

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.1 Prescribed Bodies / State Organisations

Office of the Planning Regulator (OPR)

Item 1 Preamble

Thank you for your authority's work in preparing the Proposed Variation No. 4 (the proposed Variation) to the Wicklow County Development Plan 2022-2028 (the County Development Plan).

As Wicklow County Council (the Planning Authority) is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and (2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether it has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

Chief Executive's Response

Noted

Item 2 Overview

The Office welcomes the preparation of the proposed Variation and notes the overall approach of the Planning Authority to addressing the Revised National Planning Framework (2025) (Revised NPF) and the Eastern and Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) in accordance with section 13 of the Act.

Greystones – Delgany is identified as a Self-Sustaining Growth Town in the RSES and has undergone considerable growth in terms of housing delivery prior to and during the period of the County Development Plan, exceeding current core strategy annual targets. The Office recognises that the focus of the proposed Variation is on the provision of 'catch up' infrastructure to support this housing growth and on infill development and consolidation of the built up area, in terms of further residential development within the current policy framework.

Kilcoole is identified as a Self-Sustaining Town in the RSES and the Office recognises the zoning objectives set out in the proposed Variation play an important role in ensuring the sustainable development and expansion

of the settlement over the forthcoming years.

The Office welcomes the focussed Specific Local Objectives (SLO) 1-3 for mixed use, community developments including commercial, tourism and amenity uses, with provision for active open space, green links and recreational areas, and SLO 4-7 for housing delivery and mixed use, including community facilities and amenities.

The Office also welcomes the identification of opportunity sites for town centre regeneration across the three settlements including the objectives for public realm improvements, which provide a clear policy basis for tourism development, heritage protection and the activation of town centre regeneration sites.

The Office acknowledges the Planning Authority, with the support of the National Transport Authority (NTA), has commenced the process of preparing a Local Transport Strategy (LTS), which has informed the preparation of the proposed Variation. However, the Office is concerned that an Area Based Transport Assessment has not been carried out to support the preparation of a Local Transport Plan (LTP) for the area, as per NTA guidance, to ensure consistency with County Policy Objective (CPO) 12.3 of the County Development Plan and RPO 8.6 of the RSES.

With the exception of the specific concerns set out below, the proposed Variation otherwise sets out a clear zoning strategy and framework for the future development of the lands concerned. The issues raised below largely focus on supporting the delivery of the vision of the proposed Variation and building on the ambition of the County Development Plan to develop well serviced, well connected and sustainable neighbourhoods, and promote sustainable modes of transport.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out three (3) recommendations under the following key themes:

Recommendation - Key theme

Recommendation 1 - Residential Zoning

Recommendation 2 - Transport and Accessibility

Recommendation 3 - Flood Risk Management

Chief Executive's Response

Area Based Transport Assessment (ABTA) / Local Transport Plan (LTP)

In line with the County Development Plan objective:

CDP12.3 "In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy (namely Bray and environs, Wicklow-Rathnew, Arklow, Greystones-Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy and any other settlement where it is deemed necessary by the Planning Authority) and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plan",

the process of preparing a Local Transport Plan for the Local Planning Framework area has been commenced.

However, a full ABTA / Local Transport Plan has not been completed as part of this LPF; this is regrettable but technical resources have not been available to complete the LTP, and it was decided that the lack of a completed LPT should not hold up progress on preparing a new LPF. The completed stages / tasks of the Local Transport Study have been used to inform the overall development strategy of the LPF and the roads and

transportation objectives.

At this stage of LPF making it is considered inadequate time would be available to allow for completion of the full Local Transport Plan, of the form and detail as envisaged by the NTA / TII guidance.

The Chief Executive is committed to completing the LTP as set out in objective CPO12.3, and once the LTP is complete, there will be a review of the Local Planning Framework to consider whether a Variation is needed to ensure the LTP and the LPF are consistent with each other.

Chief Executive's Recommendation

Amend the draft LPF as follows:

Section B:7 Infrastructure

Add new objective

GDK-XX: In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Greystones-Delgany and Kilcoole LPF and integrate its provisions into the LPF as appropriate.

Item 3 Residential Zoning

Residential Zoning

Context and Rationale for Recommendation

The Office welcomes the zoning objectives for New Residential Priority 1 lands which are well located and will facilitate the compact and sustainable growth of the town in a sequential manner and the clear policy approach in respect of phasing the development of zoned land in accordance with the sequential approach. In addition, the New Residential Priority 2 lands (47 ha) provide a supply of zoned lands consistent with the current core strategy.

Chapter 4 of the Development Plans, Guidelines for Planning Authorities (2022) outlines the approach for zoning that should be followed by planning authorities. The Office recognises the focus of the proposed Variation is on the provision of 'catch up' infrastructure to support housing growth and on infill development and consolidation of the built-up area, in terms of further residential development in the Local Development Framework (LDF) area and acknowledges the infrastructure assessment implementation programme provided at appendix 6 of the proposed Variation.

In terms of delivering housing on New Residential Priority 1 and / or Priority 2 zoned lands, it is necessary that the lands are serviced or serviceable within the plan period. Further details should be provided to ensure the infrastructure capacity exists or will be delivered over the plan period, and to demonstrate a standardised tiered approach for these undeveloped lands consistent with NPO 101, NPO 102 and NPO 103 of the Revised NPF and RPO 4.2 of the RSES.

Recommendation 1 – Residential Zoning

Having regard to the provision of new homes at locations that can support compact and sustainable

development and the co-ordination of housing delivery and infrastructure, and in particular to:

- **NPO 101, NPO 102, NPO 103 of the Revised NPF to consider the serviceability of land zoned for development;**
- **RPO 4.2 of the RSES to align the settlement strategy to infrastructure investment; and**
- **section 6.3 of the Development Plans, Guidelines for Planning Authorities (2022) to integrate infrastructure planning with new development,**

the Planning Authority is recommended to:

- engage with the relevant statutory bodies and demonstrate that lands zoned for New Residential Priority 1 and / or Priority 2 are serviceable within the plan period; and**
- review the zoning objectives to ensure that lands that cannot be reasonably or cost effectively delivered within the plan period are not zoned for development.**

Chief Executive's Response

The CE is satisfied that:

- all lands zoned for town centre, village centre, mixed use (where residential is permissible) and infill development in existing developed areas are serviced
- all lands zoned for Priority 1 New Residential are serviced
- all lands zoned for Priority 2 New Residential are either serviced or serviceable.

In this regard, there are no deficiencies in the capacity of water supply or wastewater treatment infrastructure for any of the lands zoned for new development in the plan area. With respect to transportation services, all zoned lands are serviced or can be serviced by roads, footpaths, cycle ways and public lighting. In addition, all lands zoned are within either a 30 minutes' walk of the train stations or a 15 minutes' walk of a bus stop.

Therefore it is not considered necessary to demonstrate further that lands zoned for New Residential Priority 1 and / or Priority 2 are serviceable within the plan period.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPP

Item 4 Transport and Accessibility

Transport and Accessibility

In its submission to the Issues Paper for the Greystones-Delgany and Kilcoole Local Area Plan the Office highlighted the importance of preparing an LTP for the area to inform land use zoning objectives based on accessibility by walking, cycling and public transport, sustainability mobility measures, delivery of an enhanced park and ride facility in Greystones and public realm enhancements.

The Office notes that the Planning Authority has commenced the preparation of an LTS with the support of the NTA, which has informed the preparation of the proposed Variation, and section A3.1 Sustainable Transportation and B7.1 Transport and Sustainability set out useful information and objectives regarding transport infrastructure. However, CPO 12.3 of the County Development Plan states that LTPs are to be prepared for towns, including Self-Sustaining Growth Towns, and should be prepared incorporating ABTA methodologies, to inform land use and investment decisions. How the proposed LTS relates to an LTP prepared in accordance with the ABTA methodology is not clear.

Given Greystones-Delgany's role as a Self-Sustaining Growth Town, having the main elements of an LTP integrated into the proposed Variation is critical to support the sustainable development of the area and the

achievement of national climate action targets. A key function of LTPs, as set out under the RSES (RPO 8.1), is to ensure the integration of land use and transport planning at local level.

For these reasons it is critical that the Planning Authority continue to work with transport authorities, NTA and Transport Infrastructure Ireland, to prioritise the completion of the LTP.

While it would have been preferable if the LTP had been prepared in advance to support the policy and zoning decisions in the proposed Variation, the Office therefore recommends that, following the preparation of the LTP, the key provisions are incorporated into the LDF within the County Development Plan as a variation under section 13 of the Act, or any equivalent provision under the Planning and Development Act 2024.

The details of recommendations set out in the emerging LTS / LTP should be reflected on the Transport Strategy Map No. 5, and the proposed interventions mapped and prioritised as appropriate for implementation.

The Office welcomes Objectives GDK59 and GDK60 of the proposed Variation which identify specific active travel projects to be supported and facilitated within the framework area. However, section 7.1 Sustainable Transportation should also include an adequate focus on the connectivity needs of the emerging development areas and sites identified as SLOs and Opportunity Sites.

In this respect, the LTS / LTP should include an assessment of connectivity to the wider network and identify any deficiencies that may exist. Recommendations for improvements should be highlighted and illustrated on the Transport Strategy Map No. 5 to ensure that the SLOs and Opportunity Sites are connected to planned active travel infrastructure.

RPO 8.14 of the RSES supports the delivery of strategic park and ride projects in specific locations, including Greystones, and CPO 12.21 of the County Development Plan supports the facilitation and enhancement of the strategic park and ride at Greystones. To support the achievement of national climate action targets including the reduction of greenhouse gas emissions and more locally traffic congestion within the LDF area, the Office therefore considers that the LDF / proposed Variation should address the delivery of a new and / or enhanced park and ride project in Greystones.

Finally, the Office notes that mode share targets have not been included in the proposed Variation / LDF and it is recommended that ambitious but realistic mode share targets are proposed together with an effective monitoring programme.

Recommendation 2 – Integrated Land Use and Transport Planning

Having regard to the provision of a sustainable Transport Strategy and the transition to a low carbon and climate resilient society including the reduction of greenhouse gas emissions, and in particular to:

- **the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021);**
- **from the Revised NPF: NPO 37 for safe and convenient alternatives to the car, NPO 69 to reduce our carbon footprint, NPO 93 for improved air quality, NPO 107 and NSO 5 for sustainable mobility;**
- **RPO 8.1 and RPO 8.4 of the RSES for the integration of land use and transport planning; and**
- **RPO 8.14 of the RSES for the delivery of strategic park and ride projects,**

the Planning Authority is recommended to:

- (i) prepare the LTP in consultation with the NTA and TII, closely aligned with the Area Based Transport Assessment guidance, and incorporate the key provisions of the LTP, including mode share targets, into the LDF for Greystones-Delgany and Kilcoole within the County Development Plan as a variation under section 13 of the Planning and Development Act 2000, as amended (or any equivalent provision under the Planning and Development Act 2024);
- (ii) include details of recommendations set out in the emerging LTS / LTP on the Transport Strategy Map No. 5, and the proposed interventions mapped and prioritised as appropriate for implementation;
- (iii) include an objective to support and facilitate the delivery of a new and / or enhanced park and ride project in Greystones;
- (iv) include the location of a new and / or enhanced park and ride project in Greystones on Land Use Zoning Objectives Map No.1 and / or Transport Strategy Map No.5;
- (v) include details of the delivery of a new and / or enhanced park and ride project in Greystones within appendix 6 Infrastructure Assessment and Implementation Programme; and
- (vi) illustrate measures on the Transport Strategy Map No. 5 to identify active travel and connectivity measures between the Specific Local Objectives, Opportunity Sites and the wider network.

Chief Executive's Response

Area Based Transport Assessment (ABTA) / Local Transport Plan (LTP)

In line with the County Development Plan objective:

CDP12.3 *"In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy (namely Bray and environs, Wicklow-Rathnew, Arklow, Greystones-Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy and any other settlement where it is deemed necessary by the Planning Authority) and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plan",*

the process of preparing a Local Transport Plan for the Local Planning Framework area has been commenced.

However, a full ABTA / Local Transport Plan has not been completed as part of this LPF; this is regrettable but technical resources have not been available to complete the LTP, and it was decided that the lack of a completed LPT should not hold up progress on preparing a new LPF. The completed stages / tasks of the Local Transport Study have been used to inform the overall development strategy of the LPF and the roads and transportation objectives.

At this stage of LPF making it is considered inadequate time would be available to allow for completion of the full Local Transport Plan, of the form and detail as envisaged by the NTA / TII guidance.

The Chief Executive is committed to completing the LTP as set out in objective CPO12.3, and once the LTP is complete, there will be a review of the Local Planning Framework to consider whether a Variation is needed to ensure the LTP and the LPF are consistent with each other.

Modal Share Targets

This is a matter that has also been raised by the NTA but no advice has been offered by the OPR or NTA as to how these targets may be calculated, and it is not considered rational or reasonable to come up with arbitrary

modal share targets as part of this LPF making process. This is a matter that can be considered in the future LTP.

(i) The Chief Executive is committed to completing the LTP as set out in objective CPO12.3, and once the LTP is complete, there will be a review of the Local Planning Framework to consider whether a Variation is needed to ensure the LTP and the LPF are consistent with each other.

(ii) Any emerging proposals in the working Local Transport Study have been incorporated into the Transport Strategy objectives and map. Following completion of the LTP, there will be a review of the transport strategy of the LPF to consider whether a variation is needed to ensure the Transport Strategy of the LPF and the LTP are consistent.

(iii) Objectives CPO 12.1 and in particular CPO 12.21 of the County Development Plan facilitate park and ride projects, with CPO 12.21 specifically in support of both the existing park and ride at Greystones and additional park and rides along strategic transport corridors (such as the N11). It is not considered necessary to recommend additional text to the draft LPF, having regard to the existing objectives in the County Development Plan.

CPO 12.1 *Through coordinated land-use and transport planning, to reduce the demand for vehicular travel and journey lengths by facilitating initiatives like carpooling and park and ride.*

CPO 12.21 *To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular:*

- to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, planned transport studies and consultation with the appropriate transport agencies and/or Regional Authority;*
- to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;*
- to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Kilcoole, Rathdrum, Wicklow and Arklow;*
- to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;*
- to promote car sharing parking spaces at premium locations in car parks;*
- to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;*
- to promote the Luas extension from City West / Tallaght to Blessington;*
- to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus service / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;*
- to encourage the improvement of bicycle parking facilities at all transport interchanges;*
- to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations;*
- to support the development of bus shelters and bicycle parking facilities where possible; and*
- to promote and support the development of fully accessible public transport services and infrastructure, that can be used by all people, regardless of their age, size, disability or ability.*

(iv) There is a planned park and ride on the Farrankelly Road at the N11 some distance outside the LPF boundary; this project is progressing with an application for consent expected to be made later in 2025. As consent is not in place yet and given the physical separation of this site from the LPF area, it is not recommended to present this on a map at this stage. There are clear written text objectives in the County Development Plan supporting the delivery of a park and ride in Greystones and in the wider area along

strategic transport corridors as set out above.

(v) Greystones is already served by the large **park-and-ride** at Mill Road and there is a planned park and ride on the Farrankelly Road at the N11, this project is progressing with an application for consent expected to be made later in 2025. There is no timeframe for the delivery of the latter park-and-ride. This is something that can be considered further under the Local Transport Plan.

(vi) All of the SLO sites, where significant development is targeted, are already identified on the Transport Strategy map, and therefore their proximity to existing and proposed improved transport connections is already presented and evident in the draft LPF. With respect to OP sites, there are all located in the centre of the settlements where transport infrastructure is already in situ. Therefore no changes are required.

Chief Executive's Recommendation

Amend the draft LPF as follows:

Section B:7 Infrastructure

Add new objective

GDK-XX: In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Greystones-Delgany and Kilcoole LPF and integrate its provisions into the LPF as appropriate.

Item 5 Flood Risk Management

Flood Risk Management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) and accompanying Plan Making Justification Tests (Justification Tests) as part of the draft LDF to inform zoning objectives, and the inclusion of flood risk mapping (Map No. 4A-D Flood Risk), as part of the proposed Variation.

In relation to the SFRA and coastal erosion, the Office considers the SFRA should include a review of National Flood Coastal Hazard Mapping and National Catchment-based Flood Risk Assessment and Management mapping alongside each other, taking account of the presence of defences and the extent of the coastal flood plain with regard to the definition of coastal flood zones.

As a flood relief scheme is proposed for Greystones and environs, as well as a potential scheme subject to further assessment for Kilcoole, the Office advises the Planning Authority to consider including an LDF objective to ensure that development proposals support and do not impede or prevent the progression of these schemes.

In relation to Sustainable urban Drainage Systems (SuDS), the Office considers that the SFRA should provide guidance on the applicability of different SuDS techniques for managing surface water run-off at key development sites, for example SLO 4, and identify where integrated and area based provision of SuDS are appropriate in order to avoid reliance on individual site by site solutions in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

Recommendation 3 – Flood Risk Management

Having regard to flood risk management, and in particular,

- **NPO 53 of the Revised NPF to take account of the effects of sea level changes and coastal erosion;**
- **NPO 78 of the Revised NPF and RPO 7.12 of the RSES to avoid inappropriate development in areas at risk of flooding in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines);**
- **NPO 77 and NPO 79 of the Revised NPF to integrate and support sustainable water management solutions; and**
- **the Flood Guidelines,**

the Planning Authority is recommended to:

- (i) **amend the Strategic Flood Risk Assessment (SFRA) to consider National Flood Coastal Hazard Mapping and National Catchment-based Flood Risk Assessment and Management mapping alongside each other, taking account of the presence of defences and the extent of the coastal flood plain with regard to the definition of coastal flood zones;**
- (ii) **include a specific objective to ensure that development proposals support and do not impede or prevent the progression of planned future flood relief schemes; and**
- (iii) **amend the SFRA to provide guidance on the applicability of different Sustainable urban Drainage Systems (SuDS) techniques for managing surface water run-off at key development sites and identify where integrated and area-based provision of SuDS are appropriate.**

The Planning Authority should liaise with the Office of Public Works regarding this recommendation.

Chief Executive's Response

- (i)** The SFRA prepared has already considered and integrated the National Coastal Flood Hazard Mapping

(NCFHM) dataset; it is unclear therefore why this has been flagged in this submission.

The OPW has flagged that one dataset, namely National CFRAM coastal dataset has not been fully integrated into the SFRA. This has been now considered and an update to the SFRA is presented as Addendum 1 to the SFRA in this report. This assessment has not given rise to any need to make amendments to the draft LPF.

(ii) It is noted from the OPW's website floodinfo.ie that there is a future 'Greystones & Environs Flood Relief Scheme' where it is proposed to "progress the development of a flood relief scheme for Greystones & environs". It is further stated that the measure outline is as follows -

"Progress the project-level development and assessment of a Flood Relief Scheme for Greystones & Environs, including environmental assessment as necessary and further public consultation, for refinement and preparation for planning / exhibition and, if and as appropriate, implementation. The proposed measure for Greystones that may be implemented after project-level assessment and planning or Exhibition and confirmation might include physical works, such as a series of hard defences (flood embankments and walls, 1.5km long) and a storage area. The measure would protect to the 1% AEP fluvial flood event, with an average hard defence height of 0.9m (reaching a maximum height of 1.8m)."

It would appear that this Flood Relief Scheme is in its very initial stages; the details are unclear/unknown and it is not being actively progressed; and therefore it is not possible to integrate support for same in any clear or specific manner in this LPF. However, all such schemes are already supported under the Flood Risk Management Objective **CPO14.05** of the County Development Plan:

"To continue to work with the OPW and other agencies to deliver Flood Defence Schemes in the County as identified in current and future FRMPs..."

Therefore it is not considered necessary to include a specific objective in the LPF.

(iii) The SFRA sets out a schedule of 'mitigation objectives' in Section 4.3, which includes the following County Development Plan objective, which will apply in the plan area:

CPO 14.13 *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*

The Council SuDS policy and development guidance sets out a range of SuDS techniques for managing surface water, that will be applied at development sites. It is not considered necessary to re-state or insert the entire SuDS document into the SFRA or the LPF in this regard.

With respect to SLO4, the draft LPF clearly sets out that a surface water management plan will be required for this area:

GDK64

With respect to localised drainage issues present in the LPF area:

a) new significant development in the area between Sea Road and Lott Lane in Kilcoole will only be considered where the development's wastewater drainage arrangements accord with an overall Drainage Area Plan (DAP) which removes / limits need for new pumping and maximises coordination of drainage networks between sites.

*b) new significant development in the Coolagad – Templecarrig area in north Greystones will only be considered where the development's surface water drainage arrangements accord with Wicklow County Council's Sustainable Urban Drainage (SUDS) Policy **and** an overall Surface Water Management Plan for the area which addresses the capacity of the area network and obviates flood risk on downstream lands.*

Chief Executive's Recommendation

Update the SFRA to consider the National CFRAM coastal dataset - See SFRA Addendum 1

Item 6 Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within five working days of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the Variation in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Chief Executive's Response

Noted

Eastern and Midland Regional Assembly (EMRA)

Item 1 Regional Spatial and Economic Strategy

The Council will be aware of the Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) which was made on 28th June 2019. The RSES presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; identifying Regional Growth Centres which act as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places. The RSES identifies Regional Growth Centres and Key Towns within the Region, however Self-Sustaining Growth Towns, Self-Sustaining Towns and Rural areas are to be defined by Development Plans.

In line with the provisions of the Planning and Development Act 2000, as amended, the planning authority shall ensure, when making a variation to the development plan, that it is consistent with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy.

Chief Executive's Response

Noted

Item 2 Legislative Context

The role and function of the Regional Assembly, including the scope of the RSES, is provided for in the Planning and Development Act 2000, as amended. It should be noted that this legislation has been superseded by the Planning and Development Act 2024, which was signed into law on 17th October 2024. However, the provisions of the Planning and Development Act 2024 relevant to the Regional Assembly have not commenced to date, and they will commence on a staged basis in the coming months. Until then, the provisions of the Planning and Development Act 2000, as amended, remain in force.

Under Section 27C of the Planning and Development Act 2000, as amended, the Eastern and Midland Regional Assembly, is obliged to prepare submissions/observations to be submitted to the relevant planning authority and copied to the Office of the Planning Regulator. A submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft variation of the development plan, and its core strategy, is consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the proposed draft variation of the development plan and its core strategy is not consistent with the RSES, the submission/ observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that it is consistent.

Chief Executive's Response

Noted

Item 3 Proposed Variation No. 4

Wicklow County Council is preparing new Local Planning Frameworks for the settlements/areas of:

- Greystones - Delgany and Kilcoole (currently under consideration)
- Arklow (to be prepared)
- Bray Municipal District (including Enniskerry and Kilmacanogue) (to be prepared)

Wicklow County Council has therefore published proposed Variation No. 4 seeking to vary the Wicklow County Development Plan (CDP) 2022-2028 to facilitate the adoption of local development frameworks for the areas above, with a view to replacing existing Local Area Plans and to ensure alignment and consistency between the County Development Plan and the draft and final Greystones – Delgany and Kilcoole Local Planning Framework to be included in the Wicklow County Development Plan 2022-2028.

The proposed Variation will add a new part (Part 6) to Volume 2 of the Development Plan 'Introduction to Local Planning Frameworks' followed by the insertion of the final Greystones – Delgany and Kilcoole Local Planning Framework.

To accommodate this proposed addition, the proposed Variation further seeks to update the text in the 'Structure of The Plan' under Volume 2 of Chapter 1 of the Development Plan in the following way (new sections in highlighted in italics):

Volume 2 contains:

- a)** a set of 'town plans' for the following settlements: Ashford, Aughrim, Avoca, Baltinglass, Carnew, Donard, Dunlavin, Laragh-Glendalough, Newcastle, Newtownmountkennedy, Rathdrum, Roundwood, Shillelagh and Tinahely.
- b)** *the land use zoning and key development objectives maps for the Local Area Plan settlements / areas of Wicklow Town – Rathnew and Blessington which have separate Local Area Plans (the written statement is published in a separate Local Area Plan).*
- c)** *Local Planning Frameworks for the settlements / areas of Greystones – Delgany & Kilcoole, Arklow & Environs and Bray Municipal District (including Enniskerry & Kilmacanogue).*

There are also proposed changes to the text in relation to zoning in Volume 1 Chapter 3 of the Development Plan (additions in italics):

As part of the LAP adoption process for the settlements of Wicklow Town – Rathnew and Blessington, the land use zoning and key development objectives maps for these LAP settlements / areas are integrated into Volume 2 of this County Development Plan by way of variation. For the remaining settlements (Bray, Enniskerry, Kilmacanogue, Greystones – Delgany, Kilcoole and Arklow), 'Local Planning Frameworks' (which will replace their previous LAPs) which set out settlement specific objectives including land use zoning and key development objectives maps are to be integrated into Volume 2 of this County Development Plan by way of variation.

New Local Area Plans (LAPs) *and Local Planning Frameworks (LPFs)* will be made for the following settlements in the period 2022-2025 in the following order of priority:

1. Wicklow Town – Rathnew
2. *Blessington*
3. *Greystones - Delgany – Kilcoole*
4. Arklow and Environs
5. Bray Municipal District (including Enniskerry and Kilmacanogue)

Upon adoption of this County Development Plan in 2022, the amount of zoned land in pre-existing LAPs exceeded the amount of land needed to meet the Core Strategy 2031 housing targets for each of the towns set out in this County Development Plan (as detailed in Table A of the Core Strategy).

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in 'Development Plans –

Guidance for Planning PART A - iii Authorities' (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF.

In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LAP/ LPF, with flexibility in the zoning provisions to ensure that (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise and (b) the LAPs/ LPFs do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

The proposed Variation also proposes amendments to the following maps:

- Map 17.09 Wicklow Landscape category map to reflect boundary of Greystones – Delgany and Kilcoole LPF
- Map 19.01a Wicklow North Coastal Cells map to reflect boundary of Greystones – Delgany and Kilcoole LPF

Chief Executive's Response

Noted

Item 4 Submission

The Regional Assembly acknowledges proposed Variation No. 4 of the Wicklow County Development Plan 2022-2028 which seeks to vary the County Development Plan having regard to the publication of the draft Greystones – Delgany and Kilcoole Local Planning Framework 2025 in order to ensure consistency between the draft and final Greystones – Delgany and Kilcoole Local Planning Framework 2025 with the County Development Plan.

It is considered that the proposed Variation is consistent with the RSES by bringing the content of the Wicklow CDP 2022-2028 into alignment with the maps and details published as part of the draft Greystones – Delgany and Kilcoole Local Planning Framework 2025, and in this regard, the Regional Assembly supports in principle the proposed amendments to the Wicklow CDP 2022-2028. Notwithstanding, the Planning Authority should note that should there be further amendments proposed to the draft Greystones – Delgany and Kilcoole Local Planning Framework 2025 (including maps published as part of this proposed Variation) that materially impact on this proposed Variation, then this will have subsequent consequences to the final wording of this Variation which should be noted.

Having regard to the draft Greystones – Delgany and Kilcoole Local Planning Framework 2025, the RSES identifies Greystones as a highly urbanised settlement in the Metropolitan Area Strategic Plan (MASP) area, strategically located on the North-South rail corridor. Table 6.1 of the RSES identifies Greystones as Level 3 (Town and/or District Centre and Sub-County Town Centres) of the retail hierarchy. Furthermore, the MASP sets out an integrated land use and transportation strategy for the sequential development of the metropolitan area, including a focus on planned development of strategic development areas in Greystones, as well as a new park and-ride location. The MASP supports employment generation at strategic locations within the metropolitan area to strengthen the local employment base and reduce pressure on the metropolitan transport network, including Greystones (see Table 5.2). The MASP notes that strategic employment locations, particularly those that are employee intensive should be located in proximity to existing or planned strategic transport corridors and supports the development of an IDA strategic site in Greystones to strengthen economic base in North Wicklow.

The draft LPF is framed by the overarching themes of the Wicklow CDP, namely; healthy placemaking, climate change, and economic opportunity. These themes strongly correlate to the 3 key principles of the RSES (Healthy Placemaking, Climate Action and Economic Opportunity), which is welcomed by the Regional Assembly. This chapter also states that the vision of the draft LPF must also be consistent with the Core Strategy of the Wicklow CDP following the hierarchy of plans, including the NPF at national level, the RSES at

regional level and the Wicklow CDP at county level, which is further welcomed by the Regional Assembly.

Chapter 4 of the draft LPF outlines the key parameters for the future physical development of Greystones-Delgany and Kilcoole based around protection of the environment, addressing climate change, sustainability, compact growth and developing the settlement in a manner that improves the modal choice of citizens. These parameters are consistent with the growth strategy of the RSES and support for the transition to a low carbon, climate resilient and environmentally sustainable Region.

The Assembly further welcomes explicit reference to maximising the potential opportunities associated with the area's strategic location at the edge of the Dublin Metropolitan Area and the focus on the dense, mixed-use regeneration and development of town and village centre infill sites (particularly vacant or under-utilised sites) that helps support our vibrant rural areas with a network of towns and villages, a key part of the Region's growth strategy.

Chapter B3 of the draft LPF set out the local objectives for the sustainable development of the LPF area's economy that are relevant to and implementable through a local land-use framework. These objectives support the strategies of the Wicklow Local Economic and Community Plan and the Wicklow Local Enterprise Office, which is welcomed by the Regional Assembly.

The 2022 Census data indicates that the draft LPF area has a low unemployment rate (Greystones-Delgany 5.5%) but the same area has a high commuter rate with a low job ratio and the majority (72%) of those travel for over for over 30 minutes. However, this is not uniform across the area of the LFP, with a strong jobs ratio of 77% identified in Kilcoole. The Assembly welcomes the breakdown of residents' employment into sectors and the introduction of specific objectives for employment types such as objective GDK28.

It is considered that the proposed Variation amendments do not impact on the core strategy chapter of the Development Plan and that the draft Greystones – Delgany and Kilcoole Local Planning Framework 2025 aligns with the principles of the RSES. Accordingly, the Regional Assembly does not have any objection to the proposed Variation No. 4 of the Wicklow CDP 2022-2028 as placed on public display and consider it consistent with the RSES for the Eastern and Midland Region 2019-2031.

Chief Executive's Response

Noted

Item 5 Strategic Environment Assessment (SEA) and Appropriate Assessment (AA)

The Assembly welcomes the preparation of the Variation of the CDP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). The SEA Environmental Report was issued with the Draft Variation of the CDP and sets out the iterative process to date including an assessment of the overall environmental effects arising from the Draft Variation of the CDP provisions.

The Environmental Report concludes that taking into account the mitigation measures which have been integrated into the Variation of the CDP, it has been determined that significant residual adverse environmental effects will not occur as a result of the implementation of the Plan. The Draft Variation of the CDP is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. The NIR concluded that the Draft Variation of the CDP will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects.

Chief Executive's Response

Noted. Please see section 4.12 of this report with regard to SEA / AA.

Item 6 Recommendations

The Regional Assembly would like to acknowledge the work that Wicklow County Council has carried out in order to prepare proposed Variation No. 4 to the Wicklow County Development Plan 2022-2028 and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

In order to ensure consistency with the RSES, the Regional Assembly makes the following recommendation:

- 1. Any material amendments to the draft Greystones – Delgany and Kilcoole Local Planning Framework 2025 (including maps published as part of this proposed Variation) should be reflected in the final wording of the proposed Variation and should be consistent with the RSES for the Eastern and Midland Region.**

Reason: In the interest of clarity and to ensure consistency with the RSES and the Wicklow County Development Plan 2022-2028.

Chief Executive's Response

Any proposed material amendments come from either:

- (a) recommendations of the Chief Executive (see Part 2 of this report) and any such recommendations will continue to be consistent with the RSES, or
- (b) proposals of the Elected Members following their consideration of this Chief Executive's report. The elected members in proposing any such amendments will be aware of their obligations under the Planning Act to consider the RSES in their decisions.

Any such amendments will be placed on display and EMRA will be consulted with, as a prescribed body, and invited to make a submission on the amendments.

Item 7 Conclusion

It is considered that proposed Variation No. 4 to the Wicklow County Development Plan 2022-2028, is consistent with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031.

Chief Executive's Response

Noted

National Transport Authority (NTA)

Item 1

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Draft Greystones/Delgany & Kilcoole Local Planning Framework (LPF) 2025, and based on the Greater Dublin Area Transport Strategy 2022 – 2042 (hereafter, the Transport Strategy), which is a consideration material to the proper planning and sustainable development of the Greater Dublin Area (GDA), would submit the below comments and recommendations for consideration.

Chief Executive's Response

Noted

Item 2 Overview and Policy Context

From a review of the Draft LPF, it is considered that the Plan is generally consistent with the Transport Strategy, as required by the Planning and Development Act 2000 (as amended), subject to the observations and recommendations set out in this report. These observations and recommendations are based on the following policy and guidance documentation, as well as the primary provisions of the Wicklow County Development Plan 2022 – 2028 (hereafter Wicklow CDP).

National Investment Framework for Transport in Ireland (NIFTI)

This is the strategic framework for future investment decision making in land transport. It guides transport investment in the years ahead to enable the National Planning Framework, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland.

NIFTI sets out the road user modal hierarchy in Ireland as; 1. Active Travel (Walking & Cycling); 2. Public Transport; 3. Private Vehicles.

NIFTI also outlines an intervention hierarchy which is: 1.Maintain; 2.Optimise; 3.Improve; 4.New.

National Sustainable Mobility Policy

This sets out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.

Climate Action Plan 2025

Under the Climate Action and Low Carbon Development (Amendment) Act 2021, emissions must reduce by 51% by 2030, setting a path towards a zero net-emissions scenario by 2050. The transport sector is committed to meeting those targets in full. For transport, there are three main actions required that should inform the policies, objectives and measures of the Local Area Plan, namely:

- Reducing the demand for travel;
- Increasing use of public transport, walking and cycling and a reduction in trips by car;
- Conversion of the transport fleet to zero emissions vehicles

National Planning Framework (NPF)

The National Planning Framework sets out the National Policy Objectives (NPO) which align with the National Development Plan (NDP) through delivery of National Strategic Outcomes (NSO).

Eastern & Midland Regional Assembly – Regional Spatial & Economic Strategy

The RSES provides a high-level development framework for the Eastern & Midland Region that supports the implementation of the NPF.

Greater Dublin Area Transport Strategy 2022 – 2042

The Transport Strategy sets out a framework for the delivery of transport infrastructure and services in the GDA region as well as key policy objectives that support the integration of land use and transport planning at

a local level.

As part of the Transport Strategy, there is an objective to enhance DART services to Greystones as part of the Dart+ Project, whilst the M11 corridor is designated as a 'Regional Bus Corridor', with ancillary objectives to provide for park and ride facilities along this route, including at Junction 11 to the southwest of Greystones.

Chief Executive's Response

Noted

Item 3 Local Transport Plan

The NTA is concerned that the Draft LPF has not been published alongside a Local Transport Plan (hereafter, LTP), particularly given the scale of the settlement (c. 22,000 population in 2022) and the population growth forecast for future years. It is noted that the preparation of a LTP is an objective under 'CPO 12.3' of the Wicklow CDP that states the following:

"In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy (namely Bray and environs, Wicklow-Rathnew, Arklow, Greystones-Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy and any other settlement where it is deemed necessary by the Planning Authority) and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plans." (Wicklow County Development Plan 2022 – 2028, Chapter 12, Section 12.8.)

Whilst it is noted that the transport elements of the LPF have been based off the work done to date for a LTP for the area, it is considered that the transport element of the LPF requires further detail, with consideration of the items raised in this submission and through further liaison with the NTA. It is submitted that the finalisation of the LTP would accommodate this additional analysis and ensure the future development of Greystones is based off a local planning and transport planning policy framework that adequately integrates land use and transport planning, based on the Area Based Transport Assessment (ABTA) guidance. The NTA are of the view that when the LTP is finalised, any elements that are of material difference to the provisions of the LPF, should be included in the LPF by way of a new variation.

NTA Recommendation

• To ensure the future transport needs of Greystones are identified based on a robust and comprehensive assessment, it is recommended that, in consultation with the NTA, the LTP is finalised at the earliest opportunity and any material changes to the LPF are captured by way of a new variation.

Chief Executive's Response

In line with the County Development Plan Objective 12.3, the process of preparing a Local Transport Plan for the Local Planning Framework area has been commenced.

However, a full ABTA / Local Transport Plan has not been completed as part of this LPF; this is regrettable but technical resources have not been available to complete the LTP, and it was decided that the lack of a completed LTP should not hold up progress on preparing a new LPF. The completed stages / tasks of the Local Transport Study have been used to inform the overall development strategy of the LPF and the roads and transportation objectives.

At this stage of LPF making it is considered inadequate time would be available to allow for completion of the full Local Transport Plan, of the form and detail as envisaged by the NTA / TII guidance.

The Chief Executive is committed to completing the LTP as set out in objective CPO12.3, and once the LTP is

complete, there will be a review of the Local Planning Framework to consider whether a Variation is needed to ensure the LTP and the LPF are consistent with each other.

Chief Executive's Recommendation

Amend the draft LPF as follows:

Section B:7 Infrastructure

Add new objective

GDK-XX: In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Greystones-Delgany and Kilcoole LPF and integrate its provisions into the LPF as appropriate.

Item 4 Car Parking

It is submitted that the LPF should include objectives that seek a reduction and consolidation of car parking in the town centre with a view to providing enhanced walking, cycling and public transport infrastructure and that the Council should strive to prepare a Car Parking Strategy to deliver on these objectives. This would align with Measure Road13 and Measure TM19 of the Transport Strategy which support a reallocation of roads space to sustainable modes of transport. It is also important that the LPF acknowledges and support the Transport Strategy's ambition to deliver a new park and ride at Junction 11.

NTA Recommendation

- **Include objectives that seek a reduction and consolidation of car parking in the town centre and seek the preparation of a Car Parking Strategy to deliver on these objectives.**

Chief Executive's Response

Reduction and consolidation of car parking

The reduction and consolidation of car parking provision within settlements is a key focus of the County Development Plan. The County Development Plan sets out explicitly that *"More effectively managing vehicular traffic and car parking in town and village centres to make public transport, walking and cycling more attractive option for availing of town / village centre services"* is a goal at the core of the transportation objectives of the plan (Chapter 12, Section 12.0) and that *"the availability of convenient and affordable parking in an area can influence people's decision on their mode of travel and has the potential to be a powerful travel demand management tool. An off-street parking policy should recognise the role that the provision or otherwise of additional parking spaces can play in encouraging or discouraging travel by car. If demand management policies are being implemented then a reduction in the number of parking spaces may be desirable in congested urban areas with parking enforcement. Planning policy may seek to limit the number of parking spaces provided for in new developments"* (Chapter 12, Section 12.4).

Parking objective CPO 12.56 of the County Development Plan states the following -

CPO 12.56 *New / expanded developments shall be accompanied by appropriate car parking provision, including provision for electric vehicle charging points as set out in Objective CPO 12.8, with particular regard being taken of the potential to reduce private car use in locations where public transport and parking enforcement are available. At such locations, the car parking standards set out in Appendix 1 Table 2.3 shall be taken as maximum standards, and such a quantum of car parking will only be permitted where it can be justified.*

In locations where public transport and parking enforcement are not available, the car parking standards set out in Appendix 1 Table 2.3 shall be taken as minimum standard in order to ensure that haphazard unregulated car parking does not occur in the vicinity of the development. Deviations from this table may be considered in multi-functional developments (e.g. hotels, district centres), where the developer provides a robust model of car parking usage to show that dual usage will occur and that peak car parking demand at any time of the day / week will always be met or other situations that may be considered on a case-by-case basis.

In situations where a developer cannot meet the necessary car parking requirement on or near the development site, the developer may request the Local Authority to accept a special payment in lieu, to be utilised by the Local Authority in providing car parking in the area.

Having regard to the above, it is not considered necessary to add anew objective to the LPF as this goal / objective is already applicable in the LPF area via the County Development Plan provisions.

Car parking strategy

This Chief Executive is agreeable to preparing a car parking strategy for the settlements as part of the Local Transport Plan

Park-and-Ride

Objectives CPO 12.1 and CPO 12.21 of the County Development Plan facilitate park and ride projects, with CPO 12.21 specifically in support of both the existing park and ride at Greystones and additional park and rides along strategic transport corridors (such as the N11). It is not considered necessary to recommend additional text to the draft LPF, having regard to the existing objectives in the County Development Plan.

CPO 12.1 *Through coordinated land-use and transport planning, to reduce the demand for vehicular travel and journey lengths by facilitating initiatives like carpooling and park and ride.*

CPO 12.21 *To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular:*

- to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, planned transport studies and consultation with the appropriate transport agencies and/or Regional Authority;*
- to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;*
- to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Kilcoole, Rathdrum, Wicklow and Arklow;*
- to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;*
- to promote car sharing parking spaces at premium locations in car parks;*
- to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;*
- to promote the Luas extension from City West / Tallaght to Blessington;*
- to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus service / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;*
- to encourage the improvement of bicycle parking facilities at all transport interchanges;*
- to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations;*

- to support the development of bus shelters and bicycle parking facilities where possible; and
- to promote and support the development of fully accessible public transport services and infrastructure, that can be used by all people, regardless of their age, size, disability or ability.

The planned park and ride on the Farrankelly Road at the N11 some distance outside the LPF boundary; this project is progressing with an application for consent expected to be made later in 2025. As consent is not in place yet and given the physical separation of this site from the LPF area, it is not reference this project in the LPF or present this on the LPF maps at this stage.

Chief Executive's Recommendation

No change to draft Greystones-Delgany and Kilcoole LPF

Item 5 Modal Share Ambitions

It is noted that the Office of Planning Regulator (OPR) typically favour the inclusion of modal share targets as part of a Local Area Plan. It is submitted that this should be considered and that generally there should be stronger objectives to reduce private car use in the settlement in favour of active travel and public transport trips. This is in the context of the existing dominance of the car for trip making in the settlement and in the context of wider national objectives to reduce car use.

NTA Recommendation

- Consider the inclusion of modal share ambitions for the Plan area in the LPF.

Chief Executive's Response

This is a matter that has also been raised by the OPR but no advice has been offered by the OPR or NTA as to how these targets may be calculated, and it is not considered rational or reasonable to come up with arbitrary modal share targets as part of this plan making process. This is a matter that can be considered in the LTP.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Gas Networks Ireland

A map has been submitted showing the gas network in the settlement area.



Chief Executive's Response

The map shows the areas within the settlements that are serviced by the Gas Network. *Appendix 6 Infrastructure Delivery Schedule, Phasing and Implementation* details the key local infrastructure within the settlements. The development and continued delivery of energy has not been incorporated into this schedule as it is addressed under the County Development Plan, and Wicklow County Council continues to liaise and work with the necessary energy providers, including Gas Networks Ireland, of such infrastructure to continue to enhance these services.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Office of Public Works

Item 1 Coastal Flood Datasets

The flood zone mapping appears to have only considered the National Flood Coastal Hazard Mapping (NCFHM) and not the National CFRAM coastal dataset.

The NCFHM maps show the worst case scenario as any flood defences potentially protecting the coastal floodplain are not taken into account (and so are in-line with the definition of the Flood Zones as set out in the Guidelines) and also assume a horizontal inland projection of the peak levels, rather than a propagation of flooding inland over time. NCFHM mapping is based on more up to date estimates of extreme coastal levels than those that were used for CFRAM coastal mapping which was based on ICPSS data. National CFRAM mapping is based on more detailed modelling of the propagation of floodwaters inland over time in a coastal flood event. As such, NCFHM and CFRAM mapping should be considered alongside each other, taking account of the presence of defences and the extent of the coastal flood plain with regard to the definition of coastal flood zones.

Chief Executive's Response

The SFRA prepared has already considered and integrated the National Coastal Flood Hazard Mapping (NCFHM) dataset. However inadvertently the National CFRAM coastal dataset has not been fully integrated into the SFRA. This has been now considered and an update to the SFRA is presented as Addendum 1 to the SFRA in this report. This assessment has not given rise to any need to make amendments to the draft LPF; this additional assessment has identified that any area proposed to be zoned that may be at risk of flooding as shown in the national CFRAM maps passes the zoning 'Justification Test'.

Chief Executive's Recommendation

Update the SFRA to consider the National CFRAM coastal dataset - See SFRA Addendum 1

Item 2 Flood Risk Assessment Stages

A Strategic Flood Risk Assessment should, among other outputs, identify principal rivers, and the location of any flood risk management infrastructure. Wicklow County Council might consider including discussion on the study area, including sources of risk such as watercourses in the town.

Chief Executive's Response

All watercourses are shown on all maps associated with the LPF and SFRA. The OPW has not identified any particular omissions in this regard – this may be a generic submissions. There are no flood risk management measures in the LPF area.

The SFRA has been prepared in line with the Flood Risk Guidelines and addresses sources of flood risk; it is not considered necessary to include further 'discussion' on the study area, including sources of risk such as watercourse in the town.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

Item 3 Past Flood Events

A review of past flood events in the settlement areas should be undertaken. Past flood events reported to the OPW can be viewed on the webportal Floodinfo; however Wicklow County Council may have other records.

Chief Executive's Response
The SFRA has been prepared in line with the Flood Risk Guidelines. All past flood event records correspond with area identified as at risk of flooding in the flood maps prepared for the SFRA.
Chief Executive's Recommendation
No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

Item 4 Flood Relief Schemes
<p>A flood relief scheme is proposed for Greystones and Environs, as well as a potential scheme subject to further assessment for Kilcoole. Wicklow County Council should have regard to these to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures. Discussion in relation to these proposals should be included and that consideration has been given during the zoning of lands. A specific objective in this regard should be included in the Draft Local Area Plan.</p>
Chief Executive's Response
<p>It is noted from the OPW's website floodinfo.ie that there is a future 'Greystones & Environs Flood Relief Scheme' where it is proposed to "progress the development of a flood relief scheme for Greystones & environs". It is further stated that the measure outline is as follows -</p> <p><i>"Progress the project-level development and assessment of a Flood Relief Scheme for Greystones & Environs, including environmental assessment as necessary and further public consultation, for refinement and preparation for planning / exhibition and, if and as appropriate, implementation. The proposed measure for Greystones that may be implemented after project-level assessment and planning or Exhibition and confirmation might include physical works, such as a series of hard defences (flood embankments and walls, 1.5km long) and a storage area. The measure would protect to the 1% AEP fluvial flood event, with an average hard defence height of 0.9m (reaching a maximum height of 1.8m)."</i></p> <p>It would appear that this Flood Relief Scheme is in its very initial stages; the details are unclear/unknown and it is not being actively progressed; and therefore it is not possible to integrate support for same in any clear or specific manner in this LPF. However, all such schemes are already supported under the Flood Risk Management Objective CPO14.05 of the County Development Plan:</p> <p><i>"To continue to work with the OPW and other agencies to deliver Flood Defence Schemes in the County as identified in current and future FRMPs..."</i></p> <p>Therefore it is not considered necessary to include a specific objective in the LPF.</p>
Chief Executive's Recommendation
No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

Item 5 Coastal Erosion

The Irish Coastal Protection Strategy Study produced 2050 Erosion Line mapping showing coastal areas potentially at risk of coastal erosion. These erosion maps have been produced for existing conditions only and do not include for projected future changes in climate such as sea level rise, increased storm frequency or associated variations in erosion rates.

The erosion hazard mapping is for strategic purposes, and minor or local features may not have been included in their preparation. Therefore, the maps should not be used to assess the erosion hazard and risk associated with individual properties or point locations, or to replace a detailed local erosion hazard and risk assessment. It was not possible to eliminate the effect of existing coastal defence structures from the erosion hazard and risk assessment. Consequently, there will be areas where no erosion line is shown that are at risk from erosion, should present defences fail or not be maintained in the future. Equally, there may be an erosion line shown in areas that are now adequately defended by coastal protection structures that were introduced during or after the assessment period.

Chief Executive's Response

Noted. With regard to coastal erosion, Objective GDK62 of the LPF states the following –

"To work with the OPW and any other relevant bodies to address the effects of sea level changes, coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas. To facilitate the provision of new or the reinforcement of existing coastal defences and protection measures where necessary and in particular to consider the implementation of the measures identified in the ECRIPP and any other similar studies that are produced during the lifetime of the LPF. To employ soft engineering techniques or natural solutions as an alternative to hard coastal defence works, wherever feasible."

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

Item 5 Consideration of Climate Change Impacts

The OPW welcomes the discussion on flood risk and climate change in the SFRA, and the inclusion of future scenario extents on the flood zone mapping. It is noted therein that while the increase in fluvial flood extent generally affects already developed areas, *"Where green field land is affected by future scenario flood mapping, the sites are generally large enough such that the development of desired uses may avoid development in the at risk area utilising the sequential approach in site planning. In some cases, zonings have been changed to more appropriate uses."*

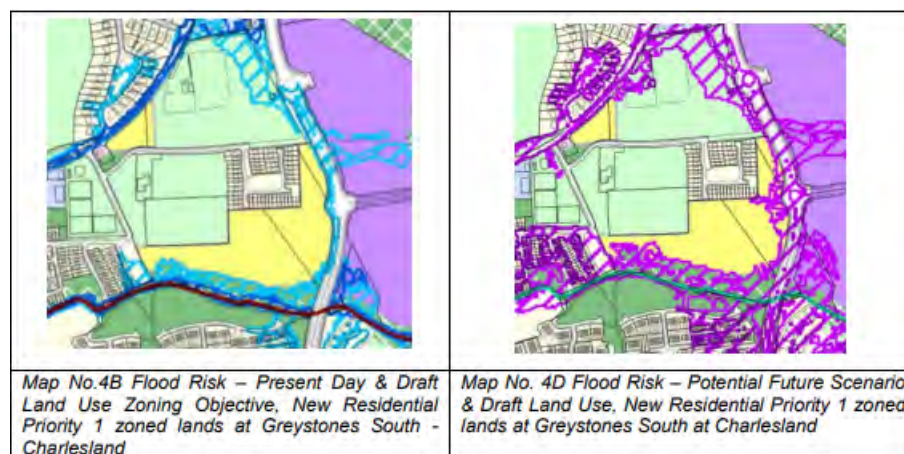
The future scenario mapping demonstrates the potential increase in flood zone B extents only. It would also be useful to also show the potential increase in the flood zone A extents as development currently appropriate in flood zone B may not be appropriate if located in flood zone A in the future and these developments may consider mitigation measures now that would ensure the development is resilient to any increases in flood risk.

Objective GDK63 states that developments *"identified as at possible future risk of flooding having regard to climate change scenarios either on Map 4C attached to this LPF or on any future maps prepared by the OPW during the lifetime of the LPF; shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA"*. There is no requirement in the Guidelines to complete a Justification Test due to climate change, only developments at risk of flooding presently would currently

require a Justification Test. However the effect of climate change should be assessed in any site specific flood risk assessment.

In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.

An area zoned for highly vulnerable RN1: New Residential – Priority 1 has been shown as at risk in both the mid-range and high-end future scenarios. Wicklow County Council might provide further detail regarding how risk to this area might be mitigated.



Chief Executive's Response

With respect to the lands in question, a small area is identified as being at 'present day' risk and these lands are zoned 'open space'. However, there are lands proposed to be zoned for new residential development RN1 located in the mid-range and high-end future scenarios.

The draft LPF objectives already provide that where land is zoned for development, but future scenario flood mapping indicates a risk of flooding, a site specific flood risk assessment will be required. The following objective is included in the LPF -

GDK63 Applications for new developments or significant alterations/extension to existing developments in an area identified as at risk of flooding (Flood Zones A and B) as set out in the SFRA and flood maps appended to this LPF OR in Flood Zone C but within an area:

- that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to new information with respect to flood risk in the area that has come to light; or
- that is identified as at possible future risk of flooding having regard to climate change scenarios either on Map 4C attached to this LPF or on any future maps prepared by the OPW during the lifetime of the LPF;

shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA.

No further mitigation is therefore considered necessary here.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

Item 6 Impacts on Other Areas

While the lands at North 3 and North 4 zoned RN2: New Residential – Priority 2 may not be prone to flood risk itself it has been identified that development of these lands could present an increased risk of flooding in the built up area of Greystones and risk of landslides in this area. Wicklow County Council have noted that *"any development considered for this area would require to integrate significant water management measures to ensure no increase in run off or flood risks"*. In line with the Guidelines, proposed new development needs to avoid increasing flood risk elsewhere and it will be important for Wicklow County Council to assess this requirement.

Chief Executive's Response

Noted; draft LPF clearly sets out that a surface water management plan will be required for this area:

GDK64 *With respect to localised drainage issues present in the LPF area:*

a) new significant development in the area between Sea Road and Lott Lane in Kilcoole will only be considered where the development's wastewater drainage arrangements accord with an overall Drainage Area Plan (DAP) which removes / limits need for new pumping and maximises coordination of drainage networks between sites.
*b) new significant development in the Coolagad – Templecarrig area in north Greystones will only be considered where the development's surface water drainage arrangements accord with Wicklow County Council's Sustainable Urban Drainage (SUDs) Policy **and** an overall Surface Water Management Plan for the area which addresses the capacity of the area network and obviates flood risk on downstream lands.*

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

Item 7 Justification Tests

The OPW welcomes the inclusion of plan making justification tests in the draft plan.

Part 3 of the Plan Making Justification Tests included in the SFRA notes in all cases that *"Assessment of flood risk has been incorporated into the Plan SEA Process"*. Part 3 of the Plan Making Justification Test as set out in the Guidelines is that *"A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere"*. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should not be passed on to development management.

Chief Executive's Response

The SFRA sets out the policies, objectives, requirements, mitigations etc that are already provided for in the Wicklow County Development Plan (Section 4.3 of the SFRA). These requirements will directly apply in the LPF area, being requirements / objectives of the County Development Plan which is 'parent' plan to this LPF. It is not considered necessary to re-state all of the County Development Plan flood risk management related measures in this LPF as they already apply in the plan area.

Please see Part 4.12 of this report with respect to SEA matters.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

Item 8 Sustainable Drainage Systems (SuDS)

Wicklow County Council have identified in the Greystones-Delgany area that a number of storm / combined sewers surcharge due to pluvial flood issues. The Draft Plan also notes that the surface water network in the Rathdown – Redford area does not have capacity to accommodate increased flows, and surface water flows generated by identified development lands in the Coolagad – Templecarrig will need to be carefully controlled. Objective GDK64 states that *"new significant development in the Coolagad – Templecarrig area in north Greystones will only be considered where the development's surface water drainage arrangements accord with Wicklow County Council's Sustainable Urban Drainage (SUDs) Policy and an overall Surface Water Management Plan for the area which addresses the capacity of the area network and obviates flood risk on downstream lands"*. No details have been provided on the Surface Water Management Plan in the Draft Plan or the SFRA. The OPW would recommend that Wicklow County Council carry out the required assessments of the surface water / drainage issues and adequately address them. The use of different Nature Based Solutions and SuDS measures should be examined in this Surface Water Management Plan.

The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites.

The Guidelines also recommend that the SFRA identifies where integrated and area based provision of SuDS are appropriate in order to avoid reliance on individual site by site solutions.

Chief Executive's Response

No details of said surface water management plan are presented as this LPF has not yet been prepared - it is new objective for this LPF area.

The SFRA sets out a schedule of 'mitigation objectives' in Section 4.3, which includes the following County Development Plan objective, which will apply in the plan area:

CPO 14.13 *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*

The Council SuDS policy and development guidance sets out a range of SuDS techniques for managing surface water that will be applied at development sites. It is not considered necessary to re-state or insert the entire SuDS document into the SFRA or the LPF in this regard.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

Item 9 Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

New bridges across rivers are proposed in the Draft Plan. It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.

Chief Executive's Response
Noted. This would be a matter pertinent to any development application / consent procedure.
Chief Executive's Recommendation
No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF or SFRA

An Post

Item 1 An Post Facilities in Greystones

An Post owns and operates a postal facility located on La Touche Road in Greystones. In the context of the Draft LPF's development and finalisation, it is critical that the Local Authority carefully considers both the current and future operational requirements of An Post and incorporates appropriate policies to support the enhancement of postal facilities in the town. An Post welcomes the continued designation of its existing facility under the 'TC: Town Centre' zoning objective.

