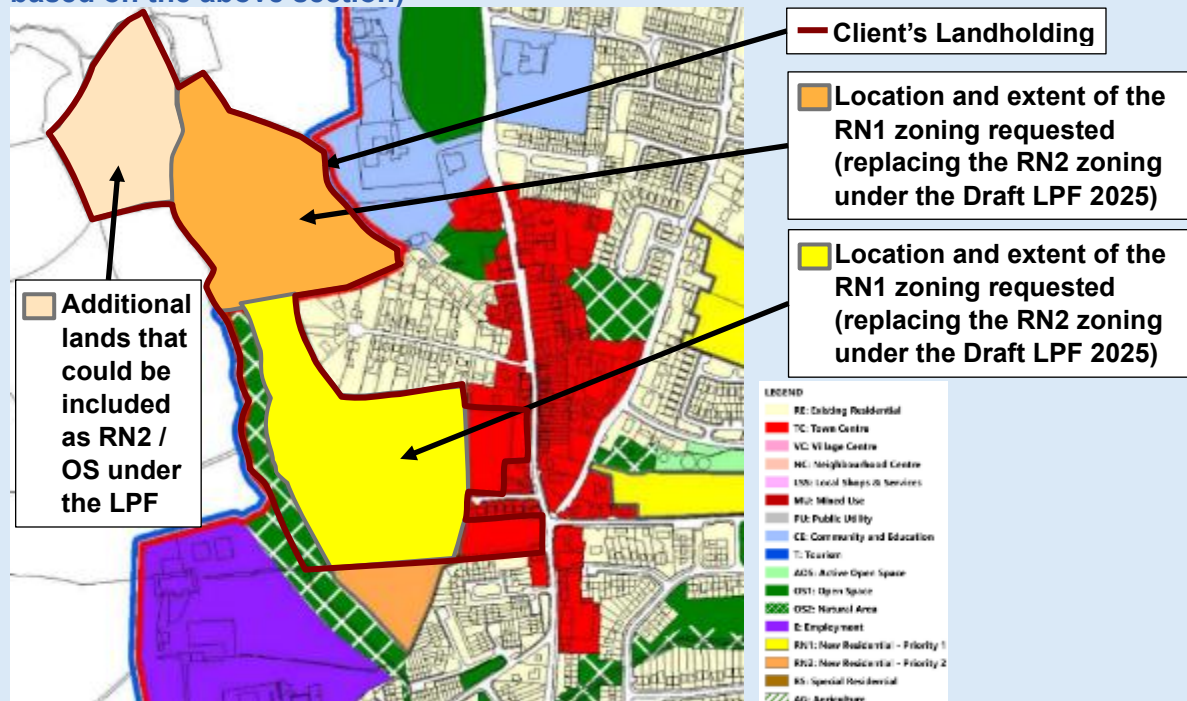
Please refer to the Draft LPF Map 1- Land Use Zoning Map at Figure and the proposed alternative Draft LPF 2025 Map 1- Land Use Zoning Objectives with client's lands and extent of the requested RN2 zoning identified (and the RN1 lands based on the above section).

**Figure 3.3: Draft LPF 2025 Map 1 (Land Use Zoning Objectives), with client's lands previous SLB lands excluded from the Draft LPF 2025 identified**



Source: Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025

**Figure 3.4: Proposed alternative Draft LPF 2025 Map 1- Land Use Zoning Objectives, with client's lands and extent of the requested RN2 zoning identified (and RN1 lands based on the above section)**



Source: Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025

We also note that our client owns lands to the north- west of the previous SLB lands as demonstrated in the above maps, which could be included in the Draft LPF and designated as RN2 lands or OS (Open space) if the Planning Authority consider it appropriate at this time.

### 3.5 ITEM NO. 5- REQUEST FOR AMENDMENTS TO SLO 5 BULFORD

#### **SUBMISSION REQUEST NO. 5**

**This submission requests that Draft SLO 5 Bulford be amended to align more closely with the current masterplan proposals prepared for our client's lands, particularly in respect of the type, location and quantum of open space to be provided. This request is based on a design team review of the SLO5 lands which identified several site-specific constraints (including existing topography and the linear configuration of the ecological buffer zone along the river) which established that there is insufficient flat, developable land within SLO5 to accommodate full-size, fully serviced pitches in accordance with draft SLO5.**

The Draft LFP includes Specific Local Objectives (SLO) on certain lands, the purpose of which is to guide developers as to the aspirations of the LPF regarding the development of these lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where the lands are zoned for 'mixed use' to give more detail on the development objective of these lands. Under the Draft LPF, a masterplan for the entire SLO area may be required to be submitted as part of the first application within the SLO.

The Draft LFP notes that where concept sketches are shown they are conceptual only, did not include complete site surveys/analysis, and should not be taken as a definitive guide as to the acceptability or otherwise of any access points, road layouts or building positions/designs.

Our client's lands to the west of and adjoining Kilcoole Main Street which are zoned in the Draft LPF for 'TC – Town Centre', 'RN2 – New Residential Priority 2' (relates to the lands which this submission requests be reclassified as RN1 lands) and 'OS2 – Natural Areas' (c. 10 ha.) under the Draft LPF are identified in the Draft LPF as SLO5, as demonstrated in Figure 3.5.

**Figure 3.5: Draft LFP SLO5**



Source: Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025

Our client welcomes SLO5 in so far as it provides for the development of the subject lands for a mix of uses including residential, community, commercial, retail / retail services and open space. As outlined above, our client is preparing an application for residential development on the southern part of the subject lands, including the lands adjoining Kilcoole Main Street, and has prepared a masterplan for the entire lands, an extract from which is included at Figure 3.6. The masterplan provides for the sustainable development of the subject lands at a location well connected to the wider settlement of Kilcoole, and demonstrates how high quality pedestrian and cycling links to the town centre, adjoining residential areas and existing transport services can be provided through the development of the lands, in accordance with SLO5.

In addition, the masterplan also includes for access from Main Street at the Main Street – Sea Road junction, redesigned as a crossroads with traffic lights, as demonstrated in the extract below. The masterplan also provides for generous areas of open space and landscaping, including a biodiversity corridor along the river to the western edge of the lands.

However, a review of SLO5 by the design team (including Darmody Architects, Studio Glasu Landscape Architects, and 2HQ Engineers), has raised some concerns in respect to the cumulative impact of the requirements of SLO5 as it relates to open space provision, which is as follows:

*“Open space shall be provided with each phase of development as follows:*

- *An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.*
- *A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc*
- *A minimum of 0.15ha per 100 houses for casual recreation space, parks etc. A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.*
- *500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc*
- *The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.”<sup>5</sup>*

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<sup>5</sup> Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031, pg. 101



**Figure 3.6: Draft Bulford Masterplan**

Source Darmody Architects.

The design team review indicates that it would be difficult to meet all the open space requirements under the Draft LPF due to site constraints related to ecological features and topography, and thus this submission seeks that this be addressed under the Variation No. 4 process.