Chief Executive's Response

Noted

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 2 Transport Proposals and Operational Considerations

The Draft LPF outlines a number of transport-related improvements aimed at enhancing connectivity and promoting safer pedestrian and cycling environments, particularly along La Touche Road. While these initiatives are broadly supported, it is important to acknowledge the specific operational requirements of postal infrastructure in the town.

Chief Executive's Response

Noted. This can be considered in the future LTP.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 3 Deliveries and Access

Access to postal facilities including post boxes, collection points, and the La Touche Road facility is typically required on a 24-hour basis. In particular, early morning deliveries and late evening collections are essential to ensure timely processing and onward delivery of mail to wider catchment areas.

To safeguard the efficient operation of postal services, it is imperative that no restrictions are introduced on delivery or collection times to or from An Post facilities, nor on public access to these services. This applies to all relevant locations, including retail offices, Delivery Service Units, and post boxes. Any such restrictions could significantly impair An Post's ability to fulfil its public service obligations and meet the terms of legally binding service agreements with the State.

We respectfully request that the Local Authority acknowledge and support this operational requirement within the Draft LPF and incorporate it into the assessment and development of future planning policy.

Chief Executive's Response

While this point is noted this would not be a matter relevant to a land-use framework; this would be more of an operational and road safety matter. This can be considered further in the future LTP.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 4 Request for Ongoing Engagement

In the event that any future area plan or development proposal may impact delivery hours or access to postal facilities in Greystones, we request that Wicklow County Council engage proactively with An Post. An Post is committed to working collaboratively with the Local Authority and local residents to minimise any potential disturbances to adjoining properties and to promote sustainable service delivery.

As previously outlined, the efficient operation of postal facilities is fundamental to the provision of reliable and accessible postal services for both business and personal customers in the region. Unhindered access for deliveries and collections at all An Post facilities is therefore vital and must be protected from potential planning restrictions or operational limitations.

Chief Executive's Response

All plans / plan variations / planning frameworks are subject to public consultation and An Post can engage with this process as they are here. With respect to specific development projects, all planning applications / consent process are similarly subject to public consultation that An Post can engage with.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

<u>Meath County Council</u>
The submission acknowledges receipt of the draft LPF. Meath County Council has no comments to make in relation to same.
Chief Executive's Response
Noted

Transport Infrastructure Ireland (TII)

Item 1 Introduction to submission

Transport Infrastructure Ireland (TII) welcomes notice of the preparation of a new local land-use plan (a Local Planning Framework) for the towns of 'Greystones-Delgany' and 'Kilcoole' by Wicklow County Council. The draft Greystones Delgany and Kilcoole Local Planning Framework (LPF) is the subject of proposed Variation no. 4 of the Wicklow County Development Plan 2022 – 2028.

TII is responsible for the maintenance and operation of safe and efficient national road and light rail networks. TII reminds the Council that the N/M11 west of draft LPF area is a vital part of the national road network and part of the European TEN-T Comprehensive Network. Future Luas, Metro and BRT alignments are a matter for the NTA. In addition, TII also has a remit designated by the Department of Transport which includes greenways and the development of a plan for an inter-urban cycle network which is delivered by the National Cycle Network Plan (NCN) published in January 2024.

TII notes that the draft LPF is to replace the Greystones-Delgany and Kilcoole Local Area Plan 2013 – 2019. TII made submission to the pre-draft consultation for a Greystones-Delgany & Kilcoole Local Area Plan (LAP) under TII ref. TII23- 125355 in January 2024. As at the TII submission to the pre-draft stage of the existing LAP review, TII reiterates:

"Project Ireland 2040, National Development Plan 2021 - 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome (NSO) no. 2 of the National Planning Framework. This requirement is reflected in the existing statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and recorded at subsection 3.6 Transport & Accessibility of Chapter 3 Core Strategy of the Wicklow County Development Plan 2022 – 2028".

The maintenance and protection of the strategic function of the national road network, that includes junctions, is also amongst the guiding principles of the transport strategy of the Eastern & Midland Regional Spatial and Economic Strategy (RSES) at Regional Policy Objective (RPO) 8.1. RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management. In addition, RPO 8.3 requires that future development is to be planned and designed in a manner that inter alia protects and maintains regional accessibility.

The NTA Greater Dublin Area Transport Strategy 2022-2042 at Measure ROAD2 sets out National Roads Requirements explicitly complementary to the Guidelines and includes provision 1: - "The primary function of national roads is to cater for strategic traffic and this function must be protected".

Chapter 12 Sustainable Transportation of the Wicklow County Development Plan 2022 – 2028 includes National Road Objectives set out at County Plan Objectives (CPOs) 12.35 to 12.42. CPO 12.40 expressly recognises the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012). TII notes that the proposed Variation No. 4 of the County Development Plan does not alter these existing National Road network Sustainable Transportation County Plan Objectives (CPOs) of the County Development Plan".

As part of TII's responsibilities for managing and improving the country's national road and light rail networks, the Authority sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology to be prepared to precede or accompany applications for developments or works. Technical guidance and standards are contained in TII Publications, available at <https://www.tiipublications.ie/>.

By review of the draft LPF maps, particularly Map No. 1 Land use Zoning Objectives and Map No. 5 Transport

Strategy, TII notes that the boundary of the draft LPF area does not extend to directly interact with the N/M11 corridor, including junctions. The single indicated direct interaction with the N/M11 is indicated on Map No. 5 "Improved Pedestrian and Cyclist Infrastructure" proposed as objective ref. GDK 59C for the local Woodstock Road which runs under the N11.

The following TII observations on the draft LPF seek to address the safety, capacity, and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outlined in Project Ireland 2040, the Section 28 Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (2012), and the Eastern Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES).

Chief Executive's Response

Noted

Item 2 Draft LPF, National Roads and Appropriate Transport Assessment

Regional Policy Objective (RPO) 8.6 of the EMRA RSES requires Local Transport Plans (LTPs) to be prepared for selected settlements in the Region by local authorities in conjunction with the NTA. The GDA Transport Strategy includes MEASURE PLAN17 – Local Transport Plans are to be based on the ABTA methodology as part of the statutory plan making process. Wicklow County Development Plan Sustainable Transport Objectives in Chapter 12 includes Sustainable Mobility Objectives including CPO 12.3 to prepare and / or update existing Area Based Transport Assessments (ABTAs) and LTPs for all towns in Levels 1-4 of the County settlement hierarchy which includes Greystones-Delgany and Kilcoole.

The TII submission to the pre-draft stage of the previous LAP review recommended that land use transportation assessment for any future LAP, now a Local Planning Framework (LPF), should be prepared based on an evidence-based area transport assessment in accordance with the requirements of the Spatial Planning and National Roads Guidelines and the Greater Dublin Area Transport Strategy and should demonstrate compatibility with the strategic function of the national road network. TII further recommended that any land use transportation assessment to support the LAP should be prepared in accordance with the ABTA Guidance and referred the Council to section 1.4 of the TII Traffic and Transport Assessment Guidelines (2014) that addresses Area Based Transport Assessment (ABTA) for Forward Planning. In addition, TII directed attention to guidance also available in TII Publications PE-PDV-02046 Area Based Transport Assessment (ABTA) Guidance Notes, jointly prepared by TII and the NTA.

TII notes the existence and inclusion of Appendix 6 Infrastructure Assessment & Implementation Programme of the draft LPF that includes TII as a named stakeholder at section 2 Key Stakeholders, subsection 2.2 Roads & Transportation Infrastructure. Subsection 3.3 Transportation & Movement opens with a description of the progression of the "Greystones-Delgany & Kilcoole Transport Study (WCC / NTA)" stating that the Study is to become the Local Transport Strategy which is "still in development". It is stated that some "stages /tasks" of the Study to become the Local Transport Strategy have been completed and have been utilised to "inform both the overall development strategy of the LPF but also the roads and transportation objectives." This Appendix 6 subsection closes with a section entitled "Proposed Greystones-Delgany and Kilcoole LPF Transport Objectives" consisting of an image of draft LPF Map No. 5 Transport Strategy. TII notes that the "Greystones-Delgany & Kilcoole Transport Study (WCC / NTA)" as set out in Appendix 6 of the draft LPF is part transposed into the written statement of the LPF at section A.3 Factors Influencing Future Development Options, subsection A3.1 Sustainable Transportation.

Having regard to the above, including the statement that of the commitment to the preparation of a "Local Transport Strategy for Greystones- Delgany and Kilcoole" at Appendix 6 and section A3.1 Sustainable Transportation of the draft LPF, TII highlights the following:

- The draft LPF includes footnotes for the Local Transport Strategy (LTS) stating “The aim of this LTS is to establish a strategic framework for the future development of transport infrastructure in the area.” TII has been aware of the undertaking of an Area Based Transport Assessment (ABTA) as Wicklow County Council previously invited TII stakeholder engagement in the preparation of an ABTA for Greystones–Delgany and Kilcoole in 2022 (TII ref. TII22-117038). The transportation study information presented in the draft LPF represents the first update of this process that TII has been apprised of since initial engagement in 2022.

Having regard to the contents of the draft LPF, TII is unable to ascertain the methodology to be employed by the County Council in the preparation of the proposed Local Transport Strategy for Greystones-Delgany and Kilcoole and is therefore of the opinion that the draft Local Transport Strategy does not represent nor meet the requirements of evidence based transport planning as would be expected to accompany an ABTA or an LTP nor the requirements of County Development Plan Sustainable Mobility Objective CPO 12.3 for the preparation of an LTP for Greystones–Delgany and Kilcoole.

- The draft LPF Infrastructure Objectives (GDK59 to GDK 64) appear to omit the commitment to the preparation of the Local Transport Strategy. Furthermore, there appears to be strong reliance on the already in progress Transportation Study, which is to become the Local Transport Strategy, for the development options, Transport Strategy Map No. 5 and the Infrastructure Objectives presented in the draft LPF. Having regard to this reliance and stated intention to complete a Local Transport Strategy, TII is of the opinion it is in order that the preparation of the Local Transport Strategy be included amongst the Infrastructure Objectives of the LPF.

TII Recommendation 1:

Commitment to the preparation and clarification of the role of the draft LPF Local Transport Strategy having regard to the requirement under County Development Plan Sustainable Mobility Objective CPO 12.3 for the preparation of an LTP for Greystones–Delgany and Kilcoole.

TII recommends that the forthcoming draft LPF proposed Local Transport Strategy for Greystones-Delgany and Kilcoole is recorded as committed to following the established ABTA methodology set out in NTA/TII Guidance.

TII also strongly recommends that the current set of draft LPF Infrastructure Objectives running for GDK58 to GDK64 include a grounding objective clearly committing to the preparation of the Local Transportation Strategy.

In this regard, TII recommends a review and review and revision of the proposed LPF text and / or Infrastructure Objectives to include a dedicated Objective for the undertaking of the proposed Local Transport Strategy in accordance with the ABTA methodology and takes account of policy and interactions with national road networks infrastructure.

Chief Executive’s Response

In line with the County Development Plan objective:

CDP12.3 “In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy (namely Bray and environs, Wicklow–Rathnew, Arklow, Greystones–Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy and any other settlement where it is deemed necessary by the Planning Authority) and utilise these assessments and plans to inform land use and

investment decisions, including the preparation of future Local Area Plan”,

the process of preparing a Local Transport Plan for the Local Planning Framework area has been commenced.

However, a full ABTA / Local Transport Plan has not been completed as part of this LPF; this is regrettable but technical resources have not been available to complete the LTP, and it was decided that the lack of a completed LTP should not hold up progress on preparing a new LPF. The completed stages / tasks of the Local Transport Study have been used to inform the overall development strategy of the LPF and the roads and transportation objectives.

At this stage of LPF making it is considered inadequate time would be available to allow for completion of the full Local Transport Plan, of the form and detail as envisaged by the NTA / TII guidance.

The Chief Executive is committed to completing the LTP as set out in objective CPO12.3, and once the LTP is complete, there will be a review of the Local Planning Framework to consider whether a Variation is needed to ensure the LTP and the LPF are consistent with each other.

Chief Executive's Recommendation

Amend the draft LPF as follows:

Section B:7 Infrastructure

Add new objective

GDK-XX: In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Greystones-Delgany and Kilcoole LPF and integrate its provisions into the LPF as appropriate.

Item 3 Draft Infrastructure Objectives in Section B.7 Infrastructure of the draft LPF

The indicated extent of Infrastructure Objectives of the draft LPF on Map No. 5 Transport Strategy that will create interactions with the N11. In addition, the upcoming proposed Local Transport Strategy may create interactions with the national road network. Therefore, TII strongly recommends explicit recognition of official national roads development policy and TII Publications amongst the Infrastructure Objectives of the LAP to ensure timely Local Transportation Strategy consultation with TII and compatibility of future development with the maintenance of the safe and efficient operation of the national road network in accordance with official national roads policy and TII Publications.

In this regard, TII notes that proposed "GDK 59C" indicated on draft LPF Map No. 5 Transport Strategy is indicated to run under the M11 and appears to be described in section B.7 Infrastructure and Services of the draft LPF as one of the "Greystones-Delgany and Kilcoole Infrastructure Objectives" as follows; "GDK59" is *"To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes:" that include provision "c) Pedestrian and cycling infrastructure from Kilcoole to Newtownmountkennedy"*.

Having regard potential national road network interactions identified in this submission, TII recommends that any proposed LPF objectives or recommendations identified that interact with the national road network do so in a manner that:-

- observes national roads policy set out in Spatial Planning and National Roads Guidelines for

Planning Authorities (DoECLG, 2012); and

- recognises of the existence of and compliance responsibilities for the design and delivery of projects impacting the national roads network under TII Publications (<https://www.tiipublications.ie/>).

In this regard and notwithstanding footnote 25 of the draft LPF for the “Greystones-Delgany and Kilcoole Infrastructure Objectives” which summarily appears to advise that objectives not yet permitted will be subject to design and development management reviews, TII reminds that any alterations to the local Woodstock Road as a result of “GDK 59C” will be required to have regard to the fact that the road travels an N11 overbridge (Eirspan Structure Name: Kilcoole Road Underpass, Structure ID: WW-N11-051.00). This N11 overbridge is a TII Structure, therefore compliance with TII Publications (Technical and Standards) is required and consultation with TII Structures may arise for the implementation of proposed objective “GDK 59C”.

TII Recommendation 2:

Revision of proposed draft LPF Infrastructure Objective GDK 59 to reflect official national roads policy and for the requirements of TII Publications for works potentially impacting the national road network.

Revision of Infrastructure Objective GDK 59 in at section B.7 Infrastructure to include additional objective (t) as follows:

“(t) To protect the strategic function of the N/M11 in accordance with Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.”

Chief Executive’s Response

This draft LPF has been prepared to be consistent with the Wicklow County Development Plan, including all strategies, principles, policies and objectives contained therein.

In addition, this LPF sits under the County Development Plan in the hierarchy of local plans, and therefore the provisions of the County Development Plan apply directly in the LPF area, and as set out in the draft LPF, it was not considered necessary to re-state all of the County principles / strategies / policies / objectives in the LPF itself.

In particular, the County Development Plan includes the following objectives with respect to national roads that will apply directly in the LPF area:

CPO 12.37 *To ensure that the N/M11 and N81 route improvement corridors as defined by TII are protected from inappropriate development and ensure that no development is permitted which would interfere with route options identified (as shown on Map 12.01).*

CPO 12.38 *To co-operate with TII in the upgrade of existing interchanges on the National Routes and where appropriate and necessary, to restrict development immediately adjacent to interchanges to provide for the future enlargement of interchanges.*

CPO 12.40 *To safeguard the capacity and safety of the National Road network by restricting further access onto National Primary and National Secondary roads in line with the provisions of the ‘Spatial Planning and National Roads’ Guidelines’ (DoECLG 2012). In particular, a new means of access onto a national road shall adhere to the following:*

- a. Lands adjoining National Roads to which speed limits greater than 60kmh apply: The creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmh apply shall generally be avoided. This provision applies to all categories of development, including*

individual houses in rural areas, regardless of the housing circumstances of the applicant.

b. Transitional Zones: These are areas where sections of national roads form the approaches to or exit from urban centres that are subject to a speed limit of 60kmh before a lower 50kmh limit is encountered. Direct access onto such road may be allowed in limited circumstances, in order to facilitate orderly urban development. Any such proposal must, however, be subject to a road safety audit carried out in accordance with the TII's requirements and a proliferation of such entrances, which would lead to a diminution in the role of such zones, shall be avoided.

c. Lands adjoining National Roads within 50kmh speed limits: Access to national roads will be considered by the Planning Authority in accordance with normal road safety, traffic management and urban design criteria for built up areas.

CPO 12.41 To ensure that all new developments in proximity to National Routes provide suitable protection against traffic noise in compliance with S.I No. 140 of 2006 Environmental Noise Regulations and any subsequent amendments to these regulations.

CPO 12.42 To protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions, significant applications either in the vicinity of or remote from the national road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development taken in conjunction with other developments with planning permission that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts.

It is therefore considered that the change request is not essential, but the CE has no objection to the suggested alternative wording.

Chief Executive's Recommendation

Amend the LPF as follows:

Section B:7 Infrastructure

Add new objective

GDK-XX To protect the strategic function of the N/M11 in accordance with Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.

Item 4 Conclusion

The contents of this submission accord with existing national, regional and local development policy and objectives related to the national road network and seek to advance the proposed Greystones-Delgany and Kilcoole LPF Variation N. 4 of the County Development Plan in a manner compatible with the maintenance of the safe and efficient operation of the national road network.

Having regard to previous TII submissions to the Pre-Draft stage of the LAP review (TII ref. TII23-125355), previous stakeholder engagement in the preparation of an ABTA by the County Council (TII ref. TII22-117038), TII/NTA Area Based Transport Assessment (ABTA) Guidance, and the contents of this submission TII is available to meet the executives of the County Council alongside the NTA to discuss any issues arising in the foregoing.

Chief Executive's Response

Noted

Land Development Agency LDA

Item 1

The Land Development Agency (LDA) welcomes the opportunity to participate and engage with Wicklow County Council on the preparation of a new Local Planning Framework (LPF) for Greystones Delgany & Kilcoole (proposed variation no. 4 to the Development Plan 2022 – 2028). The LDA is a commercial, state-sponsored, body set up by the Government with two main functions:

- To coordinate appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery; and
- To drive strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilise land values and deliver increased affordability.

Chief Executive's Response

Noted

Item 2 Role and Purpose of the Land Development Agency (LDA)

The enactment of the Land Development Agency Act 2021, which established the LDA, marked a historic move to identify and use certain relevant public lands to provide for housing and affordability needs into the future. It is imperative that the ability of state lands to deliver residential development forms part of policy in County Development Plans, as supported by, and incorporating, relevant local level plans, and that role and mandate of the LDA is recognised as a key part of this delivery.

The primary function of the LDA is to progress the development and regeneration of large-scale, strategic sites to increase the supply of housing in the State, particularly affordable and social housing. It is considered that a significant amount of new development in the coming years in our cities and towns will be large-scale regenerative projects. As part of this regeneration, the LDA is committed to the delivery of quality cost rental homes, at scale.

Cost rental is an emerging rental tenure product for Ireland that is supported by the Department of Housing, Local Government, and Heritage and the Affordable Housing Act 2021. As an emerging rental option, it is noted that cost rental is not widely understood as a tenure type by decision-makers or the public. Cost rental housing provides affordable rented accommodation to people on middle incomes (net household income below €66,000 per annum for Dublin and €59,000 for everywhere else in the country). It is aimed at people who are above the threshold for social housing but have difficulty affording private rented accommodation or purchasing a home.

With cost rental, rent covers the cost of the construction, management, and maintenance of the property, with rents to be set at least 25% below regular market rents. Cost rental offers a long-term, secure tenancy that is more affordable. Over the period up to 2026, Housing for All commits to the delivery of 10,000 cost-rental homes in urban centres by local authorities, Approved Housing Bodies (AHBs), and the LDA.

Chief Executive's Response

Noted

Item 3 Residential Development

In keeping with the overarching principles of the National Planning Framework (first revision), the Eastern and Midland Regional Assembly's Regional Spatial and Economic Strategy (RSES) (which recognises Greystones as a Self-Sustaining Growth Town (level 3) within the Dublin Metropolitan Area), the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) and other relevant policy

documents and Section 28 Guidelines, the LDA is committed to the concept of compact growth and brownfield redevelopment and regeneration. The LDA recognises the importance of infrastructure delivery in supporting residential development and, in this regard, welcomes the intention of the Draft Framework to focus on the provision of 'catch up' infrastructure. The LDA would, however, note that housing delivery should remain a priority, with consideration given to the timeline of residential development in tandem with infrastructure delivery, to ensure a pipeline of development that is implementable within the Plan area over the short to medium term.

As a state-sponsored home builder, the LDA can assist Wicklow County Council in achieving the Housing Objectives set out in B.2 'Residential Development' of the Draft LPF. It is considered that inclusion of an objective under these Housing Objectives, promoting the delivery of a range of housing types and tenures, would assist in providing a broader range of residential development types in the plan area, in support of the varying needs of the area's residents, addressing issues of affordability. Wording to the effect of the following is suggested:

To promote and facilitate the development of a range of residential development types, tenures and sizes, including affordable and cost-rental properties, in order to cater for the varying housing needs and economic circumstances of the area's population.

Furthermore, it is respectfully suggested that an objective supporting the work of the LDA should be included, to provide a policy basis for any future development that the LDA may bring forward in the plan area. An objective could make reference to the delivery of affordable and cost-rental housing types, which can be delivered by the LDA and other relevant housing stakeholders, such as Approved Housing Bodies (ABH's). The below wording is recommended:

Wicklow County Council shall proactively work with The Land Development Agency, Approved Housing Bodies (AHB's) and other relevant stakeholders, to deliver a range of residential tenures to meet the requirements of the population. Wicklow County Council will support the delivery of affordable and cost-rental housing types on appropriate lands, subject to compliance with the policies and objectives of this LPF, the Development Plan and other relevant national and regional policies and guidelines.

Chief Executive's Response

With respect to the request for policy support of various tenure types, and support for the work of the LDA, the CE recommends this being included in the LPF.

Chief Executive's Recommendation

Amend the LPF as follows:

Section B.2 Housing Objectives

Add new objective

GDK-XX To promote and facilitate the development of a range of residential development types, tenures and sizes, including affordable and cost-rental properties, in order to cater for the varying housing needs and economic circumstances of the area's population. In particular, Wicklow County Council shall work with the Land Development Agency, and other relevant stakeholders, to deliver a range of residential tenures to meet the requirements of the population including (but not limited to) affordable and cost-rental housing types on appropriate lands, subject to compliance with the policies and objectives of the LPF, the County Development Plan and other relevant national and regional policies and guidelines.

Item 4 Conclusion

The LDA supports Wicklow County Council in the progression and ultimate implementation of a Local Planning Framework for the Greystones-Delgany & Kilcoole area. The LDA requests that this submission is taken into consideration, and, where appropriate, amendments are made to the text and objectives of the LAP to further strengthen the policy framework for the sustainable development of Greystones-Delgany & Kilcoole, and the delivery of affordable housing opportunities at appropriate sites.

The LDA look forward to working with Wicklow County Council, and other stakeholders, to promote and progress the development of state land to provide sustainable residential communities.

Chief Executive's Response

Noted

Item 1 EirGrid Context

EirGrid as Transmission System Operator (TSO) develops, manages and operates the transmission grid in Ireland. The grid transports power from where it is generated to where it is needed. EirGrid is also leading the secure transition of the electricity grid to a sustainable low-carbon future. The grid brings power to industry and businesses that use electricity. It also powers the distribution network, owned and operated by ESB Networks, which supplies the electricity used in homes, businesses, schools, hospitals and farms. EirGrid balances supply and demand every minute of the day, while also planning for Ireland's long-term electricity needs.

To prepare for and facilitate future development throughout Ireland, EirGrid must make the electricity grid more resilient and increase flexibility. The grid will need to carry more power and EirGrid will need to upgrade and add to existing grid infrastructure – primarily comprising underground cables and overhead lines and substations.

The European Communities (Internal Market in Electricity) Regulations 2000 (SI 445 of 2000) sets out the role and responsibilities of the TSO; Article 8(1) (a) gives EirGrid, as TSO, the exclusive function: "To operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical and efficient electricity transmission system, and to explore and develop opportunities for interconnection of its system with other systems, in all cases with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment." It is in this statutory context that EirGrid is undertaking the planning and development of grid infrastructure in the Eastern and Midland Region.

The EirGrid Strategic Framework for Grid Development in the Eastern & Midlands Region¹ provides a programme of grid development within the region. Powering Up Wicklow, a critical programme of works will strengthen key electricity infrastructure in Wicklow and the surrounding areas, helping to make Ireland 'renewable ready' and provide a consistent and reliable supply of electricity for Wicklow.

In the Greystones-Delgany & Kilcoole area a new substation is planned, connecting to the existing Arklow-Carrickmines 220 kV circuits and ensuring a strong electricity supply to the expanding surrounding urban areas.

Chief Executive's Response

Noted

Item 2 Submission Context

Section A2.8 Service Infrastructure Page 13 acknowledges the need to facilitate and promote the delivery of reliable energy infrastructure in the area. This is in line with EirGrid's mandate to '*develop a safe, secure, reliable, economical and efficient electricity transmission system*'.

However, EirGrid request that this statement is strengthened by adding the proposed addition below, acknowledging the need to reinforce the existing network in this area. This reinforcement will provide security of supply and capacity for future growth in line with the Draft Greystones-Delgany and Kilcoole Local Planning Framework.

Draft Local Planning Framework text (page 13):

Service Infrastructure Strategy: (proposed addition text in pink)

"Facilitate and promote the delivery of reliable and effective water, drainage, energy, waste management and communications infrastructure to service the existing and future development needs of the settlements in the LPF"

area. In particular:

- to support and facilitate making the electricity grid more resilient, increasing flexibility and carrying more power.

Chief Executive's Response

The County Development Plan policies, objectives and standards will all apply directly in the LPF area, and care has been taken in the crafting of the LPF to ensure unnecessary repetition and that the LPF includes restatement / elaboration of the County Development Plan objectives only where the local context requires same. In this regard, the County Development Plan already provides for the following objectives:

Transmission & Distribution Objectives

CPO 16.18 *To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required.*

CPO 16.19 *To facilitate planned growth and transmission / distribution of a renewable energy focused electricity generation across the main demand centres.*

CPO 16.20 *To support roll-out of the Smart Grids and Smart Cities Actions enabling new connections, grid balancing, energy management and micro grid development.*

CPO 16.21 *To facilitate high energy demand development only at appropriate locations, most accessible to the National Grid.*

CPO 16.22 *To suitably manage development within 35m of existing 110KV/220kV transmission lines.*

CPO 16.23 *To support and facilitate the development of landing locations for off shore generated wind energy and for any cross channel power interconnectors.*

It is considered that these County objectives would provide strong policy to support and facilitate making the electricity grid more resilient, increasing flexibility and carrying more power. Therefore no change is recommended.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 3 Conclusion

Finally, Eirgrid would welcome the opportunity to meet and discuss the Powering Up Wicklow Programme in greater detail. Should you have any queries or require any additional information please do contact us.

Chief Executive's Response

Noted

Uisce Éireann (UÉ)

Uisce Éireann (UÉ), welcomes the opportunity to submit observations on the proposed Draft Local Framework Plan and associated Variation to the CDP. In addition to our submission at the Issues Paper Stage, we have some high-level comments below.

Chief Executive's Response

Noted

Item 1 Section A2.8 - Service Infrastructure and Objective GDK 64

To support sustainable use of the available hydraulic capacity in combined sewers, UÉ welcomes the promotion of SUDs and in particular promotion of Nature based SUDs (NbSUDs). However, we would recommend the introduction of further objectives in the LFP to promote the introduction of NbSUDs in areas contributing to combined drainage systems (for example where street scape enhancement programmes or resurfacing programmes are planned).

Keeping surface water out of combined sewers (and removing where possible) will increase capacity for foul drainage for new developments.

Chief Executive's Response

The Wicklow County Development Plan provides a suite of objectives to address the issue of surface water management that will apply directly in the LPF area:

CPO 13.20 *Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks.*

CPO 13.21 *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*

CPO 13.22 *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

The CE is happy to recommend an additional objective to address the issue raised.

Chief Executive's Recommendation

Amend LPF as follows:

Section B:7 Infrastructure

Add new objective

GDK-XX *Developments, including new/expanded developments and any planned improvements to existing urban spaces, shall be designed in accordance with the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" LAWPRO 2024.*

Item 2 Section 7.3 Water Infrastructure

Greystones Wastewater Treatment Capacity is approximately correct.

Kilcoole is slightly high and is approx. 1250PE.

New capacity registers are due to be issued shortly and will be forward to the LA. The remaining capacity available changes regularly and our registers are only an indication of available capacity. In all instances if someone is considering progressing a development, they should contact our Developer Services team who will provide a greater level of detail in relation to capacity available.

Chief Executive's Response

Noted

Item 3 SLO1 Mill Road

Greystones Wastewater Treatment Works is immediately west of the site and a sewer runs north-south along the western boundary. The TW outfall and a 2nd pipeline run along the southern boundary. A buffer zone between the WWTW and new housing would be desirable. Wayleaves would need to be maintained to protect the pipelines and allow access for maintenance.

Chief Executive's Response

Should any development proposals come forward for SLO-1 lands, the question of appropriate set-backs and wayleaves can be determined through the development management process.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 4 SLO4 Coolagad & Item 6 SLO6 Ballydonarea

SLO4: This is a large land bank on the periphery of the sewer network. This will impact the downstream network. Both sewer and watermain upgrades are likely.

SLO6: Watermain upgrades are likely.

Chief Executive's Response

Noted. It is recommended that an amendment be made to the Appendix 6 to the draft LPF to note said infrastructure improvement requirements.

Chief Executive's Recommendation

Amend LPF as follows:

Appendix 6 Infrastructure Assessment & Implementation Programme

Amend as follows:

Infrastructure assessment and requirements for key development areas (identified as SLOs)

Site ID	Current servicing status				Additional infrastructure needs to support full development of site
	Water Supply	Wastewater Infrastructure	Surface Water Infrastructure	Roads & Transportation	
SLO1: Mill Road – South Beach	1	1	1	1	N/A
SLO2: Mill Road	1	1	1	1	N/A
SLO3: Charlesland	1	1	1	1	N/A
SLO4: Coolagad	1 2	1 2	2	1	Surface Water - Surface Water Management Plan required – Developer + WCC Wastewater and water supply main upgrades downstream - Developer + UE Sports / Amenity Park – Developer Community facilities – Developer +WCC
SLO5: Bullford	1	1	1	1	Sports / Amenity Park – Developer Community facilities (childcare) – Developer Additional community facilities – Developer +WCC
SLO6: Ballydonarea	1 2	2	1	1	Wastewater Services - Drainage Area Plan required – Developer + WCC + UE Watermain upgrades - Developer + UE Amenity Park – Developer Community facilities (childcare) – Developer Additional community facilities – Developer +WCC
SLO7 : Three Trouts	1	1	1	1	Amenity Park – Developer

1 = serviced, 2 = serviceable, 3 = unserved

Item 5 SLO5 Bullford

The site is part of the Kilcoole WWTW agglomeration. A sewer traverses the site and a wayleave will be required (or diversion / build-over agreement)

Chief Executive's Response

Should any development proposals come forward for SLO-5 lands, the question of appropriate set-backs and wayleaves can be determined through the development management process.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 7 Appendix 6 Infrastructure Assessments, Section 3.3 Water Supply

Typo in table of contents should read 3.1 Water Supply
Water Supply forms part of the overall Greater Dublin Area which is currently constrained.

Chief Executive's Response

Noted. This will be corrected as a change consequent. There is no need for a formal amendment to be recommended.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 8 3.2 Wastewater Treatment

Kilcoole WWTW Capacity @1,250 approx. New Capacity Registers to be issued shortly.

Chief Executive's Response

Noted

Item 9 Map changes

Map Title Change from 'Greystones Delgany Sewer and Storm Network' to 'Greystones Delgany Sewer and Combined Sewer Network'. (Lines in red are foul sewers. Lines in green are combined sewers)

Chief Executive's Response

Noted. This will be corrected as a change consequent. There is no need for a formal amendment to be recommended.

Electricity Supply Board (ESB)

Item 1 Preamble

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, relating to the Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) 2025 - 2031. ESB is a landowner and employer in Wicklow with property and infrastructural assets throughout the County.

ESB acknowledge the aim of the Draft LPF to establish a land use framework that will guide the future sustainable development of the Greystones – Delgany & Kilcoole area. We recognise that the LPF will be informed by the hierarchy of planning documentation, particularly the Wicklow County Development Plan 2022 – 2028.

ESB welcome the recognition in Section A2.8 of the Draft LPF that “Adequate infrastructure is vital for the facilitation to future development of Greystones – Delgany and Kilcoole”. In relation to energy infrastructure this section also states.

“Facilitate and promote the delivery of reliable and effective water, drainage, energy, waste management and communications infrastructure to service the existing and future development needs of the settlements in the LPF area, in particular: to promote energy efficiency and the development of renewable energy projects”

ESB asserts that the development of critical electricity infrastructure should be a focal point in the LPF. Presently, there is inadequate capacity within our networks servicing the specified areas. It is imperative for the LPF to address these deficiencies and facilitate the requisite enhancements to the electricity network through the provision of promoting policies. Below are the key strategic considerations that must be taken into account during the preparation of the final Local Planning Framework.

Chief Executive’s Response

The County Development Plan policies, objectives and standards will all apply directly in the LPF area, and care has been taken in the crafting of the LPF to ensure unnecessary repetition and that the LPF includes restatement / elaboration of the County Development Plan objectives only where the local context requires same. In this regard, the County Development Plan already provides for the following objectives with respect to electricity:

Transmission & Distribution Objectives

CPO 16.18 To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required.

CPO 16.19 To facilitate planned growth and transmission / distribution of a renewable energy focused electricity generation across the main demand centres.

CPO 16.20 To support roll-out of the Smart Grids and Smart Cities Actions enabling new connections, grid balancing, energy management and micro grid development.

CPO 16.21 To facilitate high energy demand development only at appropriate locations, most accessible to the National Grid.

CPO 16.22 To suitably manage development within 35m of existing 110KV/220kV transmission lines.

CPO 16.23 To support and facilitate the development of landing locations for off shore generated wind

energy and for any cross channel power interconnectors.

It is considered that these County objectives would provide strong policy support to facilitate ESB projects in the LPF aimed at addressing deficiencies and enhancements to the electricity network. Therefore no change to the LPF is recommended.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 2 Overview of ESB Strategy

ESB is Ireland's foremost energy company and the largest supplier of renewable electricity in Ireland. Through innovation, expertise, and investment, ESB is leading the way in developing a modern, efficient electricity system that is capable of delivering sustainable and competitive energy supplies to customers in the 'all-islands market' (Republic of Ireland, Northern Ireland, England, Wales and Scotland). ESB operates a renewable energy portfolio that has a total of over 1.8GW of green energy generation connected to the grid.

To support transformation of the energy sector, ESB is embracing new technologies that are revolutionising the energy industry, including smarter electricity networks. We are investing in sustainable energy solutions that harnesses the power of solar, wind, wave, storage and green hydrogen to provide a cleaner future. Meanwhile we continue to play a key role in maintaining our existing operations to support security of supply for Ireland. Our objective is to develop and connect renewables to decarbonise the electricity system by 2040. ESB's progress towards achieving carbon net-zero operations is consistent with the objectives of the National Planning Framework (NPF) and Regional Spatial & Economic Strategy (RSES) for the Eastern and Midland Region.

Chief Executive's Response

Noted

Item 3 Electricity Transmission and Distribution

ESB Networks provides an essential service building and maintaining the electricity networks in Greystones – Delgany & Kilcoole and throughout Co. Wicklow. It is responsible for constructing all the sub-transmission, medium and low voltage electricity network infrastructure in the county and for managing this infrastructure, which is owned by ESB.

To support sustainable development in the plan area, ESB recommends that Section B.7 of the Local Planning Framework include wording and policies aligned with the objectives set out in Chapter 16, Section 16.3 of the Wicklow County Development Plan 2022–2028. This alignment ensures consistency between county-level strategy and local implementation, enabling local development to contribute effectively to broader regional and national sustainability goals.

ESB owns and operates 3 No. 38kV substations within the boundaries of the Draft LFP, 2 No. substations are located within Greystones, with 1 No. located in Kilcoole. These assets form a critical element of ESB operations locally and regionally. The electricity grid within the region currently possesses limited capacity to accommodate new development. This constraint, until resolved, will impede the attainment of the target of 1,953 new dwellings and the desired economic growth in Greystones – Delgany & Kilcoole.

Significant reinforcement of the existing transmission grid is urgently needed in the Greystones–Delgany and Kilcoole areas, including the development of at least one new 38kV substation within the LPF boundary and close to Greystones itself. In addition, a new 110/38kV will be required in the area west of Greystones, along with a new 220/110kV station close to the existing 220kV circuit, west of the N11. These interventions are

required to meet future residential and economic demand. Currently the Draft LPF does not address this critical infrastructure requirement in either Section A2.8 Service Infrastructure or Section B.7 Infrastructure and Services.

ESB requests early collaboration with Wicklow County Council to identify optimal locations for the infrastructure identified within the Greystones – Delgany area. In the interim, it would be prudent for the Council to identify the need for a provisional site adjacent to the proposed development zone. Furthermore, ESB advises the incorporation of a policy within Section B.7 of the plan that acknowledges the necessity for these additional substations. A clear policy that includes the text below, along with an area identified on the map, would be helpful.

"It is a policy of this Local Planning Framework to safeguard the reservation of lands, as identified by the Council, for the provision of a new 38kV ESB Substation within the plan area."

In addition to a new 38kV substation, deep reinforcement of the existing grid is essential to support the planned levels of sustainable growth in the Greystones–Delgany and Kilcoole areas. Upgrades to current infrastructure are needed to maintain adequate local and regional connectivity and to enable the integration of renewable energy sources, such as offshore wind generation, into the network.

ESB would welcome opportunities to future proof delivery of electricity infrastructure through greater collaboration between ESB and Local Authorities. Early engagement at design stage of key public infrastructure projects, e.g., new roads, public realm upgrades, and greenways, offer opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services. Please contact the local ESB Networks Office to ensure input from ESB Networks at an early stage of project design.

Chief Executive's Response

As above, the County Development Plan policies, objectives and standards will all apply directly in the LPF area, and care has been taken in the crafting of the LPF to ensure unnecessary repetition and that the LPF includes restatement / elaboration of the County Development Plan objectives only where the local context requires same. It is considered that these County objectives would provide strong policy support to facilitate ESB projects in the LPF aimed at addressing deficiencies and enhancements to the electricity network. Therefore no change to the LPF is recommended.

With respect to the identification of a site for a new substation, it is considered it would inappropriate and premature for the Council to simply 'select' a site without detailed investigation and collaboration with the ESB being undertaken. The draft LPF however clearly allows for 'utility installations in virtually all zones of the LPF, therefore a wide range of options would be available when the ESB is ready to initiate site selection.

The Council is happy to work with the ESB on such projects.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item Electric Vehicles

With Ireland's natural advantages in terms of wind and other renewables a large proportion of the power used by electric cars will be carbon free in the future. The Irish Government's Climate Action Plan 2024 has set stretching targets for EV adoption in Ireland to address energy demand and reduce emissions from Transport including achieving:

- 845,000 passenger vehicles by 2030.

- 150,000 electric vans and trucks by 2030.
- Procuring 1,200 low-emissions buses for public transport in cities.
- Building the EV charging network to support the growth of EVs at the rate required and develop our fast-charging infrastructure to stay ahead of demand.
- New scheme for 200 on-street public charge points per year for electric vehicles

The above targets demonstrate that EV's (incl. plug-in hybrid electric vehicles PHEV's) are central to Government targets for zero carbon emissions transportation systems. The establishment of EV infrastructure by ESB and the associated EV usage aligns with the key principles and benefits of sustainability and the National Climate Change Strategy on reduction of emissions. There are currently over 84,000 EVs and Plug-in hybrids registered on Irish roads, so while the number has improved, the pace of uptake must increase over the coming years to achieve our fleet electrification targets.

In this regard, ESB calls for the reinforcement of County Development Plan Strategic Objectives TM10 and TM11 in the LPF.

"Promote and facilitate the provision of EV Charging infrastructure in appropriate locations throughout the county."

"Ensure that all new development comply with national guidelines on EV infrastructure provision."

Chief Executive's Response

The LPF is a variation of the County Development Plan (CDP), therefore the LPF is part of the CDP. The CDP policies, objectives and standards all apply directly in the LPF area, and care has been taken in the crafting of the LPF to ensure unnecessary repetition and that the LPF includes restatement / elaboration of the County Development Plan objectives only where the local context requires same. In this regard, the County Development Plan already provides for the following objectives:

Climate Action & Environmental Protection Objectives

CPO 12.7 *To facilitate the development of services and utilities for electric vehicles and alternative fuel vehicles types, including the roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations.*

CPO 12.8 *To require the implementation of the following standards for EV charging in new developments:*

Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Installation of at least 1 recharging point. Installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces) Installation of ducting infrastructure for every parking space within property boundary.
New (single-unit residential) buildings	New 'own door' dwelling with car parking space located within the property boundary.	Installation of recharging points for electric vehicles on site.
New (single-unit residential) buildings	New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.	Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents. Installation of ducting infrastructure for every parking space within development.

Public Transport Objectives

CPO 12.21 *To promote the development of transport interchanges and 'nodes' where a number of*

*transport types can interchange with ease. In particular:
□ to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;*

Parking Objectives

CPO 12.56 *New / expanded developments shall be accompanied by appropriate car parking provision, including provision for electric vehicle charging points as set out in Objective CPO 12.8...*

Transport Energy Objectives

CPO 16.30 *To facilitate the development of services and utilities for electric vehicles and other low emission alternative vehicles / fuel types, including the roll-out of additional electric charging points and alternative fuel distribution infrastructure in collaboration with relevant agencies at appropriate locations.*

It is considered that these County objectives would provide strong policy to support and facilitate the provision of EV Charging infrastructure and to ensure compliance with national guidelines. The inclusion of an additional objective is therefore not considered necessary

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item Conclusion

ESB is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. In this regard, we support the ambition of the Draft LPF to deliver a land use framework that will guide the future sustainable development of the Greystones – Delgany & Kilcoole area.

Chief Executive's Response

Noted

Department of Education & Youth

Item 1 Preamble

The Department of Education and Youth wish to make the following submission to proposed Variation 4 of the Wicklow CDP 2022-2028. The department has considered the document and notes that the proposed variation will integrate the Greystones-Delgany and Kilcoole Local Planning Framework 2025 into the Wicklow County Development Plan 2022-2028.

The department also notes that the variation states that *"the LAPs/ LPFs do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation."*

In the context of the proposed variation, the department understands the rationale behind this statement, However it should be noted that in its consideration of future school place needs, the department, in conjunction with its assessment of future draft LAPs/LPFs population data, will equally examine and assess school place needs arising from any National Planning Framework amended population growth figures for Wicklow settlements even if those figures cannot be reflected in future draft LAPs/LPFs.

Chief Executive's Response

The residential development objectives of the LPF including land zoning provisions have been made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LPF, with flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Following the revision of the National Planning Framework, new population / housing targets were issued in July 2025. In accordance with Ministerial guidance, a staged process of review of these new targets is now commencing, with a view to determining if a variation of the Wicklow County Development Plan will be required to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out. It is only at that stage will it be known if it is intended to increase the population growth rate in Greystones-Delgany and Kilcoole to the extent that the local plan would require revision, for example to zone more land for housing than already set out in the draft LPF and indeed zoned/ identify more land for community infrastructure such as schools.

At this time, it is not evident that additional land will be required to be zoned in Greystones-Delgany in particular over and above that already provided for in the draft LPF to meet any increased targets, given the amount of land proposed to be zoned therein vis-a-vis the current Core Strategy target for the settlement, which has already been met / exceeded i.e. the land proposed to be zoned in the draft LPF may well be adequate to meet even an increased target. In addition, the provisions of the draft LPF with respect to school provision are designed to meet the longer term needs of the wider area. However, in the event that additional school needs are identified through the review of the new housing targets, these can be addressed during this LPF making process or via a future amendment to the LPF.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 2 Population

In the context of future population trends and their potential impact on school place requirements, the department notes that this draft Framework refers to the population growth identified for Greystones-Delgany and Kilcoole in the recent Wicklow County Development Plan 2022-2028. The department notes that the population scenario envisaged for Co Wicklow overall is the high NPF target of 157,500 people by 2026 and 164,000 by 2031. The plan has a proposed population target of 21,727 by 2028 for Greystones-Delgany and 4,778 by 2028 for Kilcoole. The department made its submissions to the CDP regarding Greystones-Delgany and Kilcoole on the basis of the potential population growth within the settlement and its environs between 2022 and 2031.

In terms of future population growth in Greystones-Delgany and Kilcoole as identified in the draft LPF, the department notes that Table 2.1 outlines a proposed 2031 population target 22,081 for Greystones-Delgany and 4,778 for Kilcoole. Table 2.20 contains housing growth targets for 2031, allowing for the Census 2022 average per household figure of 2.84 identified for County Wicklow, these proposed 8,719 and 1,738 units could see a population increase to 24,762 in Greystones-Delgany and 4,936 in Kilcoole. The department is equally mindful that the current NPF review has the potential to allocate a further projected population increase that could go beyond 24,762 and 4,936.

The department notes in the County Development Plan Core Strategy section of the LPF that the focus during the period of this LPF will be on the provision of 'catch up' infrastructure to match this significant residential growth and with respect to further residential development, will be on infill development and consolidation of the built-up area.

Chief Executive's Response

Noted

Item 3 Greystones-Delgany

There are eleven schools (eight primary and three post-primary) located in the Greystones-Delgany area. The department's preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases.

In respect of primary provision, the projected growth figures could see an increase in primary school place demand, but it is currently expected that this extra requirement could be accommodated by the expansion of existing facilities. However, the department is also mindful of potential population growth beyond 2031 and will continue to assess its requirements on an ongoing basis.

In the context of the variation report's analysis of post primary provision, the department has recognised a need to expand capacity in the relevant schools. The department acknowledges that the proposed projects for these schools are referenced in section 5.1 of the Variation 4 report. In terms of the individual schools mentioned, the department notes the following text:

"The Department of Education has approved an expansion of 250 additional places at Temple Carrig School, increasing the capacity up to 1,000 students. However, no physical expansion has been sought / approved as yet, and given the current enrolment of c. 950 students, extension is unlikely to result in any significant capacity improvements."

It should be noted that the purpose of this project is to provide various additional aspects of school accommodation where the provision of extra mainstream classroom places is but one. This project is ongoing and will cater for, support and improve the school's various accommodation requirements in the context of the school capacity being that of a 1,000 pupil school. The department respectfully requests that the text in

section 5.1 above be amended to reflect the text outlined in this paragraph.

Chief Executive's Response

Zoning around existing schools

Wherever feasible given adjoining land uses, this LPF makes provision for CE zoned land surrounding existing schools to allow for possible expansion. However, school development is allowed in all zones, so this is not an 'essential' policy provision needed to support possible school expansion.

Expansion of Temple Carrig School

The Department's submission is noted, it is not considered necessary to update the text to reflect the Department's request as there is no error in the LPF text. Permissions / consent has not yet been sought / granted for the proposed development and in the meantime, the text is relevant.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 4 Kilcoole

There are two schools (one primary and one post-primary) located in Kilcoole town. The department's preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases.

In respect of primary provision, the projected growth figures could see an increase in primary school place demand, but it is currently expected that this planned extension of Kilcoole Primary School and the increased capacity for this school may be able to cater for future potential needs resulting from the potential future population growth scenarios as identified above. However, the department is also mindful of potential population growth beyond 2031 and will continue to assess its requirements on an ongoing basis.

In the context of the variation report's analysis of post primary provision, the reference to **Colaiste Chraobh Abhann's** expansion is noted. The report states that *"This extension will only provide for a capacity increase of c. 200 students, considering the numbers currently enrolled"*. In the context of current enrolment figures, the proposed project will increase capacity by c. 200 pupils as identified above. However, it should be noted that this increase represents a 20% increase on current enrolment, which is significant. Therefore, the department would appreciate if the text could be amended to read as follows *"This extension will provide for a capacity increase of c. 200 students above the numbers currently enrolled"*.

In terms of the identification of future school place requirement that necessitates the need for the reservation and acquisitions of sites for future new schools or the requirement of new sites to facilitate the relocation of existing schools, the department would like to highlight the following points.

Chief Executive's Response

The Department's submission is noted, however it is not considered necessary to update the text with respect to the planned expansion of CCA as the text is not inaccurate.

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

Item 5 General

New school sites alongside other amenities

It is generally considered that schools are enabling infrastructure for housing and as such, schools should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and outside school hours. Further to this, other community facilities and amenities should also be positioned close to school facilities to allow for all community facilities be complimentary to each other for the benefit of the whole community. It is the department's request that the site identified fits the criteria above and would be grateful if the Council could confirm if this is the case.

Enabling infrastructure

Further to this, all enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools. This infrastructure includes road, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school facilities. It should be noted that it is not within the remit of the Department of Education and Youth to develop or fund this enabling infrastructure.

Future-proof the LPF

In relation to other aspects of the draft plan, the department notes 5.1 Education Primary schools that while this LPF does not provide for a rate of population and housing growth that would likely result in the need for an additional primary school in the short term, in order to future-proof the LPF, a new objective shall be provided which allows for the development of new primary schools on all land use zones (other than OS1 and OS2) subject to sufficient (*submission ended here*).

The department notes 5.1 Education Secondary schools that while this LPF should nevertheless be future proofed, given (a) that it is not clear that a new secondary school will be needed in Greystones – Delgany or Kilcoole in the short to medium term, (b) the large land need for a new secondary school (up to 5ha) and (c) the lack of suitable undeveloped lands close to existing residential areas within the LPF area, it is not considered appropriate to specifically identify a site for a new secondary school in the LPF area. However, as above, a new objective shall be provided which allows for the development of new secondary schools on all land use zones (other than OS1 and OS2) subject to sufficient spatial separation from any existing secondary school.

Pedestrian and cyclist permeability, safety and access to schools and public transport

The department notes and welcomes Objective GDK59 - to support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport, in particular to support and facilitate the Safe Routes to Schools programme.

SEA Alternative 5: Community Driven

The department notes and supports 6.7 Alternative 5: Community Driven which is a development strategy which focuses on healthy communities, where residents have all necessary facilities and services within short walking/cycling distance of their homes. A key component of the strategy is - Extra lands, above the minimum requirement for new schools are zoned close to residential areas.

AOS zoned land / educational needs

The department notes Land Use Zoning: Active Open Space (AOS) of the Strategic Flood Risk Assessment that having regard to the potential longer term education needs in the Greystones – Delgany area which have not

been determined at this time but may arise; the physical and environmental constraints present in the area; and the space required particularly for new secondary schools, the development of new schools shall be permissible in principle in all land use zones in this LPF, other than OS1 and OS2, subject to the following criteria (in addition to all normal planning considerations) being fulfilled: In order to ensure an appropriate spatial distribution of schools throughout the LPF area and to ensure maximum accessibility of all residential areas to schools, no new primary school shall be located within a 10-minute walking time of any existing primary schools or no new secondary school shall be located within a 20-minute walking time of any existing secondary schools; The site has excellent public transport and active travel infrastructure in situ, or planned and committed to coincide with a new school opening at the site.

CE zonings around existing schools

The department notes and welcomes the recommendation in the Primary Schools section of the Social Infrastructure Audit that sufficient zoned CE will be maintained where feasible around existing schools.

Special Educational Needs (SEN) classrooms / schools

The department also anticipates that additional Special Education Needs (SEN) provision at both Primary and Post Primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation or space to meet this growing need. On a point of information, the Department of Education and Youth engages closely with the National Council for Special Education in relation to the forward planning of new special classes and additional special school places. The National Council for Special Education (NCSE) has a statutory function to plan and co-ordinate the provision of education and support services to children with special educational needs, in consultation with the relevant education partners and the Health Service Executive (HSE). This includes the establishment of special class and special school placements in various geographical areas where there is an identified need.

The department and the NCSE are working with schools and patrons to make increased provision for children with special education needs, both in special classes at mainstream schools and in special schools. At post primary level, all schools have been advised to plan for an average of 4 special classes per school. At primary level, the focus is on ensuring appropriate provision at all medium to large primary schools (8 mainstream classes or more) in the first instance. Most special classes are established in existing accommodation and where there is a further requirement within that accommodation, additional capacity can be catered for through the provision of extension facilities.

In recent years, the department has seen an increase in SEN school place requirement. Since 2019, 11 new special schools have been established, with five more due to be established for the 2025/26 school year. The continuing need for additional provision across the country, including in County Wicklow, is kept under constant review. In this regard, the department will consult with the Council if and when additional special education needs accommodation or sites for future special schools are required within specific locations. In the context of this draft LPF and being mindful of a substantial population growth that may arise from the various future planned housing developments within its environs, the department would welcome explicit support within the plan for the provision of school accommodation for children and young people with special educational needs.

Unforeseen circumstances

In terms of assessing current and future capacity, the Department of Education and Youth has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time. The department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location.

Finally, the department welcomes the continued engagement with the Council regarding the development of both new and existing schools, as appropriate, and emphasizes the critical importance of the ongoing work of the Council in ensuring sufficient land is zoned for this purpose.

Chief Executive's Response

Zoning around existing schools

Wherever feasible given adjoining land uses, this LPF makes provision for CE zoned land surrounding existing schools to allow for possible expansion.

New school sites alongside other amenities

There is no specific new school site designated within the LPF boundary. It is an objective of the LPF (GDK39) to allow for the development of new schools on all land use zones (other than OS1 and OS2) subject to sufficient spatial separation from any existing schools.

Enabling infrastructure

Noted; the objectives of the LPF and operational of the Local Authority and other state infra agencies support the delivery of infrastructure where required to support essential development.

Future-proof the LPF

Noted

Pedestrian and cyclist permeability, safety and access to schools and public transport

Noted

SEA Alternative 5: Community Driven

Noted

AOS zoned land / educational needs

Noted

CE zonings around existing schools

Noted

Special Educational Needs (SEN) classrooms / schools.

Noted

Unforeseen circumstances.