In this regard we refer to the Landscape Review of the Greystones-Delgany and Kilcoole Local Planning Framework (LPF) prepared by Studio Glasu attached at Appendix 2, which provides an overview of the open space provision included in the current proposal prepared for the forthcoming application on the subject lands.

The Studio Glasu Landscape review highlights the site-specific constraints, including steep topography and the 25m riparian buffer zone along the river, and the integration of the drainage strategy, developed in coordination with the design team. As confirmed by Studio Glasu, the existing site features significant elevation changes, impact both the placement of buildings and the design of open spaces, and that the proposed landscape strategy responds to the site's constraints while having regard to the requirements under SLO5 of the Draft LPF as it relates to both ecological enhancement and recreational provision.

The topographical variations within the lands present challenges in terms of grading, accessibility, and the overall integration of the development with the natural landscape. The site is bordered by a boundary hedgerow with dispersed trees to the north and south, providing natural screening and ecological value. A stream runs along the southeast boundary, creating a 25m riparian buffer zone, designated as OS2 (Natural Areas) under the Draft LPF, and this area is subject to strict protection measures, limiting development in this area to preserve its ecological integrity, and that the current scheme has been designed to have regard to both ecological preservation and the provision of appropriate recreational spaces in a way that respects the natural constraints of the site.

Having regard to the requirements of SLO5 as it relates to ecological preservation and recreational space provision, the attached Landscape Review confirms that the current scheme provides for the 25m riparian buffer / ecological buffer (protecting the existing habitat)

along the river, and that public open space and amenities including c. 0.86 ha. of primary public open space, including both active and passive recreational amenities, but highlights that after excluding the ecological buffer, the usable area would be reduced to approximately 0.49 ha. Smaller open spaces will provide for secondary recreational areas and strategically located communal amenity spaces to provide both active recreational spaces and social gathering areas.

**Figure 3.7: Proposed Landscape Strategy**



Source: Studio Glasu

As part of the review of SLO5, Studio Glasu conducted a scale study to assess the feasibility of providing fully serviced playing pitches in accordance with the draft objectives under SLO5. The study revealed that, due to the site's steep topography and the presence of the 25m riparian buffer zone along the southeast boundary, there is not enough flat areas within the lands to accommodate full-size, fully serviced pitches. The site's natural constraints, including elevation changes and the ecological buffer, make it impractical to provide the required playing fields without compromising the environmental and spatial integrity of the development.

Thus, based on the design team review of the Draft SLO5 of the subject lands which identified several site-specific constraints, namely existing topography, the linear configuration of the public amenity space, and the ecological buffer zone along the river, that would limit the potential to provide full-size, fully serviced playing pitches in accordance with draft SLO, it is submitted that the requirement to provide full-size, fully serviced pitches within the subject lands should be removed from SLO5.

Thus, as evidenced by the Studio Glasu review, there is insufficient flat, developable land to accommodate full-size, fully serviced pitches within the SLO5 lands. It is considered that the open space requirements are overly aspirational and note that no site surveys/analysis were undertaken as part of the preparation of the Draft LPF.

Similarly, while the requirement for character areas within SLO5 are reasonable, it is considered that the requirement for the scheme to be divided into into a least two distinct



character areas / estates “*either side of a central green area*” is unnecessarily specific and overly onerous and will serve to constrain development on the lands.

As outlined above, our client is preparing to submit a planning application for residential development on the subject lands in the near future, on the clear understanding that the Planning Authority supports residential development on the subject lands, and the masterplan is based on extensive consultations under the previous applications and recent pre-planning consultations carried out under S.247 of the Planning and Development Act, 2000 (as amended).

Thus, this submission requests that SLO 5 Bullford be amended to provide for more flexibility and to align more closely with the current masterplan proposals prepared for our client’s lands, particularly in respect of the type, location and quantum of open space to be provided.

### 3.6 ITEM NO. 6- REQUEST FOR AMENDMENTS OPPORTUNITY SITES 7 AND 8

#### **SUBMISSION REQUEST NO. 6**

**This submission requests that the text relating to the Opportunity Sites 7 and 8 be amended to align more closely with the current proposals, particularly in relation to density, provision of access to the lands to the west and frontage onto Main Street. The current proposal provides for the development of the TC lands and the adjoining lands to the west (which are sequential to the existing and built up town centre area) including access to the lands to the west, Main Street – Sea Road junction upgrades, and public realm improvements (i.e. the plaza), at an appropriate density.**

The Draft LFP identifies a number of ‘Opportunity sites’ (OP), which relate to underutilised and unoccupied properties within that could be redeveloped to contribute to the enhancement of the town and village centres and any development proposal for these sites should have regard to the objectives of the County Development Plan and the Draft LPF.

Under the Draft LFP our client’s lands at Kilcoole Main Street are identified as OP7 (Kilcoole Centre) and OP8 (Kilcoole West- The Mollys), as shown in Figure 3.7 and Figure 3.8, respectively.

The lands identified in the Draft LPF as OP7 comprise TC (Town Centre) zoned lands c. 0.98 ha.) and include our client’s lands surrounding the Main Street – Sea Road junction, and include potential development sites including lands to the west of Main Street, the lands to the north of the junction, and an area of surface car parking on the east side of the junction, identified for potential public realm improvements, to be developed in accordance with the following GDK OP7 objectives:

#### **“Objectives GDK OP7**

- *To support the development and delivery of a comprehensive project for this area, which provides for the reconfiguration of this junction to remove the staggered junction and provides for access to the lands to the west, and which delivers significant public realm improvements such that pedestrian / cyclist and public transport uses are prioritised, and the creation of a public park / plaza in this area;*
- *To support the development of sites for mixed use development including commercial, retail, retail services, residential, community and cultural uses;*
- *Higher density development that makes the best use of this serviced urban land, will be expected;*

- *High quality frontage onto all streets will be required, that provides for passive supervision and connectivity to the street.*
- *Access to lands on the west side of the Main Street shall make provision to service future development lands to the west (zoned RN2).*
- *Any development to the west of the Main Street in the OP shall make provision for a town centre public car park of a size to be determined in consultation with the Local Authority.”<sup>6</sup>*

The lands identified in the Draft LPF as OP8 also comprise TC zoned lands (c. 0.84 ha.) and include our client’s lands to the west of Main Street, south of ‘The Mollys’ public house. The lands along the street are in use as a surface car park, with the remainder undeveloped / in agricultural use. The Draft LPF states that the lands are suitable for a mixed use development, to be developed in accordance with the following GDK OP8 objectives:

#### **“Objectives GDK OP8**

- *To support the development of these lands for mixed use development including commercial, retail, retail services, residential, community and cultural uses;*
- *Higher density development with no or limited car parking, that makes the best use of this serviced urban land, will be expected;*
- *High quality frontage onto all streets will be required, that provides for passive supervision and connectivity to the street.*
- *While access into these lands may be via a direct access onto Main Street (R761) any such access point shall not provide a through route to lands beyond this site, in particular lands to the west of this site.”<sup>7</sup>*

**Figure 3.8: Draft LPF OP7- Kilcoole Centre**

OP7 Kilcoole Centre



Source: Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025

<sup>6</sup> Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031, pg. 55

<sup>7</sup> Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031, pg. 56

**Figure 3.9: Draft LPF OP8- Kilcoole west- The Mollys**

Source: Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025

Under the Wicklow County Development Plan 2022-2028, Kilcoole is classified under “Small Towns and Villages” under which a graduated density standard of between 30 – 40+ units per ha in centrally located sites to 20-35 dwellings per ha in edge of centre sites is applicable. The Sustainable and Compact settlements Guidelines, 2024 indicates that the density range for the subject lands in Kilcoole would be to ‘Respond to existing context’ for the town centre zoned lands and 25-40 dph for the remainder of the lands, under the ‘Suburban / Urban Extension’ category.