Noted

Chief Executive's Recommendation

No change to Proposed Variation / draft Greystones-Delgany and Kilcoole LPF

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.2 Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022 – 2028

Part A.1 Proposed Changes to Chapter 1

No relevant submissions received

Part A.2 Proposed Changes to Chapter 3

No.	Name	Issues Raised
23	Liam O' Meara	<p>This submission is seeking a change in zonings for a specific site in Delgany - this zoning issue is dealt with under the 'zoning' section of this report.</p> <p>In support of their rezoning request, this submission considers Chapter 3 of the County Development Plan as presented in this Variation, in the context of the specific parcel of land that is the subject of this submission.</p> <p>It is put forward that it is evident that, given the imminent ministerial guidelines to zone more land for residential development, that a surplus of suitably located and serviced land should be zoned in the LPF for residential development. This section of Part A concludes with affirmation that the Council will adhere to the principles of compact growth, sequential development and phasing.</p>
85	Kathleen Kelleher	The submitter puts forward that planning is too short term, five or six years and that it needs to be looking ahead at least 30 years.
Chief Executive's Response		
<p>This framework is crafted under the principles of compact growth, sequential development and phasing. It is acknowledged that new housing targets have been issue by the Minister and the LPF has been crafted in a way to ensure flexibility to accommodate any additional housing target increase in the LPF area that may arise on foot of these new targets. In particular, the residential zoning provisions have provided for more zoned land than would be required to meet the current Core Strategy requirements, in order to prepare for potential higher targets.</p> <p>With respect to longer term planning, in the hierarchy of plans, the County Development Plan / Local Planning Framework is consistent with the National Planning Framework (2022 - 2040) and the Regional Spatial and Economic Strategy (2019 - 2031). Both of these National and Regional Plans are longer term plans and the CDP sits under these plans. It is also important to note that under the new Planning and Development Act 2024, County Development Plans will increase in lifespan from 6 to 10 years.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Part A.3 Proposed Changes to Chapter 17

No relevant submissions received

Part A.4 Proposed Changes to Chapter 19

No.	Name	Issues Raised
25	Hubi Kos	Protection of Coastal and Flood-Prone Zones The Council's recognition of the importance of coastal zone management is appreciated by the submitter. The submitter encourages the continued protection of flood-prone areas and the enforcement of building restrictions in zones vulnerable to erosion or sea-level rise. The submitter considers that the "worst-case scenario" forecast of potential flooding highlights the foresight the Council has to future-proof vulnerable areas.
31	Kilcoole Residents & Community Development Association (KCDA)	Coastal Cells – Marine Spatial Planning and Coastal Zone Management KCDA finds it difficult to understand the exclusion of Kilcoole from a series of 12 Coastal Cells. They put forward that the logical one for the coastal community of Kilcoole to be part of would be Cell 5 Greystones to Kilcoole (Ballynerrin). Kilcoole is in fact excluded and its settlement boundary is the limit of this and the next cell, Cell 6 Kilcoole to Wicklow Town (The Murrough). Their view is that all of Kilcoole be included in Coastal Cell 5. Access to the coast at Kilcoole was improved by Irish Rail during 2023 with the replacement of the turnstyle-type gate with an improved access arrangement suitable for the disabled, infirm and buggies with a traffic light system which improves the safety of the rail corridor greatly.
Chief Executive's Response		
<p>Submission no. 25 is noted. The Council is committed to implementing the both the flood risk and the coastal zone objectives of the Wicklow County Development Plan and this LPF with a view to reducing future flood risk and protecting coastal areas.</p> <p>Kilcoole The coastal zone management strategy set out in the County Development Plan uses 'coastal cells' as the spatial definition of the coastal area. Only settlements 'on' the coastline have been included in any coastal cell, and the 'settlement' of Kilcoole does not extend to the coast (similar to Newcastle). Ballynerrin and the Murrough are the 2 coastal cells between Kilcoole and the coastline.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Part B Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022 – 2028

Part B.1 Proposed Changes to the Table of Contents

No relevant submissions received

Part B.2 Proposed new Part 6: Introduction to Local Planning Frameworks

No relevant submissions received

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.3 Part A of the Draft LPF

Part A:1 Introduction

No.	Name	Issues Raised
38	Alan Richardson	This submission refers to elements of the Core Strategy objectives for Greystones – Delgany & Kilcoole; and refers particularly to the infrastructure and services in the area.
Chief Executive's Response		
These infrastructure and service issues are dealt with under the infrastructure and services section of this report.		
Chief Executive's Recommendation		
No change to draft Greystones /- Delgany & Kilcoole LPF.		

Part A:2 County Development Plan Strategy for Greystones – Delgany & Kilcoole

No.	Name	Issues Raised
7	Richard and David Fox	<p>This submission addresses population trends with respect to Kilcoole zoning. The submitters set out:</p> <ul style="list-style-type: none"> From the County Wicklow Settlement Hierarchy 2010-2016, Kilcoole was designated as a "Small Growth Town" and its population is targeted to grow from a level of 4,000 to a target population of 4,500 by 2016 and 5000 by 2022. This population target has been adjusted to 4,778 by 2028 in the most recent County Development Plan 2022-2028. In the current Wicklow County Development Plan 2022-2028, Kilcoole is designated as Self-Sustaining Town, with a target growth rate of 20-25%, and a target of 170 new houses over the course of the next 7 years to 2031. <p>The submitters suggest that given the current housing crisis, the impending ESRI report into national housing targets and the as yet unpublished Housing Commission Report, they propose that a higher headroom percentage should be applied to Kilcoole at this time as many of the sites zoned for residential development, some as far back as 1998 remain undeveloped.</p>
10	Orla Baines	With respect to population and housing the submitter puts forward that the 2022 Census data should be included as it is available; Greystones - Delgany had a population of 22,009 and Kilcoole had a population of 4,569 on the 2022 Census. It is suggested that the way to achieve the 2028 Greystones Delgany target needs to be updated as the 2028 target was exceeded in 2022.
38	Alan Richardson	With respect to 'Service Infrastructure Strategy' (paragraph A2.8), the submitter put forward that the promotion of improved public transport requires efficient delivery of:

	<ul style="list-style-type: none"> ▪ DART and Commuter rail on a consistent basis ▪ A much improved bus service with better links to Dublin and other Wicklow and Wexford towns ▪ More Park and Ride Hubs with bus/rail connections ▪ Buses should not have priority outside core hours, and no roads should give 24 hour priority to them, particularly as there are no 24 hour bus services. ▪ A gigantic leap in speeding up the planning process to eliminate the housing crisis.
Chief Executive's Response	
<p>Population / Housing Targets</p> <p>The residential development objectives of the LPF including land zoning provisions have been made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LPF, with flexibility in the zoning provisions to ensure that:</p> <p>(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and</p> <p>(b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.</p> <p>Following the revision of the National Planning Framework, new housing targets were issued at the end of July 2025. In accordance with Ministerial guidance, a staged process of review of these new targets is now commencing, with a view to determining if a variation of the Wicklow County Development Plan will be required to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out. It is only at that stage will it be known if it is needed to increase the population / housing growth rate in Greystones-Delgany and Kilcoole to the extent that the local plan would require revision, for example to zone more land for housing than already set out in the draft LPF.</p> <p>At this time, it is not evident that additional land will be required to be zoned in Greystones-Delgany and Kilcoole over and above that already provided for in the draft LPF to meet any increased targets, given the amount of land proposed to be zoned therein vis-a-vis the current Core Strategy target for the settlement, which has already been met / exceeded i.e. the land proposed to be zoned in the draft LPF may well be adequate to meet even an increased target.</p> <p>2022 Census</p> <p>This section of the LPF reflects what is in the existing Core Strategy of the County Development Plan and it is necessary for the LPF to present the information as it is presented in the CDP.</p> <p>Public Open Space</p> <p>Please see Section B:5 of this report.</p> <p>Transport Infrastructure</p> <p>Please see Section B:7 of this report.</p>	
Chief Executive's Recommendation	
No change to draft Greystones - Delgany & Kilcoole LPF.	

Part A:3 Factors Influencing Future Development Options

No.	Name	Issues Raised
10	Orla Baines	This submission references Volume 2 Section A3.1 of the proposed variation. It is put forward that a DART station between Greystones and Kilcoole is required to service all the new housing that has been built in the last few years; such a station will relieve the pressure on the Greystones town centre car parking and road usage.
23	Liam O'Meara	This submission is seeking a change in zonings for a specific site in Delgany. In support of their rezoning request, it is stated the land in question is in line with the overall development strategy of the LPF and should be considered to be zoned for development.
38	Alan Richardson	The submitter puts forward that there is no rationale for the arbitrary 2.5km limit from Greystones Railway Station for future development and that pursuing such a strategy will lead to less housing being built thus increasing the shortage and increasing prices even further.
Chief Executive's Response		
<p>Development Strategy</p> <p>As set out in the draft LPF, <i>'the vast majority of the existing settlement of Greystones-Delgany is located within a 2.5km radius of Greystones town centre / train station and there are numerous options for infill within this area. It is therefore the strategy of this LPF that no further development outside this 2.5km radius should be facilitated during this LPF period'.</i></p> <p>This is considered to be a rationale and robust development strategy, particularly in light of 'compact growth' goals, as within this radius there is adequate undeveloped and serviceable land to meet both the current housing targets and the possible higher future targets. As detailed in the draft LPF, c. 38ha of 'greenfield' land is proposed to be zoned for new residential development within this radius, which would accommodate 1,200-2,000 new housing units. In addition, there are ample additional opportunities for infill residential development on top of these greenfield sites, thus providing a framework for the delivery of well over 2,500 units.</p> <p>Transport Infrastructure</p> <p>Please see Section 4.10 of this report.</p> <p>Please note that submissions with respect to zoning changes are dealt with in Section 4.11 of this report.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Part A:4 Overall Strategy

No.	Name	Issues Raised
25	Hubi Kos	The submitter indicates that they support the Council's structured approach and urge that the integrity of the LAP not be diluted by piecemeal rezoning outside of the agreed framework; this helps ensure that planning decisions remain transparent, consistent, and in the public interest.
27 & 28	Coolagad Environmental Coolagad Environmental	The submitters put forward that as the population for the area has already exceeded the planned number for 2031, a pause is needed in house building to enable infrastructure and services to catch up. In addition, they suggest that the lands south of Greystones which are nearer to DART and with better N11 connection could be considered if need be. Finally it is suggested that we need to focus on biodiversity for sustainability as confirmed by the science to be necessary to reduce global warming
34	Colin Acton	The submission fully agrees that the growth in housing that has already occurred between 2016- 2025 meets the housing targets and that the focus during the period of this LPF needs to be on the provision of 'catch up' infrastructure to match this significant residential growth. They put forward that the roads are inadequate; the footpaths are in poor condition; the cycle facilities are inadequate; far too many schools are 'temporary' and new permanent school buildings are needed. It is suggested that there should be no more residential development except small (i.e. less than 20) infill development.
Chief Executive's Response		
<p>The Council is committed to working with all local and state agencies to enhance services in the area including (but not limited to):</p> <ul style="list-style-type: none"> - With respect to transportation issues: Transport Infrastructure Ireland, the National Transport Authority, Iarnród Éireann, Dublin Bus / Bus Éireann; - With respect to education and training: Department of Education & Youth, Department of Further & Higher Education, Research, Innovation & Science. <p>The LPF, in conjunction with the Wicklow County Development Plan, sets out a clear policy platform to support the delivery of new infrastructure and services where needed, and sets out numerous general and specific objectives with respect to infrastructural needs in the area. Wicklow County Council is committed to ensuring that new development is only permitted where the necessary infrastructure and services are or will be in place to service that development. The Council is also very conscious of the housing crisis and the need to maximise housing delivery where feasible, and therefore it is not considered appropriate to halt the consideration of <i>all</i> new housing development in the area, particularly in instances where it is deemed that infrastructure is available to service any proposed development.</p> <p>With regard to the proposed locations for new development, the rationale for the development strategy set out in the LPF including the locations for future development is clearly set out and in some detail in the draft LPF. It is clearly shown how accessibility to transport infrastructure and protection of the environment; / biodiversity has been integrated into the strategy formulation.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.4 Part B of the Draft LPF

Section B.1 Town Centre Regeneration

Topic 1 Public Realm/ Village Enhancement Schemes

No.	Name	Issues Raised
31	<u>Kilcoole Residents Development Association</u>	<p>The submitters put forward the following observations with respect to Kilcoole:</p> <ul style="list-style-type: none"> ▪ The urban area suffers from poor public realm infrastructure. ▪ A Village Design Plan should be developed for the overall regeneration of Kilcoole, including public realm improvements, a village centre, civic and green spaces, lighting, planting and signage ▪ Town Centre programme has been talked about for years, this needs to be a vital element for a framework plan for Kilcoole.
52	<u>Joan Moran</u>	<p>The submitter puts forward the following observations with respect to Delgany:</p> <ul style="list-style-type: none"> ▪ In support of the Delgany Public Realm Enhancement Plan. ▪ It should state in the LPF that the Delgany Village Accessibility Scheme (Convent Road Phase) must align with the Delgany Public Realm Enhancement Plan as a single scheme.
55	<u>Killincarrig Community Association (KCA)</u>	<p>The submitters put forward the following observations with respect to Killincarrig:</p> <ul style="list-style-type: none"> ▪ Placemaking, including lighting and walkways, a village sign, landscaping and maintenance is required. ▪ The submitters indicate that the Killincarrig Enhancement Scheme is greatly anticipated and welcomed as a measure to improve traffic management and placemaking in Killincarrig Village. They request that a project manager and community liaison be appointed from WCC to oversee implementation. A cost estimate, updated plans and a project timeline would be appreciated.
58	<u>Greystones Town Team</u>	<p>The submitters put forward the following observations with respect to Greystones:</p> <ul style="list-style-type: none"> ▪ Suggest the LPF includes a programme for public realm improvements in the town centre/Greystones harbour area and enhancement of walking/cycling routes, including the following: <ul style="list-style-type: none"> - enhancement of existing pedestrian links from the town to the seafront; from Trafalgar Road, Bow Lane, South Beach access points from Mill Road; - pedestrian cohesion and dominance of the route from the South Beach carpark (potentially new Greystones – Wicklow Greenway)/DART carpark to the marina (Cliff / Walk) - Identification of potential enhancement of new pedestrian links through back land developments to increase permeability ▪ The existing temporary public realm interventions at Church Road now require upgrading. A specific objective should be included to construct a permanent design solution ▪ Objective should be included to identify potential public/green spaces

		within the Town core.
65	Aiden Kelly	The submitter puts forward the following observations with respect to Kilcoole: <ul style="list-style-type: none"> ▪ A Town Square needed to bring the community together.
73	Delgany Community Council	The submitters put forward the following observations with respect to Delgany: <ul style="list-style-type: none"> ▪ Highlight the potential of Delgany as a destination village and welcome collaboration with WCC to implement the projects identified in the Paul Hogarth strategy report to revitalise towns and villages.
88	Dermod Dwyer	The submitter puts forward the following observations with respect to Greystones: <ul style="list-style-type: none"> ▪ Suggests that the LPF include a programme for public realm improvements in the town centre/Greystones harbour area and enhancement of walking/cycling routes, including the following: <ul style="list-style-type: none"> - enhancement of existing pedestrian links from the town to the seafront; from Trafalgar Road, Bow Lane, South Beach access points from Mill Road; - pedestrian cohesion and dominance of the route from the South Beach carpark(potentially new Greystones – Wicklow Greenway)/ DART carpark to the marina (Cliff / Walk) - Identification of potential enhancement of new pedestrian links through back land developments to increase permeability ▪ Objective should be included to identify potential public/green spaces within the Town core. ▪ The existing temporary public realm interventions at Church Road now require upgrading. A specific objective should be included to construct a permanent design solution ▪ Objective should be included to identify potential public/green spaces within the Town core.

Chief Executive's Response

The County Development Plan and Draft Local Planning Framework promote and facilitate the development and enhancement of the public realm and recognise that creating connectivity and linkages is vital to the success of an area's future development.

Public Realm Improvements

The Council is committed to ongoing public realm, pedestrian and cycling improvements in Greystones, Delany and Kilcoole town centres, as well as Greystones seafront and harbour. As set out in the draft LPF, the following are components of the Council's proposed town centre development strategy:

- *Support the continued enhancement of the town / village centres of Greystones, Delgany and Kilcoole as the hearts of the settlements, where people of all backgrounds, ages and abilities can avail of services and interact within their communities;*
- *Ensure that the town / village centres are attractive places to live in, to work in and to visit, easy to get to, easy to walk and cycle within and are competitive places to conduct business;*
- *Create compact town / village centres by reusing existing buildings and maximising the potential of infill and*

brownfield sites; use all mechanisms and processes available to drive forward the redevelopment and regeneration of vacant, underutilised and derelict sites;

- *Use public realm improvements to stimulate investment and economic confidence; encourage public art in publicly accessible spaces such as town / village streets and squares and along existing or future parks and amenity routes;*
- *Promote healthy placemaking and prioritise walking and cycling; improve linkages between core town / village centres and existing community infrastructure and lands earmarked for future housing development;*
- *Embrace the historic character and heritage attributes of the town / village centres and strengthen the strong sense of place;*
- *The redevelopment of lands within the town / village core areas, particularly those sites with frontage onto the main streets, shall provide for street fronting buildings of a high quality design or for high quality urban spaces, including hard and soft landscaping, and appropriate street fixtures and furniture, in order to enhance and create more attractive streetscapes;*
- *To allow a relaxation in certain development standards in the town / village centre zones in the interest of achieving the best development possible, both visually and functionally while maintaining the highest quality of design in all new developments;*
- *Facilitating a diverse mix of uses, and particularly encourage residential usage at appropriate town / village centre densities, and the concept of 'living over the shop';*

In addition, Chapter 5 of the County Development Plan 2022-2028 refers to Town and Village Centres – Placemaking and Regeneration. Section 5.6, Town and Villages Centre Objectives (CPO 5.1-5.5) relate to targeting the reversal of declines in towns and villages, increasing the quality, vibrancy and vitality of our town and village centres and controlling uses that may have a detrimental impact on the vitality of the streetscape and the public realm.

CPO 5.15-5.16 of the County Development Plan 2022-2028 sets out placemaking objectives to actively implement public realm improvements which are applicable to all towns and villages. All of these objectives apply directly in the LPF area.

Lighting, landscaping and maintenance are the responsibility of Greystones Municipal District. This request will be brought to the attention of the Municipal District Team. Please be advised that addressing these issues is contingent upon the availability of resources and funding. Additionally, there are alternative funding schemes available to support public realm improvements.

The Town and Village Renewal Scheme 2025, funded under Project Ireland 2040 focuses on regeneration projects that support active and vibrant town/ village centres by tackling vacancy and dereliction, enhancing streetscapes, developing plazas, green or recreational spaces and repurposing buildings for community use etc. Funding of up to €50,000 has been made available for renewal projects.

Village Enhancement Schemes

With respect to the non-statutory Delgany Public Realm Enhancement Plan, this is being considered in the development of infrastructure scheme / programmes in the area.

With regard to the Delgany Village Accessibility Scheme, the R762 Glen Rd and Church Road is at detailed design stage and out for tender later this year. The Convent Road options assessment has been carried out and is planned to go to Part 8 in 2025.

The Killincarrig Village Enhancement Scheme is Part 8 approved and at the detailed design stage. Greystones MD (elected members) have designated €500,000 from discretionary funding for this scheme with the balance of funds coming from the NTA. It is anticipated to have this scheme commenced in Q4 2025, if resources permit within the Active Travel direct labour team. If the works require tendering it may not commence until Q1 2026, the GMD Members are keen to see this scheme progressed and there has been engagement with

key stakeholders over the past few years.

Operational matters, such as the appointment of a project manager, fall outside the scope of this land use framework.

Public/Green Spaces

Public/green spaces are identified as AOS: Active Open Space and OS1: Open Space zonings in the LPF.

Subject to the protection and enhancement of natural biodiversity, AOS facilitates the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for the development of new high quality active recreational areas and OS1 facilitates the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.

A Green Infrastructure Audit (Appendix 5) was undertaken to identify green assets within the LPF boundary in the preparation of this plan.

More detailed assessments of submissions relating to Walking & Cycling Infrastructure / Active Travel Schemes can be found in Section 4.10 of this report.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

Topic 2 Village Centres / Neighbourhood Centres / Small Local Centres

No.	Name	Issues Raised
52	Joan Moran	The submitter puts forward that it is important to protect Delgany's identity and character and distinguish it from 'Greystones'.
55	Killincarrig Community Association (KCA)	The submitters suggest including a Killincarrig Village Objective which formally recognises the village as a distinct locality to preserve its unique character and sense of community.
Chief Executive's Response		
<p>The draft LPF recognises the settlements of both Delgany and Killincarrig as historically independent villages, as highlighted in Section A.3. They are identified as mixed use centres with appropriate zonings in recognition of their status as separate centres.</p> <p>Section B1.2 of the draft LPF in particular highlights Delgany's role as a key centre in the wider LPF area and set out a tailored set of objectives with regard to its future development. .</p> <p>While Killincarrig, being of a smaller scale, has not been provided with as detailed attention, Section B1.3 highlights its role as a Small Local Centre (SLC) and is provided with appropriate development objectives. As stipulated in the draft LPF, the County Development Plan sets out a wide range of village and small local centre objectives that will apply directly to such centres in the LPF area.</p> <p>Including a suite of detailed additional objectives for each villages / small centre within the LPF area is not considered necessary, as all overarching policies apply equally. Doing so would result in an overly lengthy and potentially repetitive document.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Topic 3 Opportunity Sites

OP5 Bellevue Road Neighbourhood Centre

No.	Name	Issues Raised
59	Tesco Ireland Limited	<p>The submitter requests changes to Objective GDK OP5 to support the redevelopment and expansion of existing retail space at the Bellevue Neighbourhood Centre. In support of this request, a retail needs assessment is attached, highlighting:</p> <ul style="list-style-type: none"> - A significant shortfall in convenience retail space in Greystones relative to population growth; - Ongoing retail leakage, with residents shopping in neighbouring towns instead of locally; - The environmental and practical drawbacks of residents having to travel elsewhere for basic goods and services; - The crucial need to strengthen existing retail centres to meet local demand, particularly the Tesco-anchored Bellevue Road Neighbourhood Centre.
Chief Executive's Response		
The CE accepts the case put forward and the need to support retail enhancement at existing neighbourhood centres and recommends amendments to the text of the draft LPF as detailed below.		
Chief Executive's Recommendation		
<p>Amend draft LPF as follows:</p> <p>Section B1.3 OP5</p> <p>Amend OP5 as follows:</p> <p><i>This existing neighbourhood centre of c. 2ha, which comprises one supermarket (Tesco), a number commercial / retail / retail service units in a variety of uses, is located in the Kindlestown area in Greystones. While the site is fully 'developed', the majority of the site is utilised for surface car parking. There is potential to reconfigure the lands so that the retail building footprint and the proportion of the site devoted to surface car parking are reduced, and the site put to better, more intensive use, and create a stronger identity and streetscape at this node. The site would be suitable for further mixed use development, primarily residential and community uses, as retail and commercial floor space is already adequate for this location with a primary emphasis on residential and community functions, alongside retail expansion where deemed appropriate or necessary.</i></p> <ul style="list-style-type: none"> ▪ To support the development of the lands for new mixed use development including retail, residential, community and cultural uses ▪ A high density development with reduced car parking, that makes the best use of this serviced urban land will be expected; ▪ New development shall be of the highest design quality, which addresses the R761 while maintaining to the highest degree possible mature trees in this area. 		

Topic 4 Other Issues - Derelict Sites

No.	Name	Issues Raised
31	Kilcoole Residents Development Association	The submitters suggest that derelict sites/buildings should be addressed (potential for community facilities)
55	Killincarrig Community Association (KCA)	The submitters put forward that derelict houses on key junction in Killincarrig pose safety concerns and reduces local amenity value. They request that grants be provided to owners to complete the property or CPO and give to a family in need of a home.
Chief Executive's Response		
<p>The provisions of both the Wicklow County Development Plan and this LPF support the regeneration, redevelopment and reuse of derelict buildings / sites.</p> <p>The Local Authority is happy to investigate whether it has powers under the Derelict Sites Act to take action with respect to any of buildings / sites that are brought to the attention of the Derelict Sites team.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.5 Part B of the Draft LPF

Topic 1 Residential Development

No.	Name	Issues Raised
8	Stuart Kinch	<ul style="list-style-type: none"> ▪ The submitter urges a temporary pause on all residential developments not yet commenced within the Greystones, Delgany & Kilcoole area, to allow council and government agencies to redirect their full attention toward critical priorities necessary to ensure the long-term sustainability, liveability and cohesion of the community. ▪ The submitter considers that continuing to allow residential development at a pace that far outstrips the development of supporting infrastructure risks seriously undermining the town's integrity and quality of life; Greystones has already experienced significant housing growth in the past decade, continuing unchecked development, while key infrastructure lags behind, puts the social fabric of our community at serious risk. ▪ The submitter fully supports the Greystones Community pact and call for a freeze on new residential building until at least 2028. ▪ The submitter suggest that significant portions of the towns housing stock are in disrepair and underfunded and that before any new social housing is developed, funding and attention must be directed to upgrading existing units. ▪ The submitter considers it critical that social housing be integrated into mixed developments in line with National Policy; that the creation of isolated or concentrated social housing estates near private developments risks repeating past planning failures, leading to division and stigma. ▪ It is suggested that a more balanced geographic distribution of social housing across the town is essential; the disproportionate concentration in the southern corridor (Killincarrig to Charlesland) has already led to unintended consequences, including negative perceptions around inclusive education at local schools. It is suggested that new residential zones, such as Zone 2 Blacklion, should incorporate integrated social housing (e.g. 30% within private developments) to encourage greater balance and cohesion.
10	Orla Baines	The submitter puts forward that housing is at capacity in Greystones-Delgany and infrastructure needs to catch up.
21	Larry Doyle	<ul style="list-style-type: none"> ▪ The submitter puts forward that social housing should be integrated into any community; note the submitter is referring specifically to a site between Blackberry Lane and Priory Road where there is currently a mobile home. It is suggested that the proposal should allow for the development of a new and properly built social housing unit in the same area of high ground along Priory Road as the existing mobile home. ▪ The submitter notes that this site is zoned RE and states any such house would have to be designed and built in a way as to blend

		<p>with the other houses in the area, and without detracting from the amenity of the neighbouring houses.</p> <ul style="list-style-type: none"> ▪ The submitter suggests the immediate curtilage of this proposed new social housing unit would be strictly private, and the general public would access the remaining public open space.
35	Tom & Sandra Hayes	<p>The submitter puts forward that future rezoning requests for residential development at Sea Road should be carefully considered, for the following key reasons and concerns:</p> <ul style="list-style-type: none"> - Future housing density would not be sympathetic to the landscape and would erode the rural character of the Sea Road area; - In light of existing developments already approved or planned in the area, the cumulative environmental and traffic impacts must be carefully considered in future applications for land rezoning and construction on currently approved sites along Sea Road.
38	Alan Richardson	<ul style="list-style-type: none"> ▪ The submitter suggests that the lands at the former Charlesland golf club should be rezoned for housing and any other lands in the Greystones realm to alleviate the housing crisis. ▪ It is suggested that as Charlesland, an adequate boundary should be planned to protect the railway and the nearby bird habitat.
85	Kathleen Kelleher	<p>The submitter requests the introduction of more Age Friendly Housing, either special AFH estates or special areas within ordinary estates. The submitter puts forward the following:</p> <ul style="list-style-type: none"> - Huge cohorts of older people living in the area in houses that are too large for their needs. - Apartments are too small with no storage, no gardens, no dual aspects. Older people need housing with no stairs and easy, possibly wheelchair access. - Most older people in the district want to stay in the area and need special planning to do so.

Chief Executive's Response

Residential Development

The LPF, in conjunction with the Wicklow County Development Plan, sets out a clear policy platform to support the delivery of new infrastructure and services where needed, and sets out numerous general and specific objectives with respect to infrastructural needs in the area. Wicklow County Council is committed to ensuring that new development is only permitted where the necessary infrastructure and services are or will be in place to service that development. The Council is also very conscious of the housing crisis and the need to maximise housing delivery where feasible, and therefore it is not considered appropriate to halt the consideration of *all* new housing development in the area, particularly in instances where it is deemed that infrastructure is available to service any proposed development.

Residential development objectives including land zoning provisions have been made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of each LPF with flexibility in the zoning provisions to ensure that (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise, and (b) each LPF does not have to be formally altered to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or changes to planning legislation.

Residential developments are currently being proposed under phased zonings ('RN 1 - New Residential Priority 1 and RN2 - New Residential Priority 2) with an emphasis on infill development and the consolidation of existing urban areas to ensure that infrastructure can effectively support future growth. The LPF acknowledges and states that, throughout the duration of the plan period, the primary focus will be on delivering 'catch up' infrastructure to align with the significant residential growth. New facilities will be required in tandem with the development of new large scale residential developments and neighbourhoods.

These developments are assessed through the development management process to ensure they align with the Core Strategy of the County Development Plan and housing targets set by the Minister. A freeze on residential construction is not being considered, particularly in light of the ongoing housing crisis.

Environmental protection is integrated into the planning process during the development of the LPF. While this framework outlines general land use policies, more specific considerations such as traffic impacts and environmental effects of developments, are addressed at the planning application stage.

Sea Road, Kilcoole

The draft LPF does not provide for zoning for further (residential) development further east of the junction of Sea Road with Holywell, beyond which the road narrows and has inadequate pedestrian / cycling infrastructure. Where new development is provided for closer to Kilcoole town centre on Sea Road (e.g. at SLO6), there is either adequate existing road / pedestrian infrastructure or the capability to improve same to the standards required to meet the demands of any new development. With respect to the protection of landscape, rural character and the environment generally in this area, all are firmly embedded in both the LPF and the Wicklow County Development Plan, the policies and objectives of which apply directly in the LPF area.

Social Housing

The residential development strategies and standards set out in the Wicklow County Development Plan apply directly to the LPF area and address social and affordable housing.

With respect to issues raised regarding the management of the existing local authority social housing stock, any other issues raised, this would be matter for the Council's Housing Directorate rather than this land use framework. The Council is committed to improving its existing housing stock and availing of all funding mechanisms and processes available to bring vacant units back into use and the repair / improvement of occupied units.

With respect to the location, layout and design of new Local Authority housing, both in terms of its own builds and Part V delivered as part of new private developments, the same development and design standards apply to all such development as private developments, as set out in Appendix 1 to the Wicklow County Development Plan. Part V assists in the Government Policy of social integration as social houses are provided, tenure blind, in private residential estates in a dispersed manner. In addition Part V prevents segregation as it ensures a mix of income groups within developments.

Age Friendly Housing

The NPF supports the provision of lifetime adaptable homes that can accommodate the needs of households over time. Specifically, the NPF requires that local housing policy will be developed with a focus on meeting the needs and opportunities of an ageing population. Chapter 6 'Housing' of the

County Development Plan outlines specific objectives (CPO 6.8) that promote the delivery of lifetime adaptable homes. These homes are designed in line with *'Building for Everyone: A Universal Design Approach and the Universal Design Guidelines for Homes in Ireland (2015)'*.

Section 6.3.6 'Universal Design & Lifetime Adaptable Housing' of the County Development Plan outlines the principles of the universal design approach, providing comprehensive best practice guidance on the design, construction, and management of buildings and spaces to ensure they are easily accessible and usable by all individuals, regardless of age, size, ability, or disability.

Appendix 1 of the County Development Plan contains the Development and Design Standards which set out WCC's requirements with respect to new developments, note Section 1.6 'Universal Design & Accessibility'. This document highlights with regard to the current and future demographic trends that proposed developments should be future proofed for the aging population. The Planning Authority will advocate age-friendly thinking with respect to new developments in the County in particular at pre-planning stage. It is recommended that developers consider an age friendly approach, with facilities and materials inclusive of an age-friendly community/society.

Chief Executive's Recommendation

No change to the Draft Greystones-Delgany & Kilcoole LPF

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.6 Part B of the Draft LPF

Section B.3 Economic Development and Employment

Topic 1 General

No.	Name	Issues Raised
8	Stuart Kinch	<ul style="list-style-type: none"> The submitter considers that there is a severe imbalance between housing and employment; limited jobs available and without investment in local employment zones, the town will become increasingly commuter dependent and economically unsustainable.
37	Derek Mitchell	<ul style="list-style-type: none"> Submitter puts forward that Greystones has the lowest percentage of people employed locally of any town/settlement in Wicklow. The submitter suggests that a lower specification commercial buildings would be viable and are needed; there are no units available for traders who want modest 500sqm 'warehouse' type buildings. There is demand, more than for higher specification offices which are more expensive. It is suggest that some undeveloped ex IDA land near the Injection Moulding factory should be zoned for this purpose.
38	Alan Richardson	<ul style="list-style-type: none"> Submitter puts forward that due to its commuter status, Greystones has a very low ratio of jobs to residents, due to the lack of support by the IDA, Enterprise Ireland and WCC; that the . IDA performed so badly over the past 50 years that it sought to divest itself of its Charlesland property and that a much better effort at attracting jobs to the town is required by all interested parties. It is suggested that a stronger emphasis on growing the indigenous sector would be a step in the right direction.
58	Greystones Town Team	<ul style="list-style-type: none"> The submitters suggest that the LPF include a clear target for job creation in Greystones, Delgany and Kilcoole in order to increase the job ratio to above 75% by 2030.
88	Dermod Dwyer	<ul style="list-style-type: none"> It is suggested that this can be achieved by supporting tourism, re-opening the cliff walk, providing a coastal greenway, encouraging the film industry and the provision of co-working hubs. It is put forward that more employment zoned lands may be required in order to avoid Greystones, Delgany and Kilcoole becoming dormitory towns with low job ratios.
88	Dermod Dwyer	<ul style="list-style-type: none"> The submitter references that the Greystones Media Campus, which promised 700 jobs during construction and 1,500 jobs thereafter. It is suggested it would be remiss if the LPF fails to support this project and specifically lists the jobs announced.
73	Delgany Community Council	<ul style="list-style-type: none"> The submitters put forward that the proposed new Media Centre in Greystones should focus on higher value added and more sustainable industry sectors such as finance, ICT, etc., which would provide better long term employment prospects and provide employment opportunities for residents in the area with these skill sets.

		<ul style="list-style-type: none"> It is put forward that while Greystones is designated as a 'Level 3 Self-Sustaining Growth Town', there are very few employment opportunities in the area and this has led to huge numbers of residents commuting to work, leading to a lower quality of life for residents as well as a serious impact on the environment.
Chief Executive's Response		
<p>It is agreed that more local employment is needed, particularly in Greystones-Delgany, to make the town more sustainable and self-sufficient, and to reduce adverse impacts such as commuting. The LPF, along with the County Development Plan and the various strategies and programmes of the numerous employment agencies active in this area, aims to put in place a framework within which new employment can be delivered and supported. The economic development and employment strategies, objectives and standards set out in the Wicklow County Development Plan 2022-2028 apply directly to the LPF area.</p> <p>Creation of Jobs</p> <p>A land use plan has no direct role in creating jobs or bringing new employers; however, this framework ensures the availability of zoned land for employment purposes and includes objectives facilitating employment development.</p> <p>The economic development strategy set out in the LPF supports and facilitates, to the highest degree possible (subject to environmental and other relevant planning considerations) all forms of employment generation and in particular, to encourage employment and commercial uses as a key activity in the town centre.</p> <p>Employment Objective GDK21 relates to employment creation and promotes the intensification of activities at existing suitable employment locations especially where this can mitigate long distance commuting.</p> <p>Quantum of Employment Zoned Lands</p> <p>The CE is satisfied that the draft LPF provides for an appropriate amount of employment zoned land for the lifetime of this Framework. The minimum quantum of zoned employment lands is 26.2ha in Greystones-Delgany and 4ha in Kilcoole, therefore, there is excess provision of zoned employment lands.</p> <p>In order to ensure that there will be no shortage of site choice for developers of new employment, sufficient undeveloped 'greenfield' land has been zoned for new employment to meet all of the jobs growth required.</p> <p>Greystones Media Centre</p> <p>While the objectives of the LPF support job creation and facilitate investment, the land use framework does not determine the specific types of industry/employment uses that occur.</p> <p>It is already an objective (GDK28) of the LPF to support the film industry, including the development of production facilities at appropriate locations and the use of the area for film locations, including the erection of temporary structures.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Topic 2 Employment in Kilcoole

No.	Name	Issues Raised				
31	Kilcoole Residents Development Association	<ul style="list-style-type: none">▪ The submitters out forward that Kilcoole is a very important employment hub in County Wicklow with a network of four vibrant business/enterprise parks on its southern and south-western fringes▪ They suggest that thee ranking of Kilcoole as a 'Level 4 Core Region Self Sustaining town' in the CDP is appropriate but the description for this category 'weak employment base' is not accurate in the case of Kilcoole. The fact Kilcoole is strong employment base needs to be reflected.				
Chief Executive's Response						
<p>As stated in the LPF, it is acknowledged that Kilcoole has a stronger 'jobs ratio' at 77%, however there is still a high proportion of resident workers who travel outside the town for work.</p> <p>The issue raised with the apparent description of Kilcoole as having 'a weak employment base' is due to the generic description applied to all level 4 towns. It is recommended that a footnote be inserted in Table 1B to recognise Kilcoole's relatively strong employment base.</p>						
Chief Executive's Recommendation						
<p>Amend the LPF as follows:</p> <p>A.2.1 County Development Plan Core Strategy</p> <p>Table 1B Wicklow Core Strategy for Kilcoole</p> <table><tr><th colspan="2">APPLICATION TO LEVEL 4</th></tr><tr><td>Settlement, Population & Housing Strategies</td><td>Level 4 settlements are designated 'Self Sustaining Towns' described in the Regional Spatial and Economic Strategy as 'towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining'¹. These towns range in size (as per the Census of population in 2022) from c. 2,000 to 4,500 persons. Population growth in Level 4 towns overall is targeted to be in the 20%-25% range between 2016 and 2031, with variation in future growth rates between towns in the level due to developments already underway in some towns.</td></tr></table> <p>1. While Kilcoole does have a relatively strong employment base, it is considered that it still generally fits in this category of town having regard to its scale and the need for targeted catch up investment to become more self-sustaining.</p>			APPLICATION TO LEVEL 4		Settlement, Population & Housing Strategies	Level 4 settlements are designated 'Self Sustaining Towns' described in the Regional Spatial and Economic Strategy as 'towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining' ¹ . These towns range in size (as per the Census of population in 2022) from c. 2,000 to 4,500 persons. Population growth in Level 4 towns overall is targeted to be in the 20%-25% range between 2016 and 2031, with variation in future growth rates between towns in the level due to developments already underway in some towns.
APPLICATION TO LEVEL 4						
Settlement, Population & Housing Strategies	Level 4 settlements are designated 'Self Sustaining Towns' described in the Regional Spatial and Economic Strategy as 'towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining' ¹ . These towns range in size (as per the Census of population in 2022) from c. 2,000 to 4,500 persons. Population growth in Level 4 towns overall is targeted to be in the 20%-25% range between 2016 and 2031, with variation in future growth rates between towns in the level due to developments already underway in some towns.					

Topic 3 Greystones Bray Cliff Walk

No.	Name	Issues Raised
8	Stuart Kinch	The submitter requests the reopening of the Cliff Walk, as this amenity is vital as a local recreational space and as a driver of footfall for local businesses and suggest that its closure is impacting the local economy.
58	Greystones Town Team	Submitters suggest the inclusion of a Specific Local Objective (SLO) to reopen, maintain, fund, enhance and protect the Bray Head to Greystones Cliff Walk. They put forward that the cliff walk is a significant recreational and tourism asset which brings positive economic impact to Bray, Greystones and the wider North Wicklow area.
88	Dermod Dwyer	
88	Dermod Dwyer	The submitter draws attention to a recently presented independent economic impact study by Jim Power which outlined the estimated annual and cumulative losses due to the closure of the Bray to Greystones Cliff Walk. Namely a cumulative loss to the Irish economy of over 70,000,000 over 4 years, that equates to a daily loss of €50,000 per day for every day the cliff walk remains closed. Mr Powers' estimates are based off the methodology used by Failte Ireland and the Irish Tourism Confederation. He notes the loss from just local use is €10,000 per day.
Chief Executive's Response		
<p>The CE recognises the economic and recreational importance of the Bray to Greystones Cliff Walk and this amenity is noted as a key tourism/recreation asset in the LPF. The Cliff Walk has been closed for some years due to serious safety issues arising.</p> <p>Wicklow County Council have procured independent consultants to carry out an 'Issues Assessment and Options' report for short, medium and long term options for reopening the cliff walk. The LPF facilitates the re-opening of the Cliff Walk.</p> <p>The Council is committed to working with the various stakeholder and landowners to get the walk opened again.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.7 Part B of the Draft LPF

Section B.4 Tourism Development

Topic 1 General

No.	Name	Issues Raised
31	Kilcoole Residents Development Association	The submitters put forward the following requests and suggestions with respect to tourism and environmental protection generally: <ul style="list-style-type: none"> - The tourism potential of Kilcoole on Ireland's Ancient East route could be enhanced further in carrying out development work in the area of the Rock – Lott Lane and improved walkways. - Kilcoole's coastal location hosting Ireland's largest nature reserve, rich tapestry of history, wealth of biodiversity and rural village vibe, coupled with its proximity to the capital renders it a very attractive eco-tourism proposition. - Supports the sustainable promotion of Kilcoole as a tourist destination, but ensuring any developments are environmentally sensitive and prioritise the conservation of natural biodiversity
37	Derek Mitchell	The submitter suggests that Greystones is well placed for yacht tourism as it is on the direct line from Lands' End and Rosslare to Scotland and this should be mentioned and encouraged.
38	Alan Richardson	The submitter highlights the following: <ul style="list-style-type: none"> - a lack of tourism facilities in Greystones - no hotels/major accommodation facilities - no facilities for camper vans - WCC should facilitate prospective developers of such resources
88	Dermod Dwyer	The submitter puts forward that the Bray to Greystones Cliff Walk is a significant recreational and tourism asset; that this facility is a key amenity for both residents and tourists. Suggests an SLO to reopen, maintain, fund, enhance and protect the Cliff walk is included in the LPF.

Chief Executive's Response

Tourism development and opportunities

The LPF fosters and encourages potential tourism development as outlined in Chapter B.4 'Tourism Development'. It recognises the excellent tourism and recreational assets of Greystones, Delgany and Kilcoole and the significant opportunities to expand this sector for the benefit of the area's economy and local employment.

Early built heritage tourism

Objective GDK32 sets out to facilitate and support the development of tourism and infrastructure related to the area's early built heritage.

Tourism accommodation

Objective GDK33 positively supports the development of new hotels in accordance with the criteria detailed. Objective GDK34 supports the development of touring caravan and camping sites, having due regard to proper planning and development of the area.

Promoting / Supporting tourism

The Wicklow County Development Plan 2022-2028 sets out a range of strategies, objectives and standards that aim to promote and facilitate the development of sustainable tourism and recreation which applies directly to the LPF area. These include Tourist Hubs and Destination Towns and Integrated Tourism / Leisure / Recreational Complexes, tourist accommodation, outdoor recreation, greenways etc. These objectives apply directly in the LPF area.

(Please see Chapter 11 – Tourism and Recreation and the Tourism and Recreation Objectives CPO 11.1-11.53).

Bray-Greystones Cliff Walk

With respect to re-opening the Bray-Greystones Cliff Walk, consultants have been procured to carry out an 'Issues Assessment and Options' report for short, medium and long term options for reopening the cliff walk. The LPF facilitates the re-opening of the Cliff Walk

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

Topic 2 Wicklow to Greystones Greenway Scheme

No.	Name	Issues Raised
31	Kilcoole Residents Development Association	The submitters suggest the LPF should give greater clarity regarding the planned 'Greystones - Wicklow Coastal Route' versus the overlapping coastal route from Bray to Arklow.
88	Dermod Dwyer	<ul style="list-style-type: none">▪ The submitter suggests including a Specific Local Objective to providing a continuous, easily accessible greenway linking Greystones to Wicklow Greenway (East Coast Greenway) with strong connections to Kilcoole, Charlesland and the wider regional network. Specifically supporting a route selection that prioritises infield boundary options and avoids the Murrough SAC.▪ The submitter suggests including a Specific Local Objective to assess the impact of the Wicklow Coastal Blueway Project to identify potential coastal amenity enhancement to support funding opportunities.

Chief Executive's Response

Objective GDK38 of the Draft LPF already clearly supports the development of new walking, cycling and horse riding routes / trails and the development of linkages between trails. It specifies, in particular, to encourage and facilitate:

- the maintenance and improvement of the full coastal area from Greystones to Kilcoole i.e. Bray Head – Bray to Greystones cliff walk and the coastal zone to the east of same including new marina park – Greystones north beach, marina, harbour – Greystones coastal route and beaches (the Cove, south beach) – Charlesland golf club to Ballygannon – the Murrough European Site at Kilcoole
- the development of a coastal route from Greystones to Wicklow Town as well as links between this potential route and Kilcoole and the R761.

The Wicklow to Greystones Greenway is currently at Phase 2 'Options Selection' stage of the "TII Project Managers Manual for Greenway Projects" and designed in conjunction with "TII Project Management Guidelines". On the completion of Phase 2, where a preferred route is identified and

with TII approval, the project will progress to Phase 3 'Design and Environmental Evaluation' and Phase 4 'Statutory Processes'. At this time, neither a final route corridor nor a final route within any such corridor has been identified.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.8 Part B of the Draft LPF

Section B.5 Social and Community Development

Topic 1 Public Open Space, Play Facilities and Sports Facilities

(Please also refer to Section B:6, sub section 6.3 of this report which refers to Green Infrastructure & Recreational Use of Natural Resources).

No.	Name	Issues Raised
6	Patricia Cusack	The submitter considers that there is too little public green space in the area. She points out that the extensive golf courses show as green space are only used by paying members and when there is some public greenspace, as in the middle of some estates, it consists of barren grass with scarce trees or bushes and little biodiversity.
10	Orla Baines	<ul style="list-style-type: none">▪ The submitter suggests that housing is at capacity and infrastructure needs to catch up and in particular a free of charge accessible public open space target per 1,000 people should be clearly stated.▪ It is put forward that teenagers and adults require this type of purpose built accessible space to play impromptu games of 5-a-side football and basketball etc to improve the population's physical and mental wellbeing.
21	Larry Doyle	<ul style="list-style-type: none">▪ The submitter suggests that there is scope to include plans for an amenity park between Blackberry Lane and Priory Road at the Delgany village end (north of the Three Trout Stream). It is put forward that given the volume of residential houses over the past 5 years and the lack of social spaces in the village, the development of a small amenity park on existing council land would provide a valuable amenity for social interaction and would align with the proposals for the greenway between the Glen to the Sea. (Details of such a proposal for a park included as part of this submission. These proposals were prepared by Delgany Community Council.)▪ It is suggested that with the increase in population, the provision of play and sensory facilities for children would be a very welcome addition to the village. The submitter notes that some elements are planned on the Convent grounds in Delgany.
30	Greystones Lawn Tennis Club	<p>The submitters set out that the Tennis Club has currently a significant waiting list of adults and children looking to join the club and like most the sporting clubs in Greystones the club currently does not have the capacity to take new members as they don't have enough courts. The submitters would like to propose that this LPF consider:</p> <ol style="list-style-type: none">1. Providing sufficient active open space to allow sporting facilities and clubs the space to expand their services to the community;2. To consider zoning council owned land adjacent to the tennis club to active open space.

31	Kilcoole Residents Development Association	<ul style="list-style-type: none"> ▪ The submitters suggest there is a need for provision of more facilities for young people in the locality, such as playing/sports courts and a skate-park and there is an urgent need for a community park which this Plan needs to reflect. ▪ The submitters put forward that more consideration needs to be given to the needs of the local sports and recreation clubs; the Gaelic and soccer clubs, for instance, are both landlocked with no scope for expansion. The soccer, gaelic, cricket, athletic, softball, scouts etc. are in dire need of land and upgraded facilities. ▪ Submitted that a solution may lie with the abandoned Charlesland golf club – the southern end of that is not far from Kilcoole, particularly if the mooted new coast road linking Kilcoole and Greystones is properly planned. There is ample space there for a top-class recreational facility there, incorporating community / shared / allocated grounds, walking paths, bike parks, playgrounds etc.
37	Derek Mitchell	The submitter suggests that there is a need for more open space and recreation areas and the LPF should include sports pitches.
47	Liam Kennedy	The submitter puts forward that Greystones is lacking a proper public park; existing facilities are mostly small green spaces. It is suggested with the closure of Charlesland Golf Club a unique opportunity exists to acquire land for a public park comparable to the likes of Shanganagh park and that this should be pursued as a priority for the Council.
53	Kilcoole Tidy Towns	<ul style="list-style-type: none"> ▪ Submitters put forward that there is a growing need and demand for a secure designated dog park in Kilcoole where residents can exercise their pets safely; this would address concerns about letting dogs' off-lead, promote responsible pet ownership and enhance community well-being through social interaction. ▪ The submitters request that existing public green spaces are protected from infill development and require that any new development include provision of publically accessible green spaces to support the physical wellbeing of residents.
54	Eire Og Greystones GAA	<ul style="list-style-type: none"> ▪ The submitters put forward that there is a significant shortage of available land within the current town boundary to support the expansion of community sports facilities and that this is particularly pressing given the continued population growth in Greystones and the increasing demand for youth sports and recreational amenities. ▪ The submitters request that that an additional 29 acres at Bellevue be included within the LPF boundary to support the development of sports and recreation infrastructure for the growing population and enable more favourable consideration for funding applications in particular under the Sports Capital Programme and other national and regional investment schemes and improve the overall ratio of open space to housing density within the town, in line with sustainable community planning principles.
56	Austin Baines	<ul style="list-style-type: none"> ▪ The submitter puts forward that the Kilcoole and Greystones areas badly need Teen Spaces identified to allow for unstructured play and hang out for teenagers. ▪ Also noted that most sports clubs in the area now have waiting lists and are in need of additional sporting facilities to meet the

		demand of the community and the LPF needs to address this.
58	Greystones Town Team	<ul style="list-style-type: none"> ▪ The submitters notes that the population of Greystones, Delgany and Kilcoole is approaching 30,000; the youth population (0-25) is approximately 33% of the population and that this will and is currently putting pressure on sports facilities. ▪ It is put forward that the area would benefit from a combined resource centre and enhanced sporting facilities. The submission welcomes proposals to provide the same adjacent to the new secondary school and existing facilities at Shoreline Sports Park and running track.
73	Delgany Community Council	<ul style="list-style-type: none"> ▪ The submitters draw attention to the lack of public play spaces in Delgany Village. ▪ Submitters suggest that the council land between Blackberry Lane and Priory Road at the Delgany village end could be used to develop an amenity park, designed in harmony with nature, allowing locals to explore the biodiversity in the area; and that this would be compatible with proposal for the greenway between the Glen to the sea. ▪ The submitters welcome the proposed new zonings of Community and Education for the former Carmelite Monastery site and the open space designation for the area in front of the site. ▪ This submission supports additional targeted zoning to facilitate an expansion to existing sports facilities in the area. ▪ The submitters noted that a proper sports ground for the newest local soccer club, Sporting Greystones, is needed. Draw attention to the fact that numbers at the existing grounds (Dr Ryan Park) have to be limited at They indicate that this club serves a lot of newer families in Delgany, have a long waiting list and are restricted at present in terms of how many hours per week they can use their facility for training and that the pitch is too small for 11 a side matches meaning that they have to travel to Kilmacanogue and rent space there.
88	Dermod Dwyer	<ul style="list-style-type: none"> ▪ The submitter notes that the current youth population currently accounts for c.33% of the total population of the overall settlement and that this puts pressure on sports facilities, community facilities and youth centres.

Chief Executive's Response

The Social Infrastructure Audit identifies that there is shortfall in outdoor play spaces and equipped play spaces in Greystones-Delgany, while there is also a shortfall in equipped play spaces in Kilcoole. The audit also confirms that while there are currently 2 dog parks located in the Greystones area there are none in Kilcoole. There are also 5 public playgrounds in Greystones, one in Kilcoole but there is currently no playground within Delgany Village.

The draft LPF recognises these shortfalls and has zoned additional lands for OS1 (Open Space 1) and AOS (Active Open Space) to cater for, **at a minimum**, the projected future populations for Greystones-Delgany and Kilcoole. In this regard the LPF also takes into account that Greystones-Delgany and Kilcoole provide for the recreational needs for a wider catchment than the towns themselves, in particular with regard to the provision of Active Open Space/Sports Facilities. The draft LPF provides for c. 27.6ha of AOS 'Active Open Space' lands that are currently undeveloped or underutilised.

With regard to the development of additional Active Open Space (AOS) including where existing clubs need enhanced or expanded facilities, it should be noted that the purchase of lands and provision / development of sports and/or facilities by the Local Authority is outside the remit of the LPF. It is the role of this land use framework to ensure adequate and suitably located lands are zoned for the uses needed to sustain the existing and future population but the delivery / purchase / development of such new sports grounds would be an implementation and funding matter outside the remit of the LPF objectives.

While the LPF provides objectives and zoning that would support the development of new sport grounds, the LPF is not the 'sports development plan' for the area and it is considered that these various suggestions would be more appropriately considered in the formulation of the new Wicklow County Outdoor Recreation Plan and the County Wicklow Local Sports Plan that are being developed during the course of 2025.

With regard to Kilcoole specifically, additional land has been re-zoned AOS east of Lott Lane totalling 4.4ha which has the potential to create a new sports and recreation zone for the Kilcoole area for all age groups, including but not limited to new sports pitches, casual walking / cycling areas, playgrounds / outdoor gyms, dog parks etc. AOS lands are also zoned adjacent to St. Anthony's FC and Kilcoole GAA to allow for the development of additional sports facilities including the potential expansion of these sports clubs. The development of SLO5 and SLO6 in Kilcoole for new housing will also require the delivery as part of these developments of significant new areas of public open space.

With respect to Charlesland golf club, the draft LPF provides objectives for exactly what submission No. 47 is suggesting. Given that the lands are in private ownership, delivery directly by the Council however would not be feasible in the short term and all avenues need therefore to remain open.

With regard to the provision of a public play space in Delgany it is noted that there is limited space within the village centre itself for such a facility. A site to the east of the Carmelite Monastery has been rezoned to OS1 to reflect a new public open space area and playground which was granted planning permission as part of a larger overall residential development. This site is located relatively close to the north of Delgany Village Centre.

With regard to the provision of a dog park in Kilcoole, the Council is supportive of the development of same and has provided two such parks in Greystones and Charlesland on Council owned lands in recent years. At this time the Council does have a suitable park space in Kilcoole within which one could be provided, but the Council is happy to work with the community in the future on such a project.

With regard to the provision of a new amenity park area on Council own lands between Blackberry Lane and Priory Road, a significant proportion of these lands are already zoned OS2. The amount of lands on either side of the Three Trout River zoned OS2 has also significantly increased under the draft LPF. As set out in the draft LPF, *'uses appropriate for natural areas (OS2) zoned land are uses that protect and enhance the function of these areas as flood plains, buffer zones along watercourses and rivers, green breaks between built up areas, green corridors and areas of natural biodiversity. The development of these lands for recreational uses may only be considered where such use is shown to not undermine the purpose of this zoning'*.

This objective would support and facilitate the development of an amenity park subject to it being established that such development and use would not undermine this objective. However as the Council has no plans at this time to develop these lands in this manner, it is not considered appropriate to specifically identify these lands for *exclusively* park development.

The request under Submission No. 30 (Greystones Lawn Tennis Club) outlined above is addressed under **Section 4.11 Zoning and Land Use** of this report. It is noted that the rezoning request under this submission would conflict with the provisions of the draft LPF in relation to Objective GDK55 (d) and the concept plan for Mill Lane Park, where the subject lands are indicated as the location of a potential wetland area.

The request under **Submission No. 54** (Eire Og) to zone additional 12.5ha at Bellevue to AOS is also addressed under **Section 4.11 Zoning and Land Use** of this report. In this regard it is noted that the subject lands are peripheral in nature, largely beyond a 2.5km radius from Greystones Rail Station and as such, the zoning of the subject lands would conflict with the statement in Section A.3.2 of the draft LPF Written Statement, as follows: *'It is therefore the strategy of this LPF that no further development outside this 2.5km radius should be facilitated during this LPF period'*.

While active travel connections to the site may be possible through Kindlestown Castle/Dromont onto the route of the L3 bus, the CE would have a concern in relation to increased volumes of private vehicles accessing the subject lands via Bellevue Hill or Templecarrig, which is constrained in width, and the resultant impact on junctions leading to the area, e.g. the junction of the R762 and L1030 at Delgany. On this basis, it is not recommended that the subject lands be zoned AOS 'Active Open Space' and brought within the LPF/settlement boundary.

This LPF has sought to locate AOS (Active Open Space) where it can be easily accessed from existing and planned residential development so that they are easily accessible by sustainable travel modes or where there are suitable undeveloped lands adjoining an existing sports club that needs expansion. Based on the Social Infrastructure Audit the LPF has zoned a quantum of undeveloped and underutilised AOS lands to cater for and above the projected population of the settlements of Greystones-Delgany and Kilcoole and their respective catchments.

With regard to the protection of existing green spaces serving residential development, the protection of sites which are identified as the public open space to serve a residential development is supported by Objective CPO 6.25 under Chapter 6 – Housing, of the 2022-2028 County Development Plan. This objective states the following; *"In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development. Such lands will be retained as open space for the use of residents and new housing or other non-community related uses will not normally be permitted"*.

It is noted that in more recent residential developments to the north of Delgany Village at Thorndale, sites have been rezoned from residential to OS1 while significant established greenspaces at Drummin Rise and Wendon Park have also been rezoned from RE (Existing Residential) to OS1 (Open Space) to protect these green areas.

With regard to the provision of new public open spaces as part of new developments, the LPF states that the development of lands identified for new residential development shall be contingent on the delivery with the development of new areas of public open space, including sports grounds for larger scale developments, at a scale commensurate with the development. In this regard proposed residential developments, as part of the planning process, will also need to demonstrate how they accord with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) and Appendix 1 Development & Design Standards of the 2022-2028 Wicklow County Development Plan in terms of the provision of public open space so as to ensure that the appropriate level of open space/facilities are delivered in tandem with new development.

Chief Executive's Recommendation

No change to draft Greystones-Delgany & Kilcoole LPF.

Topic 2 Community Resource and Youth Centres

No.	Name	Issues Raised
31	Kilcoole Residents Development Association	The submitters put forward that there is a need for a quality community space for a growing population in Kilcoole such as the upgrading of St. Patrick's Hall (Forrester's Hall).
56	Austin Baines	<p>The submitter considers that:</p> <ul style="list-style-type: none"> ▪ The Kilcoole and Greystones areas badly need Teen Spaces to allow for unstructured play and hang out for teenagers. ▪ Most sports clubs in the area now have waiting lists and are in need of additional sporting facilities to meet the demand of the community. The LPF needs to address this.
58	Greystones Town Team	<ul style="list-style-type: none"> ▪ The submitters note that the population of Greystones, Delgany and Kilcoole is approaching 30,000, that currently the youth population is approximately 33% of the population and that this will and is currently putting pressure on sports facilities, community facilities, and youth centres. ▪ It is put forward that more community facilities are required. Submitted that the area would benefit from a combined resource centre and enhanced sporting facilities.
73	Delgany Community Council	<ul style="list-style-type: none"> ▪ The submitters welcome the proposed new zonings of Community and Education for the former Carmelite Monastery site and requests the support of WCC in efforts to develop this property as a Community Centre. ▪ The submitters also welcome the retention of the accommodation building and its repurposing to provide for the crèche, retail, cafe and GP facilities. Note that these facilities will be essential to the sustainability of this development as well as to ensuring its successful integration as a core part of the village.
84	Greystones Family Resource Centre clg	<ul style="list-style-type: none"> ▪ The submitters are looking for the retention/protection of existing community spaces and seeking that further community spaces and facilities are not only included for in the plan, but are prioritised; they note that the allocation of Social infrastructure is an essential element of healthy placemaking. ▪ They draw attention to the increased population bringing increased diversity which is positive, but this also brings increased and diverse needs. It is put forward that in order to sustain the area as a place where people want to live and where these are positive social cohesion, it is critical that community spaces are consciously included in planning for the area and that land zoning is retained for future provision of these facilities. ▪ The submitters indicate that inability to participate fully in the local community can lead to disenfranchisement which often leads to anti-social behaviour and therefore space for facilitation of community connectivity is essential and needs to be factored into any zoning of land in the area. ▪ Further noted that the number of young people under the age of 25 in the Greystones-Delgany and Kilcoole area has increased by 17.5% between 2011-2022 compared to an overall county increase of 6%. Resources and supports for young people cannot be ignored in the future planning for the area as the youth population is now 34% of the total population of the area.

		<ul style="list-style-type: none"> It is suggested that a fit for purpose facility with an anchor tenant that would provide space and opportunities for broad community participation inclusive of a bespoke space for young people is needed and the zoning of areas for this and/or the repurposing of existing structures has to be prioritised.
88	Dermod Dwyer	<ul style="list-style-type: none"> The submitter draws attention to the increase in population of the 0-25 year old cohort in the LPF area, and suggest the area would benefit from the development of a combined resource centre and enhanced sporting facilities. The submitters welcomes proposals to provide the same adjacent to the new secondary school and existing facilities at Shorelines Sports Park and running track.

Chief Executive's Response

The Social Infrastructure Audit which accompanies the LPF is guided principally by demographic population growth targets set out in the adopted Core Strategy of the Wicklow County Development Plan 2022-2028, but also considers the longer term growth of the settlements and their catchments.

Greystones-Delgany is designated as a 'Self Sustaining Growth Town', which is targeted for growth rates of 25-30% whereas Kilcoole is designated as a 'Self Sustaining Town', which requires contained growth, focusing on driving investment in services, employment growth and infrastructure, whilst balancing housing delivery.

In terms of Community Facilities, Chapter 7 of the Wicklow County Development Plan 2022 - 2028 sets out the Community Facilities Hierarchy Model for the County, which details the social and community facilities that are considered necessary in settlements of varying sizes, as represented by four levels.

Table 7.1 in the CDP contains a list of the social and community facilities that are considered necessary in settlements, according to their population range. Greystones-Delgany falls into the Level 1 population range and Kilcoole falls into the Level 3 population range. On this basis, Greystones – Delgany (Level 1) and Kilcoole (Level 3) would ideally require the facilities listed in Table 3.1 of the Social Infrastructure Audit, see below:

LEVEL 1 – SETTLEMENTS WITH POPULATION RANGE 15,000 – 30,000	
Multi-purpose Community Resource Centre	Outdoor Water Sports Facilities (where applicable)
Regional and Local Indoor Sports and Recreation Facilities	Neighbourhood Parks and Local Parks
Swimming Pool/Leisure Centre	Outdoor (full size) Multi-Use Games Areas – Synthetic/ Hardcourt
Youth Centre	Playground(s)
Athletics Track and Field Facilities	Playing Pitches
Arts and Cultural Centre	Alternative/Minority Sports Facilities
Local Multi-Purpose Community Space/Meeting rooms	Open Space/Urban Woodlands/Nature Areas
	Library
<i>Acceptable rural catchment commuting time by car: 30 min</i>	
LEVEL 3 – SETTLEMENTS WITH POPULATION RANGE 2,000 – 7,000	
Community/Parish Hall	Playgrounds
Multi-purpose Community Space/Meeting Rooms	Playing Pitches
Local /Town Park (s) and Open Spaces/Nature Areas	Library
Outdoor Multi-Use Games Area – Synthetic/ Hardcourt	
<i>Acceptable rural catchment commuting time by car: 10-15 mins</i>	

In terms of actual provision of such facilities the Social Infrastructure Audit has identified the

following:

Table 3.2 Social - Community Facilities in Greystones-Delgany

Facility	Provided
Multi-Purpose Community Resource Centre Local Multi-Purpose Community Space/Meeting Rooms	Kilian House Family Centre, La Touche Road St Patrick's Recreation Centre, Church Road Presbyterian Church Hall, Trafalgar Road Nazarene Community Hall, Burnaby Lawns Hall at Christ Church, Delgany Charlesland Community Centre Greystones Bridge Club
Regional and Local Indoor Sports & Recreation Facilities	Shoreline Leisure, Mill Road Shoreline Sports Park, Charlesland
Swimming Pool/Leisure centre	Shoreline Leisure, Mill Road
Youth Centre	Coolnagreina Youth Café, Trafalgar Road
Athletics Track and Field Facilities	Shoreline Sport Track, Charlesland
Arts and Cultural Centre	Whale Theatre, Greystones
Outdoor Water Sports Facilities	Various clubs and facilities at the Harbour, Greystones e.g. sailing club, rowing club, diving club
Neighbourhood Parks and Local Parks	Burnaby Park and Sensory Garden Greystones Marina Park Greystones Dog Park, The Marina Greystones Dog Park, Charlesland Sports Park Parks within housing developments including significant areas in: Hillside, Redford Park, Kindlestown Park, Waverly, Charlesland Park, Archer's Wood, Hawkins Wood.
Outdoor Multi-Use Games Areas – Synthetic/Hardcourt	Charlesland Sports Park Archers Wood
Playground(s)	South Beach Playground Greystones Marina Playground Charlesland Sports Park Playgrounds within new housing estates e.g. Charlesland, Archer's Wood, Hawkins Wood, Glenheron,
Playing Pitches / Courts	Eire Óg GAA pitches, Mill Road Greystones Rugby Club, Mill Road Greystones United AFC, Woodlands Greystones United AFC, Archfield, Victoria Road Dr Ryan Park, Delgany Temple Carrig School Hockey Pitch Greystones Tennis Club
Alternative/Minority Sports Facilities	Greystones Lawn Bowling Club, Burnaby Park Greystones Mariners Baseball, Shoreline Leisure
Open Space/Urban Woodlands/Nature Areas	North and South Beach Cliff Walk Three Trout River
Library	Greystones Library, Mill Road

Table 3.3: Social - Community Facilities in Kilcoole

Facility	Provided
Multi-Purpose Community Space/Meeting Rooms Community/Parish Hall	Kilcoole Community Centre Kilcoole Scout's Den Kilcoole Men's Shed St Patrick's Hall Sports hall at Coláiste Chraobh Abhann
Local/Town Park (s) and Open Spaces/Nature Areas	Kilcoole Rock Kilcoole mass path Strawberry Lane walk
Outdoor Multi-Use Games Area – Synthetic/Hardcourt	Hard courts at Coláiste Chraobh Abhann
Playgrounds	Little Tern Playground
Playing Pitches / Courts	Kilcoole GAA St Anthony's FC Greystones Cricket Club Pitches at Coláiste Chraobh Abhann
Library	No library in Kilcoole

While the Social Infrastructure Audit indicates that the LPF area appears to be well served by community buildings and services, there are a number of local groups who have either no permanent base or are using inadequate facilities. It was therefore deemed necessary that the draft LPF supports and makes provision for the development of additional community spaces that may be suitable for a range of users and uses.

In this regard, the provision/development of new community facilities is particularly promoted in the draft LPF by SLO4 (Coolagad), SLO5 (Bullford) and SLO6 (Ballydonarea), as well as in any possible redevelopment of Charlesland golf course under SLO3. In addition the development of Community Facilities is not restricted to lands zoned 'CE – Community and Education' but is permissible on lands zoned residential (RN/RE and RS), Town and Village Centre (TC/VC), Neighbourhood Centre (NC) and Greystones Harbour & Marina (GHM).

In order to ensure that social/community infrastructure is provided in tandem with future housing development, Objective **GDK18** of the LPF requires the following: *"Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents. New significant residential or mixed use development proposals (of which residential development forms a component) , shall be required to be accompanied by a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services".*

With regard to the construction/development and upgrading of facilities such as community centres, it should be noted that the LPF is land use planning framework. The draft LPF and County Development Plan 2022-2028 support the provision of such facilities/service through land use zonings and policy as outlined above however the purchase of lands and provision / development of such facilities by the is outside the remit of the LPF.

With regard to the development of Active Open Space (AOS), it should be noted that the purchase of lands and provision / development of sports facilities by the Local Authority is outside the remit of the LPF.

Chief Executive's Recommendation
No change to draft Greystones-Delgany & Kilcoole LPF.

Topic 3 Education and health services

No.	Name	Issues Raised
8	Stuart Kinch	<ul style="list-style-type: none"> ▪ The submitter puts forward that there is a need to upgrade educational infrastructure; local schools are operating under a capacity strain, with many reliant on outdated temporary porta cabins. ▪ It is suggested that the pace of housing development is exacerbating this pressure and that urgent capital investment is needed to modernise and expand educational facilities.
38	Alan Richardson	<ul style="list-style-type: none"> ▪ Submitted that every September, there are insufficient places for children trying to attend secondary schools in Greystones. It is suggested that this must be down to using out of date data with regard to school going numbers and the ineptitude of the Department of Education & Youth. It is requested that provision for temporary accommodation be anticipated so to avoid this annual dilemma. ▪ The submitter identifies a need for more GP surgeries, and expresses concerns about the delay in the development if the promised Primary Health Care Centre

Chief Executive's Response

Primary Schools

The accompanying Greystones-Delgany & Kilcoole Social Infrastructure Audit sets of the current and future educational facilities needs for the LPF area and its catchment.

With regard to primary school places direct consultation with each school confirmed that the primary school infrastructure can theoretically accommodate an additional 387 children. It is noted that there is good capacity for growth in Greystones CNS in Charlesland, which is an area of significant new housing. It is also noted that 144 of these places are within Gaelscoil na gCloch Liath, which has the capacity to be fully two-stream. However, when the wider catchment is considered, there is little or no spare capacity in the primary schools in Newcastle and Newtownmountkennedy. The following planned primary school expansion projects are also in train or committed to:

Planned Primary School Expansion Projects

Name	Current Capacity	Future capacity
Kilcoole Primary School	580	c. 650
Newtownmountkennedy Primary School	376	c. 410
Woodstock Educate Together	170	c. 500 ¹
TOTAL		+ 434

In terms of primary school place provision, having regard to potential population growth in LPF area and in the wider area as provided for in the Wicklow County Development Plan Core Strategy, it appears likely that there will be adequate capacity in existing and expanded primary schools to meet short and medium terms needs. Therefore it does not appear that it is necessary to explicitly plan for an additional primary school in this Greystones-Delgany and Kilcoole LPF area at this time i.e. reserve a specific site / include specific development objectives etc. However, in order to support the possibility of future school expansion, wherever possible, lands will be zoned surrounding existing

¹ This project is at an early stage with site secured but planning permission yet to be obtained.

primary schools for 'Community – Education' use.

In addition, the draft LPF provides that new school development is permissible in principle in all land use zones (other than OS1 and OS2, subject to certain conditions)

Post Primary Schools

With regard to post primary school places, the Social Infrastructure Audit confirms that the four post-primary schools in Greystones-Delgany and Kilcoole are fully or oversubscribed with all four of the schools operating at or above their capacity.

It is planned to increase the capacity of the four schools as follows:

- Development is underway on the new Greystones Community College at Charlesland, which will have capacity for 1,000 students, an increase from the current capacity of 630 pupils.
- Planning permission has been granted to expand Coláiste Chraobh Abhann to 1,000 pupils from 800 pupils.
- The Department of Education has approved an expansion of 250 additional places at Temple Carrig School, increasing the capacity up to 1,000 students. However, no physical expansion has been sought / approved as yet, and given the current enrolment of c. 950 students, extension is unlikely to result in any significant capacity improvements.

With regard to future capacity, based on the known 2022 population of the wider catchment for the secondary schools in Greystones-Delgany and Kilcoole (35,657 persons) and the demand for secondary school places 2024/2025, it is evident that closer to 9% of the population in this area is of secondary school going age, higher than the Department of Education assumption of 7.5%, or that the catchment of the post primary schools in Greystones-Delgany and Kilcoole is much wider than the 6 EDs considered.

Using this 9% proportion going forward, and given the County Development Plan Core Strategy growth targets for the area up to 2031, it is possible that demand will increase to c. 3,415 places, which appears could be accommodated within the planned expanded secondary schools in Greystones-Delgany and Kilcoole.

However, having regard to the demographics evident for the area, wherein there are currently c. 4,408 children enrolled in primary schools in the area, there is concern that demand for secondary schools may surge above available school places within the lifetime of this LPF.

As there is uncertainty in this regard, it is not considered appropriate at this time to make provision i.e. identify and reserve a site, for an additional secondary school in the Greystones-Delgany and Kilcoole area. It is considered instead to address this possible future need by:

- Providing for a flexible zoning approach in the Greystones-Delgany and Kilcoole LPF that would allow for the development of schools on lands zoned for other non-community lands uses should the need arise (subject to control to ensure adequate spatial separation between schools, good accessibility and protection of the environment); and
- Ensuring that lands are reserved for a future secondary school in Newtownmountkennedy, as is currently the case, noting that the demand arising from population the EDs of Newcastle Upper and Lower and Altidore currently equates to 575 - 690 secondary students, and with additional population growth planned for Newtownmountkennedy and Roundwood further west, this could increase to c. 680-800 students.

The LPF as a land use framework, can facilitate the provision of new schools through appropriate land use zoning however, it should be noted that the purchase of lands and provision / development of schools is outside the remit of the LPF and the Local Authority. The provision of primary and secondary school facilities in Ireland is determined on an area specific basis by the DoEd, having regard to available school capacity, demographic projections, an analysis of child benefit records, and local travel pattern modelling.

The DoEd is monitoring the demand for and provision of schools in the LPF area on an ongoing basis and WCC will continue to consult and liaise with the DoEd in this regard.

General Practitioners

There are no national standards for health provision in Ireland relating to the provision of primary care centres or the number of doctors in an area. However, the HSE has confirmed that a typical primary care centre can serve a population of between 10,000-20,000 people, subject to appropriate resourcing. The nearest primary care centres are in Bray (7km from Greystones) and Wicklow (15km from Kilcoole).

The Graduate Medical Education National Advisory Committee (GMENAC) an advisory group to the US Department of Health and Human Services suggests a standard of 25.2 physicians to 100,000 population (or 0.25 per 1,000 population).

The current doctor to population ratio in Greystones-Delgany and Kilcoole is 1.17 per 1,000 population, with 24 doctors practicing from six different facilities, which is four times above the recommendations of GMENAC. However, the reality is quite different. All six GP practices contacted indicated that there is significant need for additional doctors in the area due to the high demand. While the number of doctors is stated to be 24, it should be noted a proportion are part time and working alternate days / shifts with other physicians. Three of the practices confirmed they are currently full; one is taking on a limited number of new patients with the remaining two practices facilitating those new to the area where possible.

The provision of health facilities and GP surgeries are a matter for the Health Service Executive (HSE), however the LPF endeavours to facilitate the provision of such facilities through flexible zoning provisions and development objectives / standards; in particular the development of new health care facilities that is supported in a wide range of land use zone categories.

While the future development of the planned Greystones Primary Health Centre may address some deficiencies with regard to GP services in the area, there will likely be a need as the town grows for further services. While the zoning of land specifically for health / GP usage would not be appropriate given the nature and scale of this use, it is recommended that the LPF supports the development of healthcare uses in all zones (other than Open Space OS1 and Natural Areas OS2) and ensure adequate land is zoned for 'Community and Education' - CE use which would allow for larger scale stand-alone medical developments.

Chief Executive's Recommendation

No change to draft Greystones-Delgany & Kilcoole LPF.

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.9 Part B of the Draft LPF

Section B.6 Heritage, Biodiversity & Green Infrastructure

Topic 1 Archaeological / Architectural Heritage

No.	Name	Issues Raised
26	Sinead Murphy & Christopher Grey	<p>This lengthy submission related to Darraghville House, Kilcoole (a protected structure). The interested reader is advised to read the complete submission. The submitter summarises their submission as follows:</p> <p>The Draft LPF requires substantial amendment to address the following fundamental concerns:</p> <ul style="list-style-type: none"> ▪ The complete absence of recognition or protection for Darraghville as a designed Historic Garden and Designed Landscape of Regional Importance (NIAH Ref. 4318), despite this being a rare heritage designation requiring specialized conservation approaches; ▪ The failure to provide specific policy protection for Darraghville House (Protected Structure Ref. 13-08 13) and the integrated designed landscape within which it sits, treating them as separate rather than unified heritage assets; ▪ The absence of any acknowledgment of the surviving demesne landscape features – including mature tree belts, the historic carriage sweep, designed views and spatial arrangements - which collectively form an irreplaceable work of landscape art; ▪ The inappropriate land use zoning designations that fail to recognize the heritage sensitivity of the historic demesne lands or support their conservation as a coherent designed landscape. <p>They note that recent planning permissions granted within the historic estate boundaries (Reg. Refs. 22921, 21469, and 221064) and put forward that these demonstrate the urgent need for explicit protective policies before further fragmentation occurs. Furthermore, they maintain that the current policy vacuum risks the permanent loss of County Wicklow's most intact historic demesne landscape within an urban setting.</p> <p>The submission specifically requests:</p> <ol style="list-style-type: none"> 1. A new objective as follows: <p>SLO-X: Protection of Darraghville House Demesne, Historic Garden and Designed Landscape</p> <p>"To protect, conserve and enhance Darraghville House (Protected Structure Ref. 13-08 13), its Demesne, and its designation as a Historic Garden and Designed Landscape of Regional Importance (NIAH Ref.</p>

		<p>4318), the Planning Authority shall:</p> <p>(a) Recognise and protect the demesne as an integrated designed landscape where all elements - including the Protected Structure, planted features, spatial arrangements, views, boundaries, and landscape features - form a unified heritage asset requiring holistic conservation;</p> <p>(b) Prohibit development that would fragment, diminish, or adversely affect the character, integrity, or understanding of the historic demesne and designed landscape, including:</p> <ul style="list-style-type: none"> ▪ The spatial relationships between landscape elements ▪ The hierarchy of spaces from formal to informal ▪ The designed approaches and circulation routes ▪ The planted framework and its screening functions ▪ The relationship between built and natural features <p>(c) Require comprehensive Heritage Impact Assessments and Conservation Management Plans for any proposed development within or adjacent to the historic demesne boundaries (as identified in the 1837-1842 Ordnance Survey and subsequent historic mapping);</p> <p>(d) Mandate detailed landscape assessments prepared by qualified historic landscape specialists, to include:</p> <ul style="list-style-type: none"> ▪ Analysis of the designed landscape's evolution and significance ▪ Identification of character-defining features ▪ Assessment of views, vistas, and spatial sequences ▪ Tree surveys acknowledging historic planting patterns ▪ Proposals for conservation and enhancement <p>(e) Ensure the preservation and appropriate management of key demesne features including but not limited to:</p> <ul style="list-style-type: none"> ▪ The carriage sweep and its formal relationship to the house ▪ Historic entrance sequences and gate lodges ▪ Tree belts, avenues, and specimen planting ▪ The eastern lawns and their designed extent ▪ Boundary treatments including walls, hedges, and ha-has ▪ Archaeological features and earlier landscape layers <p>(f) Support the restoration of degraded or lost designed landscape features where substantiated by historical evidence;</p> <p>(g) Promote public understanding and appreciation of the Historic Garden and Designed Landscape through appropriate interpretation and access arrangements that do not compromise its conservation."</p> <p>2. Specific measures to protect historic landscape features, specific trees / tree belts and key views and vistas.</p> <p>3. Amendment to GDK52 "To promote the preservation of trees, groups of trees or woodlands, in particular native tree species and those trees associated with demesne and designed landscape planting, whether subject to TPO or not..."</p> <p>4. Zoning changes as follows are requested:</p> <ul style="list-style-type: none"> ▪ Change Darraghville House from CE to 'Special Residential' ▪ To north of house, extend the AG zoning to include to
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		<p>recently permitted institutional development</p> <ul style="list-style-type: none"> ▪ Tree belt along R761: change to 'conservation' or similar <p>5. New objective as follows:</p> <p>Policy GDK-XX: Historic Gardens and Designed Landscapes</p> <p>"To protect, conserve and enhance Historic Gardens and Designed Landscapes identified by the National Inventory of Architectural Heritage, recognising them as integrated heritage assets where all components - buildings, planted features, earthworks, water features, circulation systems, and spatial arrangements - contribute to their significance. Development proposals affecting Historic Gardens and Designed Landscapes shall demonstrate through detailed assessment that the integrity, character, and designed relationships of the landscape will be protected and enhanced."</p>
58	Greystones Town Team	These submissions are extremely similar in content and therefore are grouped together.
88	Dermot Dwyer	<p>The submitters note that the LPF and CDP support natural and architectural heritage protection; they wish to emphasise that Greystones has a unique historic character as a 19th century seaside resort and its notable railway heritage. They suggest the LPF strengthens this commitment to support heritage led regeneration as a driver for town character, tourism, and identity.</p> <p>It is suggested that a specific objective for the following historic structures at risk should be included:</p> <ul style="list-style-type: none"> - the old Holy Faith Convent on Kimberly Road, - Captain Tarrant's Farmhouse <p>It is requested that the LPF supports the development and implementation of the Greystones Town Team Shopfront and Signage Guidelines, ensuring that all new shopfronts and signage within the town centre and architectural conservation areas respect the established character, materials, and proportions, in line with best practice in heritage-led regeneration.</p>
67	Burnaby Residents Association	<p>This lengthy submission is related to The Burnaby, Greystones (an ACA) and includes a report commissioned by the submitters in 2020 the purpose of which was to assess the previous LAP and make recommendations on how aspects of local planning policy for the estate and management of the public realm could be improved to ensure that its historic character continues to be preserved.</p> <p>The interested reader is advised to read the complete submission. The submitters summarise their submission as follows:</p> <ol style="list-style-type: none"> 1. The Burnaby Estate is a unique feature of Greystones and is of national heritage importance as recognized by the designation of the area as an Architectural Conservation Area (ACA). It is important that this character is protected, reinforced and preserved in the Local Area Plan. 2. The designation of an ACA is helpful in preserving the character of the area. Over the period of the last LAP, most threats to the

		<p>character of the Burnaby ACA came from planning decisions on inappropriate infill developments, proposals to demolish or substantially alter original houses and regrettably, wholly inappropriate interventions in the public realm by the local authority.</p> <p>3. The nature of some of the road schemes carried out in the Burnaby ACA over the period of the last LAP were inappropriate and damaged the character of the ACA - the works on the middle section of St Vincent Road were both insensitive and out of character. Traffic and road schemes are a key element to defining the public realm of the area and as part of the LAP the Council need to commit to ensuring that such schemes in an ACA are carried out appropriately with regard to the conservation status of the area.</p> <p>4. We welcome the RS:Special Residential Zoning and the restatement of the ACA for the area. We also note and welcome the provisions of GDK20 requiring applications to have an appropriate Architectural Heritage Assessment in support of development.</p> <p>5. Finally, we refer the Planning Authority to a Submission prepared by 7L Architects particularly for the Draft Local Area Plan & the ACA. While this report is from March 2020, the observations and contents remain valid. Specifically we would request the Council to have regard to the specific references in the Report on Land Use Zoning (4.2 on Page 30) so that the Council can address the concern that the current and proposed zoning does not preserve the historic character of the area, given that the zoning density proposed is over double the current density across the Estate. 7L contend that the 10 units per ha is effectively allowing for a doubling or tripling of the residential density of 80% of the Estate which goes against the objectives of preserving the historic character of the Estate. We request that WCC specifically considers this observation from Grade 1 Conservation Architects with significant experience in the conversation of built heritage</p>
87	Colin Love	<p>This submission makes a number of suggestions with respect to archaeology and architectural protection as follows:</p> <ul style="list-style-type: none"> ▪ With respect to the townland of Coolagad which is zoned New Residential Priority 2, it is pointed out that the zoning is close to or encompasses a Hill fort. The submitter suggests that further research on the extent of Hill Fort should be carried out prior to any construction near or at this site. ▪ With respect to the townlands of Killincarrig / Charlesland and Ballynerrin some of which is zoned mixed use and active open space, the submitter outlines that there is a medieval church ruin, lime kiln and potential site of Burial Mound and that this area is believed to be part of the early Leinster Road. He points out that the Ballynerrin church is an Ancient monument, but that the potential burial mound in Ballynerrin would need further investigation. He suggests the lime Kiln should be added to the RPS. ▪ It is pointed out that in Lower Kindlestown within the grounds of

		<p>Kindlestown House beside St. Laurence's school, there are remains of an early 18th century house. Which is the remains of the original Kindlestown House and may be a 17th century structure. This area is zoned existing residential. The submitter requests that this building be added to the RPS and the area around it be added to active open space zoning.</p> <ul style="list-style-type: none"> ▪ The submitter highlight some buildings that he believes should be added to the RPS list as follows: <ul style="list-style-type: none"> - Killincarrig Mill near Aldi supermarket in the townland of Killincarrig. It is pointed out that this mill is zoned for local shops and services and the submitter suggest removing this zoning in favour of Public Utility or Tourism. - Napoleonic Signal tower at Ballygannon - The outbuildings, walls of the wall gardens and gates of the Ballygannon House Demesne - Eyrefield Lodge on Church Road (as it is of cultural significance, as it was the home of noted cartoonist Marten Toonder and his wife also a noted artist / cartoonist). - Dysart on Kimberley Road Greystones (hideout for Michael Collins and later home to his aunt), - Carrigeden on Marine Road (which is culturally significant due to being childhood home George Chester Duggan), - Loongshan (is of cultural significance as it was home to noted America author Robert Sampson Elegant), - Merlin on Portland Place in the Burnaby (of cultural significance as it was the childhood of noted Irish actress Geraldine Fitzgerald), - Goodbrook in the townland of Kindlestown Upper (of cultural significance as home of Mountaineer Anthony Myles William Reilly, who was responsible for mapping Mont Blanc) and - Rathdown House Upper in the townland of Rathdown Upper (socially important as is an 18th century farmhouse if not older, probably the only intact Georgian farmhouse in the locality left, with gates, and outbuildings).
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Chief Executive's Response

Darraghville House

This house, its features and its attendant curtilage including gardens etc are highly protected by virtue of being placed on the **Record of Protected Structures** in the Wicklow County Development Plan. A protected structure is a building, feature or structure of special interest that is protected for architectural, social, archaeological, technical, historical, cultural, artistic and/or scientific reasons. The protection includes the interior and exterior of the structure, and the lands and any other buildings within its boundary, unless otherwise determined by the Council. This is the highest form of policy protection that is available via development plans and therefore it is refuted that the LPF does not adequately recognise Darraghville and Darraghville's curtilage heritage importance.

The LPF is subsidiary to the County Development Plan and all of the built heritage related strategies and objectives therein will apply directly in the LPF area and to Darraghville. The LPF does not reproduce all of these objectives from the County Development Plan in the LPF, but that does not mean that they do not apply in the LPF area. The submission makes reference to the limited built

heritage objectives in the LPF and suggests that these do not provide adequate protection to Darraghville and its curtilage / attendant grounds. This is not accepted; for example, the following County Development Plan objectives will apply directly in the LPF area:

CPO 8.13 *To ensure the protection of all structures, items and features contained in the Record of Protected Structures.*

CPO 8.14 *To positively consider proposals to alter or change the use of protected structures so as to render them viable for modern use, subject to architectural heritage assessment and to demonstration by a suitably qualified Conservation Architect / or other relevant expertise that the structure, character, appearance and setting will not be adversely affected and suitable design, materials and construction methods will be utilised.*

CPO 8.15 *All development works on or at the sites of protected structures, including any site works necessary, shall be carried out using best heritage practice for the protection and preservation of those aspects or features of the structures / site that render it worthy of protection.*

CPO 8.16 *To support the re-introduction of traditional features on protected structures where there is evidence that such features (e.g. window styles, finishes etc) previously existed.*

CPO 8.17 *To strongly resist the demolition of protected structures or features of special interest unless it can be demonstrated that exceptional circumstances exist. All such cases will be subject to full heritage impact assessment and mitigation.*

It should be noted that Darraghville is not a 'designated' historic garden or landscape of regional importance via the NIAH but rather is 'identified' in the NIAH survey of historic gardens and designed landscapes. There are c. 200 such historic gardens in Wicklow identified by the NIAH, and c. 6,000 nationally, so this is not necessarily a 'rare' occurrence. It should be noted that Bellevue Estate Delgany (now Delgany golf course), Killincarrig House estate (now Greystones golf club) and Kindlestown House in the LPF area are also identified in this NIAH survey.

It is not agreed that Darraghville is County Wicklow's most intact demesne landscape in an urban setting; the demesne cannot really be said to be 'intact' at this time having regard to the various historical developments on the demesne having already occurred particularly at the southern side of the demesne such as the development of St. Anthony's Church in 1968, St. Brigid's School in 1973 and a petrol filling station, and the permissions already granted on the northern side of the house (nursing home and special school / day care / respite centre).

This LPF is not the 'architectural heritage protection plan' or a 'conservation plan' for the LPF area or for any particular structure or feature within the LPF area – it is land use framework that will manage and direct future development in the area, while ensuring protection of valuable built or natural elements present. There are many protected structures in the full LPF area and the LPF does not set out specific policy protection or detailed objectives for each, describing in detail its features, value or future management / conservation requirements. There is no particular reasons why Darraghville House should have such particular attention in this LPF.

The key concern appears to be the zoning of lands surrounding the house for CE 'Community & Education' under previous plans (which has been continued) which has allowed for permission to be granted for community and education developments within the historic curtilage of the house. In the assessment of these applications, the RPS status of the house and its historic curtilage were carefully considered in coming to the decision that permission was possible to grant without significantly adversely impact on the heritage of the house and its curtilage.

In addition, it should be noted that it is only a limited area around the historic curtilage of the house that is in fact proposed for a zoning that could allow for future development and that zoning is strictly limited to community and education use. In particular, of the immediate 19ha surrounding the house which would have formed its historical curtilage, the draft LPF shows c. 8.15ha unzoned (43%), 1.43ha

zoned for Agricultural Use, c.2.6ha zoned for Open Space OS1 including the entire area to the front of the house, thus maintaining view of the house from the public road, c. 6.6ha zoned for community and education use (comprising 35% of the total curtilage, of which 1.5ha is already developed for such CE use and permission granted for education and nursing home development on c. 3.6ha) and 0.15ha zoned for town centre use (already developed). Overall therefore the draft LPF would provide for only c. 1.2ha of land with specific development zoning for future development with that development type limited to CE use.

With respect to the specific requests::

1. The suggested new objective is not supported as it is considered unnecessary and excessive. There are numerous RPS structures including demesne houses in the LPF area and it would not be reasonable or feasible to have individual tailor-made objectives such as the one suggested for each listed item.
2. The suggested additional designation re historic landscape features, key views and vistas is not considered necessary given that these elements are already protected under the RPS designation.
3. The text change suggested to GDK52 is acceptable.
4. It is recommended that the zoning of the land immediately associated with Darraghville House be zoned 'Existing Residential' to reflect its current use. It is not considered that a 'special residential' designation is needed; there are many Protected Structures in the LPF area in the RE zone and to designate just this one protected structure as 'special' would undermine the remainder.
The re-designation of the existing CE lands to the north of the house to AG is not supported as it is illogical given the permitted CE developments thereon.
There is no 'conservation' zoning in the LPF; the land on which the tree in question are located is zoned OS1 which provides adequate protection, especially given the trees are already subject to TPO.
5. The suggested new objective is considered too high level to be included in the LPF which is for any specific objective but may be more suitable for consideration on the next review of the overall heritage objectives in the Wicklow County Development Plan.

Heritage of Greystones

The County Development Plan and LPF provide **clear support** for heritage lead regeneration in Greystones; particular attention is drawn to the following objectives:

County Development Plan, Chapter 5

Objective CPO 5.6 *To seek funding and focus new investment into the core of towns and villages in order to reverse decline, foster resilience and encourage new roles and functions for streets, buildings and sites within towns and villages.*

Greystones – Delgany: *Capitalise on the potential of underutilised sites and brownfield sites to deliver compact growth, new economic opportunities and to strengthen the Greystones urban structure. The lands around the Council's office, park and ride site and former depot are a key public asset which should be the focus of any regeneration proposals. Redevelopment of this site should retain and enhance the existing public amenities including Council offices, playground and car parking and incorporate high intensity mixed use development.*

The Greystones Public Realm Plan identifies a number of opportunities to improve the public realm, improve permeability and public safety, improve access to the sea for recreational purposes, develop an events space, harness the potential for renewable energy to power public lighting and smart street

furniture, enhance green space and biodiversity and harness the town's heritage potential. Strengthen and revitalise the urban structure of Delgany, harnessing its unique heritage and environmental assets. Address dereliction and underutilised sites to deliver compact growth and revitalise the town centres.

Objective CPO 5.10 *To support and facilitate proposals for heritage or technology led regeneration.*

Objective CPO 5.17 *To harness and integrate the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive reuse, recognising its important contribution to placemaking. New development should respect and complement the historic fabric of existing towns and villages – the traditional street patterns, plot sizes, mix of building types, distinctive paving and attractive street furniture.*

Objective CPO 5.18 *To protect, integrate and enhance heritage assets, including attractive streetscapes and historic buildings, through appropriate reuse and regeneration and restrict inappropriate development that would undermine the settlement's identity, heritage and sense of place.*

Draft LPF

Section A2.3 Town Centre & Retail Development Strategy

- *Support the continued enhancement of the town / village centres of Greystones, Delgany and Kilcoole as the hearts of the settlements, where people of all backgrounds, ages and abilities can avail of services and interact within their communities;*
- *Create compact town / village centres by reusing existing buildings and maximising the potential of infill and brownfield sites; use all mechanisms and processes available to drive forward the redevelopment and regeneration of vacant, underutilised and derelict sites;*
- *Embrace the historic character and heritage attributes of the town / village centres and strengthen the strong sense of place;*

Section A2.7 Heritage Strategy

- *To enhance the quality of the natural and built environment, to enhance the unique character of the towns / villages in the LPF area and their environs as a place to live, visit and work;*
- *To promote greater appreciation of, and access to, local heritage assets.*

No specific suggestion is made as to how these objectives are not 'sufficient' or might be strengthened and therefore no changes are recommended.

With respect the old Holy Faith Convent and Captain Tarrant's Farmhouse, the farmhouse is a **Protected Structure** and as this provides the highest level of protection available in the County Development Plan, no further specific objectives are recommended. As detailed above in the response to the submission on Darraghville, the LPF is not the 'architectural heritage protection plan' or a 'conservation plan' for the LPF area or for any particular structure or feature within the LPF area – it is land use framework that will manage and direct future development in the area, while ensuring protection of valuable built or natural elements present. There are many protected structures in the full LPF area and the LPF does not set out specific policy protection or detailed objectives for each, describing in detail its features, value or future management / conservation requirements.

The Convent is not a Protected Structure nor is it identified on the NIAH. It is not considered appropriate at this time to include specific objectives in relation to same above other historic structures in the area that are similarly not on the RPS or NIAH. The Convent appears to be in good structural condition and therefore it is unclear why the submitters consider it to be at risk.

The Wicklow County Development Plan provides for shopfront and signage guidelines and therefore it is not considered appropriate to provide separate standards for Greystones. The County guidelines encapsulate the principles of respecting established character, materials, and proportions, in line with best practice in heritage-led regeneration. Therefore no change is recommended.

The Burnaby

The submission made by the Burnaby Residents association is primarily concerned with area management in terms of the Council's activities (such as public realm and road works) in the area and the Council's assessment of planning applications in the area. Neither of these are matters for the LPF which is the policy document for the area; the implementation of the policies is an 'operational' matter and the Council is committed to securing the policies and objectives of its plans / frameworks in its operations. In particular, the Council is satisfied that it is appropriately taking into account the objectives of the previous LAP and the ACA designation with respect to planning applications in the area.

Overall only one specific concern appears to be raised with respect to the policies / objectives relating to the ACA in the submission and that is with respect to the zoning / density provisions for the area. It is put forward that a density of 10/ha is too high for the area; that for over half of the estate the prevailing density is closer to 3/ha on the basis that there are 47 detached dwellings on an area of 15ha and the 10/ha allowance would result in doubling or tripling of density.

In this regard, it is considered that the 10/ha (or 4/acre) provision is reasonable, particularly in this central, well served location; has adequately protected the character of the Burnaby for over 25 years and along with the ACA designation and other County Development Plan / LPF objectives, the character of the Burnaby can still be maintained and enhanced even allowing for low density infill. The 10/ha provision requires a minimum plot size of 1,000 sqm and typical plot sizes in the Burnaby range from 800sqm-1,000sqm (for example along Killincarrick Road and Burnaby Road) to 4,000sqm (with most being in the 1,500-3,000sqm range).

Additions to the Record of Protected Structures

Wicklow County Council undertakes period review of the RPS, approximately every 6 years in accordance with the County Development Plan cycle, the last having been undertaken in 2021-2022. All of the structures detailed in the submissions can be considered in the next review which it is hoped will commence earlier than usual in 2025-2026.

With respect to the suggestion to alter the zoning of Killincarrig Mill, it unclear how a change from 'neighbourhood centre' zoning to 'public utility' or 'tourism' zoning is considered to offer additional protection (if this is the aim of the suggestion) as both of these would similarly allow for the appropriate redevelopment of the Mill, should such a project come forward. Permission was granted in 2010 for the renovation and refurbishment of the structure for commercial usage, although this project did not proceed.

Chief Executive's Recommendation

Amend the LPF as follows:

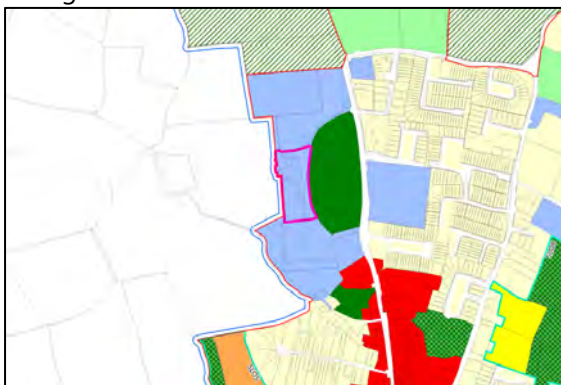
Section B:6 Heritage, Biodiversity & Green Infrastructure

Amend Objective GDK52 as follows:

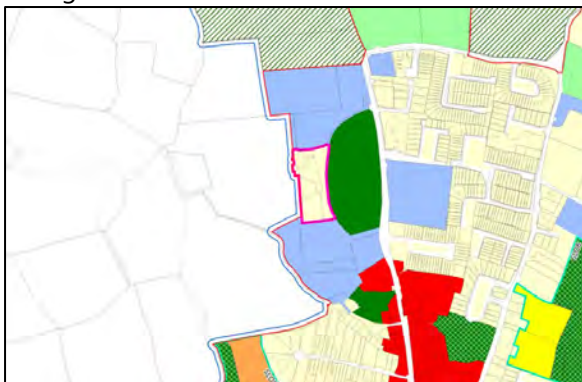
To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting **and designed landscape planting**, whether subject to TPO or not, where considered to be viable, safe and in line with sound arboricultural management principles. To require and ensure the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments.

Amend Map No. 1 Land-Use Zoning Map as follows

Change from:



Change to:



(Please note the proposed amendment map shown above also includes the amendment proposed on foot of Submission No. 82)

Topic 2 Areas of natural biodiversity, mature trees and rivers / watercourses, coastal zone

General

No.	Name	Issues Raised
86	Keith Scanlon	<p>The submitter put forward the following requests and suggestions with respect to biodiversity and environmental protection generally:</p> <ul style="list-style-type: none"> - The LPF should respect and support the (currently updating) Wicklow Biodiversity Action Plan. - Development should be concentrated in towns not up the hills and into the Glens (like Coolagad). - Rivers & streams should be protected (buffer zone 25m each side of watercourses like CDP). - An extended area should be zoned for a Glen of the Downs / River & Marine area for Nature (not development) in the LPF(as OS2 and also request an extended SAC / SPA). It is a key part of Greystones / Delgany, and the current Glen of the Downs SAC / SPA is isolated and not sustainable without further protection).
Chief Executive's Response		
<p>County Wicklow Biodiversity Action Plan 2025 (draft)</p> <p>The provisions and objectives of the draft LPF aim to support the objectives of the emerging BAP and in conjunction with the application of the objectives of the Wicklow County Development Plan, provisions is made for wide ranging protection of protected sites, habitats and species, natural corridors, woodlands, watercourses, wetlands, trees, hedgerows stonewalls and other features / elements that support ecosystems and biodiversity.</p> <p>Zoning Strategy</p> <p>As set out in the draft LPF, all effort has been made to provide for necessary new development within either the existing built up envelope of the settlements or the boundary of the previous LAP. The draft LPF does provide for development zoning in the Coolagad area, but this has been rationalised and justified where be maintained, having regard to the environmental sensitivities in the area.</p> <p>Rivers / watercourses</p> <p>The provisions of the County Development Plan apply directly in the LPF area; therefore County Development Plan objectives with regard to watercourse protection including buffer zones apply in the LPF area.</p> <p>Glen Of The Downs, SAC / SPA designation</p> <p>The Glen is a designated SAC. A considerable part of the area between the SAC and the built up settlement of Delgany is already development as Delgany Golf Club or for low density houses (along the Glen Road) or is in use for agriculture. It is not considered appropriate to zone these areas as OS2 – 'Natural Areas' given their existing usage.</p> <p>The changing of any SAC / SPA designation is not within the scope of the LPF or the power of the Council – these are EU designations managed by the NPWS</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Delgany, Blackberry Lane

No.	Name	Issues Raised
15	Rori Coleman	<p>The submitter fully supports the council in their strategy <i>"that the currently unzoned lands should not be zoned for new development and zoning be removed from the following four locations (a) high elevations of Bellevue Hill, (b) the lands at risk of flooding on the west side of Bellevue Hill, (c) the R-Special lands to the west of Bellevue Hill and (d) Blackberry Lane south of Three Trouts River"</i>.</p> <p>In this regard, he applauds the Council in recognising the highly sensitive environmental nature of these lands, and in protecting the Annex 1 habitats and the precious Three Trouts River and he considers that there should never be any large scale development on these lands south of Three Trouts for the following reasons:</p> <ul style="list-style-type: none"> ▪ He can personally attest to the issues of very high/extreme groundwater and has first-hand experience of a building project that has impacted the groundwater. He indicates that this was relatively small development and raises concerns about water/drainage issues for a larger development ▪ The land south of Blackberry Lane is abundant with wildlife. The biodiversity in and around The Three Trouts River has been well documented, with supporting documentation from Inland Fisheries Ireland. ▪ Having regard to a previous application made for these lands, the character of the area and the biodiversity would be forever destroyed by this level of development. ▪ Any major development would radically alter the existing biodiversity of the Three Trouts River and it's existing floodplain. ▪ Any major development would decimate the landscape and take out hundreds of mature trees. These trees provide an extensive carbon sink. ▪ Wildlife habitats will be destroyed.
73	Delgany Community Council	<p>The submitters put forward that they appreciate the riparian zones being designated as "Natural Area" near the rivers, particularly around the Three Trout river and stream and the dezoning around Blackberry Lane which is a very sensitive ecological environment. They agree <i>"that the currently unzoned lands should not be zoned for new development and zoning be removed from the following four locations (a) high elevations of Bellevue Hill, (b) the lands at risk of flooding on the west side of Bellevue Hill, (c) the R-Special lands to the west of Bellevue Hill and (d) Blackberry Lane south of Three Trouts River"</i></p>
Chief Executive's Response		
Submissions are noted.		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Kilcoole

No.	Name	Issues Raised
25	Hubi Kos	<p>The submitter offers the following observations in support of the Council's efforts to protect Kilcoole's unique identity:</p> <ul style="list-style-type: none"> Preservation of Natural Habitats and Biodiversity Corridors The Kilcoole area is home to nationally important habitats, including the coastal nature reserve, wetlands, and the nesting grounds of protected bird species such as the Little Tern and the Red Kite. The submitter was heartened to see that these areas remain protected and undisturbed and supports continued zoning restrictions in sensitive areas to support biodiversity, carbon storage, and climate resilience, in line with national and EU environmental objectives. Maintaining the Integrity of Agricultural Land While recognising the need for sustainable population growth, the submitter understands that the previous LAP already made provision for future residential development through phased zoning. It is their understanding that this strategic foresight reduces the necessity to rezone additional agricultural lands and in addition to preserving these lands it not only protects the rural character of Kilcoole but also helps maintain green buffers and food-producing potential. Safeguarding Historical and Cultural Landscape Features Kilcoole's heritage — including its historic field boundaries, laneways, and vernacular buildings — is a defining feature of its character. It was very evident from reviewing the LAP, that where possible, it continue to promote policies that retain and sensitively incorporate these features into any new development to maintain a sense of place. Support for Infrastructure-First Development The submitter welcomes the LAP's sensible focus on ensuring infrastructure grows with the community. Roads, schools, footpaths, and services should be planned alongside housing. It's also important that new public transport routes are designed carefully to avoid flood-prone areas and areas of natural beauty and critical natural habitats. Protection of Coastal and Flood-Prone Zones The Council's recognition of the importance of coastal zone management is appreciated by the submitter. The submitter encourages the continued protection of flood-prone areas and the enforcement of building restrictions in zones vulnerable to erosion or sea-level rise. The "worst-case scenario" forecast of potential flooding highlights the foresight the council has to future-proof vulnerable areas. Enhancing Green Spaces and Community Wellbeing The inclusion of public green areas and the protection of green corridors for both recreation and biodiversity is considered by the submitter to be an excellent feature of the current plan. It is put forward that these should remain a priority, ensuring that as Kilcoole

		<p>grows, the quality of life for residents is not compromised.</p> <ul style="list-style-type: none"> ▪ Avoiding Ad-Hoc Rezoning <p>The submitter supports the Council's structured approach and urges that the integrity of the LAP not be diluted by piecemeal rezoning outside of the agreed framework; it is put forward that this helps ensure that planning decisions remain transparent, consistent, and in the public interest.</p>
35	Tom and Sandra Hayes	<p>The submitters raise concerns about the impact on environment and wildlife in the Kilcoole area, particularly around Sea Road and the coastal area, in the event of further development occurring in this area. In particular, they put forward that:</p> <ul style="list-style-type: none"> - The area of Natural Beauty adjacent to the bird sanctuary at Kilcoole beach is a critical habitat for nesting terns (a protected species); - There are breeding Red Kites, a protected bird of prey species recently reintroduced to Ireland, which may be disturbed or displaced by construction and increased human activity; - The nearby wooded area provides essential habitat for woodpeckers, another sensitive species whose habitat would be threatened by future proposed works.
53	Kilcoole Tidy Towns	<p>Under this topic, this submission addresses as number of issues as follows:</p> <p>Buffer zones</p> <p>The submitters put forward that buffer zones play a critical role in maintaining the environmental and visual integrity of local watercourses - Kilcoole Stream that runs from Glen of the Downs, through the mass path and on down to the Breaches, home to Irelands largest Little Tern colony which is protected by Birdwatch Ireland since 1985, and a winter haven for Greenland white-fronted geese and Brent geese. The submitters recommend a minimum buffer zone of 15-20m be maintained on either side of the Kilcoole Stream to protect ecological habitats and preserve scenic quality, these buffer zones must be kept free from development including fences or garden extensions from new housing developments.</p> <p>It is suggested that natural vegetation must be retained or restored within buffer zones to support biodiversity and reduce surface water runoff. These buffer zones should be designated as green infrastructure in the Local Area Plans, natural planting, and habitat restoration within these buffer zones to support pollinators and aquatic life.</p> <p>Protection of Trees and Hedgerows</p> <p>It is put forward that protecting trees and hedgerows is a key part of safeguarding biodiversity, local character, and climate resilience; that given the upsurge in building and development in Kilcoole it is vital that all planning applications take the protection of mature trees and hedgerows into consideration.</p> <p>The submitters indicate a particular concern about the mature trees along the old convent grounds and surrounding areas as this area has become a wildlife haven for several decades. It is put forward that the</p>

		<p>removal of trees and hedgerows during development must be prohibited unless absolutely necessary and justified by ecological assessment, requiring replacement planting with mature and native species where removal is unavoidable, also maintaining ecological corridors by ensuring hedgerows are linked and not fragmented by development.</p> <p>Biodiversity</p> <p>The submitters indicate that biodiversity-the variety of life around us is one of Kilcoole's greatest assets, Kilcoole Tidy Towns believes that promoting biodiversity should be a key part of every local policy, project and development in Kilcoole, and they are calling for the protection of natural habitats and wildlife corridors, green space design that supports pollinators, birds and native species, sustainable landscaping in new developments, by embedding biodiversity into planning and land use.</p>
65	Aidan Kelly	The submitter raises concerns about the impact of new development on both the greenbelt around Kilcoole and the wetlands nearby..
Chief Executive's Response		
<p>Submissions are noted.</p> <p>With respect to suggested buffer zones along streams, the County Development Plan provides for a 25m development free buffer along watercourses wherever possible (CPO13.2, 17.6) and this has been implemented in this LPF in Kilcoole in SLO5 and 6 and through the OS2 zoning provided along watercourses, including the Kilcoole Stream wherever feasible.</p> <p>The protection of biodiversity is firmly embedded in the Wicklow County Development Plan, the policies and objectives of which apply directly in the LPF area; for example (not exhaustive list):</p> <p>CPO 17.1 <i>To protect, sustainably manage and enhance the natural heritage, biodiversity, geological heritage, landscape and environment of County Wicklow in recognition of its importance for nature conservation and biodiversity and as a non-renewable resource.</i></p> <p>CPO 17.2 <i>Ensure the protection of ecosystems and ecosystem services by integrating full consideration of these into all decision making.</i></p> <p>CPO 17.3 <i>To support and promote the implementation of the County Wicklow Heritage Plan and the County Wicklow Biodiversity Action Plan.</i></p> <p>CPO 17.4 <i>To contribute, as appropriate, towards the protection of designated ecological sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).</i></p> <p><i>To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including but not limited to the following and any updated/superseding documents:</i></p> <ul style="list-style-type: none"> - <i>EU Directives, including the Habitats Directive (92/43/EEC, as amended) , the Birds Directive (2009/147/EC) , the Environmental Liability Directive (2004/35/EC) , the Environmental Impact Assessment Directive (2011/92/EU, as amended), the Water Framework Directive (2000/60/EC), EU Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC); EU 'Guidance on integrating ecosystems and their services into decision-making'</i> 		

- (European Commission 2019);
- National legislation, including the Wildlife Acts 1976 and 2010 (as amended) , European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008 (as amended) and the Flora Protection order 2015;
- National policy guidelines (including any clarifying circulars or superseding versions of same), including 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018), 'Guidance for Consent Authorities regarding Sub-Threshold Development' (2003), 'Tree Preservation Guidelines', 'Landscape and Landscape Assessment' (draft 2000), 'Appropriate Assessment Guidance' (2010);
- Catchment and water resource management plans, including the National River Basin Management Plan 2018-2021 (including any superseding versions of same);
- Biodiversity plans and guidelines, including National Biodiversity Action Plan 2017-2021 (including any superseding versions of same) and the County Wicklow Biodiversity Action Plan;
- Ireland's Environment – An Integrated Assessment 2020 (EPA), including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.

CPO 17.5 Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan .

CPO 17.6 Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.

CPO 17.8 Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.

CPO 17.12 To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.

CPO 17.14 Ensure that development proposals support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the European network in Wicklow.

CPO 17.16 *Require pollinator friendly landscape management and planting within new developments and on Council owned land.*

CPO 17.18 *To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of the long-term sustainability of a stable ecosystem amenity or the environment generally, as set out in Schedule 17.05 and Maps 17.05 and 17.05A - H of this plan.*

CPO 17.20 *Development that requires the felling of mature trees of environmental and/or amenity value, even though they may not have a TPO in place, will be discouraged.*

CPO 17.21 *To strongly discourage the felling of mature trees to facilitate development and encourage tree surgery rather than felling if such is essential to enable development to proceed.*

CPO 17.22 *To require and ensure the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments.*

CPO 17.23 *To require the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).*

CPO 17.24 *To ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Documents No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.*

CPO 17.25 *Ensure that floodplains and wetlands are retained for their biodiversity and ecosystems services value and resist development and activities that would interfere with the natural water cycle to a degree that would interfere with the survival and stability of these natural habitats.*

CPO 17.26 *Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.*

CPO 18.1 *To recognise the importance and contribution of Green Infrastructure for the maintenance of biodiversity and ecosystem services, ensuring that the region and county will be better able to adapt and respond to climate change issues.*

CPO 18.2 *To protect existing Green Infrastructure resources and to facilitate, in consultation with relevant stakeholders, the development of green infrastructure that recognises the benefits that can be*

achieved with regard to the following:

- provision of open space amenities,
- sustainable management of water,
- protection and management of biodiversity,
- protection of cultural heritage, and
- protection of protected landscape sensitivities.

CPO 18.3 *New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment.*

CPO 18.4 *To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, European sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.5 *To identify and facilitate the provision of linkages along and between green / river corridors within the county and adjoining counties to create inter connected routes and develop riverside parks and create linkages between them to form 'necklace' effect routes including development of walkways, cycleways, bridleways and wildlife corridors where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.6 *To promote and facilitate the development of coastal trails linking up with existing recreational trails, creating new linkages between coastal sites and inward linkages to settlements and green spaces in built up areas and extensions to existing facilities where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.*

CPO 18.7 *To facilitate the development of green bridges / wildlife crossings over existing physical transport barriers to repair fragmentation of the Green Infrastructure network caused by such grey infrastructure developments.*

CPO 18.8 *To require the integration of Green Infrastructure principles and inclusion of native planting schemes in all development proposals in landscaped areas, open spaces and areas of public space.*

Greenbelts

As provided for in the draft LPF, all effort has been made to provide for necessary new development within either the existing built up envelope of the settlements or the boundary of the previous LAP. No new development zoning is proposed for example in the agricultural area areas between Kilcoole and Greystones, Kilcoole and the coast, or Kilcoole and Newcastle / Newtown.