As demonstrated in the extract from the current masterplan at Figure 3.6, the current scheme provides for a strong building edge fronting Main Street, while also including for junction upgrades and includes a plaza to the south of same.

Thus, while our client supports the identification of the opportunity sites, this submission seeks that the text relating to OP7 and OP8 be amended to align with our clients realistic expectation for the subject lands based on recent discussions with the planning Authority, as it relates to density and setbacks from Main street and the associated access to the larger landholding. Based on the classifications, set out under the Development Plan and the Compact Settlements Guidelines, 2024, it is considered that a graduated density standard of between 25 – 40 uph across the total landholding is appropriate for the subject lands.

In addition, in the context of the as per the current masterplan, it is considered that the access through the OP lands to the lands to the west should not be restricted.

Thus, this submission requests that the following amendments to Objectives GDK OP7 and Objectives GDK OP7 (proposed text in **green**, deleted text ~~in red with a strikethrough~~)

**“Objectives GDK OP7**

- To support the development and delivery of a comprehensive project for this area, which provides for ~~the reconfiguration of this junction to remove the staggered~~ junction **upgrades** and provides for access to the lands to the west, **and includes for which delivers significant public realm improvements such that** pedestrian / cyclist **access and public transport uses are prioritised**, and the creation of a public ~~park~~/plaza in this area;
- To support the development of sites for mixed use development including commercial, retail, retail services, residential, community and cultural uses;
- ~~Higher density development that makes the best use of this serviced urban land, will be expected;~~ **Density ranges should be based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment, and existing context, and be determined at development management stage, having regard to the objectives of the County Development Plan, and relevant Planning Guidelines;**
- High quality frontage onto all streets will be required, that provides for passive supervision and connectivity to the street.
- Access to lands on the west side of the Main Street shall make provision to service future development lands to the west (zoned RN2 **(RN1)**).
- ~~Any development to the west of the Main Street in the OP shall make provision for a town centre public car park of a size to be determined in consultation with the Local Authority.~~<sup>8</sup>

**“Objectives GDK OP8**

- To support the development of these lands for mixed use development including commercial, retail, retail services, residential, community and cultural uses;
- ~~Higher density development with no or limited car parking, that makes the best use of this serviced urban land, will be expected;~~ **Density ranges should be based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment, and existing context, and be determined at development management stage, having regard to the objectives of the County Development Plan, and relevant Planning Guidelines**
- High quality frontage onto all streets will be required, that provides for passive supervision and connectivity to the street.
- ~~While access into these lands may be via a direct access onto Main Street (R761) any such access point shall not provide a through route to lands beyond this site, in particular lands to the west of this site.~~<sup>9</sup>

**4.0 CONCLUSION**

Our client, Brookhampton Limited, generally welcomes the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, subject to the requests made above which will provide for the sustainable development of their lands at Bullford, Kilcoole, Co. Wicklow.

As has been set out above, the subject lands at Bulford Kilcoole present an important opportunity to deliver much-needed residential development and it is submitted that the new Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 should provide an appropriate and flexible planning framework for the delivery of same.

<sup>8</sup> Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031, pg. 55

<sup>9</sup> Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031, pg. 56

We respectfully request that the recommendations set out within this submission are considered in the preparation of the Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025-2031 under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 in relation to lands at Bullford, Kilcoole, Co. Wicklow.

We would be pleased to discuss this submission or the lands to which it relates, should the Council have any queries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Spain', is written over a horizontal line.

**John Spain Associates**



## APPENDIX 1- RELEVANT PLANNING HISTORY

### **Subject Lands**

#### **WCC REG. REF.: 22/15 & ABP Ref.: 314721-22**

An application was submitted to WCC for a Phase 1 residential development of 56 no. units on the 12th of January 2022, which was subject to a Further Information request and a Clarification of the Further Information request, but ultimately refused permission by WCC for two no. reasons on the 1st of September 2022. The decision was the subject of a first party appeal to An Bord Pleanála (ABP), and the Board upheld the Council's decision and refused permission under ABP 314724-22 on the 9<sup>th</sup> of February 2024 for 2 no. reasons, which related to density and unit mix (relating to the provision of primarily two-storey semi-detached houses and the suburban type layout), and junction and capacity assessment, respectively.

The proposed development was described as follows in the public notices submitted with the application:

*"The development will consist of the construction of 56 no. residential units, internal roads, car parking, pedestrian and cycle paths, public open space and all associated site and infrastructural works to facilitate connections to public services.*

*The 56 no. residential units will consist of:*

- *7 no. 4-bed 2 storey end-terrace houses (Type A)*
- *24 no. 3-bed 2 storey end-terrace houses (Type C)*
- *20 no. 3-bed 2 storey mid-terrace houses (Type D and D1)*
- *2 no. 2-bed 2 storey mid-terrace houses (Type D2)*
- *3 no. 2-bed bungalows (Type G)*

*The associated site and infrastructural works include foul and surface water drainage, attenuation tanks, car parking spaces, 4 no. bicycle shelters, bin storage, an ESB substation and all associated development. The proposal includes a vehicular entrance from Main Street, Kilcoole, with the associated upgrades / improvements to Main Street to facilitate this access, which are external to the planning application site boundary, to be provided subject to agreement with the Planning Authority."*

**Figure A.1.1: Extract of Site Layout Plan, as submitted at CFI stage, for the above application, with the overall masterplan context shown for information purposes**