Protection of wetlands / coastal areas

Through the carrying out a Habitats Directive (appropriate) Assessment of the draft LPF and through the implementation of both the objectives of the draft LPF and County Policy Objectives 17.4, 17.5 and 17.6 set out above, the highest level of protection possible is provided for the wetlands, coastal areas and protected species to the east of Kilcoole.

Chief Executive's Recommendation
No change to draft Greystones - Delgany & Kilcoole LPF.

Trees / TPOs

No.	Name	Issues Raised
87	Colin Love	<p>This submission requests that the avenues of scotch pine trees in the Woodlands area of Greystones associated with the former Woodlands Hotel / Killincarrig House be added to the list of TPOs.</p> <p>The submitter outlines that these avenues of trees were planted by the Hawkins Whitshed family for their Victorian Country House and are all that highlights the existence of the house and Demesne, as the house, outbuildings and gate lodges are lost.</p>
Chief Executive's Response		
<p>Wicklow County Council undertakes periodic reviews of existing and possible additional TPOs approximately every 5-6 years, the last review being in 2021-2022 as part of the Wicklow County Development Plan. These trees can be considered in the next review.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Topic 3 Green Infrastructure & Recreational Use of Natural Resources

General

No.	Name	Issues Raised
6	Patricia Cusack	The submitter considers that there is too little public green space in the area. She points out that the extensive golf courses show as green space are only used by paying members and when there is some public greenspace, as in the middle of some estates, it consists of barren grass with scarce trees or bushes and little biodiversity. She puts forward that there is a great need for more public green areas with more diverse planting in Greystones.
47	Liam Kennedy	The submitter puts forward that Greystones is lacking a proper public park; existing facilities are mostly small green spaces. It is suggested with the closure of Charlesland Golf Club a unique opportunity exists to acquire land for a public park comparable to the likes of Shanganagh park and that this should be pursued as a priority for the Council.
53	Kilcoole Tidy Towns	<p>The submitters put forward that green spaces are essential for the mental and physical well-being of residents and play an important role in local biodiversity and climate resilience; they request that existing green spaces be protected from infill development, any new development include provision for new publicly accessible green spaces, with policies be adopted to support rewilding and tree planting in underused or neglected green areas.</p> <p>It is suggested that the LPF identifies and zones new community green spaces for long term protection and use.</p> <p>In addition, the submitters outline that there is a growing need and demand for a secure designated dog park where residents can exercise their pets safely, as this would help address concerns about dogs off-lead in ecologically sensitive areas such as Kilcoole Beach and heritage paths; it would reduce conflict in natural areas where wildlife and livestock are present, it would also promote responsible pet ownership, enhance community well-being through social interaction. It is suggested that the dog park should be located near existing footpaths, designated parking, with access to waste bins, a water supply and seating for users.</p> <p>It is suggested the LPF zones adequate connected open spaces to serve as natural flood plains and biodiversity hubs, maintain greenbelts and undeveloped land between Kilcoole and neighbouring villages - Newtown Mount Kennedy, Newcastle, and Greystones, to reduce sprawl and support climate adaptation. It is put forward that this will reduce long-term costs, protect the community from environmental risks, and create a greener future for Kilcoole.</p>
65	Aidan Kelly	The submitter raises concerns regarding the use of Kilcoole beach / wetlands area by dogs and suggests that loose dogs should not be allowed on the beach/ wetlands, and moved up to Greystones or given a dog park.

Chief Executive's Response

It is agreed that there is a need for more public, high quality green space in the LPF area. In this regard, the draft LPF makes provision for the zoning of a considerable quantum of land for new public Open Space, of a range of types from highly usable sports grounds (AOS), to parks / recreation spaces (OS1) and natural areas (OS2).

With respect to the **open spaces in new housing developments**, the Council through the application of the standards of the County Development Plan requires the provision of new open spaces and strives to ensure all spaces are of high usability, and accessibility, and are landscaped appropriately in way that promotes active use while protecting biodiversity. In particular, as set out in Appendix 1 of the County Development Plan:

"All development proposals should seek to enhance biodiversity and avoid or minimise loss of existing local habitats and wildlife corridors.."

"Landscaping and biodiversity enhancement plans shall generally be required for new developments, particularly but not limited to those on greenfield sites, and shall be submitted with the planning application. These plans shall highlight existing natural features (such as trees, hedgerows, verges, watercourses etc) to be retained and enhanced, and detail new landscaping and biodiversity enhancement measures including (but not limited to) species, number, size and location of new planting, the provision of swift bricks / boxes or towers, bat boxes, etc and measures to protect ecological corridors, water courses etc. The plan should put an emphasis on the use of native species where possible. Planting schemes shall take account of future maintenance requirements. All landscaping design and management shall be pollinator friendly and generally in accordance with the planting and maintenance approach set out in the Pollinator Friendly Planting Code of the All-Ireland Pollinator Plan."

(Section 1.3 'Protecting Nature & Biodiversity')

- *Open spaces shall be attractively landscaped through the use of both hard and soft landscaping where appropriate. Open spaces should incorporate existing features and encourage pedestrian use by suitable paving;*
- *In larger developments (in excess of 1ha), consideration should be given to dedicating part of the residential open space (not exceeding 25% of the total space) to community gardens; at a minimum, landscaping plans will be required to identify a suitable area (in terms of soil type, gradient, light, drainage etc) within the residential open space area that would be suitable for future community garden use by the resident community.*

(Section 8.5 'Residential public open space')

With respect to **Charlesland golf club**, the draft LPF provides objectives for exactly what submission No. 47 is suggesting. Given that the lands are in private ownership, delivery directly by the Council however would not be feasible in the short term and all avenues need therefore to remain open.

With respect to **protection of green spaces from 'infill'**, where lands are zoned 'OS' infill development is generally not permissible. In addition, objective CPO 6.25 of the County Development Plan requires that *'In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development. Such lands will be retained as open space for the use of residents and new housing or other non-community related uses will not normally be permitted'*.

With respect to *dog parks*, the Council is supportive of the development of same and has provided

two such parks in Greystones and Charlesland on Council owned lands in recent years. At this time the Council does have a suitable park space in Kilcoole within which one could be provided, but the Council is happy to work with the community in the future on such a project. With respect to the use of Kilcoole beach by dogs, at this time there is no prohibition on the use of this beach for dogs, but in accordance with bye-laws, dogs must be on a leash or under adequate control at times and must not be worrying, chasing, injuring, disturbing any animals, birds or other creatures on the beach.

With respect to the suggestions regarding connected green spaces to serve as **natural flood plains and biodiversity hubs**, and the maintenance of greenbelts between settlements, the LPF provides for same as detailed in the GI maps and objectives, the flood mitigation objectives and maps and the zoning maps where applicable (such as the AG zone separating Kilcoole from Greystones).

The LPF does not cover any areas to the west of south of Kilcoole and therefore does not provide for **greenbelt designation between Kilcoole and Newtown / Newcastle**. These areas between towns are not zoned for development and are managed via the County Development Plan rural development policies and objectives.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

Amenity use of Three Trouts River

No.	Name	Issues Raised
21	Larry Doyle	The submitter request that the LPF makes provision for an amenity park between Blackberry Land and Priory Road at the Delgany village end (north of the Three Trout Stream). It is put forward that given the volume of residential houses over the past 5 years and the lack of social spaces in the village, the development of a small amenity park on existing council land would provide a valuable amenity for social interaction and would align with the proposals for the greenway between the Glen to the Sea. <i>(this submission is accompanied by a detailed description of this suggested park)</i>
73	Delgany Community Council	The submitters' request, given the lack of public open space in Delgany , that the Council owned lands between Blackberry Land and Priory Road at the Delgany village end be used to develop an amenity park which could be designed in harmony with nature and as an amenity through which locals can explore the biodiversity in the area. It is put forward that this proposed park could be compatible with the proposals for the greenway between the Glen to the Sea; this proposal is for a greenway of approximately 4 km running from Barry's Bridge on the N11/R762 junction down to the coast at Greystones, where it might link up at some future time with an East Coast Greenway. The proposed route generally follows along the route of the Three Trout Stream. In this regard the Delgany Community Council has produced a 'Greenway feasibility study'.
Chief Executive's Response		
<p>The lands in question are for the most part zoned 'OS2 – Natural Areas'. As set out in the draft LPF, <i>'uses appropriate for natural areas (OS2) zoned land are uses that protect and enhance the function of these areas as flood plains, buffer zones along watercourses and rivers, green breaks between built up areas, green corridors and areas of natural biodiversity. The development of these lands for recreational uses may only be considered where such use is shown to not undermine the purpose of this zoning'.</i></p> <p>This objective would support and facilitate the development on an amenity park subject to it being established that such development and use would not undermine this objective. However as the Council has no plans at this time to develop these lands in this manner, it is not considered appropriate to specifically identify these lands for <i>exclusively</i> park development.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Amenity / heritage walks / paths

No.	Name	Issues Raised
53	Kilcoole Tidy Towns	<p>The submitters put forward that Kilcoole is home to a number of historic paths, mass paths and walking routes which reflect the local heritage, community identity and rural character; these paths are not only of cultural and historic significance but also serve as a valuable recreational routes for residents and visitors. The Ballydonarea Loop Walk proves to be immensely popular with visiting walking groups.</p> <p>The submitters strongly urge that the plan officially designates and protects heritage paths as assets of the community and cultural value, ensure development does not encroach on or obstruct these paths, provide support to keep them accessible and safe.</p> <p>The submitters put forward that buffer zones play a critical role in maintaining the environmental and visual integrity of heritage paths. The submitters recommend a minimum buffer zone of 15-20m be maintained on either side of heritage paths to protect ecological habitats and preserve scenic quality and that these buffer zones should be kept free from development including fences or garden extensions from new housing developments. It is suggested these buffer zones should be designated as green infrastructure in the Local Area Plan, with natural planting, and habitat restoration within these buffer zones to support pollinators and aquatic life.</p>
Chief Executive's Response		
<p>It is not within the remit of this LPF to 'officially designate' walking routes / paths but rather it can identify such routes as local assets / active travel routes and ensure development proposals in the vicinity have regard to same. In this regard, it is recommended that known key amenity routes be identified on the GI maps associated with this LPF as an amendment, such as the Ballydonarea Loop / Strawberry Lane walk in Kilcoole.</p> <p>Should any of these routes be legally Public Rights of Way, they may be identified in the County Development Plan. In this regard, the Kilcoole mass path / Sally Walk is already identified as PROW in the County Development Plan and shown on the heritage maps associated with this LPF.</p>		
Chief Executive's Recommendation		
<p>Amend LPF as follows:</p> <ol style="list-style-type: none"> 1. Add 'Amenity Routes' to Map 3 – Key Green Infrastructure' including in particular all routes identified in Objective GDK55 2. Amend Objective GDK55 as follows: <p>To facilitate the development and enhancement of suitable access to and connectivity between areas of interest for residents, wildlife and biodiversity, with focus on promoting river corridors, European sites, nature reserves and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of European sites.</p>		

In particular, to promote the maintenance of existing and the development of new open spaces and recreational areas linked by green corridors as follows:

- a) Along the full coastal area from Greystones to Kilcoole as follows:
Bray Head – Bray to Greystones cliff walk and the coastal zone to the east of same including new marina park – Greystones north beach, marina, harbour – Greystones coastal route and beaches (the Cove, south beach) – Ballygannon – the Murrough European Site at Kilcoole.
- b) Linking Delgany to Kilquade and Kilcoole along St. Patrick's river route and the Mass Path
- c) Along Three Trouts Stream from Glen Road, Delgany to the sea
- d) From the R761 at Three Trouts Bridge to Mill Road
- e) Linking Coolagad to Kindlestown Woods
- f) **Ballydonarea Loop / Strawberry Lane walk in Kilcoole from Lott Lane to the coast**

3. Amend **SLO6 Ballydonarea** as follows:

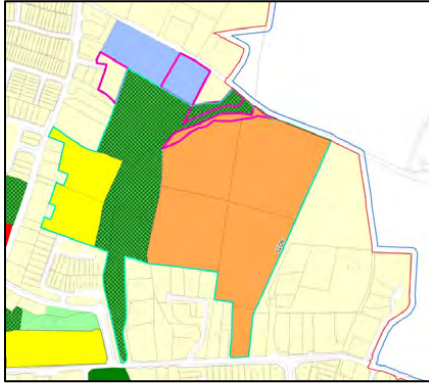
These SLO lands are located east of Lott Lane, Kilcoole in the townlands of Kilcoole and Ballydonarea and measure c. 12.7ha and are zoned for 'RN1 – New Residential Priority 1', 'RN2 – New Residential Priority 2' and 'OS1 – Open Space'. **The Ballydonarea Loop / Strawberry Lane walk forms part of the northern boundary of this area.** This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre and existing transport services.
- A total area of c. 8.8ha is zoned for new housing development which shall be divided into a least two distinct character areas / estates either side of the central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Lands zoned RN1 shall be accessed from Lott Lane only. Lands zoned RN2 shall be accessed from Sea Road only. Pedestrian and cycling connectivity shall be provided between the two RN zones across the green space, to Ballydonarea **Lane Loop / Strawberry Lane walk** to the north and Wellfield to the south;
- **New development within 25m of the Ballydonarea Loop / Strawberry Lane walk shall be so designed as to maintain and enhance the walk, preserving all natural features including watercourses, trees and mature hedgerows. No walls / fences will be permitted in this buffer zone, no structures shall back onto same and any structures shall be so designed to address and overlook the walk, and provide passive surveillance of same.**
- Open space shall be provided as follows
 - A central green area shall be provided along the watercourse and encompassing a natural wooded area to the north-west of same, of not less than 3.6ha in area.
 - Within this space, a 'natural' undisturbed area of not less than 10m shall be maintained either side of the stream and existing trees and hedgerows shall be maintained. Cycleway / footpath crossings over / through the watercourses, or tree / hedgerow lines, shall be minimised to that absolutely necessary for access; any such stream crossing shall be via a clean span bridge that maintains its natural character.
 - Where following ecological assessment, it is found that there are areas within this OS zone suitable for re- development, said lands shall be laid out for recreational purposes, including suitable play spaces, walks, seating area etc
 - The open space shall link fully through from Sea Road to Ballydonarea Lane.
- Community facilities shall be provided within the SLO area to meet the needs of the new resident community of the area. In particular, the development shall include at a

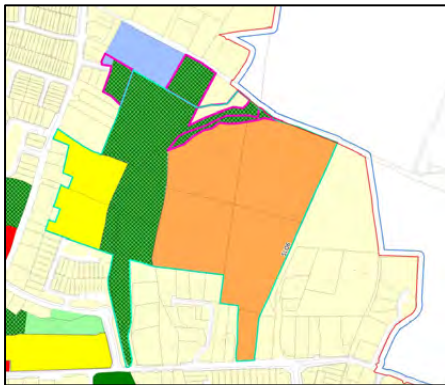
minimum a childcare facility; in determining additional requirements for community facilities, a community services audit shall be carried out.

Amend Map 1: Land Use Zoning and SLO map as follows:

Change from:



Change to:



Note: A number of submissions have requested changes in this SLO area – No.'s 18, 32, 41 and 57. The recommended amended map integrates all and any changes that the CE is recommending in this area on foot of all of these submissions.


Topic 4 Visual Amenity, Views and Prospects

No.	Name	Issues Raised
53	Kilcoole Tidy Towns	The submitters put forward that the protection of rural character is vital for Kilcoole village, and they urge the Local Area Plan to protect key views, such as the view of the Sugarloaf mountain on the mass path and the view of the sea from Kilcoole Rock, and ensure any new developments are sensitively designed to respect Kilcoole's rural setting including scale, materials and landscaping, avoiding high-density or visually intrusive development in areas of natural beauty and scenic spots, as this would protect not only the cultural and environmental heritage but also protect Kilcoole's distinctiveness and long term appeal as a liveable, low impact community.
Chief Executive's Response		
<p>The draft LPF does not provide for development zoning along the mass path west of the existing school and therefore does not provide for development that might obstruct any views of the Sugarloaf from the mass path. At this time, there is no view or prospect listed of the Sugarloaf from the mass path. There are very limited views of the Sugarloaf available along the mass path between the Forester's Hall and the walled garden, due to both land form and mature vegetation – the views from this route are no more open or more frequent than most locations in Kilcoole. Any development in this area would be managed via the objectives of the Wicklow County Development Plan for rural development.</p> <p>With respect to the view of the sea from Kilcoole Rock, although land is proposed for zoning within this vista, it would be at a considerably lower elevation and would be highly unlikely to interfere with views of the sea.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Topic 5 Climate Resilience and Action

No.	Name	Issues Raised
53	Kilcoole Tidy Towns	<p>The submitters put forward that as the impacts of climate change become more visible it is vital that any future plans be developed with climate resilience at its core, and they urge that the Local Area Plan adopt policies that reduce climate risks through natural low impact solutions - promotion of tree planting using native species in public spaces and new developments, support projects such as community gardens, green roofs and pollinator corridors, protect existing mature trees.</p> <p>It is suggested that the LPF require the use of sustainable drainage systems-rain gardens, permeable paving to manage surface water naturally, avoiding over-reliance on hard drainage infrastructure, use nature based solutions to reduce runoff especially near the Kilcoole stream to keep the water quality healthy.</p>
Chief Executive's Response		
<p>The Wicklow County Development Plan policies and objectives, which apply directly in the LPF area, address the concerns and suggestion made by the submitters with respect to:</p> <ul style="list-style-type: none"> ▪ climate action generally (chapters 2, 4, 8, 12, 12, 14, 15, 16, 17, 18, 19) ▪ new tree planting (Appendix 1) ▪ use of native species (CPO 17.22, 18.8, Appendix 1) ▪ community gardens (Appendix 1) ▪ green roofs (Appendix 1) ▪ pollinator corridors (CPO 17.16, 18.4, 18.5, Appendix 1) ▪ protection of mature trees (CPO 17.18 – 17.21, 17.23, Appendix 1) ▪ sustainable drainage, nature based solution (CPO 14.12, 14.13, 14.15, 17.25, 17.26, 18.2, Appendix 1) 		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Topic 6 GI mapping

No.	Name	Issues Raised
61	Tom O'Shea	These submissions both relate to lands on Mill Road Greystones in particular surrounding Mill House, Leo House, Aldi and the old Mill.
63	Tom O'Shea	<p>Concern is raised over the GI map, which shows the boundaries of these sites as 'existing green spaces'.</p>  <p>In this first submission (No. 61), which is prepared by an agent on behalf of the landowner, it is indicated that the marked green areas in question include the submitters garden and it is considered that the inclusion of these 'private spaces' may restrict any future development potential of the property and therefore request that they be 'excluded'. The submitter notes that no other residence in the plan has had their 'private spaces' earmarked for this purpose. The submitter requests that the areas be 'removed from any future maps forming part of the GDKLAP'. The second sub (No. 63) which is directly from the landowner, it is requested that that land be identified as 'residential garden' in final drawing / zoning.</p>
Chief Executive's Response		
<p>Chapter 18 of the Wicklow County Development Plan 2022-2028 sets out the policies and objectives applicable in the LPF area with regard to Green Infrastructure. It states that '<i>Green Infrastructure (GI) can be broadly defined as 'an interconnected network of green space that conserves natural ecosystem values and functions and provides associated benefits to human populations. Green Infrastructure is the ecological framework needed for environmental, social and economic sustainability – in short it is a nation's natural life sustaining system'.</i></p> <p>GI can include varying land uses - pasture lands, croplands, woodlands, heath, bog, scrubland, quarries, parks, formal and informal green spaces, active and passive spaces, areas around domestic and non-domestic buildings, brownfield areas, waterways, waterbodies, waterway corridors, wetlands, coastal areas and community/institutional lands such as hospitals, schools, graveyards, allotments and community gardens. Heritage sites, European sites and NHAs are also important GI sites.</p> <p>Therefore, in the creation of GI mapping for the Greystones-Delgany and Kilcoole LPF, primarily watercourse based green corridors were identified to form the core of ecological corridors in the area. Other areas of potential biodiversity value were also identified, and thereafter potential linkages</p>		

between same were evaluated in order to connect the individual sites into a coherent, interlinked network of ecological corridors and 'necklace' effect routes. In the identification of watercourse-based green corridors, particular regard has been had to CPO 17.26 of the Wicklow County Development Plan, which requires a 25m riparian buffer zone along watercourses in line with guidance issued by Inland Fisheries Ireland.

Other areas of value that have been included as sites in the ecological corridor network have been informed by the Wicklow County Development Plan 2022-2028, with a particular focus on the County Policy Objectives set out in Chapter 17 'Natural Heritage & Biodiversity', combined with the data sources listed above. Such sites could include:

- Significant existing areas of forestry or woodland, as identified by GIS mapping, aerial imagery or visual inspection.
- Areas identified as Local Biodiversity Areas in previous studies.
- European sites (SACs, SPAs) and land with high ecological connectivity to such, i.e. lands in close proximity and visibility.
- Other protected sites, e.g. NHAs or pNHAs, and land with high ecological connectivity to such, i.e. lands in close proximity and visibility.
- Existing hedgerows, linear tree stands, and 'stepping stone' areas that provide connectivity between sites.
- Where relevant, existing 'green' land use zonings as per the previous LAP

The resultant Key GI Map No. 3 includes a series of interconnected ecological corridors.

While the Key GI Map is **not as a land use / zoning map**, it has been use to guide both the crafting of the land-use zones and the development of appropriate objectives for the LPF area to ensure the maintenance of the biodiversity and ecological connectivity of identified (or otherwise) GI assets.

Key GI Map No. 3 indicates GI Assets regardless of the land use zoning of the assets in question. In some cases, it may be worth zoning areas of land for a land use that would ensure the protection of such GI assets, e.g. OS2 'Natural Areas', while in other cases it may be too prescriptive or unwieldy to identify and 'zone' accordingly all GI assets on a land use map.

The GI asset identification process was transposed into the land use zoning objectives utilising the following approach:

- 25m riparian buffer zones on both sides of a watercourse, where largely undeveloped, will generally be specifically protected via an appropriate 'open space' land use zoning objective, as per CPO 17.26 of the Wicklow County Development Plan 2022-2028.
- Defined European, or other, protected sites will not be zoned
- Necessary buffers around defined European, or other, protected sites, will generally be protected via an appropriate 'open space' land use zoning objective.
- Significant areas of existing woodland/forestry will, where deemed necessary, generally be protected via an appropriate 'open space' land use zoning objective, as per CPO 17.18-17.23 of the Wicklow County Development Plan 2022-2028.
- Hedgerows and linear tree stands will generally not be protected via land use zoning objectives but will rather be protected via the development management process.
- GI assets that form part of existing permitted open spaces, e.g. the permitted public open space for a residential development that would usually be zoned RE 'Existing Residential' in previous local area plans, will generally be specifically protected via an appropriate 'open space' land use zoning objective.
- GI assets that form part of other existing permitted developments, will be included or excluded as land use zoning objectives on a case-by-case basis. Where not included, they can be protected as needed through the development management process.

Those assets identified as warranting protection via an appropriate land use zoning objective have had a variety of specific land use zoning objectives assigned to them. A precautionary approach has been taken, where land use zonings will be considered in the following order of preference: OS2 'Natural Areas' zoning objectives as a first preference, followed by a preference for OS1 'Open Space' or AOS 'Active Open Space' zoning objectives, followed by zoning objectives that could involve the substantial development of structures on the land. Wherever there was be ambiguity about the level of development possible on a GI asset while maintaining its essential biodiversity and ecological connectivity functions, input from WCC Heritage/Biodiversity Officers was sought.

In the creation of Green Infrastructure mapping, regard was had to the following sources of information:

Tailte Éireann Prime 2 Mapping:

WATER_LINE

WATER_SINGLE_STREAM_LINE

WATER_POLY

VEGETATION_POLY (FUNC_ID = Managed Woodland)

VEGETATION_POLY (FUNC_ID = Unmanaged Woodland)

VEGETATION_POLY (FUNC_ID = Green Space)

VEGETATION_POLY (FUNC_ID = Cemetery)

VEGETATION_POLY (FUNC_ID = Graveyard)

EPA OGC Web Mapping Service:

River Waterbodies

National Parks & Wildlife Service OGC Web Map Service:

Special Protection Area (SPA)

Proposed Natural Heritage Area (pNHA)

Bluesky Mapping:

National Tree Map

WCC Datasets

Local Biodiversity Areas

Historical Mapping & Aerial Imagery

Geohive.ie

Google Earth

Google Maps

Environmental Impact Assessment Reports, Natura Impact Assessment Reports (Appropriate Assessment), Ecological Assessments and Other Assessments of recent and historical planning applications, as relevant.

Site Visits

Mill Road

These submissions relates to the following areas marked green along the boundaries of the property:

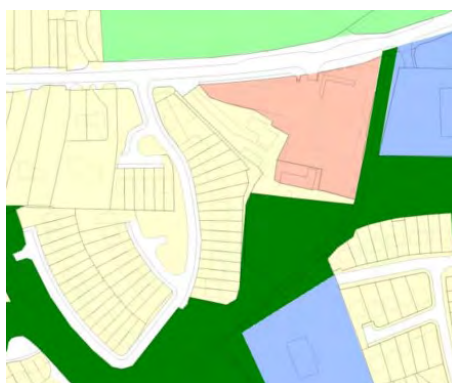


The light green areas are identified as 'existing green areas' in the Tailte Éireann Prime 2 Mapping: VEGETATION_POLY (FUNC_ID = Green Space) and this is how they come to be shown on the GI map. This data set does not distinguish between 'public' and 'private' green areas.

While it appears that the intention of the Tailte Éireann mapping is to identify only existing *open* spaces and not private gardens, there are locations in the LPF area where private gardens are shown on this Tailte Éireann map layer (this is not the only location this occurs in the LPF area).

While the submission asks for these areas to '*be removed from any future maps forming part of the GDKLAP*', it is going to be assumed that the concern is **only with the GI mapping**, but not the LPF zoning map given that the submission speaks to the development potential of the lands. It would seem illogical that they would seek to have the lands 'removed' from all maps, GI and zoning, if development was being contemplated.

As set out above the Key GI Map is **not as a land use / zoning map**, and given that it appears that the lands that are the subject of this submission are for the most part **are** proposed to be zoned for development type uses (RE), it is not that clear what the concern relates to. It is not clear why the identification of some green features on the lands would damage any development potential, when the objectives of the County Development Plan and LPF anyway require retention of natural features where present, whether or not they are identified on GI maps.



Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.10 Part B of the Draft LPF

Part B:7 Infrastructure & Services

Topic 1 Infrastructure (general)

No.	Name	Issues Raised
8	Stuart Kinch	Submitter suggests a pause on all further residential development in order to allow focus to be placed on addressing infrastructure deficiencies, in particular: <ul style="list-style-type: none"> - Re-opening the cliff walk - Activating employment land - Transforming public transport infrastructure - Upgrading education infrastructure
10	Orla Baines	The submitter puts forward that housing is at capacity in Greystones-Delgany and infrastructure needs to catch up. Particular reference is made to the need for additional active open space / recreation infrastructure.
25	Hubi Kos	The submitter welcomes the plan's focus on ensuring infrastructure grows with the community. Roads, schools, footpaths, and services should be planned alongside housing. Submitter puts forward that it is also important that new public transport routes are designed carefully to avoid flood-prone areas and areas of natural beauty and critical natural habitats
34	Colin Acton	The submitter agrees that the growth in housing that has already occurred between 2016- 2025 meets the housing targets and that the focus during the period of this LPF needs to be on the provision of 'catch up' infrastructure to match this significant residential growth. He puts forward that the roads are inadequate; the footpaths are in poor condition; the cycle facilities are inadequate; far too many schools are 'temporary' and new permanent school buildings are needed. He suggests there should be no more residential development except small (i.e. less than 20) infill development.
52	Joan Moran	The submitter puts forward that the focus during the period of this LPF needs to be on the provision of 'catch up' infrastructure to service the residential growth that has already occurred between 2016- 2025. She states that the roads are inadequate; the footpaths are in poor condition; the cycle facilities are inadequate; far too many schools are 'temporary' and new permanent school buildings are needed. She suggests there should be no more residential development except small (i.e. less than 20) infill development.

Chief Executive's Response

The Council is committed to working with all local and state agencies to enhance services in the area including (but not limited to):

- With respect to employment and tourism: Department of Enterprise, Tourism & Employment, Industrial Development Agency, Enterprise Ireland, Failte Ireland;
- With respect to transportation issues: Transport Infrastructure Ireland, the National Transport Authority, Iarnród Éireann, Dublin Bus / Bus Éireann;
- With respect to education and training: Department of Education & Youth, Department of Further & Higher Education, Research, Innovation & Science.

The LPF, in conjunction with the Wicklow County Development Plan, sets out a clear policy platform to support the delivery of new infrastructure and services where needed, and sets out numerous general and specific objectives with respect to infrastructural needs in the area. Wicklow County Council is committed to ensuring that new development is only permitted where the necessary infrastructure and services are or will be in place to service that development. The Council is also very conscious of the housing crisis and the need to maximise housing delivery where feasible, and therefore it is not considered appropriate to halt the consideration of *all* new housing development in the area, particularly in instances where it is deemed that infrastructure is available to service any proposed development.

Cliff Walk

The Cliff Walk has been closed for some years due to serious safety issues arising. The Council is committed to working with the various stakeholder and landowners to get the walk opened.

Employment

More detailed assessed of submissions relating to economic development and employment can be found in Section B.3 of this report. It is agreed that more local employment is needed, particularly in Greystones-Delgany, to make the town more sustainable and self-sufficient, and to reduce adverse impacts such as commuting. The LPF, along with the County Development Plan and the various strategies and programmes of the numerous employment agencies active in this area, aims puts in place a framework within which new employment can be delivered and supported.

Public Transport

See Section 7.2 to follow.

Education

More detailed assessment of submissions relating to education and training employment can be found in Section B.5 of this report. The LPF, along with the County Development Plan and the various strategies and programmes of the education and training agencies active in this area, aims puts in place a framework within which new schools and training facilities can be delivered and supported.

Active Open space

More detailed assessment of submissions relating to open space can be found in Section 4.8 of this report. The LPF, along with the County Development Plan aims puts in place a framework within which new open spaces and sports grounds can be delivered and supported.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

Topic 2

Sustainable Transportation

Walking & Cycling Infrastructure / Active Travel Schemes

No.	Name	Issues Raised
4	Dermot Ray & Eileen Byrne	<p>Submitters are opposed to objective GDK59 (b) – a potential walking / cycling link from Ballygannon to Charlesland – for the following reasons:</p> <ul style="list-style-type: none"> - Object to route passing over their land, without their consent; - The land is actively farmed; - Family has previously been subject to CPO on other lands which remains unresolved and this process has adversely mentally and financially affected them.
14	Grace Goggin	<p>Submitter raised concerns about the safety of the Kilquade Road from its junction with the Kilcoole Road to its junction with the Woodstock Road (near Kilquade Hill estate). Submitter notes an objective in the LPF to support pedestrian improvements from the Kilcoole Road junction to Huntsbury (road leading to Church and Garden Centre) but notes no improvements are detailed along the remainder of this road further south.</p>
21	Larry Doyle	<p>Improvements are required to pedestrian infrastructure in Delgany village, including better footpaths, traffic calming and pedestrian crossings, such as a crossing from Jacob's Ladder, from Priory Road to the burial grounds and from the Wicklow Arms to the adjacent corner.</p>
30	Greystones Lawn Tennis Club	<p>The club indicates that it is encouraging active travel to and from the club and suggests:</p> <ul style="list-style-type: none"> - Additional bicycle stands at locations like Tesco and Donnybrook Fair (both on the public footpaths and on their sites); - More safe active travel routes from Kilcoole, Delgany and Kilquade towards Greystones and bicycle stands at locations like at Garden Village, Kilquade, Kilcoole Main Street, Kilquade Church and Garden centre
31	Kilcoole Residents Development Association	<ul style="list-style-type: none"> ▪ The submitters identify the need for improved infrastructure for access to schools in the Kilcoole, Newtownmountkennedy and south Greystones areas, in particular the need for cycle lanes from Newtownmountkennedy to Kilcoole and from Kilcoole to Greystones. ▪ The submitters consider that a pedestrian and cycle link between Kilcoole centre and the train station would be a welcome addition for the population of Kilcoole; and that the completion of footpath to the train station will require land zoning. ▪ The submitters request that an integrated network of cycling tracks be included across the district.
34	Colin Acton	<ul style="list-style-type: none"> ▪ The submitter considers it good to see that Map 5 Transport Strategy shows GDK60 highlighted (Improved Pedestrian Cyclist Infrastructure) for the full length of Convent Road from the Wicklow Arms to Lidl. However, the submitter points out that Map 5 has omitted the planned, and necessary, pedestrian and cyclist improvements along the R762 from the Wicklow Arms to the Killincarrig double roundabouts and suggest this scheme needs to

		<p>be added back in.</p> <ul style="list-style-type: none"> ▪ The submitter points out that there are no footpath or cycleway maps shown for Delgany and suggests that this be re-considered. ▪ It is also suggested that a major omission is the lack of consideration of the legacy cul-de-sac arrangement of many of the housing developments and suggests that there needs to be a plan to improve permeability for pedestrians and cyclists across the settlement. ▪ In terms of delivery, the submitter puts forward that there has been no maintenance of footways in Delgany for years, let alone improvement, while lots continues to happen in Greystones. ▪ The submitter is disappointed to see the Convent Road Phase as 'Medium Term' and believes the scheme is urgently needed given the poor condition of the road and footpaths in the village centre and the traffic increases in the area. The submitter suggests that roads strategy should be that this through traffic uses the Delgany Bypass NOT the village centre; this will allow Delgany Public Realm Enhancement Plan. ▪ The submitter considers it is important to state in the LPF that the Delgany Village Accessibility Scheme (Convent Road Phase) must align with the planned Delgany Public Realm Enhancement Plan as a single scheme.
36	Pat Nolan	<p>The submitter objects to the proposed pedestrian / cycling route corridor marked as Objective GDK59B which is on his lands. He would like to see a feasibility study for the corridor carried out, which would entail discussion and collaboration with affected landowners if this study shows that a route on the main road is not achievable.</p>
38	Alan Richardson	<p>The submitter puts forward that</p> <ul style="list-style-type: none"> ▪ the objectives to '<i>Enhance infrastructure to facilitate walking, cycling and increased use of public transport</i>' is pure aspiration. He points out that Greystones is a commuter town with an indifferent transport service and too far from Dublin to be a realistic proposition for cycling or walking with distances in excess of 20km. ▪ The idea of pedestrianising that part of Killincarrick Road between Church Road and Burnaby Road is without any merit. ▪ With respect to the objectives for pedestrian, cycling and road layout improvements in Castle Villas, Carrig Villas and New Road in Killincarrig in order to create a 'homezone' environment, there is no definition of what 'homezone' means but it is likely to impact on those residents who need a car to go to work, school, shopping etc without any consultation. Further parking spaces here would reduce the need for some of the spaces in the village coming from the Kilcoole side which negatively impacts on the sightlines for the pedestrian crossing.
47	Liam Kennedy	<p>The submitter puts forward that the provision of walking/cycling facilities between Kilcoole and Charlesland should be accelerated from a medium to short term objective. In support of this he points out that the new post-primary school (Greystones Community College) is already under construction at Charlesland and will contain many students from Kilcoole and therefore it is important that there be a safe and direct route for them to access the school</p>

		using active travel in order to mitigate traffic on the Kilcoole road; the distance involved (from Lott Lane area) is very short and it should be possible to develop a greenway link at relatively low cost.
52	Joan Moran	<p>The submitter raised a number of points with respect to foot and cycle ways:</p> <ul style="list-style-type: none"> ▪ She considers that Objective GDK4 is very good; the objective of enhancing the public realm and facilities for pedestrians and cyclists along Convent Road; ▪ She is happy to see Map 5 Transport Strategy shows GDK60 highlighted (Improved Pedestrian Cyclist Infrastructure) for the full length of Convent Road from the Wicklow Arms to Lidl. However, the submitter points out that Map 5 has omitted the planned, and necessary, pedestrian and cyclist improvements along the R762 from the Wicklow Arms to the Killincarrig double roundabouts and suggest this scheme needs to be added back in; ▪ She points out that there are no footpath or cycleway maps shown for Delgany and suggests that this be re-considered; ▪ She considers there needs to be a plan to improve permeability for pedestrians and cyclists across the settlement and this is a barrier to sustainable travel currently; ▪ Notwithstanding the fact that for many years Delgany has been carrying the burden of extensive development and associated construction traffic which must have generated significant income in the way of levies etc for the local authority there has been no maintenance of footways in Delgany for years, let alone improvement; ▪ She is disappointed to see the Convent Road Phase as 'Medium Term' and believes the scheme is urgently needed given the poor condition of the road and footpaths in the village centre and the traffic increases in the area. The submitter suggests that roads strategy should be that this through traffic uses the Delgany Bypass NOT the village centre; this will allow Delgany Public Realm Enhancement Plan.
53	Kilcoole Tidy Towns	<p>The submitters encourage the LPF to adopt principles of sustainable transport both walking and cycling infrastructure to reduce car dependency, support healthier lifestyles and meet climate action targets. It is put forward that Kilcoole has great potential for enhanced walking and cycling due its compact layout and safe, connected walking and cycling routes that would link it to Greystones, Newtownmountkenedy and Newcastle villages. In addition, they support the "safe routes to school" initiatives to encourage more children to walk or cycle.</p>
55	Killincarrig Community Association (KCA)	<p>The submitters request an improvement to local pedestrian routes around Killincarrig; it is put forward that at the moment they are partial and disconnected, or unsafe especially around key routes like Mill Road and Carrig Villas.</p> <p>It is suggested that formalising and fully re-instating the historic pedestrian route from Greystones station to Killincarrig via the golf course would greatly benefit the community and align with the County Development Plan.</p> <p>With respect to cycling, the submitters suggest the development of more integrated and comprehensive local cycle lanes in the</p>

		Killincarrig area, connecting into cycling infrastructure in Greystones, and Bray and the Wicklow Mountains.
56	Austin Baines	<p>This submission relates to Objective GDK59R – pedestrian and cycling infrastructure improvement from Prettybush Corner to Kilquade. In this regard the submitter requests the extension of this objective to include all of Kilquade Road from Prettybush Corner to Woodstock Road for a number of reasons:</p> <ul style="list-style-type: none"> ▪ there are volumes of walkers runners and cyclists along this road and the whole length of this road requires cycling and pedestrian improvement and safety; ▪ this road serves the population of the Garden Village, Kilquade Hill and Kilcoole residents; ▪ Extending GDK59R along this road would nicely link up with GDK59C and GDK59B giving improved pedestrian and cycling facilities; ▪ While the residents successfully campaigned for the 50km speed limit on Kilquade Road, there are increased volumes of traffic and speed on this road, as a lot of traffic uses this road as a rat run to avoid the traffic lights and traffic delays in Kilcoole and Newtownmountkennedy; ▪ the Kilquade Road in the interim badly needs traffic calming measures and more speed signs on this road.
58	Greystones Town Team	<p>The submitters request that an integrated network of cycling tracks be included across the district. Also suggest provision of a specific objective for a pedestrian walkway through Coolagad to Kindlestown Woods.</p> <p>The submitters further suggest:</p> <ul style="list-style-type: none"> ▪ that the LPF includes a programme for public realm improvements in the town centre, Greystones harbour area and as noted above, enhancement of key pedestrian cycling routes; ▪ that the LPF includes an objective for a town mobility plan to inform further public realm priorities and safe walking / cycle routes, including the following: <ul style="list-style-type: none"> - enhancement of existing pedestrian links from the town to the seafront; from Trafalgar Road, Bow Lane, South Beach access points from Mill Road; - pedestrian cohesion and dominance of the route from the South Beach carpark (potentially new Greystones – Wicklow Greenway)/ DART carpark to the marina (Cliff / Walk) - Identification of potential enhancement of new pedestrian links through back land developments to increase permeability.
73	Delgany Community Council	<p>The submitters put forward that 90% of traffic going through Delgany village is using the route as a through route and this means that the village has become increasingly dangerous for pedestrians and cyclists. They suggest that the road through the village needs to change to reduce this traffic and to allow the businesses in the village to continue to flourish.</p> <p>They point out that the footpaths are in dire need of repair; they are uneven, hazardous and difficult to navigate for anyone let alone those whose mobility is compromised.</p>

85	Kathleen Kelleher	<p>The submitter makes the following suggestions:</p> <ul style="list-style-type: none"> ▪ When housing estates are being designed adjacent to undeveloped fields, potential future pedestrian connections between estates should be considered; pedestrian paths and cycle lanes should be connected from one estate to another and there should be no need for paths and lanes to follow roads and get caught up with traffic; ▪ Pedestrian accesses should be open, well-lit and capable of being easily monitored, not narrow laneways with high walls. Examples of good housing estate connections include Redford Park/Rise/Close/Court, St. Crispin's, La Touche Park, Rathdown Park. These estates have excellent footfall connections and are a safe walking route to St. Kevin's NS on Rathdown Road. ▪ The off road green link to Kilcoole is an excellent idea, just what is needed.
88	Dermod Dwyer	<p>The submitter requests that an integrated network of cycling tracks be included across the district. Also suggest provision of a specific objective for a pedestrian walkway through Coolagad to Kindlestown Woods.</p> <p>The submitter further suggests:</p> <ul style="list-style-type: none"> ▪ that the LPF includes a programme for public realm improvements in Greystones town centre, Greystones harbour area and as noted above, enhancement of key pedestrian cycling routes; ▪ that the LPF includes an objective for a town mobility plan to inform further public realm priorities and safe walking / cycle routes, including the following: <ul style="list-style-type: none"> - enhancement of existing pedestrian links from the town to the seafront; from Trafalgar Road, Bow Lane, South Beach access points from Mill Road; - pedestrian cohesion and dominance of the route from the South Beach carpark (potentially new Greystones – Wicklow Greenway)/ DART carpark to the marina (Cliff / Walk) - identification of potential enhancement of new pedestrian links through back land developments to increase permeability.

Chief Executive's Response

GDK59 (b) – a potential walking / cycling link from Ballygannon to Charlesland

This is an objective in support of the possible future development of a link route for pedestrians and cyclists between the two closest parts of north Kilcoole and south Greystones (Charlesland). Such a link would allow for direct access from Kilcoole to the wide range of community, sports and education facilities in Charlesland, thereby supporting more uptake in walking and cycling, as the existing regional road linking these two areas does not have adequate high quality, safe walking and cycling infrastructure and constrained potential to provide for same within its current remit.

No route for this link has been determined at this time, and the objective shown on the maps is a wide corridor within which a potential route might be determined following further analysis and consultation with landowners. There is no funded programme at this time to develop such route on the submitters' lands, nor is there any plan at this time to CPO any lands.

In order to address the concerns raised, it is recommended that the corridor within which such a route might be located is widened in order to allow for more options for its route to be examined, taking into account the concerns raised by the submitters.

With respect to the imminent need for improved connections between Kilcoole and Charlesland having regard to the development of a new secondary school in Charlesland, it is agreed that either improvements to the regional road or the development of a new route should be a **short term** priority.

Kilquade (L-1042)

The road in question is outside the LPF boundary. However, the LPF does include an objective to support the delivery of improved pedestrian and cycling infrastructure on the northern part of this road between the Kilcoole Road (Prettybush Corner) passing the graveyard and down as far as Kilquade Church, connecting with the Mass Path / Sally Walk from Kilcoole (Objective GDK59R). This objective although outside the LPF boundary is considered appropriate to connect both south Greystones and Kilcoole (via the mass path) to both the graveyard and church which are facilities that are highly used by residents of these areas. South of Huntsbury, there is very little development until one reaches Kilquade Hill estate and therefore it is not deemed that there is a strong case for the delivery of enhanced pedestrian and cycling infrastructure along the entirety of this route.

It is already an objective of the LPF to improve pedestrian and cycling facilities along the Woodstock Road (Objective GDK59C) and this road is very close to the main cluster of dwellings on the most southern part of the L-1042 around the Kilquade Hill. However, the L-1042 in this area is narrow with very limited scope for the widening that would be necessary for the development of footpaths and cycleways linking it to the Woodstock Road, in particular the eastern boundary of this road comprises the wall of the Kilquade House estate, subject to protected structure designation which would include its historic boundary walls. It is therefore considered that it would not be appropriate to include an objective to deliver pedestrian and cycling infrastructure along the entirety of the L-1042 as this would likely be an unachievable objective.

Delgany Village Schemes

The 'Delgany Village Accessibility Scheme' provides for improvements to pedestrian and cycling infrastructure from the junction of the R762 with Bellevue Hill to Killincarrig roundabouts. This scheme was incorrectly described in the draft LPF and it is recommended that Objective GDK60 and the Travel Strategy Map be amended to clarify this objective. There are no plans however as part of this scheme at this time for a pedestrian crossing at Jacob's Ladder or the Priory Road junction, but these can be considered in the future, particularly if a footpath is developed along the south side of the R762 west of the Priory Road junction.

The 'Convent Road Active Travel Scheme' (already detailed in the LPF but incorrectly named) includes junction tightening and an uncontrolled crossing at the Convent Rd/R762 junction.

In light of these submissions, a review and improvement of all the pedestrian and cycling schemes names, descriptions and labels will be undertaken.

With regard to the delivery of these schemes, given the project design, permitting, land acquisition (if necessary), funding and construction time requirements, it is envisaged that these projects will be delivered in the medium term rather than short term. The Council is actively working on the first stage (detailed design and permitting) of these projects at this time.

With respect to the non-statutory 'Delgany Public Realm Enhancement Plan', this is being considered in the development of infrastructure scheme / programmes in the area.

Access to schools

It is agreed that access to schools requires improvement and the LPF supports and facilitates the delivery of improved pedestrian and cycling infrastructure to all schools, and between Newtownmountkennedy and Kilcoole and from Kilcoole to south Greystones, in particular as detailed in Objectives GDK59 (b) and (c).

Connection to Kilcoole train station

It is agreed that improve connections are required between Kilcoole town centre and Kilcoole train station and the LPF supports and facilitates the delivery of improved pedestrian and cycling infrastructure along this route in particular as detailed in Objectives GDK59 (a). It is not agreed that the zoning of land along this route is necessary to achieve the delivery of this infrastructure.

Integrated cycling network

The Council is committed to the improvement of the cycling network throughout the settlements of Greystones-Delgany (including Killincarrig) and Kilcoole, and the LPF objectives fully support the delivery of a new and improved cycling infrastructure, as detailed below (Objective GDK59):

Objective GDK59

*To support and facilitate the implementation of local projects which improve pedestrian and **cyclist permeability**, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes:*

- a) Pedestrian and **cycling infrastructure** from Kilcoole Main Street to Kilcoole train station*
- b) Pedestrian and **cycling infrastructure** from Kilcoole to Charlesland, which may be in the form of a new pedestrian and **cycling route** from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road*
- c) Pedestrian and **cycling infrastructure** from Kilcoole to Newtownmountkennedy*
- d) Pedestrian infrastructure along the full length of Priory Road from Eden Gate to Delgany*
- e) Pedestrian infrastructure from Delgany to Kindlestown Woods*
- f) Pedestrian and **cycling safety improvements** on the Charlesland dual carriageway from Kilcoole Road to Mill Road (part of Pathfinder Programme)*
- g) Pedestrian and **cycling safety improvements** from Killincarrig crossroads to Greystones station (part of Pathfinder Programme)*
- h) Pedestrian and **cycling safety improvements** from Greystones station to the harbour via Church Road and Victoria Road (part of Pathfinder Programme)*
- i) Pedestrian and **cycling safety improvements** along Church Lane*
- j) Pedestrian and **cycling infrastructure** from Church Road to the harbour via La Touche Place and Trafalgar Road, including the potential development of a new foot/cycle bridge over the railway line*
- k) Pedestrian and **cycling infrastructure** along the Kilcoole Road from Killincarrig crossroads to Knockroe roundabout*
- l) Pedestrian and **cycling infrastructure** from Charlesland Wood to Mill Road via Burnaby Lawns including a new bridge across the Three Trout's River (part of Pathfinder Programme)*
- m) Pedestrian, **cycling** and road layout improvements in Castle Villas, Carrig Villas and New Road in Killincarrig in order to create a 'homezone' environment*
- n) Pedestrian and **cycling improvements**, including potential full pedestrianisation, of Killincarrick Road along Burnaby Park from the Church Road junction to the Burnaby Road junction*
- o) Additional projects under the **Pathfinder programme***
- p) **Safe Routes to Schools programme***
- q) **National Cycle Plan** and the **NTA Greater Dublin Area Cycle Network Plan***
- r) Pedestrian and **cycling infrastructure** from Prettybush Corner to Kilquade*
- s) Pedestrian and **cycling infrastructure** from R761 to Chapel Road via Applewood Heights*

Footway and cycleway maps

The maps of existing footpaths and cycleway presented Appendix 6 to the LPF are drawn from OSi data which is not complete in all locations, so it may be that there are footpaths in Delgany and other locations that are not identified. It is noted that the maps presented do not adequately show the full extent of Delgany and an additional map can be provided showing more detail for footpaths in Delgany in Appendix 6.

The cycleway map presented does show the full extent of any mapped cycleways in Delgany.

Footpath maintenance

This is an operational and budgetary matter for the Municipal District and not a matter for this LPF.

Cul-de-sacs and permeability generally

The Council is committed to improving permeability generally as set out in **Objective GDK59** *'To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport....'*

The following objectives of the County Development Plan apply already in the LPF area:

CPO 12.13 *To facilitate the development of pedestrian and cycle linkages through and between new and existing developments to improve permeability and provide shorter, more direct routes to schools, public transport, local services and amenities while ensuring that personal safety, particularly at night time, is of the utmost priority.*

CPO 12.14 *To facilitate the implementation of local projects which support pedestrian and cyclist permeability, safety and access to schools and public transport.*

In addition, in the development management process, the maximisation of accessibility and permeability is a consideration in the assessment of application for new developments (as set out in Appendix 1 'Development & Design Standards' of the Wicklow County Development Plan).

Killincarrick Road

The merits behind the objective to consider the pedestrianisation of this section of Killincarrick Road are numerous and far outweigh any arguments to keep it as a vehicular route; in particular pedestrianisation could:

- Provide more public realm space in a town centre environment that is lacking in this type of space;
- Provide a multifunctional space and not a single use space, i.e. for vehicles mainly;
- Provide space for potential outdoor markets;
- Provide greater space for the numerous social events that often require the use of the Burnaby Park;
- Create potential for currently closed retail space to reopen as a coffee shop/restaurant/retail space with outdoor seating;
- Increase footfall in the area and increase their turnover of existing shops, which are not bulky or large volume shops and as such walking slightly further to these shops will not discommode them;
- Not discommode any existing residents and there are no existing vehicular accesses to private properties along this section
- Improve traffic safety in this area – there are regular near misses of vehicles exiting Killincarrick Road onto Church Road and driving through a red light, i.e. the 'green man' phase of the signalised pedestrian crossing;

It is considered that no negative impact to traffic movements in the town centre as a result of such a

pedestrianisation, as evidenced by a number of multi day closures of this section of road to facilitate filming. Vehicular access and egress to the Burnaby area is adequately accommodated from the R762 by way of Hillside Rd, St Vincent's Rd and Park Lane. Loss of parking immediately on this section can easily be offset by the existing, highly underutilised, parking spaces available along Whitshed Rd, Portland Rd and Somerby Road.

Killincarrig Schemes

The Council is committed to the improvement of the cycling network throughout the LPF including in Killincarrig as detailed in Objective GDK59 above; including pedestrian and cycling safety improvements from Killincarrig crossroads to Greystones station (part of Pathfinder Programme); pedestrian and cycling infrastructure along the Kilcoole Road from Killincarrig crossroads to Knockroe roundabout; pedestrian, cycling and road layout improvements in Castle Villas, Carrig Villas and New Road in Killincarrig in order to create a 'homezone' environment; and pedestrian and cycling safety improvements from Killincarrig crossroad to Blacklion along the R761 (all as shown on Map 5).

The LPF has omitted in error reference to the Killincarrig Improvement Scheme and this will be rectified.

With respect to the Killincarrig 'homezone', the term 'homezone' is well defined in numerous national and international best practice urban street design guidance, and is mainly based on the Dutch 'woonerf' or 'living street' design principles. Guidance documents include but are not limited to:

- 'The Design Manual for Urban Roads and Streets' by the Department of Transport
- 'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities' by the Department of Housing, Local Government and Heritage.
- Adamstown Street Design Guide
- 'Homezones – Challenging the future of our streets', by the UK Department for Transport.
- 'Homezone Residential Areas' by The Chartered Institution of Highways and Transportation, UK.

Homezones do not necessitate the removal of access for vehicles or parking, but will create a greater sense of a slow speed residential environment. A homezone street environment will in fact rationalise parking which is currently haphazard, inappropriate and sometimes illegal in this area. A homezone environment will also allow opportunities for Nature Based Sustainable Drainage Solutions which will reduce the risk of flooding to some properties in the area as well as improving the aesthetic of the streetscape. Any detailed design proposals would require public consultation through the Part 8 Planning Process. The inclusion of this type of measure in the LPF sets out the Council's desire to improve this specific area due to ongoing concerns raised by residents.

With respect to the route to Killincarrig via the golf course from Greystones station, it is unclear precisely what route is referenced, as the route from Greystones golf club through Burnaby Heights into Killincarrig is intact and in use. Maintenance issues for this route would not be a policy matter for an LPF but an operational and budgetary matter. If there are other historic, unmaintained and more direct routes via the golf club these routes would likely be on private lands and therefore it would be difficult to formalise said routes without embarking on considerable negotiations with landowners and / or CPO.

Coolagad to Kindlestown link

The LPF makes provision for such a link – in the objectives for SLO4 as follows: *'Green links shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods.'*

Greystones public realm and pedestrian / cycling enhancements

The Council is committed to ongoing public realm, pedestrian and cycling improvements in Greystones town centre, seafront and harbour. As set out in the draft LPF, the following are components of the Council's proposed

town centre and retail development strategy:

- *Support the continued enhancement of the town / village centres of Greystones, Delgany and Kilcoole as the hearts of the settlements, where people of all backgrounds, ages and abilities can avail of services and interact within their communities;*
- *Ensure that the town / village centres are attractive places to live in, to work in and to visit, easy to get to, easy to walk and cycle within and are competitive places to conduct business;*
- *Create compact town / village centres by reusing existing buildings and maximising the potential of infill and brownfield sites; use all mechanisms and processes available to drive forward the redevelopment and regeneration of vacant, underutilised and derelict sites;*
- *Use public realm improvements to stimulate investment and economic confidence; encourage public art in publicly accessible spaces such as town / village streets and squares and along existing or future parks and amenity routes;*
- *Promote healthy placemaking and prioritise walking and cycling; improve linkages between core town / village centres and existing community infrastructure and lands earmarked for future housing development;*
- *Embrace the historic character and heritage attributes of the town / village centres and strengthen the strong sense of place;*
- *The redevelopment of lands within the town / village core areas, particularly those sites with frontage onto the main streets, shall provide for street fronting buildings of a high quality design or for high quality urban spaces, including hard and soft landscaping, and appropriate street fixtures and furniture, in order to enhance and create more attractive streetscapes;*
- *To allow a relaxation in certain development standards in the town / village centre zones in the interest of achieving the best development possible, both visually and functionally while maintaining the highest quality of design in all new developments;*
- *Facilitating a diverse mix of uses, and particularly encourage residential usage at appropriate town / village centre densities, and the concept of 'living over the shop';*
- *Facilitate an appropriate expansion of retail floorspace to reduce leakage of expenditure from both the town / village itself and the wider County. Guide and promote the expansion of retail floorspace first and foremost within the core retail area and thereafter in accordance with the sequential approach to retail development;*
- *Provide for an expansion in the variety of retail and retail service facilities so that the town / village includes a range of retail outlets that provide for the day to day needs of the local population and the needs of other businesses and tourists, in accordance with the provisions of the "Retail Planning Guidelines for Planning Authorities" (DoEHLG 2012), and any subsequent Ministerial Guidelines or directives and the Wicklow County Retail Strategy.*

With respect to some of the specific suggestions / infrastructure improvements suggested in submissions:

- the LPF sets out objectives for the improvement of pedestrian and cycling routes between Greystones town centre and the seafront / harbour (GDK59 h and j, and the 'pathfinder' scheme – all marked on Map 5);
- the LPF pedestrian and cycling objectives would provide for a cohesive network from the south beach / DART car park to the marina / cliff walk;
- it is intended that the draft Local Transport Plan will be completed and this will essentially provide for an overarching 'mobility plan' for the area
- the suggestion with regard to accessibility through backland sites isn't abundantly clear; no specific locations are suggested / described where this might arise. However in the development management process, the maximisation of accessibility and permeability is a consideration in the assessment of application for new developments (as set out in Appendix 1 'Development & Design Standards' of the Wicklow County Development Plan).