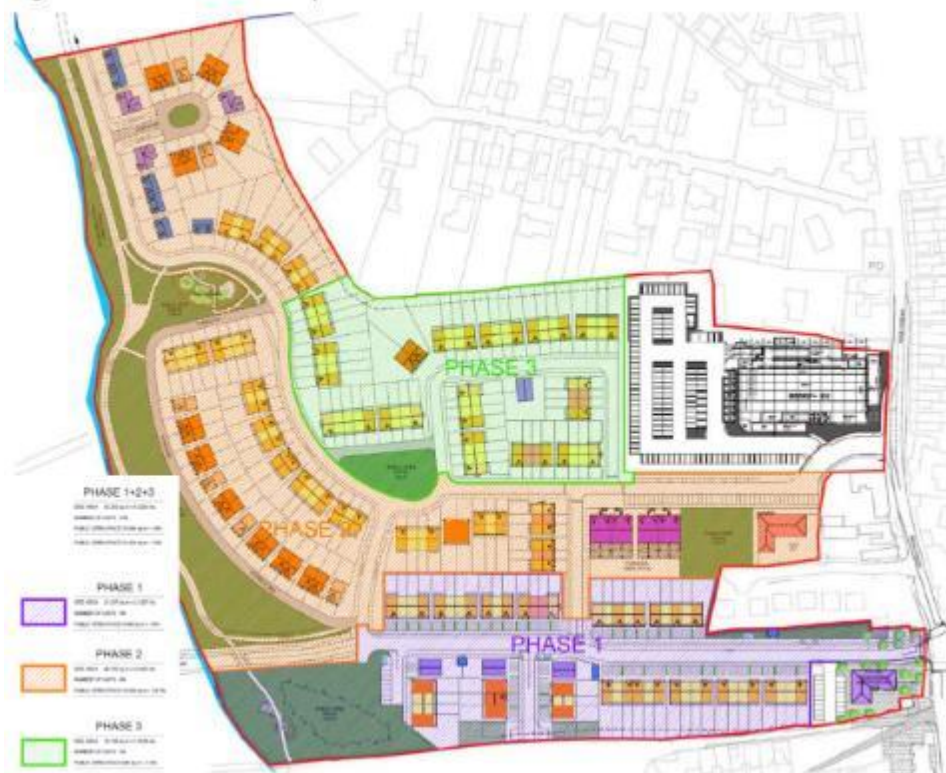


Source: Planning Application WCC Reg. Ref.: 22/15

### **WCC Reg. Ref.: 23/3 – Lidl and Commercial Application at Main Street, Kilcoole**

An application was submitted to WCC in January 2023 for a Lidl retail store and 3 commercial / retail units on the eastern part of our client's landholding, as illustrated in Figure A.2 below, which are zoned for Town Centre purposes.

**Figure A.1.2: Overall Masterplan for Client's Landholding Submitted with Reg. Ref.: 23/3**



On the 23rd of February 2023, Wicklow County Council (WCC) refused permission for construction of a part single part two storey discount food store supermarket with ancillary off-licence use, with a GFA of c. 2,393sqm gross floor space and net retail sales area of c. 1,430sqm, three single storey retail/commercial units (attached to the foodstore building), an access road from Main Street and provision of associated car parking, signage, landscaping, cycle parking, substation and all other associated and ancillary development.

WCC's decision to refuse permission was for 4 no. reasons, which can be summarised as follows:

- (1)(a-c) Having regard to the size of the proposed retail unit and the existing medium sized convenience stores in Kilcoole, the proposal would not accord with the retail strategy for the area and would be contrary to the Development Plan's Retail Hierarchy;*
- (2) The single storey design does provide for the requirements of Action Plan and would undermine compact growth in these town centre zoned lands;*
- (3) The development does not protect the historic and traditional rural character of Kilcoole Town Centre Character Area; and*
- (4) The development of the access to the wider AP9 lands would be premature pending the determination by the planning/roads authority of a road layout for the area and therefore to allow this development would endanger public safety by reason of traffic hazard. (Emphasis added)***

The Planner's Report for this application states that *"No action area has been agreed in respect of these lands; however, a draft action plan was put forward in 2017 which did not meet the criteria as it did not provide vehicular access as required for the AP lands and there were concerns with respect to land owner consent on the southern side."*

This further recent refusal for planning permission in respect to our client's overall landholding at Bullford, including reference to the development being premature pending road infrastructure provision for the wider AP9 lands, further demonstrates the difficulty our client has faced in bringing forward development on the lands, and noting that the Planning Authority has not sought to progress an Action Plan for AP9 with the various landowners.

#### **ABP Ref.: 302552-18- SHD Application**

Planning permission for a Strategic Housing Development was refused by An Bord Pleanála in an order dated the 14<sup>th</sup> December 2018. The development comprised the construction of 267 number residential units, five number retail units, four number office units, a childcare facility, an innovation hub facility including adjacent civic space, internal roads, car parking, pedestrian and cycle paths, public open space, and all associated site and infrastructural works to facilitate connection to all public services. An extract from the site layout plan accompanying the application is shown in Figure A.3.



**Figure A.1.3: Site Layout from Previous SHD Application**

The Board's decision to refuse was for 3 no. reasons for refusal, which are summarised below.

- **Reason no. 1** relates to the lack of certainty in relation to the wastewater network capacity, pumping station capacity and the water storage requirements for the overall development, and the proposal being premature pending the existing deficiencies being addressed. It is apparent from the Inspector's Report that he was not comfortable recommending a grant of permission for 50 residential units and commercial floorspace, based on IW's confirmation of capacity in wastewater and water supply (see IW correspondence submitted with the application and their letter during the five weeks attached).
- **Reason no. 2** relates to the AA Screening Assessment and the deficiencies in the wastewater system, with the Board not being satisfied that the development would not adversely affect the integrity of Natura 2000 European sites. The Moore Group AA Screening Report had concluded that there would be no adverse impacts, however, the Board based on reason for refusal no. 1 were not satisfied this could be proven.
- **Reason no. 3** relates to the provision of residential units on open space zoned land. As noted above, the Planning Authority did not consider this aspect of the proposal to be a material contravention of the LAP noting in respect to Action Plan zoned lands that *'the position, location and size of the land use zonings shown on Map A within the action plan areas are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out below.'* The Inspector, whilst acknowledging this aspect of the scheme as a concern, did not recommend it as a reason for refusal.

As outlined in the above submission, the Irish Water capacity issues have been resolved and the recommendations for the new LAP would help address the other reasons for refusal.



Notwithstanding the reasons for refusal, the Inspector's Report considered several elements of the scheme to be acceptable, which we summarise below and which are of relevance to the Planning Authority's assessment of the Phase 1 application.

- **Residential Amenity** – The Inspector notes that the proposed development complies with all minimum standards in the Apartment Guidelines 2018. In terms of separation distances, the Inspector's Report states *"I am satisfied that the proposed development will provide an acceptable level of residential amenity for future occupants. In addition, I note the concerns expressed by observers, however the proposed development has been designed to preserve the residential amenities of nearby properties and subject to the amendments I have recommended, will enhance the residential amenities associated with the environs of Kilcoole."*
- **Public Open Space** – The Inspector's Report states that *"In broad terms, the quantum and approach to public open space is good."*
- **Urban Design and Building Heights** – The Inspector's Report states that *"The building heights proposed are not excessive and mirror existing two and three storey forms already found along Main Street. I am satisfied that in broad terms the Urban Design principles employed by the applicant are satisfactory and will result in a good urban form and an improved public domain."* The Inspector also states *"In general, I am satisfied that the urban design approach to repairing the streetscape of Kilcoole has been successfully achieved by the applicant. Subject to minor amendments, exclusively to do with finish material, I am satisfied that the retail, commercial and innovation hub will be a valuable addition to the urban form of the area. In this respect, I find that the proposal would broadly meet the requirements outlined in objective AP9 of the LAP and would improve the appearance of Main Street."*
- **Density** – The Inspector states *"Though the LAP looks for 22/Ha on these lands the increased density of 35 units per hectares broadly meets the density thresholds set out in Appendix A of the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities'. Given the context of the site, the availability of local services and public transport opportunities, I consider that the density proposed is within the acceptable levels provided for in national guidelines."*
- **Traffic and Transport** – Having regard to the existing road network the Inspector is *"satisfied that the proposed development will not lead to significant levels of traffic congestion in the area and will result in the development of zoned lands at more appropriate levels of residential density."*
- **Creche** - The Inspector's Report states *"Given the information provided by the applicant, the composition of the apartments and houses and likely demand for creche places, the proposed facility is acceptable"*.

#### **ABP Ref.: 304348-19- SHD Pre-Application Request**

In addition, updated proposals for the overall Bullford site were progressed as far as Stage 2 of the SHD process with An Bord Pleanála under ABP Ref.: 304348-19. However, a Stage 3 SHD application was not subsequently lodged. The Board's Opinion was issued on the 26<sup>th</sup> of June

2019 and includes two items requiring further consideration and twelve specific information items for the proposals to constitute a reasonable basis for an application. The two items requiring further consideration can be summarised as follows:

- **Item No. 1- Infrastructural Constraints-** The Board requested documentation at application stage to clearly address 1) issues of water and wastewater infrastructure constraints in the network serving the proposed development, 2) the timelines involved in addressing the constraints relative to the construction and completion of the proposed development and 3) who will be carrying out any necessary works.
- **Item No. 2- Unit Mix-** The Board requested further consideration/justification of the proposed unit mix, particularly the extent of 3 bed and larger residential units, with regard to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Urban Design Manual and SPPR4 of the Building Height Guidelines.

The applicant did not subsequently proceed with a second SHD application for the lands.

### ***Other Relevant Permissions***

#### **Wicklow County Council Reg. Ref.: 03/8544**

On the 20<sup>th</sup> June 2003, permission was refused by WCC for the construction of a 206-unit residential development consisting of 44 no. 3-bed townhouses, 50 no. 2-bed townhouses, 22 no. 4-bed semi-detached houses, 18 no. 3-bed duplex townhouses, 72 no. 2-bed apartments and development works including a portion of a distributor road on site. An extract from the site layout plan accompanying the application is shown in Figure A.4.

**Figure A.1.4: Extract from Site Layout Plan for refused application Reg. Ref.: 03/8544**



WCC's reasons for refusing application Reg. Ref.: 03/8544 related to (a) the dangerous and inadequate junction with Main Street proposed, (b) no traffic impact assessment, (c) inadequate surface water drainage, (d) insufficient public and private open space, (e)

inadequate variety of layout, pedestrian and cycle links and poor integration with existing development, (f) no provision for childcare facilities and (g) no Part V proposals. These issues have all been addressed in the SHD development proposals submitted, and subsequent phased applications, which incorporate the full landholding up to the Main Street.

**Wicklow County Council Reg. Ref.: 98/8364**

On the 29<sup>th</sup> May 1998, permission was refused by WCC for the construction of 6 no. residential and 2 no. retail units in a 2-storey block with attic conversion, car parking and associated works. The scheme was to be located in the northeast corner of the subject site, facing onto Main Street. WCC's reasons for refusal related to (a) prematurity pending upgraded sewerage facilities, (b) prematurity pending the determination by WCC of a road layout for the area, as the site was considered the only feasible route for a road to serve town centre zoned lands to the west, and (c) building height out of keeping with existing development.

**ADJACENT LANDS**

**Wicklow County Council Reg. Ref.: 17887**

On the 30<sup>th</sup> November 2017, WCC granted permission for the demolition of an existing building and construction of new town centre mixed use development on lands adjacent to the south-east of the application site. The mixed-use development will consist of a 3-storey building including 2 no. ground floor office units, a ground floor medical centre and 8 no. apartments, a hard and soft landscaped civic space, new pedestrian links and associated development works. An image extract from application is shown in Figure A.5.

**Figure A.1.5: Image extract from approved application Reg. Ref.: 17887 showing mixed use building and civic space viewed looking south-west.**



The proposed strategic housing development has been designed to integrate with approved development Reg. Ref.: 17887 to the south. Please refer to paragraphs 5.20 and 5.21 of this cover letter / planning report for further details and the overall site layout and landscape plans for details of the proposals which are partly on the applicant's landholding and partly on WCC

lands, for which a condition can be attached requiring these public realm improvements to be implemented such to agreement with the Planning Authority.



**APPENDIX 2- MINISTER' S LETTER TO THE CHIEF EXECUTIVES OF ALL CITY AND COUNTY COUNCILS, DATED 16TH OF MAY 2025**

An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreacht  
Department of Housing,  
Local Government and Heritage



Friday, 16<sup>th</sup> May 2025

To: Cathaoirigh, City and County Councils

**Re: Approval of the Revised National Planning Framework (NPF) and  
Establishment of the Housing Activation Office**

Dear Cathaoirleach,

Providing for the housing needs of our people is this Government's top priority.

I know that you share this focus locally - it is clear that we need to urgently accelerate our delivery of housing and this must be done at all levels of Government.

To support the required scaling up of housing delivery in all parts of the country, the Revised National Planning Framework (NPF) was approved by both Houses of the Oireachtas in recent weeks, following Government approval in early April. This is a vital element of our efforts to increase housing supply and to ensure that our planning system can reflect the scale of the Government's ambition over the coming years. It is a step change in how we are doing business on housing, and it needs every part of Government and Local Government to meet the need.

In order to match our ambition with the level of urgency that is required, city and county development plans across the country must now be reviewed and updated to align with the Revised Framework as quickly as possible.

I have already signalled my intention to issue further policy direction following approval of the Revised NPF. This will be done soon and will update housing growth requirements for each local authority to replace the current Housing Supply Targets. This will inform and enable the development plan variation process under the Planning and Development Act 2000.

I know that you share this Government's sense of urgency in providing the homes we need.

That is why - for you and your planning, housing and infrastructure teams – it is incredibly important to immediately take every step possible at this juncture to prepare for housing growth.

Oifig an Aire Tithíochta,  
Rialtais Áitiúil agus Oidhreacht  
Office of the Minister for Housing,  
Local Government and Heritage

Teach an Chustaim, Baile Átha Cliath, D01 W6X0  
Custom House, Dublin, D01 W6X0  
T +353 1 888 2403 | [minister@housing.gov.ie](mailto:minister@housing.gov.ie)  
[www.housing.gov.ie](http://www.housing.gov.ie)



It will be necessary for your teams to consider at pace the most suitable locations and opportunities for new housing development in your administrative areas, taking into account where delivery is most likely to occur and where infrastructure and services are available, or may be readily provided.

Notwithstanding the urgency of the task, I wish to highlight the importance of both ensuring that processes regarding land and zoning matters are transparent and allow for public participation, as well as the importance of environmental assessment in accordance with statutory requirements.

Where there are any existing barriers to the delivery of housing related infrastructure and services in locations where housing delivery is in high demand, we intend to assist you through the new Housing Activation Office in my Department.

The Housing Activation Office will identify and seek to address barriers to the delivery of infrastructure projects required to enable housing develop through

- (i) the alignment of funding and
- (ii) coordination of infrastructure delivery providers.