Bicycle park / stands

The Council is committed to requiring new bicycle parking as part of new developments (in the application of the design standards set out in the County Development Plan) and in providing parking on the public road / on public

lands where possible. The locations suggested in the some submission are noted and will be brought to the attention of the District Engineer and Active Travel team and can be reviewed also as part of the finalisation of the Local Transport Plan.

Chief Executive's Recommendation

A: Amend **Objective GDK59** as follows:

To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes:

- a) Pedestrian and cycling infrastructure from Kilcoole Main Street to Kilcoole train station
- b) Pedestrian and cycling infrastructure from Kilcoole to Charlesland, which may be in the form of a new pedestrian and cycling route from Ballygannon (north Kilcoole) to Charlesland to the east of the regional road
- c) Pedestrian and cycling infrastructure from Kilcoole to Newtownmountkenedy
- d) Pedestrian infrastructure along the full length of Priory Road from Eden Gate to Delgany
- e) Pedestrian infrastructure from Delgany to Kindlestown Woods
- f) Pedestrian and cycling safety improvements on the Charlesland dual carriageway from Kilcoole Road to Mill Road (part of Pathfinder Programme)
- g) Pedestrian and cycling safety improvements from Killincarrig crossroads to Greystones station (~~from Burnaby Lawns east being~~ part of Pathfinder Programme)
- h) Pedestrian and cycling safety improvements from Greystones station to the harbour via Church Road and Victoria Road (part of Pathfinder Programme)
- i) Pedestrian and cycling safety improvements along Church Lane
- j) Pedestrian and cycling infrastructure from Church Road to the harbour via La Touche Place and Trafalgar Road, including the potential development of a new foot/cycle bridge over the railway line
- k) Pedestrian and cycling infrastructure along the Kilcoole Road from Killincarrig crossroads to Knockroe roundabout
- l) Pedestrian and cycling infrastructure from Charlesland Wood to Mill Road via Burnaby Lawns including a new bridge across the Three Trout's River (part of Pathfinder Programme)
- m) Pedestrian, cycling and road layout improvements in Castle Villas, Carrig Villas and New Road in Killincarrig in order to create a 'homezone' environment
- n) Pedestrian and cycling improvements, including potential full pedestrianisation, of Killincarrick Road along Burnaby Park from the Church Road junction to the Burnaby Road junction
- o) Additional projects under the Pathfinder programme
- p) Safe Routes to Schools programme
- q) National Cycle Plan and the NTA Greater Dublin Area Cycle Network Plan
- r) Pedestrian and cycling infrastructure from Prettybush Corner to Kilquade
- s) Pedestrian and cycling infrastructure from R761 to Chapel Road via Applewood Heights

B: Amend **Objective GDK60** as follows:

In order to facilitate the delivery of improved pedestrian / cyclists safety, public realm enhancement programmes and vehicular movement improvements in the LPF area, to support and facilitate the delivery of the following schemes:

- a) *In order to improve pedestrian and cyclist safety and to allow for future improvements to the public realm in Delgany village: the 'Delgany Village Accessibility Scheme' (~~Convent Road Phase~~) project;*
- b) *In order to improve pedestrian and cyclist safety between Delgany and Blacklion: the '~~Chapel Road Pedestrian and Cyclist Infrastructure Improvement Scheme~~'; '~~Convent Road Active Travel Scheme~~';*
- c) *In order to improve pedestrian and cyclist safety in Kilcoole town centre and to allow for future improvements to the public realm on Kilcoole Main Street particularly in the area between 'Upper Green' and 'Sylvan Lawns': the improvement of the alternative route to the east of Kilcoole to 'bypass' the core town centre. This route*

commences at the R761 junction with Lott Lane at Kilcoole Community Centre, continues along Lott Lane to Sea Road and onto 'Holywell Avenue' to the south of Sea Road, as far as the regional road at CCA. Improvement shall include the re-design of various existing junctions in order to give priority to this route as shown on Map No. 5 as Objective GDK60

d) The Killincarrig Improvement Scheme

Where such improvements are located on designated development land, the development shall be so delivered to provide for those elements of the scheme within that site.

As **change consequent** to these recommended amendments, it is recommended that an additional objective is added to GDK59 as follows

t) Enhanced pedestrian and cycling infrastructure along R761 from Killincarrig to Templecarrig

Amend Map 5 to reflect these changes

C: Amend Appendix 6 as follows:

Section 3.3 Transportation & Movement

Add the following additional map: Delgany footpaths

D: Amend Appendix 6 as follows:

Amend **Implementation & Infrastructure Delivery Schedule Table** as follows:

Infrastructure	Delivery Schedule	Funding
TRANSPORT		
Delgany Village Accessibility Scheme (Convent Road Phase)	Medium term	State, WCC
Chapel Road Pedestrian and Cyclist Infrastructure Improvement Scheme	Immediate	State, WCC
Alternative route to the east of Kilcoole to 'by-pass' the core town centre	Ongoing	Developer, State, WCC
Pedestrian and cycling infrastructure from Kilcoole Main Street to Kilcoole train station	Medium term	State, WCC
Pedestrian and cycling infrastructure from Kilcoole to Charlesland	Medium term Short term	Developer, State, WCC
Pedestrian and cycling infrastructure from Kilcoole to Newtownmountkennedy	Medium term	State, WCC
Pedestrian infrastructure along the full length of Priory Road from Eden Gate to Delgany	Short term	State, WCC
Pedestrian infrastructure from Delgany to Kindlestown Woods	Immediate	State, WCC
Pedestrian and cycling safety improvements on the Charlesland dual carriageway from Kilcoole Road to Mill Road (part of Pathfinder Programme)	Immediate	State, WCC
Pedestrian and cycling safety improvements from Killincarrig crossroads to Greystones station (part of Pathfinder Programme)	Immediate	State, WCC
Pedestrian and cycling safety improvements from Greystones station to the harbour via Church Road and Victoria Road (part of Pathfinder Programme)	Immediate	State, WCC
Pedestrian and cycling safety improvements along Church Lane	Medium term	State, WCC
Pedestrian and cycling infrastructure from Church Road to the harbour via La Touche Place and Trafalgar Road, including the potential development of a new foot/cycle bridge over the railway line	Medium term	State, WCC
Pedestrian and cycling infrastructure along the Kilcoole Road from Killincarrig crossroads to Knockroe roundabout	Short term	State, WCC
Pedestrian and cycling infrastructure from Charlesland Wood to Mill Road via Burnaby	Immediate	State, WCC

Lawns including a new bridge across the Three Trout's River (part of Pathfinder Programme)		
Pedestrian, cycling and road layout improvements in Castle Villas, Carrig Villas and New Road in Killincarrig in order to create a 'homezone' environment	Medium term	State, WCC
Pedestrian and cycling improvements, including potential full pedestrianisation, of Killincarrick Road along Burnaby Park from the Church Road junction to the Burnaby Road junction	Long term	State, WCC
Pedestrian and cycling infrastructure from Prettybush Corner to Kilquade	Medium term	State, WCC
Pedestrian and cycling infrastructure from R761 to Chapel Road via Applewood Heights	Medium term	State, WCC
To cooperate with NTA, Iarnród Éireann and other relevant transport planning bodies in the delivery of a high quality, integrated and accessible transport system in the LPF area. In particular to support and facilitate the following schemes / programmes: a) The improvement of mainline train and DART services b) The improvement of existing and provision of new bus services within the LPF area and linking the LPF area to the wider County and to Dublin	Ongoing	State, WCC

Public Transport

No.	Name	Issues Raised
8	Stuart Kinch	The submitter puts forward that public transport is underdeveloped and unreliable; that DART services are frequently suspended on weekends, and the promised bus depot on Farrankelly Road/M50 has not materialised. It is suggested that as the majority of residents commute to Dublin, improved transport links are essential to accessibility and economic resilience.
25	Hubi Kos	The submitter put forward that it will be important that new public transport routes are designed carefully to avoid flood-prone areas and areas of natural beauty and critical natural habitats
31	Kilcoole Residents Development Association	<ul style="list-style-type: none"> ▪ The submitters put forward that while public transport has improved recently, there remains gaps; they suggest that small changes like stopping all existing trains in Kilcoole would improve the lives of people living in the community and reduce carbon emissions by making people move away from cars. They draw attention to the fact that the second morning train is usually full on arrival and provides standing-room only, for the hour's journey to Dublin. The third morning train at 9:16am is a welcome development. ▪ They point out that there is still a lack of connecting bus links to/from the DART in Greystones; there is currently only an hourly bus service to/from Greystones – compared to much more frequent services for Newtownmountkennedy and Charlesland. They suggest that the bus service should be every half-hour and the train/DART times should coordinate with bus services. ▪ They draw attention to the Aircoach service which does not serve Kilcoole at all. ▪ Submitters are happy that Kilcoole Railway Station has been included in the plan with other rail stations in the County for improvement of parking facilities and bus links at or near it. ▪ They indicate they would like to see improvement of mainline train and DART service into Wicklow, and an increase in rail capacity along the coastal route south of Greystones and improvement of the Dublin-Rosslare line. ▪ It is suggested that Kilcoole bus service be improved and that the Railway Station be further improved beyond the recent addition of a ticket machine and provision for tag on/off using leap cards; and that facilities for public transport users should extend to the provision of a shelter at the platform
34	Colin Acton	<ul style="list-style-type: none"> ▪ The submitter points out that the BusConnects programme has already been rolled out - there is no more to come - and that the bus services from Delgany are very poor. It is suggested that they WCC needs to push the NTA to do more. ▪ With respect to Objective GDK61, the submitter considers that there are items missing here that should be added, namely a dedicated feeder bus from GDK to the proposed N11 bus-based park and ride, and a feeder bus (and active travel links) to the Bus Eireann stops at Junction 9 (Glenview) as the 133 is very good alternative to the DART or the X1 and X2 services but it is difficult to access it from GDK.
37	Derek Mitchell	<p>The submitter is concerned with the DART+ south programme and rail infrastructure / services, and sets out the following points:</p> <ul style="list-style-type: none"> ▪ Currently the DART service is 30 minute best frequency because of the

		<p>single track from Bray. Bray has a 10 minute frequency. This is the only single track system in the Greater Dublin Area and this severely restricts frequency. Irish Rail is planning a 20 minute service frequency by putting a passing loop near the mouth of the south tunnel. This should be specifically allowed in this plan.</p> <ul style="list-style-type: none"> ▪ However the Jacobs Report of 2019 said this would also need to be double tracked to Greystones Station for a 20 minute frequency. This would mean a new bridge at La Touche Place. This should also be provided for in the plan. ▪ Irish Rail is talking about providing DART to Kilcoole and Wicklow. The single line will mean a frequency of less than every 30 minutes. Double tracking from Greystones to Charlesland, or possibly Kilcoole, would allow considerably better frequency. This should be specifically allowed in the plan. ▪ A train depot could be placed in Charlesland which would assist replace some storage space lost in Bray due to the enhanced Greystones service. <p>The submission also suggests that land should be zoned in the plan area for a bus depot.</p>
38	Alan Richardson	<p>The submitter puts forward that:</p> <ul style="list-style-type: none"> ▪ the train commuter service from Wexford/Gorey is pathetic, the DART service is worse than the 1955 steam run timetable, that improved public transport requires the delivery of DART and Commuter rail on a consistent basis; ▪ the bus service is erratic with phantom buses in the system with long delays and a poor service; an improved bus service with better links to Dublin and other Wicklow and Wexford towns is needed; buses should not have priority outside core hours, and no roads should give 24 hour priority to them, particularly as there are no 24 hour bus services; ▪ references to DART+ are without any credibility due to Iarnród Éireann's record on delivery; despite the best efforts of some, it now looks that even the 2031 for the service is in doubt; ▪ more Park and Ride hubs with bus/rail connections are needed with the appropriate transport links can enable commuters to leave their vehicles – however vastly improved rail and bus schedules must be put in place for this to happen.
52	Joan Moran	<ul style="list-style-type: none"> ▪ The submitter points out that the BusConnects programme has already been rolled out - there is no more to come - and that the bus services from Delgany are very poor. It is suggested that they WCC needs to push the NTA to do more. ▪ With respect to Objective GDK61, the submitter considers that there are items missing here that should be added, namely a dedicated feeder bus from GDK to the proposed N11 bus-based park and ride, and a feeder bus (and active travel links) to the Bus Eireann stops at Junction 9 (Glenview) as the 133 is very good alternative to the DART or the X1 and X2 services but it is difficult to access it from GDK.
55	Killincarrig Community Association (KCA)	<p>Submitters consider that existing bus stops on Mill Road are poorly placed and lack integration with recent developments and upgrades. It is suggested that bus stops should be relocated to areas where pavements are not so narrow for better accessibility and safety.</p>

Chief Executive's Response

The Council is not a direct provider of public transport services.

The Council is committed to working with public transport agencies and providers, such as Transport Infrastructure Ireland, the National Transport Authority, Iarnród Éireann and Dublin Bus / Bus Éireann to improve public transport services in the area, as set out in Objective GDK61 of the LPF to follow.

GDK61 *To cooperate with NTA, Iarnród Éireann and other relevant transport planning bodies in the delivery of a high quality, integrated and accessible transport system in the LPF area. In particular to support and facilitate the following schemes / programmes:*

a) The improvement of mainline train and DART services including (but not limited to):

- to facilitate all options available to increase capacity through Bray Head;*
- to support the delivery of the DART+ programme;*
- to support electrification of the rail line south of Greystones and the provision of high speed and*
- high frequency services on the existing underutilised south east rail line to south Wicklow, and*
- to support improvements to Greystones and Kilcoole train stations*

b) The improvement of existing and provision of new bus services within the LPF area and linking the LPF area to the wider County and to Dublin including (but not limited to):

- supporting the development and delivery of bus service enhancement projects, including BusConnects and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate;*
- facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted).*

Greystones is already served by a large **rail park-and-ride** at Mill Road. The County Development Plan objectives already support and facilitate the improvement of car parking for rail users at both Greystones and Kilcoole Stations (County Policy Objective 12.21).

With respect to the **planned bus park-and-ride** on the Farrankelly Road at the N11, this project is progressing with an application for consent expected to be made later in 2025. With respect to bus services that will be available from this location, and the provision of feeder buses to same, this will be a matter considered by the NTA as part of this future project. With respect to the provision of feeder buses to the N11 to meet up with the 133, this would also be a matter for the NTA.

With respect to **new public transport routes**, these will generally be located on existing public roads / tracks, so the likelihood of new impacts on flood prone areas / natural areas is limited; however should new development on greenfield lands be proposed, it would be subject to application of all County Development Plan and LPF flood risk prevention and environmental protection objectives.

With respect to the specific suggestions re objectives for passing loops, double tracking, train depots, bus depot etc it is noted that the inclusion of such project objectives has not been identified in submissions as needed by any of the transport agencies or organisations such as NTA, Iarnród Éireann or Dublin Bus / Bus Éireann. However, objective GDK61 detailed above would fully support and facilitate such infrastructure.

With respect to bus stop locations, an LPF would not specify such matter but rather this would be a matter for the Council's Roads and Transportation team and the bus providers.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

Traffic management & road safety

No.	Name	Issues Raised
8	Stuart Kinch	Submitter raises concern about road safety on Mill Road (highly trafficked road with many sports clubs, congested, lacking traffic calming measures) and that further large development in this area should be required to use Farrankelly Road for access.
35	Tom and Sandra Hayes	<p>The submitters raise concerns about the impact on traffic and pedestrian safety on Sea Road, Kilcoole particularly in the event of further development occurring in this area. In particular, they put forward that:</p> <ul style="list-style-type: none"> - Future rezoning of agricultural land for residential housing would cause a significant increase in car traffic on the Sea Road, which is an already narrow and lightly serviced route from Holywell to the beach; - Future proposed housing developments on this road would also lead to increased traffic congestion on surrounding roads; - Increased traffic on Sea Road would further endanger pedestrians, particularly as the current infrastructure lacks proper continuous footpaths or safe crossing points. A reduction in the speed limit from 50km to 30km should be considered due to the number of people who walk to and from the beach daily; - Future developments could exacerbate congestion and create dangerous conditions for existing residents, beach visitors, and local wildlife.
55	Killincarrig Community Association (KCA)	<ul style="list-style-type: none"> ▪ The submitters indicate that the Killincarrig Enhancement Scheme is greatly anticipated and welcomed as a measure to improve traffic management and placemaking in Killincarrig Village. They request that a project manager and community liaison be appointed from WCC to oversee implementation. A cost estimate, updated plans and a project timeline would be appreciated. ▪ The submitters request the Council prioritises the implementation of traffic calming measures in the village and review safety and sightlines at the junction of R761 with Carrig Villas, at the double roundabouts and at the junction of Carrig Villas with Mill Road.

Chief Executive's Response

Mill Road (R762)

This LPF is a land-use plan and does not address operational traffic management issues per se, but does address the need to ensure new development zones can be adequately serviced by safe road infrastructure. At this time, no traffic management concern arise with respect to Mill Road which generally flows very well and is in the main only heavily trafficked when the numerous sports facilities thereon are in high use. There are footpaths along the full extent of this road, cycleways along much of it, and public transport services. There are no large development sites indicated in the LPF for this area, with the only large site in the vicinity being the Council owned land at Charlesland which it is intended to access from the Farrankelly Road.

Sea Road, Kilcoole

The draft LPF does not provide for zoning for further (residential) development further east of the junction of Sea Road with Holywell, beyond which the road narrows and has inadequate pedestrian / cycling infrastructure. Where new development is provided for closer to Kilcoole town centre on Sea Road (e.g. at SLO6), there is either adequate existing road / pedestrian infrastructure or the capability to improve same to the standards required to meet the demands of any new development. Attention is drawn to County Policy Objective 6.20 of the County Development Plan which requires that:

CPO 6.20

Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents....

*New significant residential or mixed use development proposals shall be required to be accompanied by a '**Accessibility Report**' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means **other than** the private car:*

- (a) local services including shops, schools, health care and recreational facilities, and*
- (b) public transport services.*

Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.

In addition, it is an objective of the LPF (GDK59A) to support and facilitate pedestrian and cycling improvements from Kilcoole Main street to Kilcoole train station along Sea Road.

Killincarrig Enhancement Scheme / traffic safety

With respect to the design and delivery of this scheme, and other changes such as those suggested to improve safety in this area, these would not be a matter for this land use framework but a matter for the Council's Roads & Transportation Projects team; improved safety and accessibility is at the core of the design of all roads schemes and projects.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF

Car parking

No.	Name	Issues Raised
55	Killincarrig Community Association (KCA)	The submitters put forward that the primary mode of transportation in the area is private cars and local businesses require parking as an amenity for employees and customers. Employees of local businesses require parking as their working hours are not supported by the public transport system. It is requested that improvement to car parking in Carrig Villas be provided with a potential spillover parking areas formalised by the local green space 'the Sandpit'.
85	Kathleen Kelleher	The submitter puts forward that housing estates need sufficient parking, with two parking spaces per residential unit; the lack of sufficient parking creates problems for residents and unpleasant congestion.
Chief Executive's Response		
<p>Killincarrig / Carrig Villas</p> <p>Public car parking is available in Killincarrig Village and at Carrig Villas (c. 25 spaces) which appears to be functioning adequately to provide for the 5 businesses in Killincarrig. There are no plans at this time to provide additional car parking at the 'sandpit' to serve the village businesses given it is c. 400m away from the commercial centre of Killincarrig.</p> <p>Housing Estates</p> <p>Car parking is to be provided in accordance with the standards set out in the Wicklow County Development Plan, which requires 2 off street car parking spaces for all dwelling units over 2 bedrooms in size and for every 5 residential units provided with only 1 space, 1 visitor space. There is a move under national guidance towards reducing car parking in new housing developments where the development is located close to high quality public transportation services and / or a managed street parking regime (such as in town centres), in order to encourage less car dependence and higher uptake of sustainable and active travel modes.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Roads (General)

No.	Name	Issues Raised
38	Alan Richardson	The submitter suggests that WCC needs to upgrade the road network for all road users and not just pedestrians and/or cyclists.
85	Kathleen Kelleher	<p>The submitter suggests that housing estate entrance roads should be the width of three cars, as opposed to narrow entrance roads that hardly indicate that an estate is even there. It is put forward that a well-developed entrance road, with a well-marked name plate, is aesthetically pleasing, and gives an estate a sense of place.</p> <p>It is also put forward that narrow roads in estates do not allow for on road parking, causing problems for visitors and deliveries.</p>
Chief Executive's Response		
<p>As set out in the Wicklow County Development Plan, it is the aim of the development strategy for the County to facilitate and encourage sustainable forms of movement and transport, prioritising active travel modes of walking and cycling, and for larger settlements, public transport. However, this is not intended to be to the exclusion of other road users, as the County Development Plan also set out the following key goal: <i>'Facilitating the improvement of the existing road network, to enhance safety for all users, and to remove bottlenecks and hazards'</i>.</p> <p>This is reflected in many objectives of the County Development Plan including CPO 12.35, 12.36, 12.38, 12.39, 12.43, 12.45, 12.46, 12.47, 12.49, 12.50, 12.52, 12.55.</p> <p>(Chapter 12 Wicklow County Development Plan)</p> <p>https://www.wicklow.ie/Portals/0/adam/Documents/4QqoHuAzdUuLW79dEdFOgw/Link/Chapter%2012%20-%20Sustainable%20Transportation.pdf</p> <p>With respect to the design of the entrances into new housing estates, and road widths within estates, in accordance with the County Development Plan, the standards set out in the following guidance documents are applied:</p> <ul style="list-style-type: none"> • <i>Best Practice Urban Design Manual (DoEHLG 2009)</i> • <i>Sustainable Residential Development in Urban Areas (DoEHLG 2009)</i> • <i>Quality Housing for Sustainable Communities (DoEHLG 2007)</i> • <i>Development Management Guidelines (DoEHLG 2007)</i> • <i>Design Manual for Urban Roads and Streets DMURS (DoHPLG / DoTTS 2019)</i> • <i>Permeability Best Practice Guide (NTA 2015)</i> • <i>Traffic Management Guidelines (DoT / DoELG 2019)</i> • <i>Road Safety Audit (TII 2017 Publication: TII GE-STY-01024)</i> • <i>National Cycle Manual (NTA 2011)</i> • <i>Smarter Travel (DoT 2009)</i> • <i>Traffic & Transport Assessment Guidelines (TII 2014)</i> • <i>Design Manual for Roads and Bridges (TII 2011)</i> • <i>Recommendations for Site Development Works for Housing Areas (DoELG 1998)</i> • <i>Universal Design Guidelines for homes in Ireland (NDA 2015)</i> 		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF		

Topic 3 Flooding & Coastal Erosion

No.	Name	Issues Raised
20	Coolagad Environmental CWPPN-00889	With regard to the flood risk maps, the submitter suggests that the entire site area at Bridge Cottage A63H971 should be included due to recent excavations of green infrastructure from the site and replacement with hard surface.
25	Hubi Kos	The Council's recognition of the importance of coastal zone management is appreciated by the submitter. The submitter encourages the continued protection of flood-prone areas and the enforcement of building restrictions in zones vulnerable to erosion or sea-level rise. The submitter considers that the "worst-case scenario" forecast of potential flooding highlights the foresight the Council has to future-proof vulnerable areas.
35	Tom and Sandra Hayes	The submitters raise concerns about the impact on flood risk and water management on Sea Road, Kilcoole particularly in the event of further development occurring in this area. In particular, they put forward that: <ul style="list-style-type: none"> - Part of the Sea Road area is low-lying and close to the coastline, and there is potential risk of coastal flooding and development of housing would reduce green space and reduce surface water run-off; - Development of housing would add hard surfaces that will increase water runoff, potentially impacting nearby protected sites and private lands; - Flood risk areas have being identified in the draft development plan shown on maps, including worse case scenarios, hence the above.

Chief Executive's Response

The Council is committed to implementing the both the flood risk and the coastal zone objectives of the Wicklow County Development Plan and this LPF with a view to reducing future flood risk and protecting coastal areas.

Bridge Cottage

The property detailed is not located in the area identified as at risk in the 'present day' flood risk maps. With respect to the longer term flood risk 'scenarios' developed by the OPW, the property is identified as potentially at risk. The area of land to the north of the cottage which has been cleared and is under development (planning permission granted for two dwellings) is not identified as being at risk even in these higher risk scenarios, likely due to being upslope of the watercourse and the direction of the likely flood flows.

It is not made clear in the submission why the submitter considers that the risk level has increased due to the new development, and in particular no engineering, scientific or hydrological case is put forward. The flood maps prepared for this LPF are based on best scientific knowledge / data available with respect to flood risk. The Local Authority in the finalisation of these maps is happy to take into account any additional scientific knowledge / data that may be presented by the public through this consultation process, but no such information has been supplied with this submission. Therefore no change is recommended.

Sea Road, Kilcoole

The concerns raised are noted and accepted; through the carrying out of the SFRA, the Council has ensured that no areas that are identified as at risk of flooding are proposed for zoning for new development in the Sea Road area, both in the 'present day' known risk and in the future flood risk scenarios.

Where new development is proposed (on lands not identified as at risk of flooding) the Council will implement the surface water management objectives and standards of the County Development Plan to ensure

appropriate management of run-off e.g.

- CPO 14.11** *To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.*
- CPO 14.12** *Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.*
- CPO 14.13** *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*
- CPO 14.14** *Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SuDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.*
- CPO 14.15** *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

Topic 4 Water Infrastructure

No.	Name	Issues Raised
38	Alan Richardson	The submitter suggest that WCC needs to work with Uisce Éireann in ensuring that there is an adequate water supply for all new developments and to make sure it is provided for in a timely manner and where planning obstructions are getting in the way of development, these need to be removed without delay.
Chief Executive's Response		
Wicklow County Council works closely with UE to ensure water supplies are adequate for new developments being considered for permission and where new land is proposed to be zoned for development. In accordance with the NPF and Ministerial guidelines, where undeveloped land is not serviced by water and is not serviceable, the land is not proposed for zoning.		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

Topic 5 Infrastructure (Other / General)

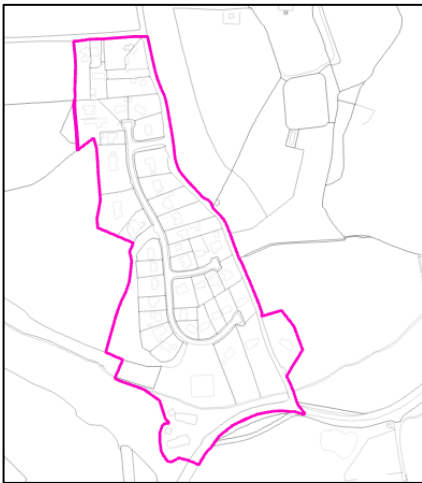
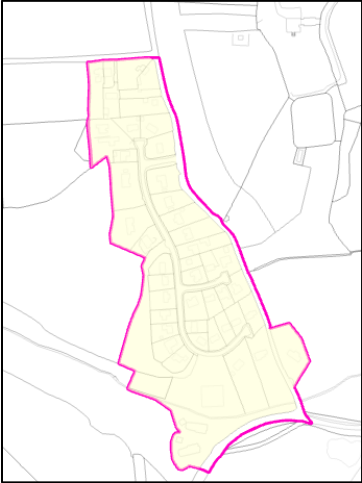
No.	Name	Issues Raised
37	Derek Mitchell	The submitter suggests lands should be zoned in the area for a recycling centre.
38	Alan Richardson	The submitters puts forward that it is incongruous that WCC makes a charge per housing unit for infrastructural development and then takes an inordinately long term to put it in place.
Chief Executive's Response		
<p>Recycling</p> <p>The objectives of the Wicklow County Development Plan apply directly in the LPF area. These objectives would support and facilitate the development of a recycling centre should a need be identified in the 'National Waste Management Plan for a Circular Economy' or the County Wicklow 'Litter Management Plan':</p> <p>CPO 15.3 <i>To facilitate the development of existing and new waste prevention and recovery facilities and in particular, to facilitate the development of 'green waste' recovery sites.</i></p> <p>CPO 15.5 <i>To have regard to the Council's duty under the 1996 Waste Management Act (as amended), to provide and operate, or arrange for the provision and operation of, such facilities as may be necessary to promote reuse or for the recovery and disposal of household waste arising within its functional area.</i></p> <p>CPO 15.6 <i>To facilitate the development of sites, services and facilities necessary to achieve implementation of the objectives of the Regional Waste Management Plan.</i></p> <p>It is not considered in this regard that a site needs to be zoned specifically zoned for a recycling centre, but such utility infrastructure could be considered in range of zones, as specified in the zoning table that forms part of the LPF.</p> <p>Development levies</p> <p>Wicklow County Council collects development levies in accordance with the provisions made for same in legislation and Ministerial guidelines. These levies generally form only part of the funding required to deliver new infrastructure and additional funding supports, as well as appropriate consents / permission require to be in place before new infrastructure can be developed, which can take some time, especially for larger schemes. WCC is committed to delivering the new infrastructure that is within its remit and ensuring that new development is supported by the necessary services.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

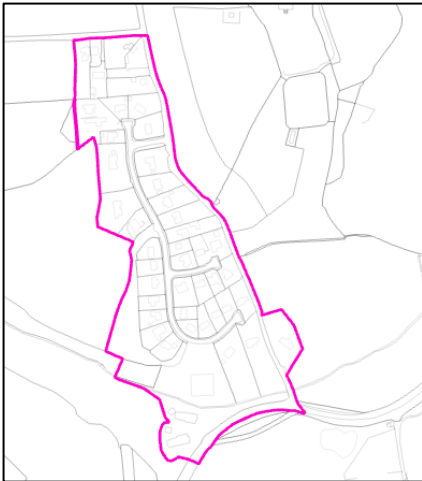
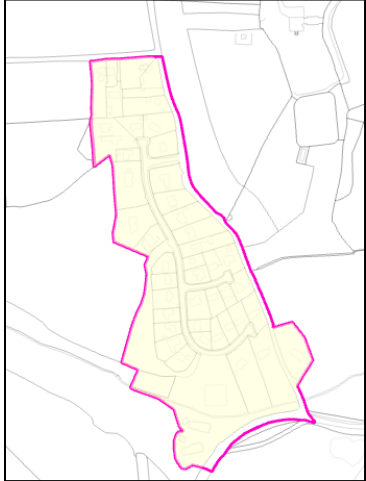
PART 4 SUMMARY AND ASSESSMENT OF SUBMISSIONS

Part 4.11 Part B of the Draft LPF

Part B: 8 ZONING & LAND USE

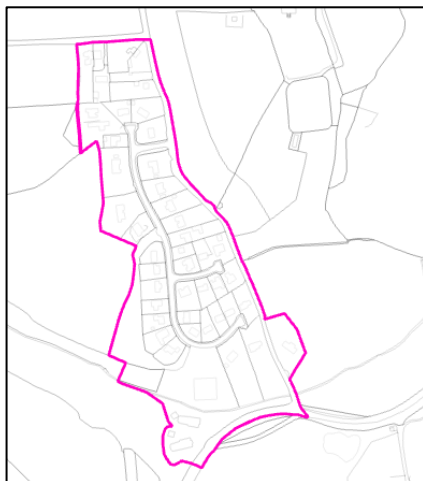
This section of the report is concerned with requests for changes to zoning. These are presented in numerical order, rather than by area / location. However, if more than one submission is made with respect to the same lands, these are grouped together.

No.	Name	Issues Raised
2	Plan8 Architects	<p>It is requested that lands of c. 11ha at Kilquade, outside the settlement boundary with no specific land use zoning in the Draft LPF, be zoned RE 'Existing Residential' and brought within the plan boundary. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> Existing established residential settlement. All existing public services are available in the area. Located 1.5km from Kilcoole village centre. Located within very close proximity to several employment zones, including Druids Glen Golf Club and Hotel, Kilcoole Industrial Estate, Bullford Industrial Estate, Network Industrial Park. Located close to educational facilities. Serviced land and generous plot sizes make appropriate infill development feasible. This residential settlement should no longer be considered as 'open countryside'. <p>Change from:</p>  <p>Change to:</p> 
5	Stephen Moore	<p>It is requested that lands of c. 11ha at Kilquade, outside the settlement boundary with no specific land use zoning in the Draft Plan, be zoned RE 'Existing Residential' and brought within the plan boundary. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> Existing established residential settlement with no availability of 'open countryside' outside the boundaries of this submission. All existing public services are available in the area. Located 1.5km from Kilcoole village centre, making it easily cycle and

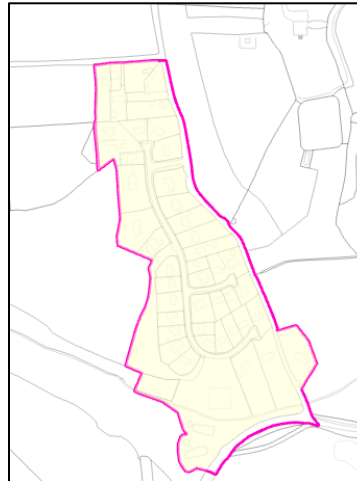
		<p>foot friendly through the inclusion of the improved pedestrian and cyclist infrastructure proposed as part of the GDK59C - Map No.5 Transport Strategy.</p> <ul style="list-style-type: none"> ▪ Located in very close proximity to several employment zones, including Druids Glen Golf Club and Hotel, Kilcoole Industrial Estate, Bullford Industrial Estate, Network Industrial Park, all cyclable and within walking distance. ▪ Located close to educational facilities, all cyclable and within walking distance. ▪ Serviced land and generous plot sizes make appropriate infill development feasible. Currently there are pockets of land that cannot be used as 'open countryside', but could be utilised for providing much needed housing, whilst completing 'oasis' sites available within the boundaries of this submission by way of appropriate infill housing. ▪ This residential settlement should no longer be considered as 'open countryside' as it is an established residential area adjacent to open countryside, with no potential to revert to open countryside. <p>Change from:</p>  <p>Change to:</p> 
42	Liam Kennedy	<p>It is requested that lands of c. 11ha at Kilquade, outside the settlement boundary with no specific land use zoning in the Draft Plan, be zoned RE 'Existing Residential' and brought within the plan boundary. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Situated 1.5km west of the centre of Kilcoole village. ▪ Currently just outside the current LAP boundary at Level 10 (Open Countryside). ▪ Existing established residential settlement. ▪ All existing public services are available in the area. ▪ Located within very close proximity to several employment zones including Druids Glen Golf Club and Hotel, Kilcoole Industrial Estate, Bullford Industrial Estate, Network Industrial Park. ▪ Located close to educational facilities. ▪ Serviced land and generous plot sizes make appropriate infill development feasible. ▪ This residential settlement should no longer be considered as 'open countryside'. ▪ Will act as a 'bookend' between the urban settlement and the open

countryside located to the north and west.

Change from:



Change to:



Chief Executive's Response

This housing area is located well outside the boundaries of Kilcoole and there are large swathes of undeveloped agricultural lands between this area and Kilcoole town centre. These lands do not form part of Kilcoole nor would comprise a natural extension to same. Any zoning of these lands, even for the existing residential use, would require either a significant expansion of the LPF boundary and Kilcoole settlement boundary, or an isolated pocket floating west of the town.

Section A.4 'Development Strategy' of the Draft LPF written statement sets out that the *'..the development strategy for Kilcoole will focus on the lands to the east of the Main Street in the Lott Lane area, in order to maximise use of the existing road network, to improve the eastern route around the town centre and to maximise proximity to Kilcoole train station'*.

To consider 'expansion' to the west, as is suggested here would not accord with this robust and most environmentally appropriate strategy.

While it is accepted that a developed housing estate cannot be best described as 'open countryside', this housing area is located in the rural zone and is not dissimilar to the dozens of small villages located in the rural areas of the county. The County Development Plan carefully manages development in the rural zone, and provides for new housing where genuine rural need arises and for village housing subject to qualification and occupancy controls. Infill development at the subject lands, without housing occupancy controls (which would be the case for RE zoning), would not align with this strategy and would represent sporadic rural development, without demonstration of need to live in the rural area.

The subject area is also lacking a footpath connections to Kilcoole, noting that Objective GDK59C of the draft LPF does not extend along the L-5542.

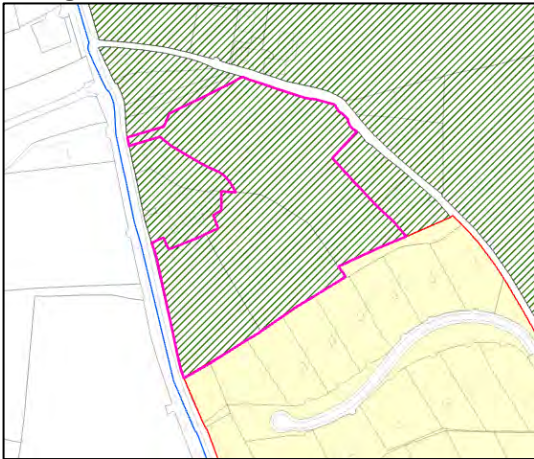
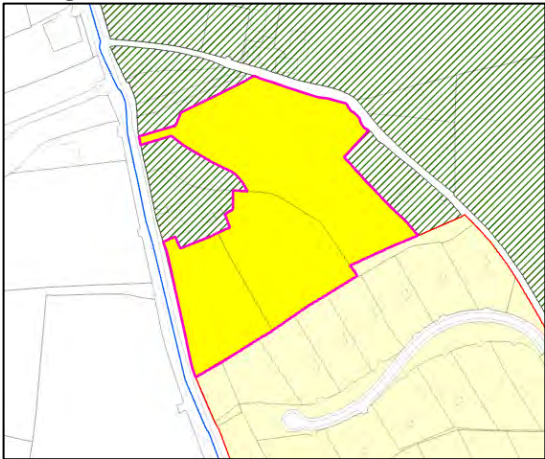
Furthermore, attention is drawn to the settlement boundary of Kilcoole and the LPF boundary as per Map No. 1 of the Draft LPF. The Tourism/Leisure/Recreational Complex zoning at Druids Glen Golf Club/Woodstock Demesne is a standalone zoning set out in Chapter 11 of the Wicklow County Development Plan 2022-2028, and is **not** within the settlement or LPF boundaries of the draft LPF. As such, the extension of the

settlement/LPF boundaries to include the subject lands would not be contiguous with the remainder of the plan area.

On this basis, it is not recommended to zone the subject lands RE 'Existing Residential'.

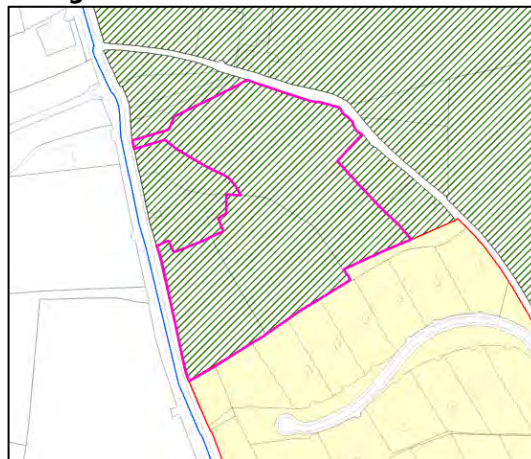
Chief Executive's Recommendation

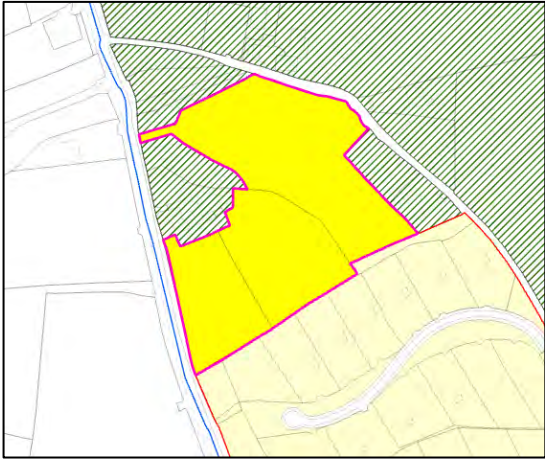
No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
3	John Darcy	<p>It is requested that lands of c. 3.6ha, zoned AG 'Agriculture' in the Draft LPF, be zoned for residential use [illustrated as RN1 'New Residential - Priority 1' below]. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ In the late 1990s the Council re-drew the town boundary, which resulted in the lands being removed from the town boundary. ▪ Consider the provision of acceptable levels of housing that is now required to meet exceedingly high population growth in the town. ▪ Under direction from the National Planning Framework, it is stated in the Wicklow County Development Plan 2022-2028 that regional and local planning policies should be sufficiently 'agile' to accommodate valid propositions for development. ▪ Pursuant to the objectives of the County Council in delivery progress to an area already at capacity (exceeding 5 year population targets), rezoning these lands to allow much needed community-focused development. <p>Change from:</p>  <p>Change to:</p> 
11	John Darcy	<p>[This submission is supplementary to Submission No. 3 above].</p> <p>It is requested that lands of c. 3.6ha, zoned AG 'Agriculture' in the Draft Plan, be zoned for residential use [illustrated as RN1 'New Residential - Priority 1' below]. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Strategic location and suitability:

- Alignment with National and Regional Planning Policies.
- Support for Local Development Needs.
- Infrastructure and Services: The site is already serviced by existing infrastructure ensuring that development can proceed without undue delay.
- Environmental Considerations:
 - Archaeological concerns raised by Council: Preliminary Assessments indicate that the site has no known environmental or archaeological constraints that would preclude residential development. North Shore and Darcy's Park (directly adjacent to castle ruin) revealed no archaeological effects. The land is significantly further away from the site of interest. Request that the Council re-evaluate this concern with the location maps included.
 - The land is situated in lower Windgates to the left of Bray Head's furthest left margin and is not in the Bray Head area but lies in the lower inland area of Windgates to the left of the entire Bray Head land mass running parallel to the Windgates road. Darcy's land pocket is no longer visible from any area of Greystones due to the development of the Marina and Harbour area and is surrounded by other buildings. Maps included as visual evidence of the exact location and significantly different direction to the Bray Head area.
 - Coastal erosion Council concerns raised: Darcy land pocket is significantly inland from the Greystones Coastline, separated from the coast by land east of the railway track, the railway track itself and a farm west of the railway track, a row of residential properties and another roadway.
 - Drainage concerns: the land shares similar elevation profile to the boundary of the North Shore development. There is precedence for building on the Greystones coastline with the recent Marina development, coastal erosion concern should be reassessed. Darcy land is west of Ennis Lane. If drainage is of concern, willing to have a relevant survey carried out prior to undergoing any building work.
 - In light of the above, the rezoning is appropriate. The Darcy family has always sought to contribute to the community of Greystones, historically donating land in the provision of Redford Cemetery, Darcy Park is built on land historically owned by the family.

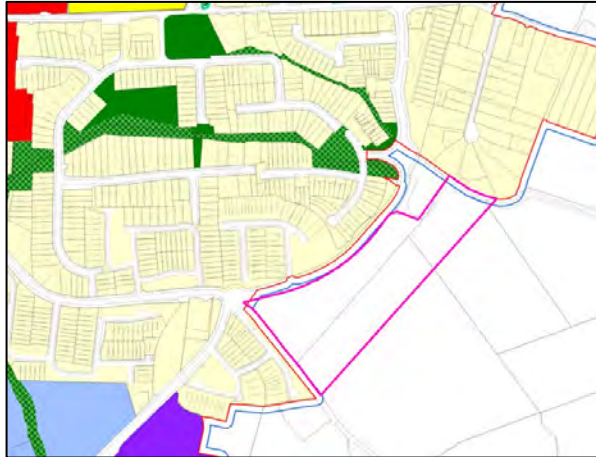
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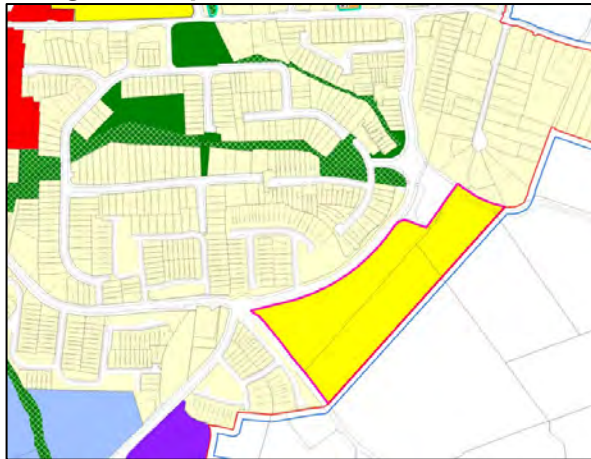
		<p>Change to:</p> 
Chief Executive's Response		
<p>The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:</p> <ul style="list-style-type: none"> ▪ The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy; ▪ Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022). <p>The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.</p> <p>In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:</p> <ul style="list-style-type: none"> ▪ Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended) ▪ Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection. The CE does not accept the characterisation of the subject lands as an 'infill', noting that structures to the north of the lands are largely farm buildings and dwellings consistent with a rural area. ▪ Conflict with the objectives of Coastal Cell No. 3 as set out in the Wicklow County Development Plan 2022-2028; ▪ Conflict with the assessment of the area set out in Section A3.3 of the draft LPF. The CE does not concur that the lands could have no archaeological constraints, noting a number of finds arising during the development of the North Shore development to the immediate south; ▪ Conflict with Section 7.2 of the draft LPF in relation to the avoidance of exacerbating coastal erosion arising from surface water run-off. The CE does not concur that it would be appropriate to zone the land ahead of ongoing investigations into coastal erosion in the area; ▪ Conflict with Prospect 6 as set out in the Wicklow County Development Plan 2022-2028; ▪ Conflict with Prospect P3, Views V1, V3, V4, V6, and Objective GDK57 as set out in the draft LPF. 		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

No.	Name	Issues Raised
7	Richard and David Fox	<p>It is requested that lands of c. 3.9ha at Cooldross Middle, outside the settlement boundary with no specific land use zoning in the Draft Plan, be either zoned for residential use [illustrated below as RN1 'New Residential – Priority 1], or zoned partly for residential use and partly SLB 'Strategic Land Bank', and brought within the plan boundary. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Site was zoned for residential development in the 1998 Draft LAP but removed from final plan, AGR 'Agriculture' in the 2008 Kilcoole LAP. In the 2013 plan, the land was zoned SLB (1.7ha – Site A), with the comment in the plan that <i>"these lands are amongst the lands that the Council deems most suitable for development"</i>, and AG – agricultural use (2.2ha – Site B) outside of the town boundary. ▪ County Wicklow Settlement Hierarchy 2010-2016: Kilcoole as a small growth town with a target population of 5000 by 2022. Target adjusted to 4,778 in the most recent County Development Plan 2022-2028. Kilcoole now designated a Self-Sustaining Town with a target growth rate of 20-25%, with a target of 287 new houses by 2031. Given the current housing crises, the impending ESRI report into national housing targets and the as yet unpublished Housing Commission Report propose that a higher headroom percentage should be applied to Kilcoole at this time as many of the sites zoned for residential development, some as far back as 1998 remain undeveloped. ▪ The lands are adjacent to the boundaries of residentially zoned and developed lands within the 2013 Kilcoole Local Area Plan (Holywell Ballycrone Manor and the Sea Road). Therefore, it is a logical continuation of what is already developed. ▪ The lands will have vehicular access to both Newcastle Road, Cooldross Lane and the Sea Road. There is also direct access in place onto the more recently constructed distributor road from Sea Road to the Newcastle Road and has 250m of road frontage. ▪ The site is within walking distance of the local schools and served by existing footpaths and cycle lanes and as such, would fall into the category of Tier 1 Serviced Zoned Land if it were rezoned residential at this time. ▪ The site is elevated, with no history of flooding. ▪ The Planning Authority has already zoned 1.6 hectares of the lands as SLB when it prepared the 2013 Local Area Plan i.e. as lands suitable for rezoning to residential in this current review of the Local Area Plan. The development of these lands will lead to the consolidation of development in this area adjacent to the new distributor road and adjacent to the existing built up area. ▪ The site is adjacent to sewage and water services, with Kilcoole Waste Water plant located on another portion of the land. ▪ Advantages over other sites available <ul style="list-style-type: none"> A: Proximity to the centre of town B: Infill Site C: Available Infrastructure

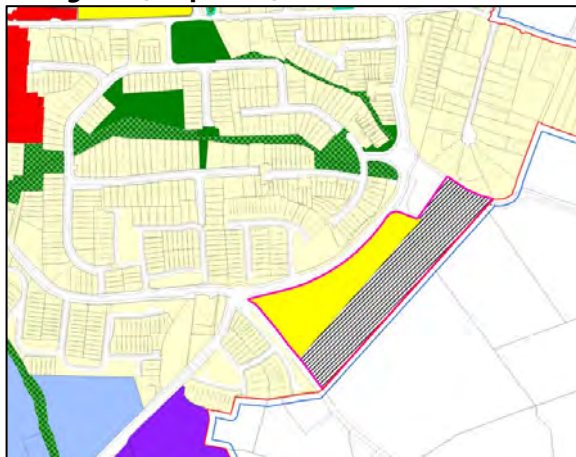
Change from:



Change to (Request 1):



Change to (Request 2):



Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

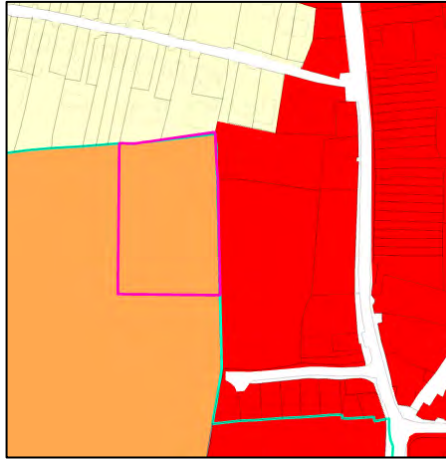
Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

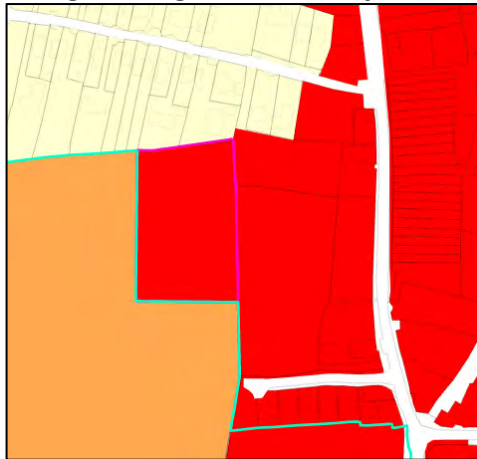
No.	Name	Issues Raised
12	Lidl Ireland GmbH	<p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left). This submission relates to lands in Kilcoole on the west side of the Main Street (shown on maps to follow).</p> <p>The submitter seeks the following amendments to the Draft LPF:</p> <ol style="list-style-type: none"> 1. That the Town Centre zoning objective boundary be extended to include the entirety of the subject site; 2. That the 'uses generally appropriate' within the Town Centre zoning objective be amended to include Supermarket / Foodstore or Medium Sized Supermarket / Foodstore; 3. That the SLO5 objective boundary be reduced to omit the part of the subject site currently within the SLO5 objective boundary (corresponding to the above zoning objective extension); 4. That the Opportunity Site OP8 Kilcoole West – 'The Mollys' be reconfigured to: a. Be reduced to the south and expanded to the west match the boundary of the subject site (corresponding to the above zoning objective extension / SLO reduction); b. Be amended to reflect the conceptual layout of the current mixed use scheme under consideration in Reg. Ref: 24/60545; and, c. Provide an updated set of text objectives. 5. That Table 10.1 of the Development Plan be amended to omit any reference to a 1,000 sqm aggregate threshold; 6. That Section B1.5 Kilcoole of the LPF be amended to omit any reference to a 1,000 sqm aggregate threshold; 7. That a new objective, GDK13a, be included to affirm the greater importance of Small Towns relative to Neighbourhood Centres, in keeping with the explicit and established principles of the Development Plan, for instance, as follows (or to similar effect): <p><i>GDK13a Within Small Towns, it is the objective of the Planning Authority that retail provision would be expected to be more extensive than Neighbourhood Centres. As such, and given the overarching importance of reducing leakage and promoting the expansion of retail floorspace first and foremost within core retail areas, there shall be no quantitative threshold on the provision of retail floorspace subject to adherence to the qualitative role and function of the Town as outlined in the Retail Strategy.</i></p> 8. In the event that Table 10.1 and Section B1.5 are not amended, an alternative GDK13a, for instance, as follows (or to similar effect): <p><i>GDK13a Within Small Towns, it is the objective of the Planning Authority that retail provision would be expected to be more extensive than Neighbourhood Centres. As such, and given the overarching importance of reducing leakage and promoting the expansion of retail floorspace first and foremost within core retail areas, there shall be no quantitative threshold on the provision of retail floorspace subject to adherence to the qualitative role and function of the Town as outlined in the Retail Strategy. Thresholds referenced in Table 10.1 and Section B1.5 of the Plan shall not apply in such instances.</i></p>

		<p>The submission set out detailed rationale for each request that the interested reader should consider.</p> <p>In support of items 1 and 3 in particular the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The proposed Lidl demise (i.e. less the proposed shared access road / permeability link to the landbank to the rear) is in the order of 0.95ha; ▪ The LPF as currently drafted contains materially conflicting objectives and what could be interpreted as restrictions in this regard, in a number of respects, including the extent of the town centre zoning boundary; ▪ The subject site is primarily proposed to be zoned Town Centre, with the exception of the western extents. The exclusion of part of the subject site leads to an insufficient site / plot depth to achieve the stated aims for the town centre, as demonstrated by the proposed scheme for the site (currently in the planning process) which requires a deeper plot; ▪ In order for this important gap in the Main Street to be adequately and meaningfully infilled, the associated development plot should be sufficiently deep to accommodate the practical requirements of town centre uses, which includes requirements in terms of car parking, deliveries / servicing, etc. The requirement to provide permeability to the Main Street also reduces the Town Centre use of the full frontage to Main Street, hence the greater need for additional depth of the Town Centre zone, to ensure a critical mass in terms of plot size; ▪ Furthermore, the Town Centre zoning at present does not distinguish non-town centre uses to the south, e.g. Ashlawn, which interrupts the actual footprint of land available to town centre uses; ▪ Notably, the LPF provides a distinct set of uses generally appropriate for town and village centres separate to those for neighbourhood centre, small local centres and local shops and services, which would be an opportune means of graduating the scale of retail appropriate to different centre types, within the Level 4 category. This further reinforces the need, that the Small Towns be afforded the opportunity to achieve their stated objectives, which are explicitly to exceed the scale and function of Neighbourhood Centres, notwithstanding that both occupy Level 4 designation; ▪ The plot divisions within the LPF do not align with the parcels under the control and developability of various landowners and stakeholders. The opportunity arises now to modify same to align with practical deliverable plot areas / sites (e.g. the Lidl lands boundary), including SLO 5 – Bullford. Removing the subject lands from SLO5 (at least the Lidl demise, e.g. if access road / permeability corridor was required to remain) would provide a more practical and appropriate designation for the SLO lands, as the Lidl subject lands have their own context separate to those of the wider landbank. The Lidl subject lands/demise can and should be appropriately managed via the land use zoning and opportunity site designation, without inclusion within any SLO designation.
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Change zoning/SLO boundary from:

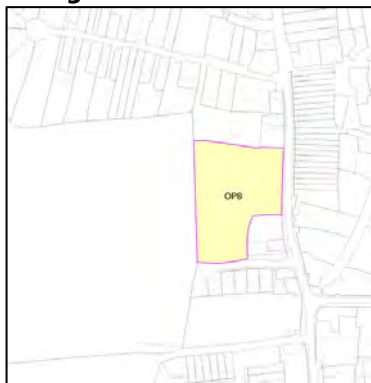



Change zoning/SLO boundary to:



Change OP boundaries as follows:

Change from:



		<p>Change to:</p> 
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Chief Executive's Response

Request 1

The CE is amenable to the extension of the TC 'Town Centre' zone as indicated if this would allow for more flexibility and support for the provision of needed additional commercial development (including retail) in Kilcoole centre to address spending leakages to other towns. However, this raises concerns that acceding to such a change would infer that the CE is supportive of the development of a large floorplate, single storey discount foodstore type development (with associated car parking) at this location, which is not the case. Permission has been refused for this format of development in June 2025 primarily on the basis that this format would not represent an efficient and sustainable use of zoned lands in a town centre, would not accord with national and local planning policy objectives to achieve compact growth, which seek to revitalise towns and direct development into Core Areas at suitable intensity to ensure sustainable development.