The Office will develop a programme of public infrastructure investment to address infrastructure barriers impacting our housing delivery.

The planning and delivery of housing-related infrastructure will be critical to unlocking both currently zoned lands identified for housing development, and newly zoned lands further to the revised NPF.

For now, I am requesting that you make it your absolute priority to prepare for the review of your development plans.

City and County Development Plans must be reshaped as quickly as possible to reflect the nation's updated housing requirements. The servicing of these lands needs to be planned and progressed as soon as possible so that we can get building programmes moving.

We have to pull together to do what needs to be done to respond to the crisis at hand and get housing delivered. I look forward to working with you to achieve this shared goal.



Is mise, le meas,

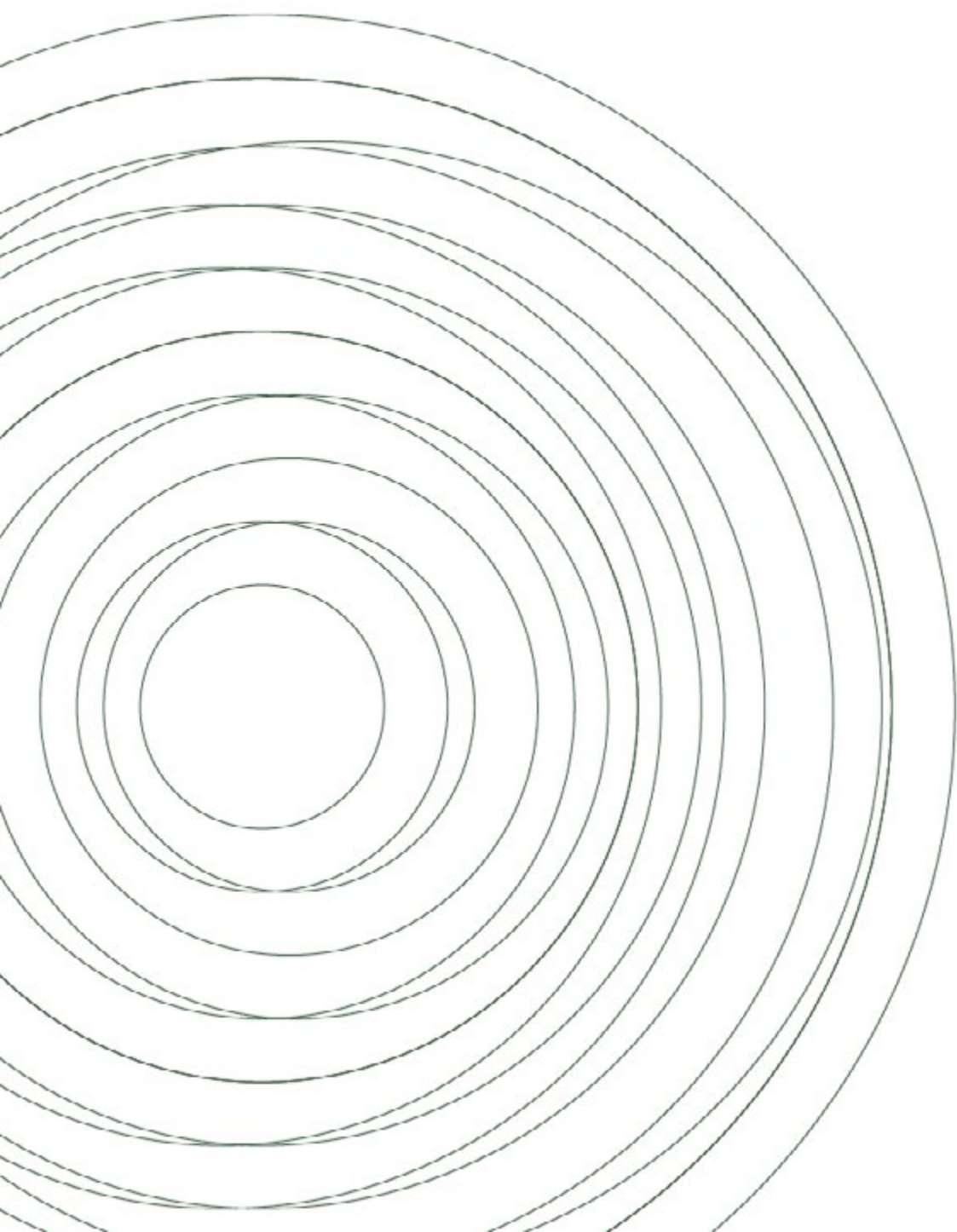
A handwritten signature in black ink, appearing to read 'James D. Browne', is written over a horizontal line.

**James Browne TD**

**Minister for Housing, Local Government and Heritage**



## **APPENDIX 2- STUDIO GLASU LANDSCAPE REVIEW**



# BULLFORD, KILCOOLE CO WICKLOW

Landscape Review of the Greystones-Delgany  
and Kilcoole Local Planning Framework (LPF) /  
Proposed Variation No. 4 to the Wicklow County  
Development Plan 2022 – 2028

Date

20.06.2025

**Studio Glasu**

# OVERVIEW

This report outlines how we (Studio Glasu) reviewed the Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 (Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028) from a landscape perspective and applied it to the lands which are subject of this submission at Bullford, Kilcoole. The report highlights the site-specific constraints, including steep topography and the 25m riparian buffer zone along the river, and the integration of the drainage strategy, developed in coordination with the design team including Darmody Architecture, John Spain Associates Planning Consultants and 2HQ Engineering.

## Site Area and Space Allocations

The development area currently under consideration relates to a redline boundary of 3.5965 ha, is subject to several landscape constraints and opportunities. The space allocations are as follows:

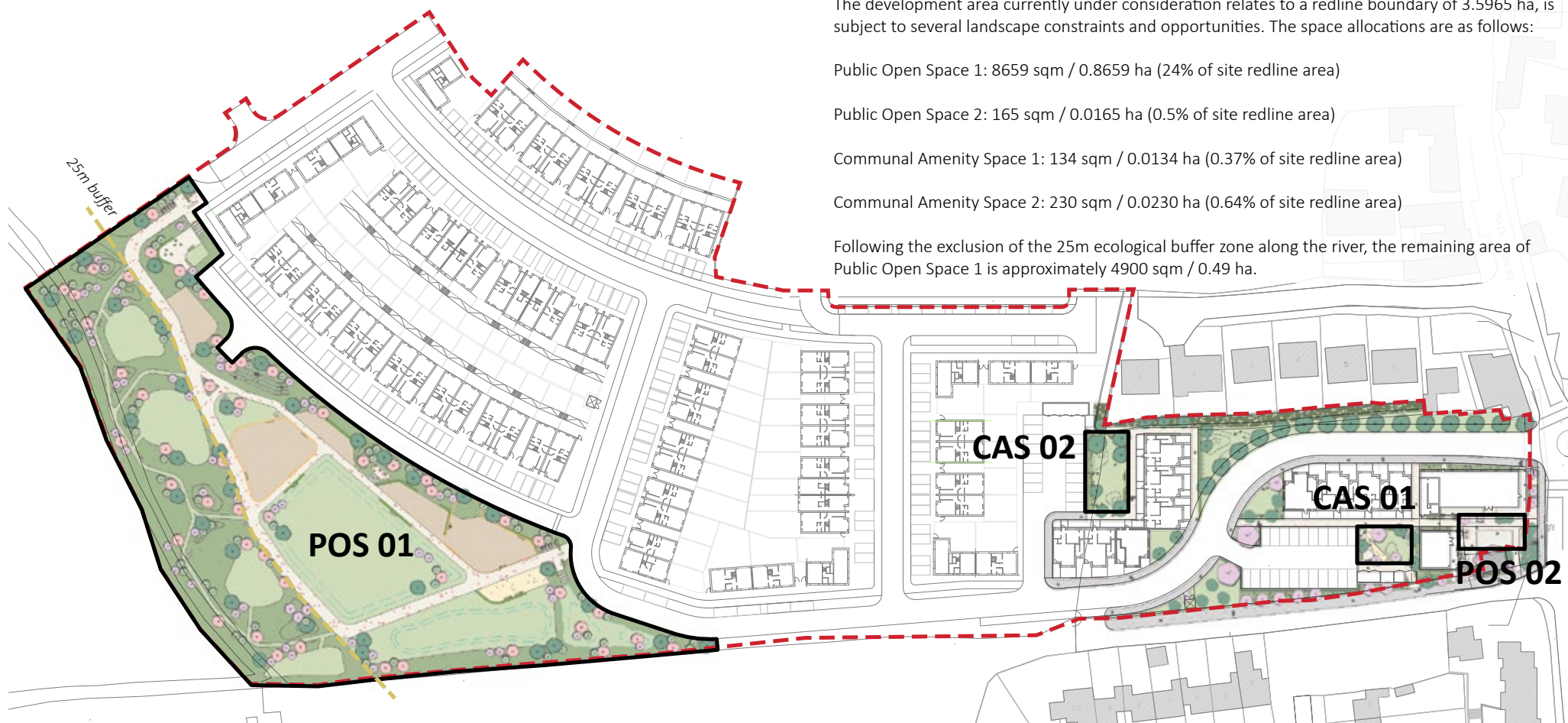
Public Open Space 1: 8659 sqm / 0.8659 ha (24% of site redline area)

Public Open Space 2: 165 sqm / 0.0165 ha (0.5% of site redline area)

Communal Amenity Space 1: 134 sqm / 0.0134 ha (0.37% of site redline area)

Communal Amenity Space 2: 230 sqm / 0.0230 ha (0.64% of site redline area)

Following the exclusion of the 25m ecological buffer zone along the river, the remaining area of Public Open Space 1 is approximately 4900 sqm / 0.49 ha.



^ Overview of Public Open Spaces and Communal Open Spaces within the development area including the riparian zone



# SITE CONSTRAINTS

The existing site features significant elevation changes, which impact both the placement of buildings and the design of open spaces. These topographical variations present challenges in terms of grading, accessibility, and the overall integration of the development with the natural landscape. The site is bordered by a boundary hedgerow with dispersed trees to the north and south, providing natural screening and ecological value. A stream runs along the southeast boundary, creating a 25m riparian buffer zone, designated as OS2 (Natural Areas) under the Draft LPF. This zone is subject to strict protection measures, limiting development in this area to preserve its ecological integrity. Historically, the field has been farmed for agricultural use, a practice that continues to the present day, with the land primarily dedicated to crop rotation.

These existing conditions, including the agricultural use and natural features, as well as the riparian zone, have been carefully integrated into the landscape strategy. This ensures both ecological preservation and the provision of appropriate recreational spaces in a way that respects the natural constraints of the site.



^ Diagram illustrating the topography across the site. Approx level difference across the site redline boundary 10m



^ Series of site photos of the existing field



# DRAFT GREYSTONES / DELGANY & KILCOOLE LOCAL PLANNING FRAMEWORK 2025-2031

## Review of Draft LPF SLO5 – Open Space and Landscape Requirements

The subject site falls under the remit of Specific Local Objective (SLO5) as outlined in the Draft Greystones-Delgany and Kilcoole Local Planning Framework (2025). This SLO contains key landscape and ecological directives that directly inform the design of open space, ecological buffers, and recreational provision at Bullford, Kilcoole.

Extract from Draft LPF (SLO5, p.101):

“Open space shall be provided with each phase of development as follows:

- An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.
- A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc.
- A minimum of 0.15ha per 100 houses for casual recreation space, parks etc. A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10–15% residential open space.
- 500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc.
- The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings.”

## Application of Draft LPF SLO5 – Open Space and Landscape Requirements

We have reviewed and applied key Draft LPF objectives to the site, particularly in relation to ecological preservation, drainage integration, and public amenity provision:

### Ecological Protection

The 25m riparian buffer zone is maintained in full, in accordance with the Draft LPF. This area is preserved as an ecological corridor, free from development, and existing trees, hedgerows, and natural habitats are retained.

### Open Space Provision

The proposed open space strategy aligns with the Draft LPF targets and includes:

POS01 (0.8659 ha): The principal public open space. After deducting the ecological buffer, the usable area is approximately 0.49 ha, providing a mix of active and passive recreational amenities.

POS02 (0.0165 ha): A secondary public space for passive use.

Communal Amenity Spaces (CAS01 & CAS02): Distributed across the site to support informal recreation and social interaction.

# APPLICATION OF DRAFT LPF OBJECTIVES TO THE DEVELOPMENT AREA



^ Series of site photos of the riparian zone

## Drainage Strategy and Integration with the Riparian Zone

Our drainage strategy, developed in coordination with 2HQ Engineering and the design team, utilises the riparian zone for the surface water attenuation basin.

We have reviewed the Wicklow County Council Development Plan and specifically SLO5 Bullford, which outlines the objectives for the riparian corridor:

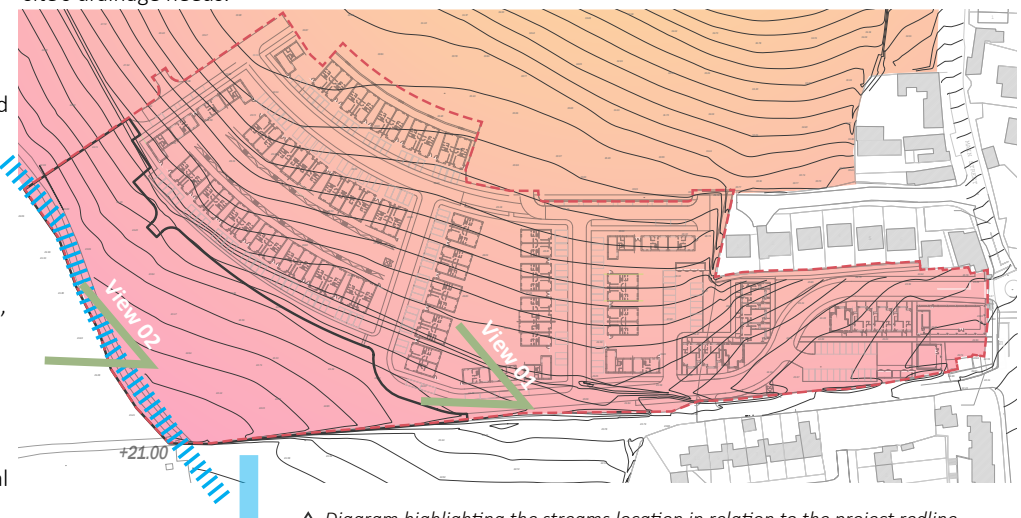
“An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.”