Therefore it is recommended that this zoning change is accompanied by an associated additional objective in OP8 as follows:

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~~ **required on these lands. In particular, any ground level commercial or retail development proposed shall include upper floors of residential use.**
- High quality frontage onto all streets **and open spaces** 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.

Request 2

The CE does not consider it necessary to include the additional description of 'Supermarket/Foodstore' or 'Medium Sized Supermarket/Foodstore' as requested. Retail uses are already permissible under the TC 'Town Centre' zoning, which would encompass the wording suggested. The precise nature and scale of retail provision permissible at any particular location is then further elaborated (beyond land use zoning) in the retail policies of the Wicklow County Development Plan 2022-2028 and the draft LPF as relevant.

Requests 3, 4

The CE is amenable to the extension of the OP boundary to the west, but not a reduction to the south. There is no requirement for development plan objectives to align with property ownership boundaries, and the lands to the south are clearly interconnected with the northern part due to the need to share access arrangements. The CE is amenable to the change in the SLO boundary to reflect the change supported above.

Requests 5, 6

This request is seeking a change to an objective in Chapter 10 of the adopted Wicklow County Development Plan 2022-2028. No changes are proposed to Chapter 10 of the Wicklow County Development Plan as part of this variation and it is considered unreasonable and excessive to change a higher level objective of the County Development Plan that applies to numerous towns, just to support one development in one town. Furthermore, the request is not 'necessary' to support this particular project as (a) the 1,000sqm provision is not a 'cap' and (b) it is evident from the recent planning application (which was refused for design and density issues) where the principle of additional floor space in Kilcoole, over and above the indicated '1,000sqm aggregate' set out in the County Development Plan was deemed possible to consider where a strong case was made, backed up with data and a Retail Impact Assessment. Therefore no change is recommended.

Section B1.5 of the draft LPF is a simple re-statement of the provisions of the County Development Plan; therefore as no change is recommended to Chapter 10 of the County Development Plan, no change is recommended to B1.5 of the LPF.

Requests 7, 8

The CE is satisfied that the provisions of the Wicklow County Development Plan 2022-2028 are explicit in:

- stating that the retail provision in small towns is expected to be more extensive than neighbourhood centres;
- County Policy Objectives, in particular CPOs 10.1, 10.3, 10.4, 10.5, 10.6, 10.8, 10.9 already fully address and support the objective to reduce leakage and promote the expansion of retail floorspace first and foremost within town centre and core retail areas;

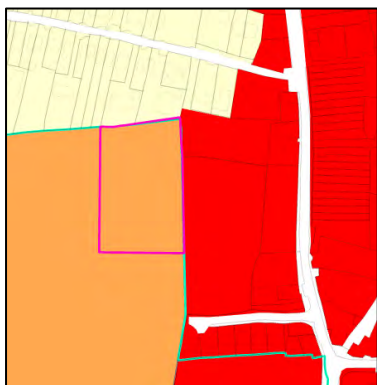
and therefore no new objectives as requested are necessary.

Chief Executive's Recommendation

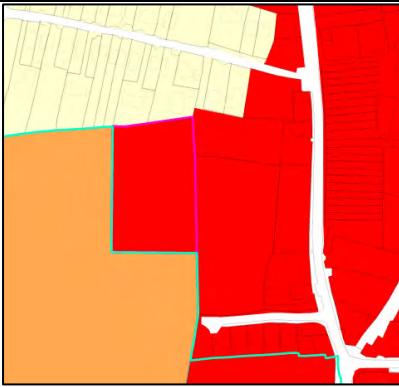
Amend the LPF as follows:

Amend Map No. 1 Land Use Zoning objectives (and any changes consequent) as follows:

Draft LPF:



Recommended Amendment (including amended SLO5 boundary):

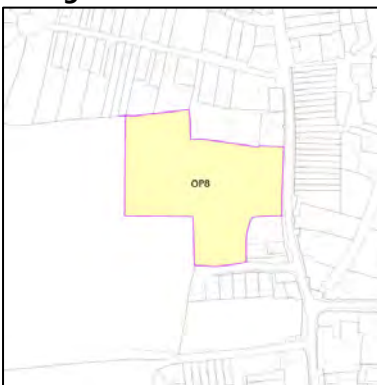


Amend the boundary of OP8 as follows:

Change from:



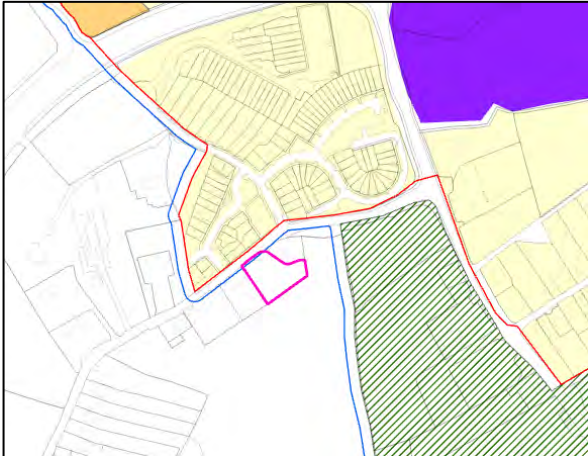
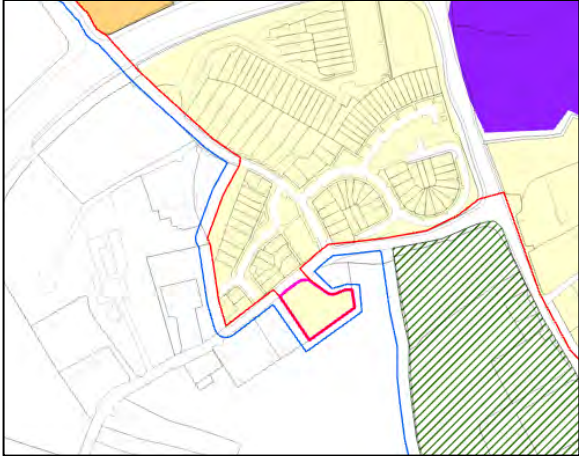
Change to:



Amend the text of OP8 as follows:

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~~ required on these lands. In particular, any ground level commercial or retail development proposed shall include upper floors of residential use.
- High quality frontage onto all streets and open spaces 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.

No.	Name	Issues Raised
13	Sandra Byrne Lucina Byrne & Gavin McGuinness	<p>It is requested that lands of c. 0.18ha at Priestsnewtown, outside the settlement boundary with no specific land use zoning in the Draft Plan, be zoned for residential use [though this is not explicitly stated, it is clear from the submission that this is what is requested, illustrated most appropriately below as RE 'Existing Residential] and brought within the plan boundary. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The submission refers to previous withdrawals/refusals of planning applications based on the assertion that they are 'not from the area', despite family roots in Kilcoole traced back to 1750. ▪ The site's classification as being marginally outside the LPF settlement boundary, situated within a "landscaped designed Access Corridor Area" is being used as a pretext to deny development without any explanation. ▪ There are no significant views or amenities in the immediate vicinity that would be compromised. ▪ The assertion that [development of the site] constitutes "non-essential housing" ignores the current housing crisis. ▪ The submission asks the Planning Authority to examine again the detail of the proposed variation and rectify this oversight. ▪ [The submission includes a series of maps demonstrating the site's context.] <p>Change from:</p>  <p>Change to:</p> 

Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

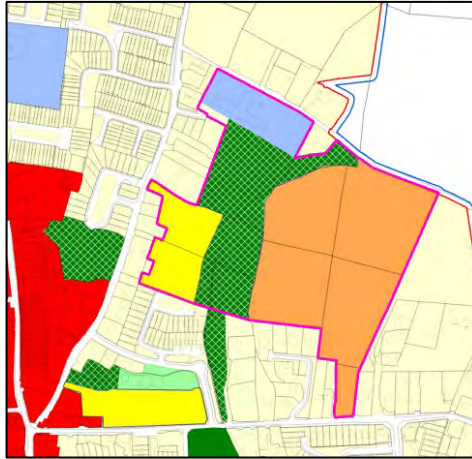
Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

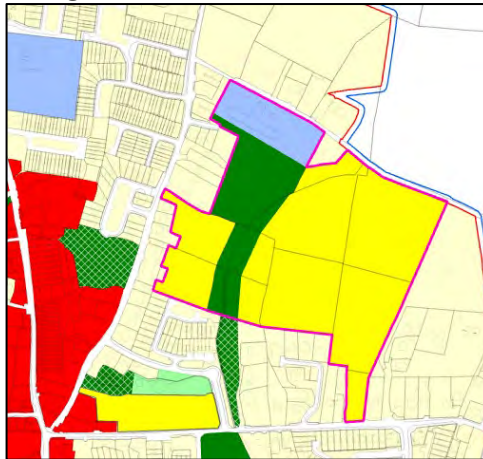
No.	Name	Issues Raised
18	Dwyer Nolan Developments Ltd.	<p>This submission relates to lands identified in the draft LPF as SLO6 in Ballydonarea, Kilcoole (see map to follow)¹:</p> <p>The following is requested</p> <ol style="list-style-type: none"> 1. That c. 2.3ha of land, zoned OS2 'Natural Areas' in the draft LPF, be zoned OS1 'Open Space'. [The map submitted also requests that c. 0.07ha of land zoned RE 'Existing Residential' be zoned OS1 'Open Space'] 2. That c. 1.0ha of land, zoned OS2 'Natural Areas' in the draft LPF be zoned RN1 'New Residential – Priority 1'. 3. That c. 7.3ha of land, zoned RN2 'New Residential – Priority 2', be zoned RN1 'New Residential – Priority 1'. <p>In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ There is a conflict between the map and text with respect to the OS designation in SLO6 (whether it is OS1 or OS2); it is put forward that the OS1 description is much more suited to an area of open space located between residential developments. ▪ The existing stream is very small, often dry, and there is no record of flooding. Biodiversity levels are low. OS2 zoning is not necessary for a riparian corridor, as recommended in the Inland Fisheries Guidelines for Urban Watercourse. ▪ The extent of the proposed of open space is not needed, particularly on the south-eastern side of the watercourse. This creates a c. 90m wide corridor to the stream (25m to the west and c. 65m to the east). A riparian corridor of 25m, either side of the stream, is considered adequate, as per the Inland Fisheries Guidelines for Urban Water Courses. ▪ Two areas of RN1 are indicated on the maps, one in the ownership of Dwyer Nolan and subject of a planning application for 67 dwellings. The smaller RN1 area has planning permission for 45 dwellings. It is considered that the phasing of development on the subject residential lands is both unreasonable and unnecessary. ▪ The Development Plan Guidelines for Planning Authorities 2022 advocates that <i>'It is policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new plan under preparation, should not be subject to dezoning'</i>. This applies to the proposed change of zoning to open space referenced above. ▪ In relation to phasing: <i>'development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan from coming forward'</i>. Section 4.4.3 of the Guidelines states <i>'In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential... than would equate to meeting precisely the projected housing demand for that settlement.'</i> The sections of the Guidelines quoted above, readily allow for a flexible approach to the zoning of the Residential lands in Ballydonarea. A flexibility which allows for the lands in question to be zoned RN1- New Residential Priority 1.

¹ Please note that Submission **No.'s 18, 32, 41 and 57** all relate to SLO6 and immediately surrounding areas.

Change from:



Change to:



Chief Executive's Response

The OS lands in SLO6 are proposed to be zoned OS2 and there is inadvertently an error on one part of the text which suggests that the open space lands in SLO6 are zoned OS1 rather than OS2. The zoning map and the SLO6 image both clearly show this as OS2.

The condition and ecological value of the lands in SLO6, particularly the lands identified as OS have been carefully surveyed and evaluated as part of the LPF crafting process and it is clear that the OS areas proposed not only contain a natural watercourse corridor, but also a much wider area of high biodiversity value including (but not limited to):

- a natural and somewhat wet area of c. 1.7ha to the south of the existing nursing home, which is densely vegetated with a wide variety of natural species including significant tree cover, which appears to have come about from natural rewilding. This area however does appear to be tended to and improved as there is evidence of some new trees planting, including oak saplings.



- an unmanaged grassland area to the east of the watercourse of c. 0.9ha; there is observed evidence in this area of Red Kites and the presence of Kilcoole Rock in proximity suggests further raptor species, and such grasslands can provide a foraging grounds for such species.



Significant dense hedgerows and trees lines cross through the area, including on the proposed residentially zoned lands.

Where development is taking place rapidly in what was a peri-urban agricultural landscape, the relative ecological and amenity value of retained green areas is high. Not only are they important in the context green infrastructure but they can also contribute to flood management, and enable future restoration in line with the EU Nature Restoration Law, National Biodiversity Action Plan, and County Wicklow Development Plan policies. This aligns with the precautionary principle and national planning objectives promoting resilient, nature-positive development.

As urbanisation progresses, remaining semi-natural land parcels gain disproportionate value as stepping stones, buffers, and green infrastructure for biodiversity (National Biodiversity Action Plan 2023–2030). Even degraded areas (e.g., invasive species present) can serve as important reservoirs for future restoration and contribute to habitat connectivity under Article 10 of the Habitats Directive

Existing hedgerows and watercourses serve as crucial ecological corridors, linking fragmented habitats across the wider landscape—functions explicitly recognised under Article 10 of the Habitats Directive (Ireland must maintain ecological connectivity). Protection of these features aligns with national pollinator strategies, climate resilience planning, and SuDS-integrated design policies.

Even potential wetlands provide key ecosystem services, including:

- ☐ Flood attenuation
- ☐ Water filtration and carbon storage
- ☐ Space for future nature-based solutions
- ☐ Habitat for wetland species and pollinators

These co-benefits are central to the National Restoration Plan (due under the EU Nature Restoration Law) and

support targets under the Water Framework Directive and Climate Action Plan 2024.

The National Biodiversity Action Plan (Target 2.3) commits to increasing land under restoration, especially in urban fringe and semi-natural spaces. Degraded lands offer high potential restoration uplift at relatively low cost- this is supported by NPWS guidance on habitat rehabilitation and by EPA research on nature-based urban flood management.

The OS2 zone as proposed in the draft LPF is therefore considered fully justified in the interest of protection and maintenance of habitats and biodiversity. However the SLO objectives do contain a provision that if following ecological assessment, some parts of the OS2 are found to be suitable for human use without damage to natural habitats, then such area may be laid out with sensitively designed and located paths, play spaces etc.

No changes are therefore proposed to the configuration of the zones or the objectives for this SLO on foot of this submission but the LPF text should be corrected to ensure it is clear that the open space is zoned OS2.

With respect to the small area of lands shown on the draft LPF as RE but requested to be changed in this submission to OS, these lands form the entrance of the nursing home adjacent. It is considered that these lands should be amended to 'CE – Community / Education' to reflect their existing use.

Note: A number of submissions have requested changes in this SLO area – No.'s 18, 32, 41 and 57. The recommended amended map to follow integrates all and any changes that the CE is recommending in this area on foot of all of these submissions. With respect to this submission, the only change recommended on foot of the submission is that detailed above (CE zoning at nursing home).

With response to the request to zone additional lands for residential purposes in lieu of OS zoning, the residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).

With respect to the phasing provisions, the CE is satisfied that these are appropriate and necessary in order to ensure both consistency with housing targets set out in the Wicklow County Development Plan but also in the interest of orderly development to ensure development emanates from the centres of towns in a sequential manner and does not entail leapfrogging to more peripheral lands. No change is therefore recommended.

Chief Executive's Recommendation

Amend the LPF as follows:

B.9 SPECIFIC LOCAL OBJECTIVES (SLO)

SLO6 – Ballydonarea

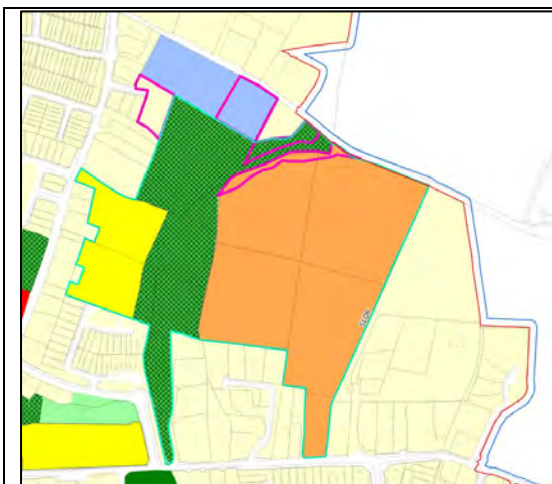
These SLO lands are located east of Lott Lane, Kilcoole in the townlands of Kilcoole and Ballydonarea and measure c. 12.7ha and are zoned for 'RN1 – New Residential Priority 1', 'RN2 – New Residential Priority 2' and '~~OS1 – Open Space~~. OS2 'Natural Areas'.

This area may be developed for a mix of uses including residential, community and open space, in accordance with the following requirements:

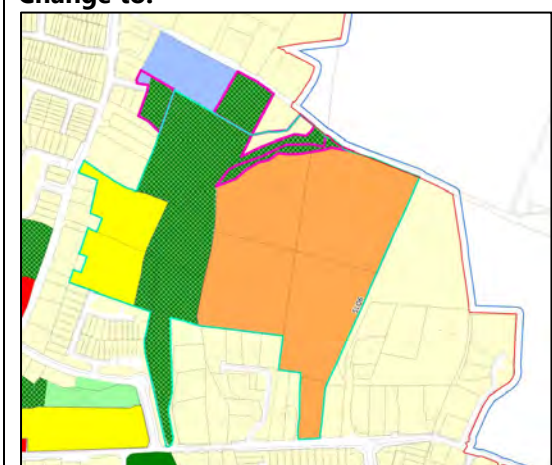
- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre and existing transport services.
- A total area of c. 8.8ha is zoned for new housing development which shall be divided into a least two distinct character areas / estates either side of the central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Lands zoned RN1 shall be accessed from Lott Lane only. Lands zoned RN2 shall be accessed from Sea Road only. Pedestrian and cycling connectivity shall be provided between the two RN zones across the green space, to Ballydonarea Lane to the north and Wellfield to the south;
- Open space shall be provided as follows
 - A central green area shall be provided along the watercourse and encompassing a natural wooded area to the north-west of same, of not less than 3.6ha in area.
 - Within this space, a 'natural' undisturbed area of not less than 10m shall be maintained either side of the stream and existing trees and hedgerows shall be maintained. Cycleway / footpath crossings over / through the watercourses, or tree / hedgerow lines, shall be minimised to that absolutely necessary for access; any such stream crossing shall be via a clean span bridge that maintains its natural character.
 - Where following ecological assessment, it is found that there are areas within this OS zone suitable for redevelopment, said lands shall be laid out for recreational purposes, including suitable play spaces, walks, seating area etc
 - The open space shall link fully through from Sea Road to Ballydonarea Lane.
- Community facilities shall be provided within the SLO area to meet the needs of the new resident community of the area. In particular, the development shall include at a minimum a childcare facility; in determining additional requirements for community facilities, a community services audit shall be carried out.

Amend map as follows:

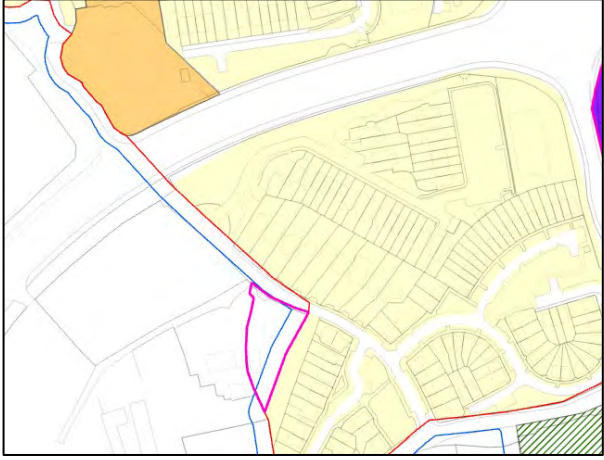
Change from:

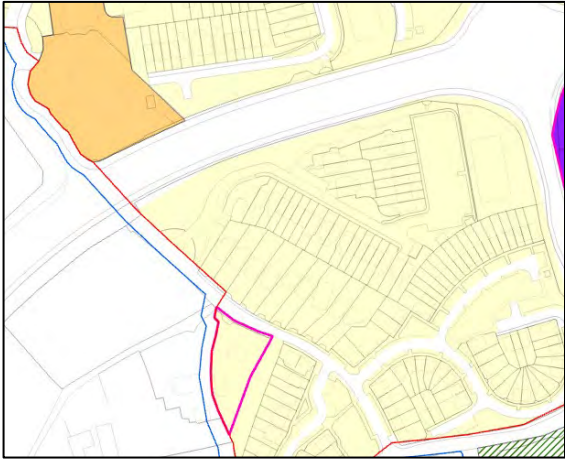


Change to:



Note: A number of submissions have requested zoning changes in this area – No.'s 18, 32, 41 and 57. The recommended amended map above integrates all and any changes that the CE is recommending in this area on foot of all of these submissions. With respect to this submission, the only change is that detail above (CE zoning at nursing home)

No.	Name	Issues Raised
19	Martin O'Malley	<p>This submission relates to lands of c. 0.24ha located on Priory Road, Farrankelly, just north of Farrankelly Way (as shown on the map to follow).</p> <p>It is requested that these lands, which are currently outside the plan boundary and are therefore unzoned, be zoned RE 'Existing Residential' and brought within the plan boundary. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The site is located within the Farrankelly residential area with frontage onto an existing residential street facing the Eden Drive/Eden Wood estate and beside Farrankelly Way. ▪ The zoning of the site as agriculture is a zoning anomaly in the context of its location within the Greystones-Delgany Census Town boundary and Farrankelly townland boundary. ▪ The site is in effect an infill site within the built envelope of an existing residential area, but currently any development or works at the site can only be assessed under the Council's rural policy framework. ▪ It is proposed that the site is zoned 'RE Existing Residential' consistent with the surrounding area. ▪ There are no environmental designation, biodiversity constraints, visual or heritage reasons that justify its rural designation. Development at this site would deliver infill housing in accordance with GDK15 and GDK 19. <p>Change from:</p> 

		<p>Change to:</p> 
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Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

The submission states that the subject lands are located 'on the edge' of the 2.5km radius of the town centre. Rather, the subject lands are located beyond this radius, and on this basis the subject lands were not assessed under Section A3.3 of the draft LPF. The impact on future development options of areas 'Delgany 3' and 'Delgany 4', those areas closest to the subject site, was as follows:

*'While these areas are adjoining the built envelope of Greystones-Delgany and some are proximate to some services, concerns arise with respect to suitability of road infrastructure, serviceability, flood risk, **unnecessary sprawl into the rural landscape at all locations** and impacts on archaeology, landscape and the natural environment. **It is the strategy therefore that currently unzoned lands should not be zoned for new development** and zoning be removed from the following four locations (a) high elevations of Bellevue Hill, (b) the lands at risk of flooding on the west side of Bellevue Hill, (c) the RSpecial lands to the west of Bellevue Hill and (d) Blackberry Lane, south of Three Trouts River.'* [emphasis added]

As zoning was removed from comparable adjacent areas which are **closer** to the town centre than the subject lands, it would not be consistent to zone the subject site and bring it within the settlement/LPF boundary. This approach is explicitly stated in Section A.4 'Development Strategy' as follows:

'The development strategy for Greystones-Delgany will be one primarily of consolidation and infill, with no

further settlement expansion beyond the previous LAP boundary;

The CE does not agree with the categorisation of the subject site as an 'infill' site. Intensification of development of this site would increase the population at a peripheral/edge of centre location, rather than focusing on infill opportunities that already exist within the LPF boundary. To do so would not be consistent with the Development Strategy set out in Section A.4, as follows:

'To focus on the dense, mixed use regeneration and development of town and village centre infill sites (particularly vacant or under-utilised sites) that are currently served or proximate to public transport services, as a priority above edge of centre or peripheral, greenfield locations.'

On this basis, it is not recommended to zone the lands RE 'Existing Residential' or bring the lands within the settlement/LPF boundary.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
23	Liam O'Meara	<p>This submission relates to lands of c. 2.3ha located on the R762 between Killincarrig crossroads and Delgany (as shown on the map to follow).</p> <p>It is requested that the lands zoned OS2 in the draft LPF, be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds area raised:</p> <ul style="list-style-type: none"> ▪ The lands were zoned existing residential and R5 in the Greystones-Delgany & Kilcoole Local Area Plan 2013. ▪ The lands are c. 560m from Delgany village centre, c.320m from Mill Road and public transport (bus) links and opposite Delgany National School. The links include bus services to the DART station and Dublin city centre. ▪ It is assumed that [the zoning] has been influenced by the extent of the floodplain and the contours of parts of the site, which are considered to create steep banks. ▪ It is evident that, given the imminent Ministerial guidelines to zone more land for residential development, that a surplus of suitably located and service land should be zoned in the LPF for residential development. ▪ The framework states that the focus in respect of further residential development will be on infill development and the consolidation of the built-up area and that there will be no quantitative restriction on the number of units that may be delivered within the built-up envelope of towns. ▪ Undeveloped sites in Delgany are assessed in pages 31-32 of the Framework, which are more peripheral than the subject site. ▪ Given all of the above it is evident that the subject site is ideally located and suited to residential development. ▪ Development Plan Guidelines for Planning Authorities 2022 states that zoned housing land should not be subject to dezoning, that there must be sufficient flexibility in development plans, and that it may be necessary to zone more land than required to meet housing demand. ▪ Flooding: Circular PL2/2014 - Planning authorities must strike a fair balance between avoiding flood risk and facilitating necessary development. Map 4C shows that the majority of the subject site will not be affected by the predicted future extent of flooding. ▪ Steep Banks: The subject site has been surveyed for this submission. [The submission includes a proposed site plan and section]. It is possible to provide dwellings without undue impact on the existing slopes or steep banks, subject to detailed design and design assessments as part of any planning application. Development on such slopes is typical of many sites in Wicklow, e.g. Archer's Wood, Priory Gate (steeper than subject site). ▪ It is noted that it is proposed to de-zone substantial areas of land that were/are zoned for residential development in the previous/current Local Area Plan. This greatly increases the need to re-zone the subject site as proposed. ▪ The Council is asked to note that the submitter has agreed terms with [named developer] to develop residential lands. Accordingly, if the zoning of the subject site is re-instated, as proposed in this submission, the lands will be developed.

	<p>Change from:</p>  <p>Change to:</p> 
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Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

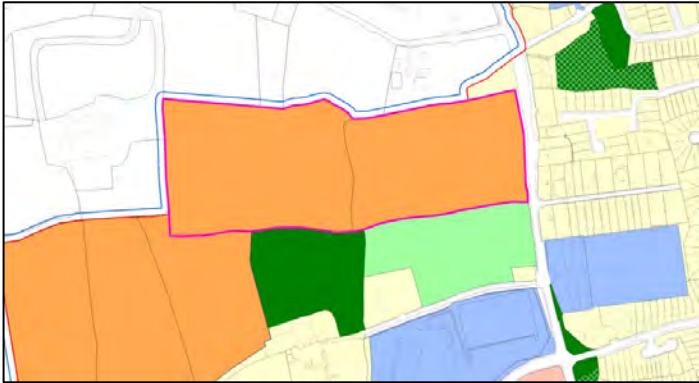
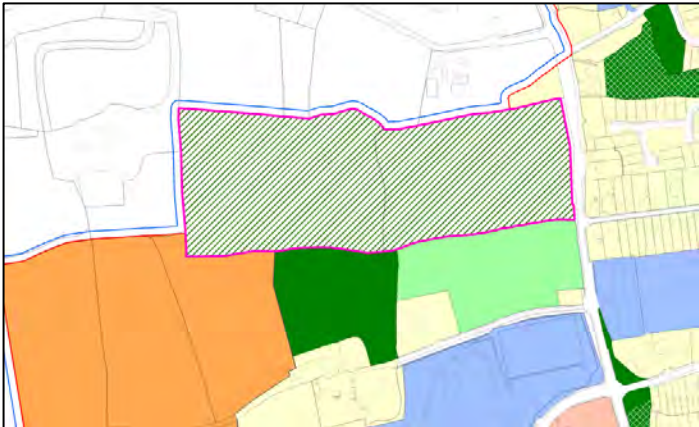
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).
- The requested rezoning would result in a reduction in lands zoned OS2 'Natural Areas'. These are essential zonings that are necessary to support the sustainable development of the LPF area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

The CE does not agree that the lands are suitable for the development of housing. GIS data available indicates that at the steep slope on the site, there is an approximately 17m drop over 40m, a c. 42.5% slope. Indicative layouts included in the submission indicate residential dwellings developed directly on this slope. While it may, subject to further detailed design/engineering assessment, be physically possible to develop a limited number

of dwellings on the lands, to do so would be an inefficient use of resources as well as environmentally damaging considering the likely earthworks/infrastructure required. Considering the value and vulnerabilities of the adjacent riverine corridor and floodplain of the Three Trouts Stream, the subject lands are considered to be ideal for the maintenance of the existing natural and green assets in situ.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
27	Coolagad Environmental	<p>This submission relates to lands of c. 8.4ha located on the R761 at Coolagad, north Greystones (as shown on the map to follow).</p> <p>It is requested that these lands zoned RN2 'New Residential – Priority 2' in the draft LPF, be zoned AG 'Agriculture'. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ This farm is of huge heritage importance in that it has been farmed consistently by generations of the Massey family going back to 1650. ▪ This farm provides a significant area of natural biodiversity for Greystones. ▪ The Greystones area has already far exceeded the planned population growth up to 2031, and needs many years for infrastructure & services to catch up. Also there is more than adequate zoned land to the south of Greystones which is better served with the connection nearby to the N11. ▪ The topography is therefore quite unsuitable for massive housing development, and is far more valuable for farming related objectives which need not exclude additional family homes for this farming family in the future. ▪ The Massey Farm is the only significant employer to the north of Greystones town, and benefits many other supplier businesses in the area. ▪ There is an obvious opportunity for diversification also into organic crops which would provide a secure healthy food source locally for Greystones into the future. <p>Change from:</p>  <p>Change to:</p> 

Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In these regards, the request for the zoning of *significantly less* land for residential use as detailed in this submission would:

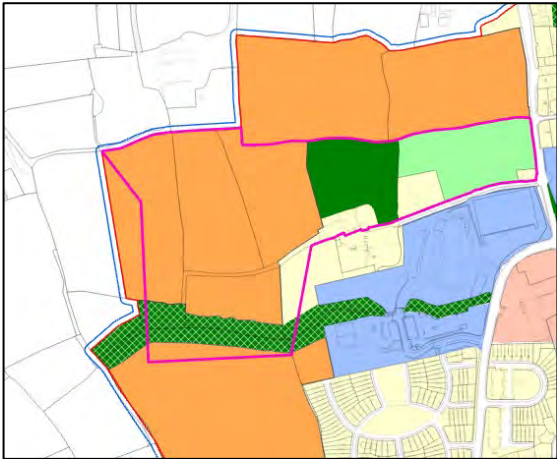
- Likely not provide sufficient flexibility in the zoning provisions of the draft LPF to ensure a phased stream of zoned land.

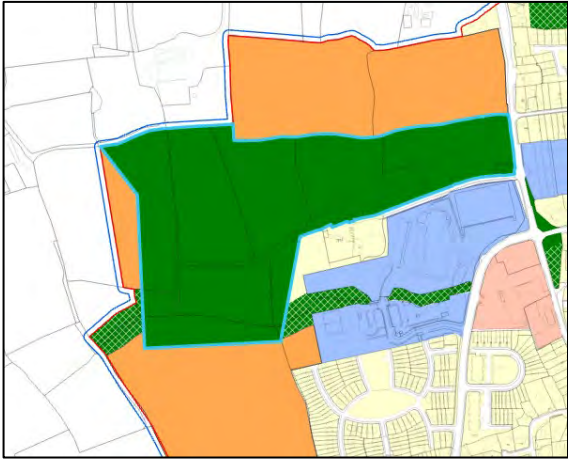
These lands have been proposed for residential zoning, as per previous development plans and for the reasons as detailed in Part A of the draft LPF. These lands are considered suitable, in conjunction with the land to the immediate south, to be developed as a new neighbourhood in accordance with the SLO4 objectives set out in the draft LPF, which will include the delivery of significant new community facilities, public open spaces and sports grounds as well as preserved natural areas.

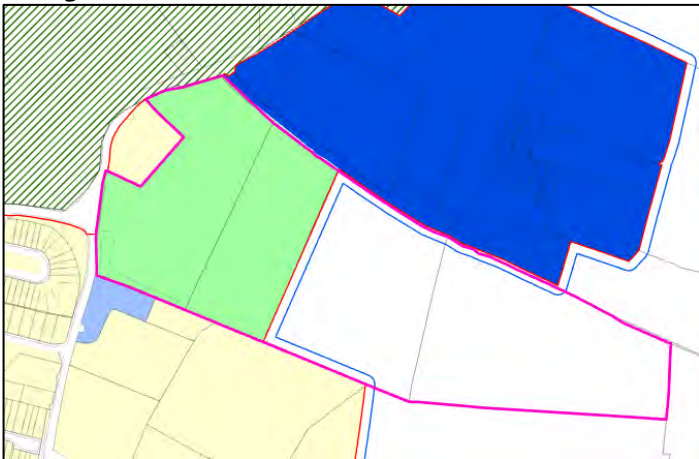
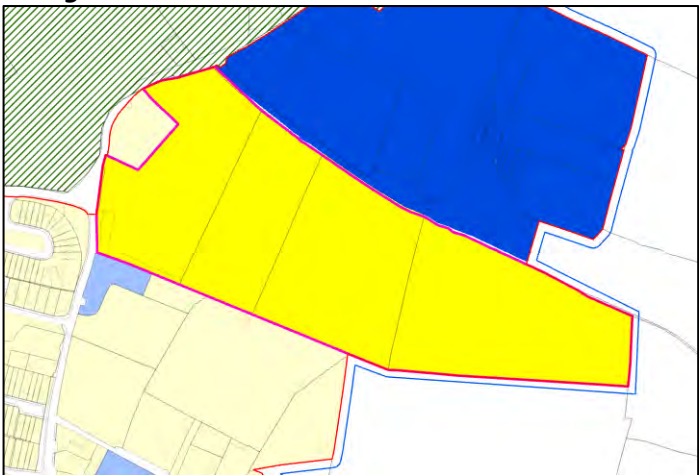
(Please note this submission is not made by the landowner, but by a community group)

Chief Executive's Recommendation

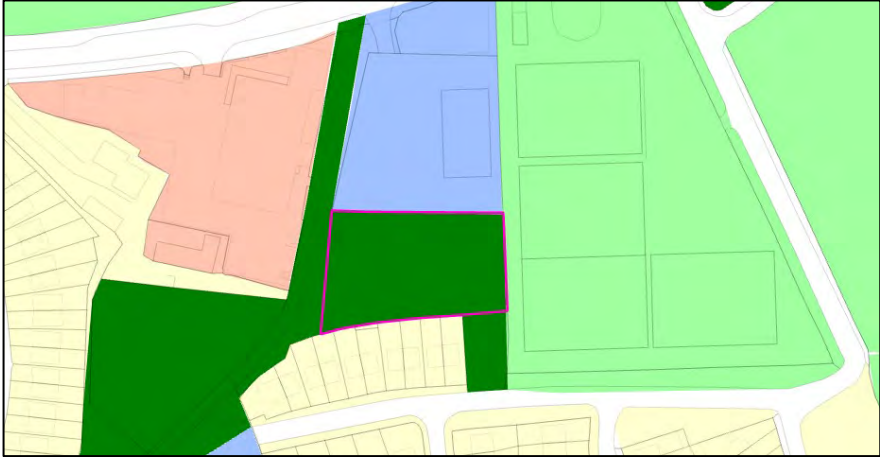
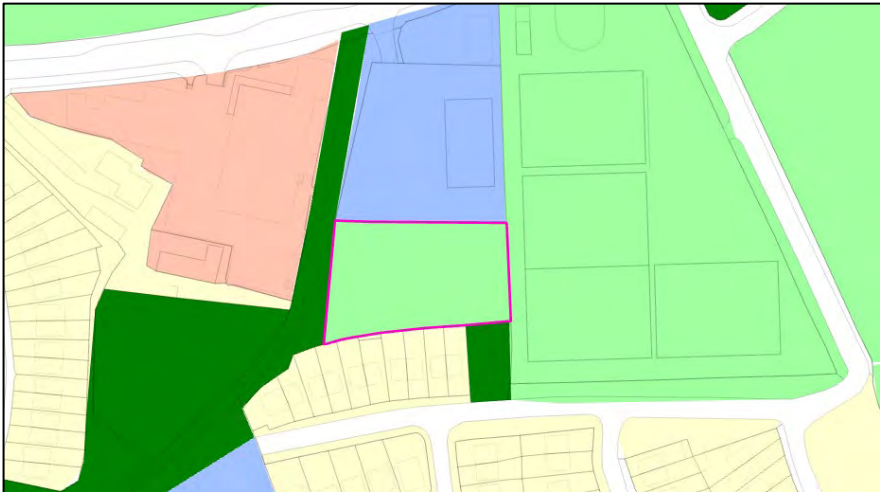
No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
28	Coolagad Environmental	<p>This submission relates to lands of c. 6.9ha located at Coolagad, north Greystones as shown on the map to follow.</p> <p>It is requested that these zoned RN2 'New Residential – Priority 2', RE 'Existing Residential', AOS 'Active Open Space', OS1 'Open Space' and OS2 'Natural Areas', be zoned 'Nature Park' illustrated below as OS1 'Open Space']. In support of the rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Greystones has experienced massive development and expansion in recent years such that the current population already far exceeds the planned population growth up to 2031. The area now needs many years without further development to allow for infrastructure & services to catch up. Also, there is more than adequate zoned land to the south of Greystones which is better served with the connection nearby to the N11. ▪ Following on from all the recent additional developments, the area now desperately needs and deserves a good sized Nature Park, and the ideal place is on the lands beside Templecarrig School; this location is most ideal right beside 3 schools and with pedestrian access from many nearby housing estates. ▪ In addition these lands could also provide safe parking for the existing Cemetery, and space for a new cemetery when that becomes necessary. ▪ There is a further advantage for this location as in due course this new Nature Park could link up via the adjacent Kindlestown Woods; once linked up, this would provide a fabulous Nature Park facility for the entire Greystones/ Delgany/Kilcoole area with multipoint pedestrian access, cycle paths etc. ▪ This proposed Nature Park would also provide the essential protective buffer zone for the historic Massey Farm Lands. <p>Change from:</p> 

	<p>Change to:</p> 
<p>Chief Executive's Response</p>	
<p>The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:</p> <ul style="list-style-type: none"> ▪ The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy; ▪ Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022). <p>In these regards, the request for the zoning of <i>significantly less</i> land for residential use as detailed in this submission would:</p> <ul style="list-style-type: none"> ▪ Likely not provide sufficient flexibility in the zoning provisions of the draft LPF to ensure a phased stream of zoned land. <p>These lands have been proposed for residential zoning, as per previous development plans and for the reasons as detailed in Part A of the draft LPF. These lands are considered suitable, in conjunction with the land to the immediate north and south, to be developed as a new neighbourhood in accordance with the SLO4 objectives set out in the draft LPF, which will include the delivery of significant new community facilities, public open spaces and sports grounds as well as preserved natural areas.</p> <p>The requested rezoning would result in both the removal of substantial residentially zoned lands but also Active Open Space lands and lands to be developed for community uses. These are essential zonings that are necessary to support the sustainable development of the LPF area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.</p> <p>(Please note this submission is not made by the landowner, but by a community group)</p>	
<p>Chief Executive's Recommendation</p>	
<p>No change to draft Greystones - Delgany & Kilcoole LPF.</p>	

No.	Name	Issues Raised
29	Mary O'Connor & Michael Gahan	<p>This submission relates to lands of c. 10.9ha located at Ballydonarea, Kilcoole (as shown on the map to follow).</p> <p>It is requested that the land zoned partly AOS 'Active Open Space' and partly unzoned and outside the LPF boundary in the draft LPF, be zoned for residential use [illustrated as RN1 'New Residential – Priority 1'] and brought within the town development boundary. In support of this rezoning, the following grounds area raised:</p> <ul style="list-style-type: none"> ▪ The land is suitable for a small development to align with the proposed development plan. ▪ Services are available. ▪ The land is adjacent to the existing town boundary and the natural progression as the town population and the local economy expands in line with WCC CD forecasts. ▪ The submission makes reference to a map but no such map was included in the submission. It is stated that this map identifies lands that they could offer to Wicklow County Council for the purpose of providing a playing pitch, parking and associated recreational facilities to serve this development and adjoining local authority housing development. <p>Change from:</p>  <p>Change to:</p>  <p>Note: Due to the omission of the map referenced, it is not clear where the</p>

		suggested playing pitches etc would be located within the holding.
Chief Executive's Response		
<p>The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:</p> <ul style="list-style-type: none"> ▪ The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy; ▪ Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022). <p>The settlement/ LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.</p> <p>In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:</p> <ul style="list-style-type: none"> ▪ Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended). ▪ Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection. ▪ The requested rezoning would result in a reduction in AOS zoning. These are essential zonings that are necessary to support the sustainable development of the LPF area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles. <p>It is noted that there is a dwelling currently under construction on the lands, to the immediate south and adjoining the existing dwelling on the lands. However, this is already located within the lands zoned RE 'Existing Residential' in the draft LPF.</p>		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

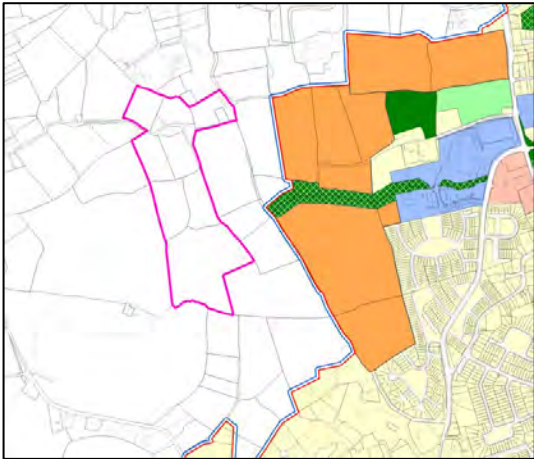
No.	Name	Issues Raised
30	Greystones Lawn Tennis Club	<p>This submission relates to lands of c. 0.3ha located at Killincarrig, Greystones to the west of the existing Greystones tennis club (as shown on the map to follow).</p> <p>It is requested that, these lands zoned OS1 'Open Space' in the draft LPF be zoned AOS 'Active Open Space'. In support of this request, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The club does not have the capacity to take new members. ▪ There is a demand for sporting facilities with the growth in population in Greystones Kilcoole Delgany. ▪ Consider providing sufficient active open space to allow sporting facilities and clubs the space to expand their services to the community. ▪ This land is owned by Wicklow County Council. The Tennis Club would be interested should the Council want to sell this land. <p>Change from:</p>  <p>Change to:</p> 
Chief Executive's Response		
<p>The lands in question are proposed for OS1 zoning as it is the objective of the Council as set out in the draft LPF for these Council owned lands are intended be developed as an amenity park (GDK55d).</p> <p>To zone the subject lands AOS 'Active Open Space' would conflict with this objective and if developed for enclosed sports use, would prejudice options for the development of a well-connected amenity park in this area.</p>		

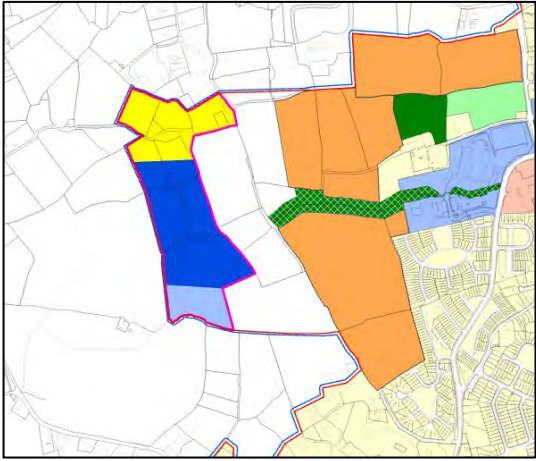
In addition, these lands are receivers of water flows from the old mill race passing under the Mill and Mill Lane and are wet underfoot. To develop these lands for hard surfaced and enclosed sports uses would unduly interfere with this natural drainage pattern in the areas and with the local biodiversity that is supported by these water flows.

On this basis, it is not recommended to rezone the subject lands.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPP.

No.	Name	Issues Raise
33	Paul & Renee Sutton	<p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left). This submission relates to lands of c. 14.5ha located at Coolagad, north Greystones (as shown on the map to follow).</p> <p>It is requested that these lands, currently with no specific land use zoning being outside the LPF boundary, be zoned for residential [illustrated below as RN1 'New Residential – Priority 1'], agri-tourism (with accommodation) [illustrated below as T 'Tourism'], and community orchard uses [illustrated below as CE 'Community & Education'] and brought within the settlement/LPF boundaries. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The lands are located just outside the current LAP boundary. ▪ The rezoning would facilitate a unique and integrated vision that supports local sustainability, tourism, biodiversity, and community development. ▪ The proposed lands are adjacent to indicative greenway routes shown in the current LAP. The lands serve as a natural connection between Greystones and Kindlestown Hill. ▪ The location can accommodate a multi-functional greenway link, a community-led orchard and food forest, eco-sensitive accommodation in the form of off-grid pods, and low-density sustainable housing designed in harmony with the landscape. These uses are consistent with national/local policy goals concerning climate action, sustainable tourism, community well-being, and compact growth. ▪ [The submission includes a range of background documents, incl. pre-planning documentation.] <p>Change from:</p> 

		<p>Change to:</p> 
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Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement, and environmental protection.

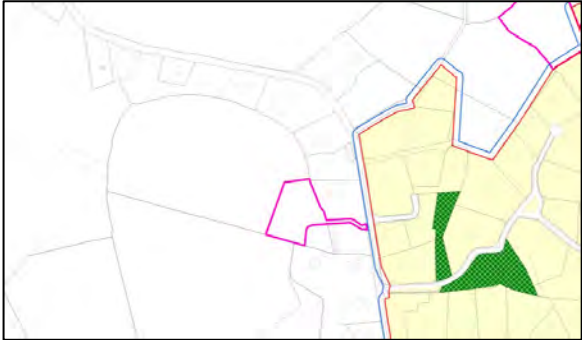
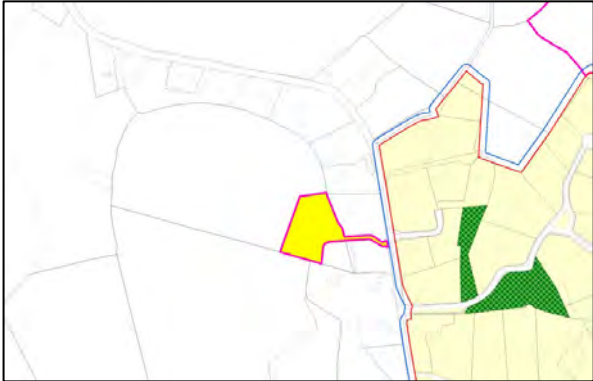
In relation to the requests for the non-residential zonings on the land for tourism and community uses, the Wicklow County Development Plan sets out policy supports for such development in rural areas (subject to suitable controls) and therefore it is not essential for the lands to be 'zoned' in order for such developments to be considered. It is noted that no applications for permission have been sought previously for any of these elements of the 'project' under the County Development Plan provisions and therefore it is unclear why the submitters consider the need for 'zoning' to support their project.

The lands are not contiguous to the existing settlement/LPF boundaries and the zoning of such would represent leapfrog development in a visually sensitive area.

On this basis, it is not recommended to zone the lands as requested.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
39	Paraic McGarty and Emily Joyce	<p>This submission relates to lands of c. 0.6ha located at Bellevue Demesne north Delgany (as shown on the map to follow).</p> <p>It is requested that these lands, with no specific land use zoning and outside the settlement/LPF boundaries in the draft plan, be zoned RN1 'New Residential – Priority 1' for one dwelling. In support of the rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The site already had permission granted previously for one dwelling and is in effect infill. The site is adjacent to Delgany village (approx. 800m) and permitting development for one dwelling would be in keeping with the proper planning and sustainable development of the area. ▪ The site has been recently purchased by returning emigrants with deep roots in Delgany/Greystones and professional real estate backgrounds. There is no intention to sell or develop multiple units for profit. ▪ Previous planning approval 14/1860. The site at Bellevue is one of three subdivisions with an existing house, a house under construction, and [the submitter's] lot as the final parcel. ▪ Services (water, sewer, electricity) are available at the street. Footpaths and street lighting in place across the road. Given the surrounding residential development, it is anomalous for this lot to retain rural restrictions, as infrastructure capacity exists and the site logically extends the adjoining residential pattern. <p>Justification and Benefits: Efficient use of land support for demographic objectives), alignment with LPF housing targets, minimal infrastructure cost and environmental impact, community benefit and social cohesion.</p> <p>Change from:</p>  <p>Change to:</p> 

Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

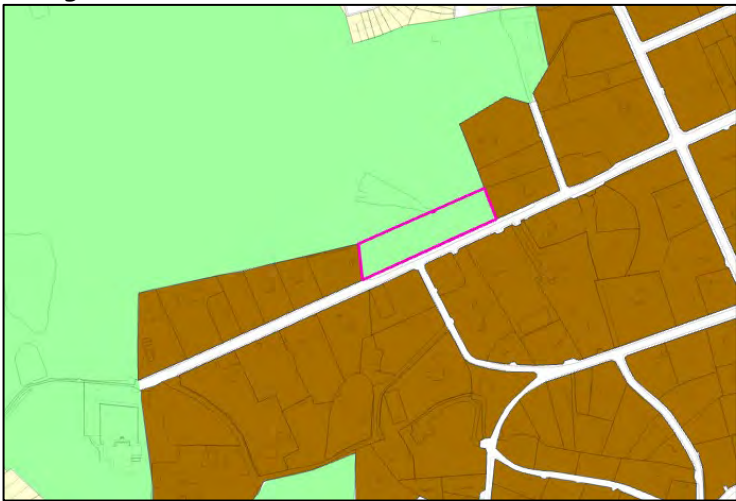
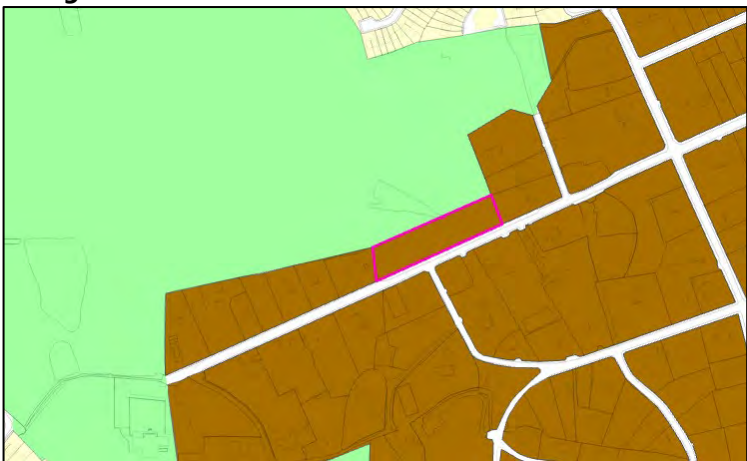
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).
- Comprise the haphazard and piecemeal extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

To zone these lands would not align with the analysis of this area, and subsequent impact on development options, as discussed in Section A3.3 of the Draft LPF.

On this basis, it is not recommended to zone the subject lands.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
40	Greystones Golf Club	<p>This submission relates to lands of c. 0.5ha located on the grounds of Greystones GC on Whitshead Road in the Burnaby, (as shown on the map to follow).</p> <p>It is requested that these lands, zoned AOS 'Active Open Space' in the draft LPF, be zoned RS 'Special Residential'. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The lands were zoned R10 in the last Greystones-Delgany & Kilcoole LAP. ▪ It is assumed the dezoning to AOS is in error. ▪ The lands are not used or required by Greystones Golf Club for sporting use, are serviced and are approx. 650m from Greystones Railway station, a 6-minute walk. As such, the lands represent an ideal opportunity for infill development. ▪ The club would welcome and appreciate the return of residential zoning as its value represents a potential safety net for the club in leaner economic times. ▪ Development would fit into the urban streetscape. A small residential infill zoning will be in accordance with the proper planning and sustainable development of the area. <p>Change from:</p>  <p>Change to:</p> 

44

[Greystones Golf Club](#)

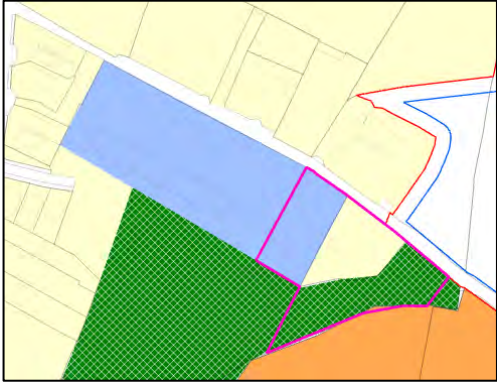
[Duplicate of the above submission]

Chief Executive's Response

The change in zoning is not in error. The AOS zoning reflects the current usage of the lands as part of the golf course. The previous zoning of this land was not taken up at any time and no applications for residential development have been made. In addition, the lands front into the Burnaby, where only lower density housing would be possible in accordance with the objectives of the LPF and it was not considered appropriate therefore to maintain this zoning in the new LPF, but rather to allocate other lands for new residential development that have the potential for more intensive housing.

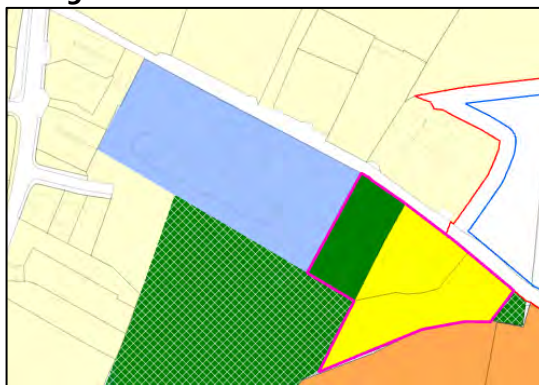
**Chief Executive's Recommendation**

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
41	Nicky and Dominic Cox	<p>This submission relates to lands measuring c. 0.5ha at Ballydonarea, Kilcoole in SLO6 (as shown on the map to follow)².</p> <p>Please note that multiple duplicate submissions were received and submissions from both agent and landowner that differed slightly in their requests. Mapped zoning requests are as per a map submitted by the agent.</p> <p>It is requested that these lands zoned RE 'Existing Residential' and OS2 'Natural Areas' in the draft LPF, be zoned RN1 'New Residential – Priority 1' [some submissions request the previous RE/R15 zoning] and that c. 0.2ha of lands at Ballydonarea, zoned CE 'Community & Education' in the draft LPF, be zoned OS1 'Open Space'. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The lands zoned OS2 are in use as a private residential garden and provide residential amenities which the proposed OS2 zoning will not provide. The garden contains primarily grass and a field that was previously used for light farming, there is very little native vegetation. ▪ There are currently unkempt and wild lands to the west of the holding which might be more appropriately zoned OS1 or OS2 rather than CE. This location would also be beneficial as it is closer to an existing natural biodiversity link from Ballydonarea Lane to the new Council development to the rear of Ballydonarea Lane. ▪ Nicky Cox has sold part of his holding to his son Dominic who has recently returned from Australia and intends to build a dwelling. ▪ The trees on the southern boundary of the garden are suffering from Ash Dieback and will need to be removed presently. ▪ RN1 zoning rather than RN2 zoning is more appropriate for these lands, given the current housing crises and the Minister's impending directives. <p>Change from:</p> 

² Please note that Submission **No.'s 18, 32, 41 and 57** all relate to SLO6 and immediately surrounding areas.