“The only developments that will be considered in such areas are those which contribute to the objective of the ‘Natural Areas’ zone... and can be shown to not diminish the role and function of such areas.”

The OS2 zoning aims to protect and enhance existing open, undeveloped lands that include flood plains, buffer zones along watercourses, and green corridors. Additionally, the plan allows essential infrastructure, such as drainage basins, within these zones if it does not undermine the purpose of the zoning or cause significant adverse environmental impacts.

We have designed the attenuation basin to extend 10m from the watercourse within the 25m riparian zone. The basin is essential to the site’s drainage strategy, and its location within the riparian zone complies with the Draft LPF’s criteria for necessary infrastructure, as it does not compromise the ecological integrity of the area.

Furthermore, we will enhance the buffer zone around the basin with native, wetland-tolerant planting to improve the riparian zone, aligning with the environmental objectives of the Draft LPF while meeting the site’s drainage needs.



^ Diagram highlighting the streams location in relation to the project redline



# LANDSCAPE STRATEGY



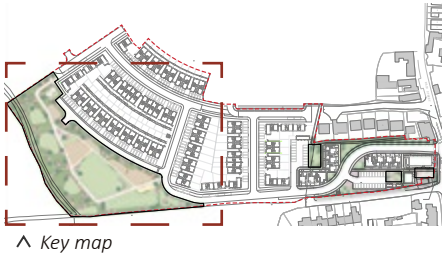
The proposed landscape strategy responds to the site’s constraints while seeking to achieve the requirements under the Draft LPF for both ecological enhancement and recreational provision. The strategy includes:

**Ecological Zone:** The 25m riparian buffer along the southeast boundary will be enhanced by introducing native, wetland-tolerant planting to improve the ecological value of the existing corridor within our redline boundary. This planting will support biodiversity, strengthen the riparian habitat, and align with our natural drainage goals by helping to manage surface water runoff. In addition to these ecological improvements, low-impact, informal paths will be incorporated to allow passive access and encourage nature engagement, while maintaining the area’s ecological integrity. This approach ensures the riparian zone serves both environmental and community-oriented purposes.

**Recreational Amenities:**

A linear pedestrian and cycle route will run parallel to the river, offering access to various recreational areas. Active amenities will include boules courts, table tennis tables, outdoor fitness equipment, and formal playgrounds. Informal recreational spaces will include open lawn areas for kickabout use and naturalized earth mounds for nature-based play.

**Public Open Space Design:** The main POS01 area (approximately 4900 sqm after excluding the ecological buffer) will be designed to accommodate both active and casual recreation. This area will also feature social seating areas for community engagement and gatherings.



^ Key map

^ Overview of Public Open Space 01

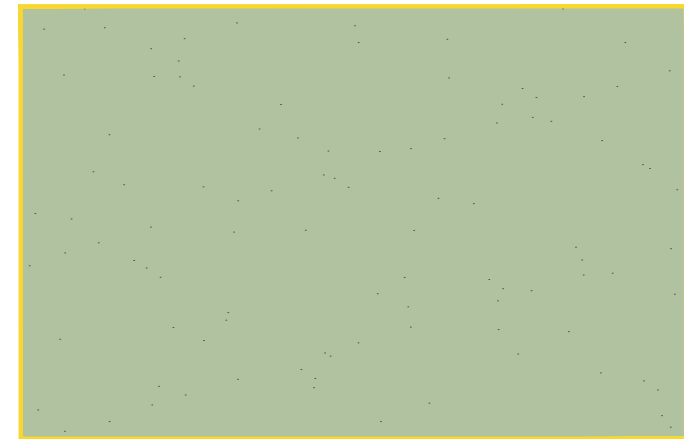
# LANDSCAPE STRATEGY - SCALE STUDY

As part of our design process, we conducted a scale study to assess the feasibility of providing fully serviced playing pitches in accordance with the draft objectives outlined in the Draft LPF. The study revealed that, due to the site's steep topography and the presence of the 25m riparian buffer zone along the southeast boundary, there is insufficient flat, developable land to accommodate full-size, fully serviced pitches. The site's natural constraints, including elevation changes and the ecological buffer, make it impractical to provide the required playing fields without compromising the environmental and spatial integrity of the development.

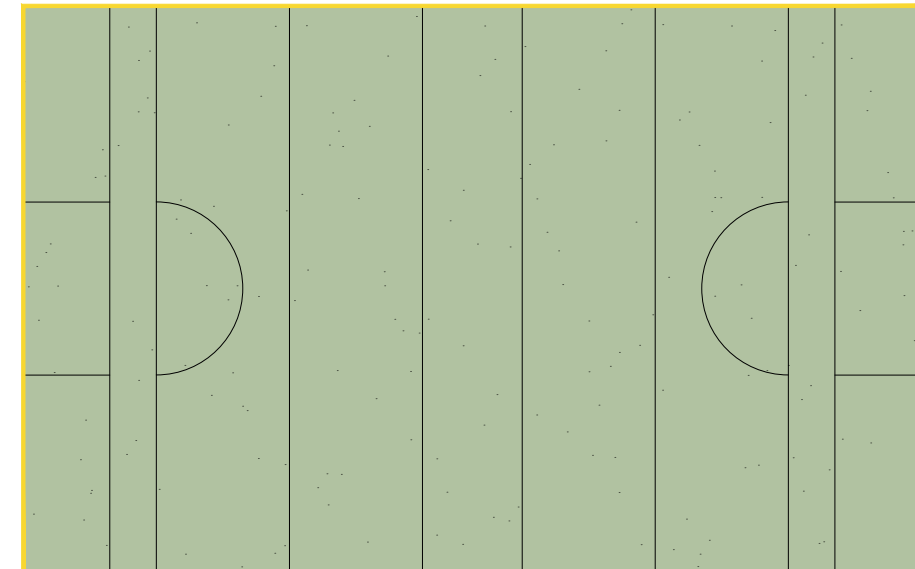
Consequently, we have adjusted the open space strategy to focus on more accessible, informal recreational spaces that align with the site's limitations while still meeting the community's recreational needs. The development balances ecological preservation with the creation of accessible, multifunctional public spaces, ensuring that the site offers meaningful recreational opportunities while enhancing the natural environment. The approach is therefore both appropriate and sustainable, supporting the long-term goals of the draft LPF while addressing the unique constraints of the site.



^ Scaled linear park masterplan



^ Scaled soccer pitch



^ Scaled GAA pitch



# Studio Glasú Studio Glasú Studio Glasú

Studio Glasú is a member of the Irish  
Landscape Institute and the Garden &  
Landscape Designers Association



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