Change to:



Chief Executive's Response

A review of the zoning objectives for this area has been undertaken in light of this submission (and others in this area, namely 18, 32 and 57), including further surveys of the vegetation and biodiversity of the area.

It is agreed that the lands proposed for CE zoning in the draft LPF to the east of the Nursing Home would be more suitably zoned OS2 given their existing natural condition and potential to link the natural area adjoining them to the south onto Ballydonarea Lane (note that the submitters do not own these lands; Submission No. 57 is from the landowner [Peter Allan O'Connor](#)).

With respect to the request to change lands from OS2 to RN1, the eastern boundary of these lands is currently heavily vegetated and provides a strong green corridor between Ballydonarea Lane and the natural areas to the south.

Existing hedgerows serve as crucial ecological corridors, linking fragmented habitats across the wider landscape - functions explicitly recognised under Article 10 of the Habitats Directive (Ireland must maintain ecological connectivity). It is considered vital this corridor be retained and therefore it is not considered appropriate to completely remove the OS2 zoning in this area.

The OS2 zone as proposed in the draft LPF is therefore considered fully justified in the interest of protection and maintenance of habitats and biodiversity. However the SLO objectives do contain a provision that if following ecological assessment, some parts of the OS2 are found to be suitable for human use without damage to natural habitats, then such area may be laid out with sensitively designed and located paths, play spaces etc.

The CE therefore recommends a reduced size OS2 corridor as show below.

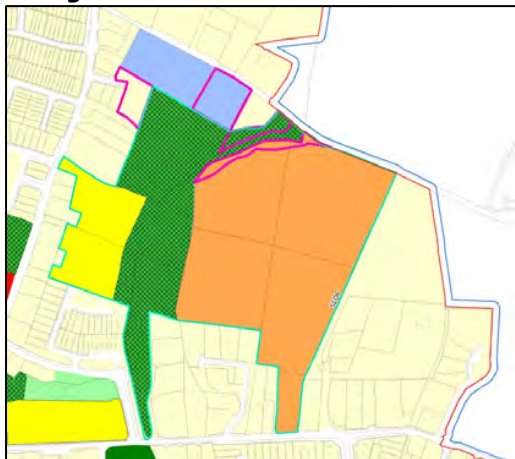
Note: A number of submissions have requested changes in this SLO area – No.'s 18, 32, 41 and 57. The recommended amended map to follow integrates all and any changes that the CE is recommending in this area on foot of all of these submissions. With respect to this submission, the only change recommended on foot of the submission is that detailed above (narrowing of OS2 band and new OS2 area to east of Nursing Home).

Chief Executive's Recommendation

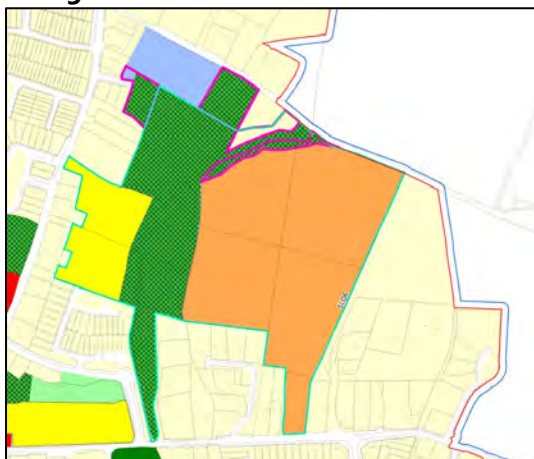
Amend the draft LPF as follows

Map No. 1 Land Use Zoning

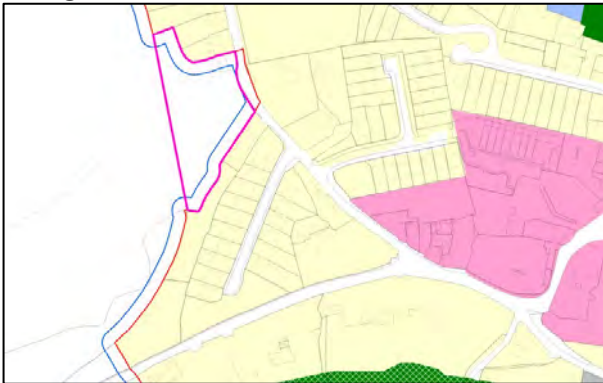
Change from:



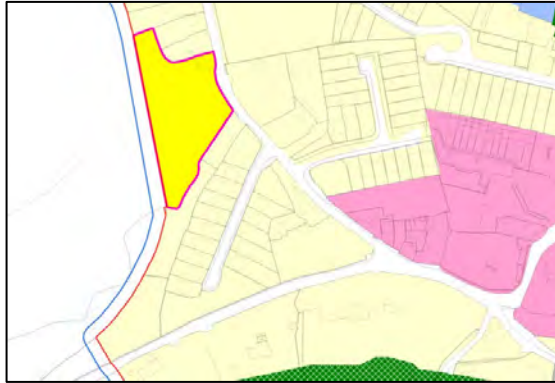
Change to:



Note: A number of submissions have requested changes in this SLO area – No.'s 18, 32, 41 and 57. The recommended amended map above integrates all and any changes that the CE is recommending in this area on foot of all of these submissions. With respect to this submission, the only change recommended on foot of the submission is that detailed above (narrowing of OS2 band and new OS2 area to east of Nursing Home).

No.	Name	Issues Raised
43	Delgany Golf Club	<p>This submission relates to two parcels of land measuring c. 0.6ha and 2.7ha at Bellevue Demesne, Delgany (as shown on the maps to follow).</p> <p>Request 1: It is requested that c. 0.6ha of land at Bellevue Demesne with no specific land use zoning and outside the settlement/LPF boundaries in the draft LPF, be zoned RN1 'New Residential – Priority 1' or RE 'Existing Residential' [Illustrated below as RN1 'New Residential – Priority 1']. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The area was zoned RE in the last LAP. ▪ The lands are ideally suited to infill development, in the middle of Delgany village, adjacent to the bus routes, all services and are serviced, are close to local schools, and are within walking distance of Greystones Railway station. ▪ The zoning should not be altered as it will have a material detrimental effect on the financial viability of Delgany Golf Club. The club has a substantial bank loan outstanding and part of the Bank covenants is that the bank loan to value (LTV) of land/property does not fall below a certain value. If these lands are de-zoned, it may lead to Delgany Golf Club being in breach of their bank covenants and the bank may call in their loans. ▪ The club has already incurred substantial professional fees/time in assessing options on these sites. ▪ In the current housing crisis it is entirely inappropriate to de-zone these lands. ▪ Development on these lands would complete the urban streetscape on Bellevue Hill. <p>Change from:</p> 

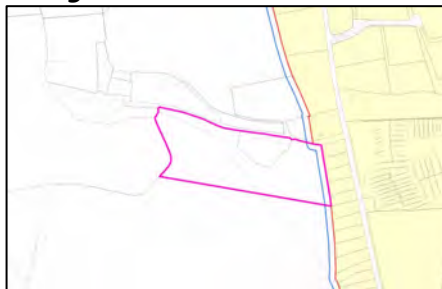
Change to:



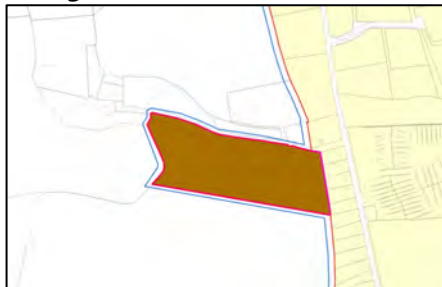
Request 2: It is requested that c. 2.7ha of land at Bellevue Demesne, with no specific land use zoning and outside the settlement/LPF boundaries in the draft LPF, be zoned RN1 'New Residential – Priority 1' or RE 'Existing Residential' [Illustrated below as RN1 'New Residential – Priority 1']. In support of this rezoning, the following grounds are raised:

- The area was zoned Special R-B in the last LAP.
- The lands are ideally suited to infill development, 600m or less from Delgany village, close to village and the bus routes, are serviced, are close to local schools, and are within walking distance of Greystones Railway station.
- The zoning should not be altered as it will have a material detrimental effect on the financial viability of Delgany Golf Club (as above)
- The club has already incurred substantial professional fees/time in assessing options on these sites.
- In the current housing crisis it is entirely inappropriate to de-zone these lands.
- Development on these lands would complement existing dwellings on Bellevue Hill and on access roads to these lands off Bellevue Hill.

Change from:



Change to:



Chief Executive's Response

In response to both Requests 1 and 2, the residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement.

To zone these lands would not align with the analysis of this area, and subsequent impact on development options, as discussed in Section A3.3 of the Draft LPF.

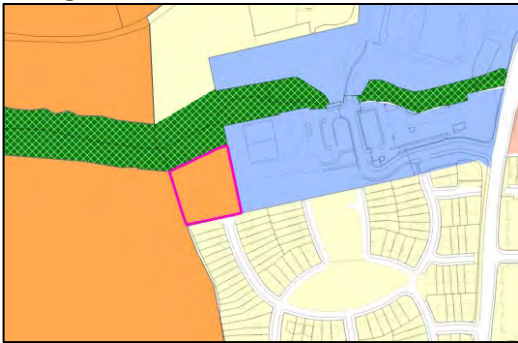
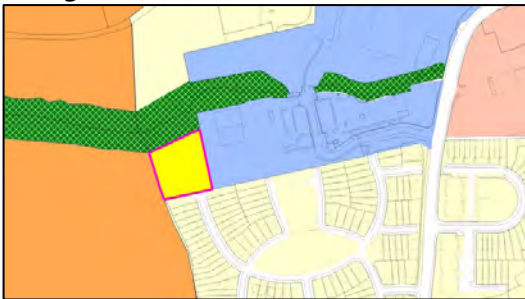
It should be noted that the previous residential zonings of these lands was not taken up at any time and no applications for residential development have been made. In addition, given the location of the lands, particularly the northern parcel, only lower density housing would be possible in accordance with the objectives of the LPF and it was not considered appropriate therefore to maintain these zonings in the new LPF, but rather to allocate other lands for new residential development that have the potential for more intensive housing. It is not considered proper planning and sustainable development to zone lands not for the purpose intended i.e. the delivery of needed housing but to manage bank loans.

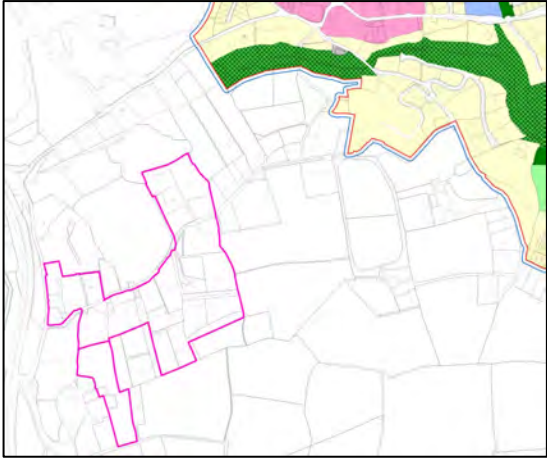
With respect to the southern parcel, the roadside frontage of these lands comprise an historic gateway and driveway into the Bellevue Demesne, and it is likely that protection of same would anyway limit development potential.

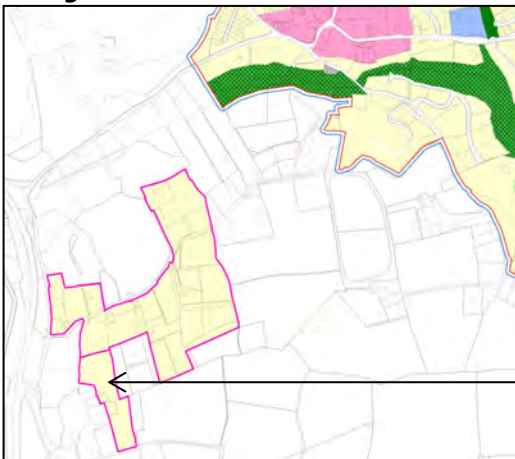
On this basis, it is not recommended to zone the subject lands.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
50	Morgan Evans	<p>This submission relates lands measuring c. 0.5ha at Coolagad, north Greystones (as shown on the maps to follow).</p> <p>It is requested that these lands, zoned RN2 'New Residential – Priority 2' in the draft LPF, be zoned RN1 'New Residential – Priority 1'. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The land can be read effectively as an extension to the existing Waverly Estate and is immediately adjacent to all of the required services such as foul, surface water and piped water supplies. Given the fact that this land is in separate ownership to the RN2 lands adjacent, it will have a minimal impact on the land use zoning but will provide a much needed variety of housing types. <p>Change from:</p>  <p>Change to:</p> 
Chief Executive's Response		
<p>The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:</p> <ul style="list-style-type: none"> ▪ The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy; ▪ Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022). <p>In these regards, the request for a change in the 'prioritisation designation' as detailed in this submission would:</p> <ul style="list-style-type: none"> ▪ Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended). 		
Chief Executive's Recommendation		
No change to draft Greystones - Delgany & Kilcoole LPF.		

No.	Name	Issues Raised
51	Clement Wilson	<p>This submission relates lands measuring c. 14.6ha at Drummin East, Delgany (as shown on the maps to follow).</p> <p>It is requested that these lands, with no specific land use zoning and outside the settlement/LPF boundaries in the draft LPF, be zoned RN2.5 'Residential 2.5/ha' [illustrated below as RE 'Existing Residential']. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Lands have been dezoned and it is requested that the Council considers reinstating the R2.5 zoning on these lands and extending the boundary to include an additional c. 5 acres of zoned land to the south and west [the requested extended area is shown demarcated from the larger area of previously zoned lands by a pink line in the below maps]. ▪ The land at this end of Blackberry Lane in Drummin East is an established part of Delgany having been developed over 50 years, the walking conditions on this end of Blackberry Lane are not hazardous. ▪ In relation to the additional 5 acres: Mains water available in overall holding, ample room for wastewater treatment, access from R762 or the lower part of Blackberry Lane, sufficient space to improve Blackberry Lane junction and provide a public footpath if required, ample scope to accommodate any future impact from widening the N11. Well screened on all sides and any development would be invisible from the N11. ▪ The land in question is serviced with footpaths and cycleways within 15 minutes' walk time of an existing or committed bus service (less than 5 minutes using internal footpaths on the lands). The isochrones map published with the draft plan has erred in this area. ▪ The land is less than 800m via a pedestrian laneway to the Bromley roundabout on the R774 that connects to Greystones. ▪ Whilst high density town centre development is obviously preferred, there is a need for a variety of housing types in any community, including lower density housing. Lower density zoning also serves to reduce demand for one off, unsustainable and sporadic rural sites. Totally removing any lower density zoning from the plan is contrary to the principles of sustainable development. There would be no need to walk on Blackberry Lane. <p>Change from:</p> 

	<p>Change to:</p>  <p>Area referred to as 'additional 5 acres' below pink line</p>
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Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

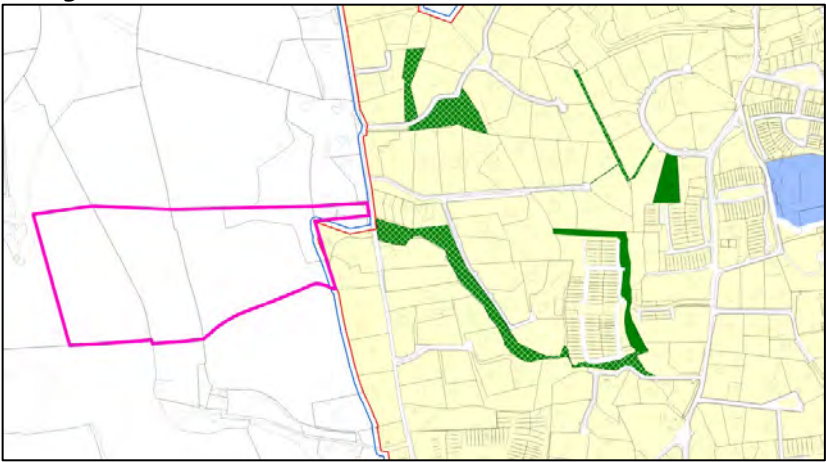
The zoning of the subject lands, whether previously zoned or requested for additional zoning, would conflict with the statement in Section A.3.2 of the draft LPF Written Statement, as follows: *'It is therefore the strategy of this LPF that no further development outside this 2.5km radius should be facilitated during this LPF period'*. The lands requested for additional zoning would further conflict with development strategy set out in Section A.4 of the draft LPF Written Statement, including the following statement: *'The development strategy for Greystones-Delgany will be one primarily of consolidation and infill, with no further settlement expansion beyond the previous LAP boundary'*.

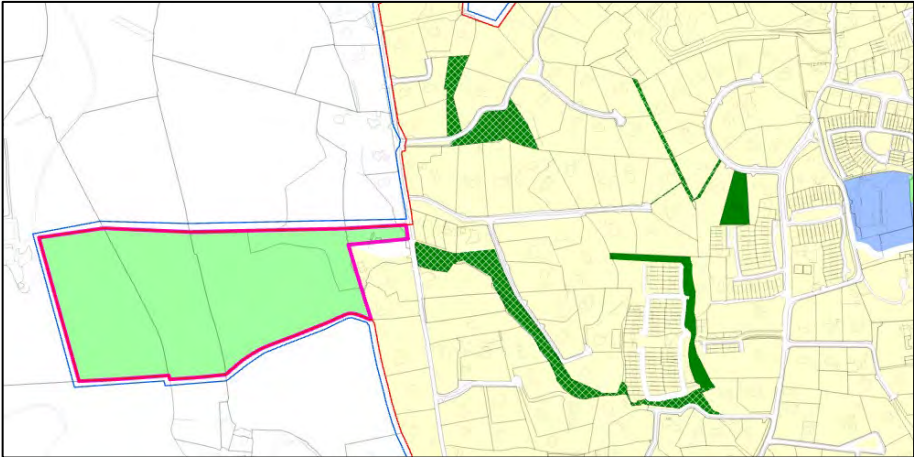
In addition, as detailed in both the draft LPF and the SEA, this area is particularly environmentally sensitive and therefore is not considered appropriate for continued or new designation for development.

On this basis, it is not recommended to zone the subject lands R2.5 'Residential 2.5/ha'.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
54	Eire Og Greystones GAA	<p>This submission relates lands measuring c. 12.5ha at Bellevue Demesne, Delgany (as shown on the maps to follow).</p> <p>It is requested that these lands, with no specific land use zoning and outside the boundaries of the draft LPF, be brought within the LPF settlement boundary. [It is not explicitly stated in the submission that a rezoning is requested, however is it reasonably clear from the content of the submission that an AOS 'Active Open Space' zoning is requested for the lands. It is illustrated as such in the below maps.]</p> <p>In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ There is a significant shortage of available land within the current town boundary to support the expansion of community sports facilities, considering population growth in Greystones. ▪ The inclusion of the lands within the Greystones town boundary would: <ul style="list-style-type: none"> - Support the development of much-needed sports and recreation infrastructure. - Enable more favourable consideration for funding applications, particularly under the Sports Capital Programme, where proximity to town centres and integration with sustainable transport are evaluation criteria. - Facilitate active travel connections to the site from nearby neighbourhoods. - Improve the overall ratio of open space to housing density within the town. - Align with the regeneration objectives outlined in the LPF, particularly those focused on enhancing the provision of active/passive open space; supporting healthy communities; promoting land use strategies that balance residential development with community's social and physical infrastructure needs. <p>Change from:</p> 

	<p>Change to:</p> 
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Chief Executive's Response

[It is not explicitly stated in the submission that a rezoning is requested, however is it reasonably clear from the content of the submission that an AOS 'Active Open Space' zoning is requested for the lands. The submission is assessed in relation to both an extension of the settlement boundary and the rezoning to AOS 'Active Open Space'.]

The accompanying Greystones-Delgany & Kilcoole Social Infrastructure Audit sets out the rationale for the quantum of AOS lands within the draft LPF. In accordance with the analysis set out in same, the LPF already makes considerable provision for new AOS lands, close to the centres of population of the settlement and identified area of new housing growth. Therefore there are no strong grounds for the zoning of these lands for AOS on the basis of inadequacy of existing and proposed AOS in the area.

Furthermore, the subject lands are very peripheral in nature, largely beyond a 2.5km radius from Greystones centre. As such, the zoning of the subject lands would conflict with the statement in Section A.3.2 of the draft LPF Written Statement, as follows: *'It is therefore the strategy of this LPF that no further development outside this 2.5km radius should be facilitated during this LPF period'*.

Though it is recognised that pedestrian connections may be possible to Delgany village and through Kindlestown Castle/Dromont onto the route of the L3 bus, there are no cycle way connections present or likely possible and the CE would have a serious concerns in relation to increased volumes of private vehicles accessing the subject lands via Bellevue Hill or Templecarrig, which is constrained in width and alignment, and the resultant impact on junctions leading to the area, e.g. the junction of the R762 and L1030 at Delgany.

In addition, the development of these lands for sports uses, including associated land / topography alterations, land drainage, construction of roads, car parks, clubhouses, equipment stores etc and installation of floodlighting, netting etc would undoubtedly have a serious impact on the protection of the landscape in this highly scenic and elevated area, on local drainage including an area susceptible to flooding to the east of the lands, on ecology and biodiversity (given that playing pitch development would require substantial land clearance including mature trees) and on the built heritage of the area given the location of the lands within the historic Bellevue Demesne and directly adjacent to the protected Bellevue House remains.

On this basis, it is not recommended that the subject lands be zoned AOS 'Active Open Space' and brought within the LPF/settlement boundary.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
57	Peter Allan O'Connor	<p>This submission relates to lands measuring c. 0.48ha at Ballydonarea, Kilcoole SLO6 (as shown on the map to follow)¹.</p> <p>It is requested that the lands, zoned OS2 'Natural Areas' in the draft LPF, be zoned for residential use as per the previous plan or similar residential zoning [illustrated below as RN1 'New Residential – Priority 1']. It is further requested that a Specific Local Objective be included on the overall landholding requiring the delivery of integrated green infrastructure – such as a green break or green corridor. In support of this rezoning request, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The site was previously zoned R15 'Residential 15/ha', CE 'Community & Education', and AOS 'Active Open Space' in the previous plan. ▪ The Planning Authority should not only maintain but increase the supply of serviced, zoned land within Kilcoole. The site is serviced and within 550m walking distance of Kilcoole town centre. ▪ The subject lands have access onto Lott Lane, with direct access to public mains foul drainage, mains surface water drainage, mains water supply, electricity, and vehicular access to the public road, adjacent to existing residential development and a short walk to a range of services. ▪ The intended de-zoning of residential lands is contrary to Ministerial Guidance, the National Planning Framework, The Regional Spatial and Economic Strategy for the Eastern and Midland Region, the Compact Settlement Guidelines, Compact Growth policy, and the Development Plan Guidelines for Planning Authorities. ▪ The submitter has no issue with the continuation of the CE 'Community & Education' portion of the site, though a change to residential zoning could also be appropriate given the ample road frontage. ▪ The Draft LPF provides no rationale for the change to OS2 'Natural Areas'. The Draft LPF Green Infrastructure Audit demonstrates no basis for the change. The lands do not amount to a significant natural heritage asset and has minimal 'natural area' value. The site has no watercourse, river, steep banks, or built up areas either side. It is questioned why this zoning is being used as a green break/corridor inside such a small settlement as Kilcoole, wholly contrary to the sustainable development of a town located on the railway line. ▪ Proposed alternative approach: If the intention is to preserve visual separation or green infrastructure continuity, this could be achieved more effectively through a Specific Local Objective applied in conjunction with residential or mixed-use zoning. ▪ The subject site falls between two parcels of land that are proposed to be zoned for residential use, rezoning the subject site as OS2 'Natural Areas' risk creating fragmented, piecemeal development.

¹ Please note that Submission No.'s 18, 32, 41 and 57 all relate to SLO6 and immediately surrounding areas.

	<p>Change from:</p>  <p>Change to:</p> 
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Chief Executive's Response

The condition and ecological value of the lands in SLO6, particularly the lands identified as OS have been carefully surveyed and evaluated as part of the LPF crafting process and it is clear that the overall SLO6 OS areas proposed not only contain a natural watercourse corridor, but also a much wider area of high biodiversity value.

The specific area requested for rezoning in this submission comprises a natural and somewhat wet area of c. 1.7ha to the south of the existing nursing home, which is densely vegetated with a wide variety of natural species including significant tree cover, which appears to have come about from natural rewilding. This area however does appear to be tended to and improved as there is evidence of some new tree planting, including oak saplings.

Where development is taking place rapidly in what was a peri-urban agricultural landscape, the relative ecological and amenity value of retained green areas is high. Not only are they important in the context green infrastructure but they can also contribute to flood management, and enable future restoration in line with the EU Nature Restoration Law, National Biodiversity Action Plan, and County Wicklow Development Plan policies. This aligns with the precautionary principle and national planning objectives promoting resilient, nature-positive development.

As urbanisation progresses, remaining semi-natural land parcels gain disproportionate value as stepping stones, buffers, and green infrastructure for biodiversity (National Biodiversity Action Plan 2023–2030). Even

degraded areas (e.g., invasive species present) can serve as important reservoirs for future restoration and contribute to habitat connectivity under Article 10 of the Habitats Directive

Existing hedgerows and watercourses serve as crucial ecological corridors, linking fragmented habitats across the wider landscape—functions explicitly recognised under Article 10 of the Habitats Directive (Ireland must maintain ecological connectivity). Protection of these features aligns with national pollinator strategies, climate resilience planning, and SuDS-integrated design policies.

Even potential wetlands provide key ecosystem services, including:

- ☐ Flood attenuation
- ☐ Water filtration and carbon storage
- ☐ Space for future nature-based solutions
- ☐ Habitat for wetland species and pollinators

These co-benefits are central to the National Restoration Plan (due under the EU Nature Restoration Law) and support targets under the Water Framework Directive and Climate Action Plan 2024.

The National Biodiversity Action Plan (Target 2.3) commits to increasing land under restoration, especially in urban fringe and semi-natural spaces. Degraded lands offer high potential restoration uplift at relatively low cost- this is supported by NPWS guidance on habitat rehabilitation and by EPA research on nature-based urban flood management.

The OS2 zone as proposed in the draft LPF is therefore considered fully justified in the interest of protection and maintenance of habitats and biodiversity. However the SLO objectives do contain a provision that if following ecological assessment, some parts of the OS2 are found to be suitable for human use without damage to natural habitats, then such area may be laid out with sensitively designed and located paths, play spaces etc.

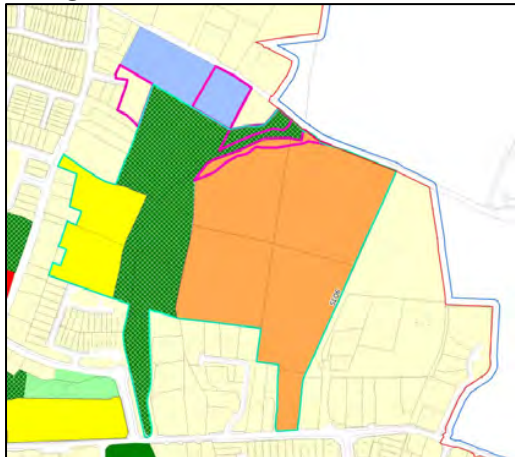
Therefore no changes are recommended on foot of this submission. However further to this submission and Submission No.'s 18 and 41 from adjacent landowners, further assessment and consideration of the ecology of the area and appropriate protections / zoning has been undertaken and it is recommended that the zoning and objectives for this area be altered as detailed to follow.

Chief Executive's Recommendation

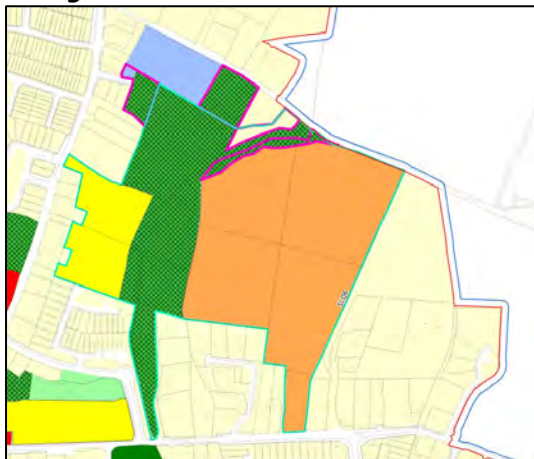
Amend draft LPF as follows:

Map 1 Land Use Zoning

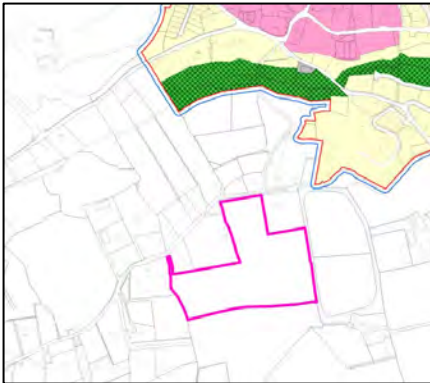
Change from:

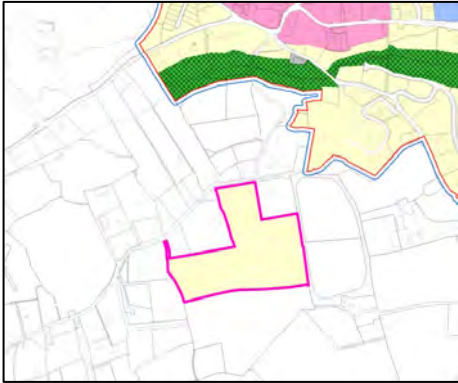


Change to:



Note: A number of submissions have requested changes in this SLO area – No.'s 18, 32, 41 and 57. The recommended amended map above integrates all and any changes that the CE is recommending in this area on foot of all of these submissions. With respect to this submission, no changes are recommended on foot of the submission.

No.	Name	Issues Raised
62	Dwyer Nolan Developments Ltd.	<p>This submission relates to lands measuring c. 5.5ha at Stilebawn, Delgany (as shown on the map to follow).</p> <p>It is requested that these lands, outside the settlement/LPF boundary with no specific land use zoning in the Draft LPF, be zoned R2.5 Residential [illustrated below as RE 'Existing Residential']. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The lands are currently zoned R2.5 Residential <i>'To provide for the development of sustainable residential communities up to a maximum density of 2.5 units per hectare and to preserve and protect residential amenity'</i>. ▪ The Draft LPF/settlement boundary has reduced, despite the current County Development Plan's Core Strategy and the Draft LPF stating that an additional 1,953 no. dwellings are required to be delivered during the period 2016 – 2031. ▪ Of the sites zoned RN1 'New Residential - Priority 1' in Greystones-Delgany: One has retention permission for prefabricated classrooms, one in the ownership of WCC with an application for permission withdrawn in 2019, not aware of any indication when the site may be developed, i.e. less than that likely to be developed for housing in the short to medium term. ▪ c. 27ha of land at Coolagad in Draft LPF as RN2 'New Residential – Priority 2' could generate c. 1,080 units. Difficult to understand when RN2 lands will become available, the target population figures have essentially already been met; decision by An Bord Pleanála in November 2024 to refuse permission for housing at Coolagad due to housing target. ▪ It is considered that the Planning Authority needs to review and make considerable material alterations to the Draft LPF to account for accurate population targets and associated future housing needs for Greystones-Delgany, including lands zoned for residential development. ▪ A recent planning application for 8 no. dwellings has been lodged with the Planning Authority for the subject site at Stilebawn, proposing 8 no. dwellings, in keeping with the existing land use zoning objective. There are adequate services available to serve the subject development proposal / site and the design is of a high quality that will assimilate successfully with the receiving environs. <p>Change from:</p> 

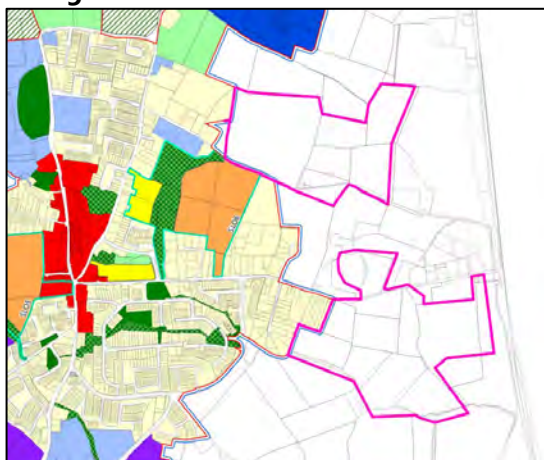
		<p>Change to:</p> 
<p>Chief Executive's Response</p>		
<p>The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:</p> <ul style="list-style-type: none"> ▪ The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy; ▪ Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022). <p>The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.</p> <p>In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:</p> <ul style="list-style-type: none"> ▪ Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended) ▪ Conflict with the strategy set out in Section A.3.2 of the draft LPF Written Statement, being beyond a 2.5km radius from Greystones town centre/train station, as follows: <i>'It is therefore the strategy of this LPF that no further development outside this 2.5km radius should be facilitated during this LPF period.'</i> ▪ Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection. These lands are not served by adequate road infrastructure to support new development; in particular Blackberry Lane is severely deficient in width and alignment and is lacking pedestrian and cycling infrastructure. <p>In addition, as detailed in both the draft LPF and the SEA, this area is particularly environmentally sensitive and therefore is not considered appropriate for continued designation for development.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Greystones - Delgany & Kilcoole LPF.</p>		

No.	Name	Issues Raised
66	Beakonshaw Developments Ltd.	<p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>This submission relates to lands measuring c. 43ha to the east of Kilcoole, north and south of Sea Road (as shown on the map to follow).</p> <p>It is requested that these lands which are outside the settlement/LPF boundary and with no specific land use zoning in the draft LPF, be zoned RN1 'New Residential' [largely south of Sea Road] and SLB 'Strategic Land Bank' [north of Sea Road]. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Given the severity of the housing crisis and the urgent need to address housing supply shortages both locally and nationally, it is essential to maximise the efficient use of serviced land that is contiguous to the town or infill. ▪ Proposed Variation No. 4 and the Draft Greystones/Delgany and Kilcoole LPF is premature pending the imminent Directive from the Minister of Housing mandating all local authorities to identify future land suitable for residential rezoning. ▪ Of only two sites that are carried forward for immediate new residential zoning (RN1), one is approved and the other is on appeal. If approved this year there is still 3 years or half the life of the LPF still to run. ▪ Regarding RN2 long term residential lands, one site is on appeal, and the other site has not so much as a planning application lodged on it since 2013 (adoption of the LAP). ▪ WCC's position to zone no additional lands against increased population targets set out in the NPF First Revision and new housing allocations in the county is also at odds with the population growth of the town which grew by 330 persons or 7.8% from 2016 to 2022. ▪ The submitter estimates there is a requirement to zone for 16ha to 25ha, based on what we believe are flawed populations projections used by the Council based on the 2016 Census. ▪ Kilcoole is just one of two Level 4 settlements with a train station the other being Rathdrum within the County. Only Bray, Wicklow Town, Arklow and Greystones have a rail station but have limited development opportunities close to those stations. Rathnew has a train station but is paired with Wicklow town for future development purposes. ▪ The subject lands can be accessed via Sea Road where there is already an efficient and regular bus service and is within walking distance of both the town centre, the beach and coastal walk, the well-used Ballydonarea Loop and the rail station. ▪ The subject lands are serviceable and close to existing services. ▪ A transport assessment [included in the submission] has been undertaken by Transport Insights. [This is a lengthy document with some of the key points being as follows. Please refer to the full document]: <ul style="list-style-type: none"> - 'Measure RAIL3 – DART Extension' advocates that the NTA and Irish Rail will extend the South-East DART corridor to deliver electrified rail services to Wicklow Town, via Kilcoole. - The DART+ Coastal South Project will deliver an improved and more frequent electrified network, with additional passenger capacity and

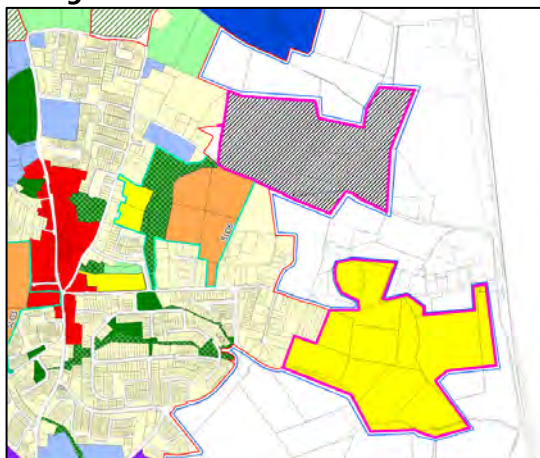
enhanced train services between the city centre and Greystones (begin planning in mid-2025).

- Wicklow town, and consequently Kilcoole is expected to get an hourly service by 2028 (within the lifetime of the Draft Variation).
- The following are the key points on Flooding summarised based on an assessment by Langan Consulting Engineers, experts on flooding [This is a lengthy document. Please refer to the full document]:
 - The submitter's lands north of Sea Road are subject to relatively little flooding under any present or future flood scenario.
 - The submitter's lands south of Sea Road are subject to relatively modest flooding under the present day flood scenario presented in the Draft Variation. Under the present day scenario and the most extreme flood scenario for 2100 the majority of the submitter's lands and primary access to the lands north and south of Sea Road are not subject to any flood risk.
- A high-level ecological assessment has been undertaken and concludes the following:
 - There are eastern parts of the subject lands that flood, and may be appropriate for the feeding of wintering birds. These areas will not be developed in any case and will be retained as open space.
 - The eastern part of the subject lands are located close to but not within the ecologically sensitive beach network, the coast and the SAC and SPA located therein. The eastern portion of lands directly abuts the Murrough Wetlands SAC and the Murrough SPA which are of European importance.
 - It is noted from other, more recent, planning applications, in this locality that the local waste water treatment plant is reaching capacity with the result that outfall sewage is being released to the adjacent watercourse without treatment thereby potentially polluting the Designated Site. In response, local developers have included on site waste water treatment to treat their waste water before discharging treated waste water to the adjacent water courses to prevent pollution of the adjacent SPA and SAC. A similar waste water arrangement will likely be required in this instance also.

Change from:



Change to:



Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended). In relation to issues raised in the submission in relation to impending revisions to population targets, the phasing strategy as set out in the draft LPF is intended to account for expected population target increases without the need to vary the LPF further.
- Conflict with the assessment set out in Section A.3.3 of the draft LPF Written Statement in relation to Kilcoole 'Area 1' and 'Area 2', and the resulting impacts on development options. The CE is satisfied that this assessment remains robust.
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, and environmental protection.

In relation to issues raised regarding the use of climate change scenario flood mapping, the CE wishes to draw attention to the Strategic Flood Risk Assessment accompanying the draft LPF. This SFRA used 'current scenario' flood mapping in the application of the sequential approach/justification tests, with future climate change scenarios to be accounted/designed for at development management stage as per Objective GDK63 of the Draft LPF.

It is noted that the subject lands are in close proximity to Kilcoole Train Station. However, greater proximity to the train station also corresponds to greater proximity to The Murrough Wetlands SAC, the Murrough SPA, and the Murrough pNHA. While there are zoned lands in the draft LPF further from these protected sites that have yet to be developed it is not considered appropriate to unnecessarily encroach eastwards towards these sites. Though the submission refers to engagement with an ecologist in this respect, little detail is provided, other than mention of potential on-site waste water treatment.

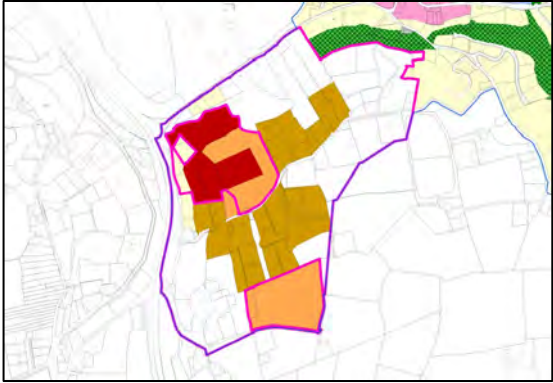
The use of the SLB 'Strategic Land Bank' land use zoning is now no longer recommended by the CE, with little material difference to the developability of lands under this zoning versus an agricultural land use zoning or under no specific land use zoning. The inclusion of lands as SLB 'Strategic Land Bank' is not considered to be warranted in advance of zoning for immediate/phased development.

On the basis of the above, it is not recommended to zone the lands as requested.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
68	Julia Davies	<p>This submission relates to two areas land in the Drummin East / Stilebawn area of Delgany. Firstly it relates to the entire area between Delgany and the N11 around the Blackberry Lane / Drummin area (c. 63ha), but secondly it also relates specifically to lands owned by the submitter in this wider area, measuring c.13.7ha (both shown on the map to follow).</p> <p>Wider area: It is requested that this area outside the settlement/LPF boundary and with no specific lands use zoning in the draft LPF, be brought within the settlement boundary/LPF with a range of land use zonings. [The approximate request is mapped below with RN2 'New Residential – Priority 2', RE 'Existing Residential', and R-Special 'Special Residential' zonings.] In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ These lands should be included in the boundary to allow for this area to obtain much needed attention. ▪ This area can no longer be logically described as 'rural'. ▪ Caught between a busy transport network and a 'Level 3 Large Growth Town II'. ▪ It has, today, a significant population, with a busy road network that calls for proper attention within the Greystones/Delgany & Kilcoole LPF 2025. ▪ Without due attention within this LPF, this band of land is at risk of becoming a 'no-man's land' with no safe infrastructure, safe access to public transport or access to open spaces. <p>Submitters lands: It is requested that c. 13.7ha as shown on the map to follow outside of the settlement/LPF boundary and with no specific land use zoning, be zoned RN2 'New Residential – Priority 2' and public use (incl. mixed use, public utility, open space, tourism) [This is illustrated as MU 'Mixed Use' in the below maps.]. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Surrounded today by busy roads, housing and a huge increase in the local population. ▪ Rendered unworkable as a viable operating farm, livestock at risk of attack by suburban dogs. ▪ In the event of the subject lands being zoned to residential RN2 alongside public space, investment can be made to open-up parts of land, currently private, to the now large local population and to visitors, including: <ul style="list-style-type: none"> - Mixed Use – to allow for new urban spaces and to provide amenities to better serve the area. - Public Utility – improved infrastructure for active and sustainable travel (park and ride/safer routes to public transport/pedestrian and bike paths along west Blackberry Lane/improvement of existing road network). - Amenity Open Areas: facilitate opportunities of new high quality amenity open areas including new sports pitches/playgrounds/outdoor gyms and access to walking routes. - Tourism: To provide for tourism related development/aire de service/encourage longer dwell time for visitors to the area.

	<p>Change from:</p>  <p>Change to:</p> 
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Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Conflict with the strategy set out in Section A.3.2 of the draft LPF Written Statement, being beyond a 2.5km radius from Greystones town centre/train station, as follows: *'It is therefore the strategy of this LPF that no further development outside this 2.5km radius should be facilitated during this LPF period.'*
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection. These lands are not served by adequate road infrastructure to support new development; in particular Blackberry Lane is severely deficient in width and alignment and is lacking pedestrian and cycling infrastructure.

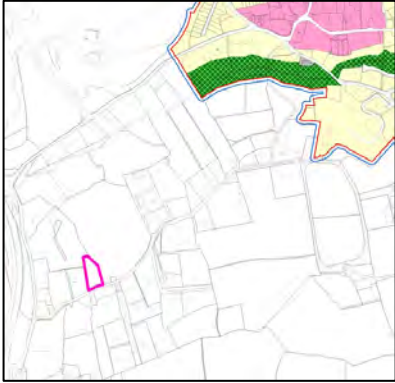
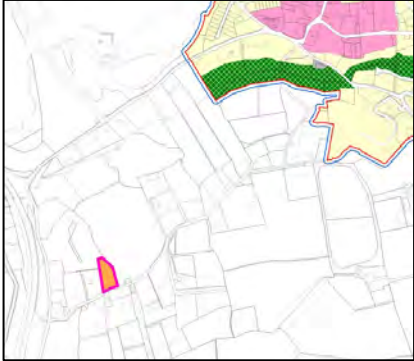
Furthermore, the proposals in the submission for a range of other uses, including tourism and playing pitches, would represent significant trip attractors to Blackberry Lane, which is not desirable considering its location on

the periphery of the settlement and the potential of increased traffic movements associated with such, especially with respect to traffic from Greystones-Delgany that may traverse the east of Blackberry Lane to access the area. These lands are not served by adequate road infrastructure to support new development; in particular Blackberry Lane is severely deficient in width and alignment and is lacking pedestrian and cycling infrastructure.

In addition, as detailed in both the draft LPF and the SEA, this area is particularly environmentally sensitive and therefore is not considered appropriate for continued or new designation for development.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
69	Julie Davies	<p>This submission relates to lands measuring c. 0.3ha at Drummin East, Delgany (as shown on the map to follow).</p> <p>It is requested that these lands outside the settlement/LPF boundary and with no specific land use zoning in the draft LPF, be brought inside the boundary and zoned RN2 'New Residential – Priority 2'. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The subject site cannot be used/built on under the current guidelines; adjacent plots were made viable for residential development, while the subject site was not. ▪ The subject site is on Blackberry Lane west, adjoining and opposite existing residential developments, with ample road frontage and close to public transport. ▪ The subject site is an "area located within the commuter catchment" (Project Ireland 2024) ▪ Accessible by foot to an extensive public transport network. ▪ Surrounded by housing under R2.5 'Residential 2.5/ha'/R5 'Residential 5/ha' and one-off housing. ▪ The subject site 'extends outwards from existing residential developments, is contiguous to the existing developed area, is in accordance with a streamline and co-ordinated approach, is consistent with the sequential approach. <p>Change from:</p>  <p>Change to:</p> 

Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Conflict with the strategy set out in Section A.3.2 of the draft LPF Written Statement, being beyond a 2.5km radius from Greystones town centre/train station, as follows: *'It is therefore the strategy of this LPF that no further development outside this 2.5km radius should be facilitated during this LPF period.'*
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection. These lands are not served by adequate road infrastructure to support new development; in particular Blackberry Lane is severely deficient in width and alignment and is lacking pedestrian and cycling infrastructure.

In addition, as detailed in both the draft LPF and the SEA, this area is particularly environmentally sensitive and therefore is not considered appropriate for continued or new designation for development.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
70	David and Ida Kelly	<p>This submission relates to lands measuring c. 8ha at Kindlestown Upper, Delgany (as shown on the map to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>Request 1: It is requested that c. 8ha of lands at Kindlestown Upper, partially outside the settlement/LPF boundary with no specific land use zoning and partially zoned RN2 'New Residential – Priority 2' be zoned either wholly RN1 or part RN1 and part RN2 [illustrated below as part RN1 and part RN2].</p> <p>In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The lands proposed in the draft LPF as RN2 should be considered infill, bound by existing development to its east, south, and west, and is therefore 'core strategy neutral'. These lands are well-served by many basic services/facilities/amenities, with a host of these within 10-20 minutes' walk/2-5 minutes cycle. ▪ The underestimation of population growth and housing delivery is emphasised. Insufficient land has been zoned RN1 to accommodate forthcoming uplifts to population and housing targets without amendments or variations being made to the Development Plan and its LAPs/LPFs. WCC should redistribute their Core Strategy targets to new RN1 lands. ▪ The overall lands are Tier 1 and serviced, able to connect to existing development services, within the existing built-up footprint or contiguous/spatially sequential within a settlement. ▪ No Landscape Character Assessment or Landscape Visual Impact Assessment accompanies the Draft LPF. The onus should be on the applicant of a future planning application to demonstrate that visual impacts will not arise. The wording in 'Greystones-North' should be revised as follows: <i>"With respect to lands to the west of the regional road, taking the new housing developments of Seagreen as a reference, it is clear that any development at higher elevations is likely to impact on may risk impacting the landscape and setting of Kindlestown Hill, which is a significant natural and historical landmark in the area. Therefore zoning in this area should remain only as far west as the current zoning and shall not extend any further west or north. Therefore, Applicants for medium- and large-scale developments west of the Regional Road may be required to prepare a Landscape Visual Impact Assessment (LVIA) to determine if unreasonable visual impacts on Kindlestown Hill will arise. A determination in relation to the need to prepare an LVIA should be sought by way of pre-planning consultation with the Planning Authority if the Applicant is unsure of the need for same."</i> <p>Request 2: It is requested that the subject lands be omitted from Specific Local Objective 4. In support of this change, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The vast majority of the SLO4 lands to the north are in the ownership of a single third-party. Therefore, the submitter may be limited by the realities

of delivering their portion of the overall development of the landbank.

- Omitting the site from SLO4 will not detract from the vision of SLO4 being secured given the substantial swathe of residential lands to be retained in its extent.

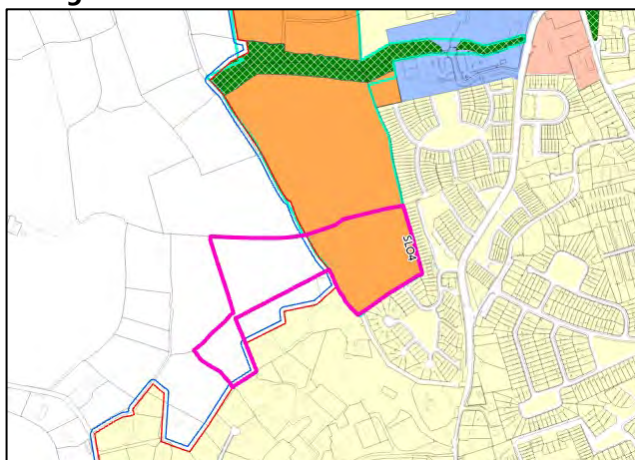
Request 3: It is requested that Objective **GDK16** be amended as follows: the first requirement of 75% of RN1 lands to have planning permission and commenced should be reduced to 50%, with the reference to 'development initiated' omitted.

The second requirement of Core Strategy and Population Targets, should be wholly reconsidered and redrafted to require prospective applicants to demonstrate (1) hard and soft infrastructure have adequate capacity to accommodate the development and (2) ecological and environmental impacts can be ruled out.

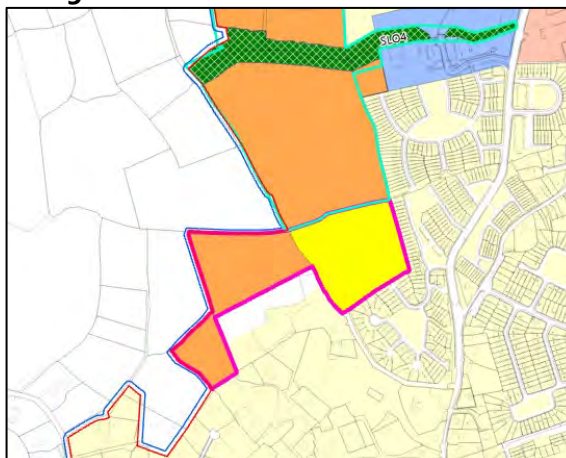
In support of this change, the following grounds are put forward:

- The submitter has serious concerns with respect to this objective, its application and its potential to delay housing at a time of acute shortages and failures to meet national housing targets.
- Should, for any reason, planning permission and development not be realised at the single site of 'Greystones – Charlesland', then there will be an absolute freeze on any RN2 lands being allowed to come forward, as it accounts for > 25% of all RN1 lands.
- There is a lack of vital clarity as to what constitutes a 'significant breach' of Core Strategy targets.
- Core Strategy targets are a 'trajectory of travel', and are fundamentally not caps or limits.
- Therefore, where infrastructure is adequate and environmental impacts can be ruled out, there is no reasonable basis upon which to inhibit the proposed of development where it is proposed on appropriately zoned and located land.
- The submission includes a feasible and viable residential proposal for the subject site.

Change from:



Change to:



Chief Executive's Response

In relation to **Request 1**, the residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement. The CE is satisfied that the impact on future development options as described in 'Greystones North' remains robust.

In these regards, the request for the zoning of additional land for residential use, or the removal of phasing, as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Conflict with the assessment of areas 'North 4' and 'Delgany 1' (both of which relate to the subject lands) as set out in Section A.3.2 of the Draft LPF, and the resulting impacts on future development options. The CE is satisfied that this assessment remains robust.
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

In relation to **Request 2**, though it is noted that the majority of SLO4 is within the ownership of a single, large landholder, it is considered vital that the overall SLO4 lands be developed with to the objectives contained therein. Noting that the subject lands are adjacent to one of a small number of access points into SLO4, to omit the lands may risk poor pedestrian permeability from the overall SLO to the existing built-up area in the development of different landholdings. In this regard attention is drawn to the following objective of SLO4: *'Green links shall be provided throughout the area to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods'*. On this basis, it is not considered appropriate to omit the lands from SLO4.

In relation to **Request 3**, the CE is satisfied that the phasing provisions in the draft LPF are sufficiently flexible to allow for the delivery of both current and future housing targets. The residential development objectives of the LPF including land zoning provisions have been made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at

the time of adoption of the LPF, with flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Following the revision of the National Planning Framework, new population / housing targets were issued in July 2025. In accordance with Ministerial guidance, a staged process of review of these new targets is now commencing, with a view to determining if a variation of the Wicklow County Development Plan will be required to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out. It is only at that stage will it be known if it is intended to increase the population growth rate in Greystones-Delgany and Kilcoole to the extent that the local plan would require revision, for example to zone more land for housing than already set out in the draft LPF.

At this time, it is not evident that additional land will be required to be zoned in Greystones-Delgany in particular over and above that already provided for in the draft LPF to meet any increased targets, given the amount of land proposed to be zoned therein vis-a-vis the current Core Strategy target for the settlement, which has already been met / exceeded i.e. the land proposed to be zoned in the draft LPF may well be adequate to meet even an increased target.

It is not considered necessary to introduce further flexibility at this time, as to do otherwise may risk 'leapfrog' development to more peripheral areas while more central sites remain undeveloped.

Chief Executive's Recommendation

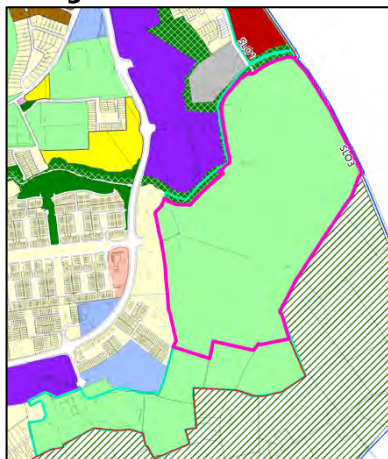
No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
71	D/RES Properties and the Evans Family	<p>This submission relates to lands measuring c. 63ha at Ballynerrin/Charlesland/Knockroe, (as shown on the map to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>Request 1: It is requested that these lands, zoned AOS 'Active Open Space' in the draft LPF, be zoned RN2 'New Residential' [The submission also states that other SLO3 lands not in the submitter's ownership can also be zoned RN2 if considered appropriate]. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Advancing the LPF in the absence of an updated Core Strategy raises serious concerns regarding the robustness and longevity of the land use framework now proposed. ▪ Greystones, which is situated within the Dublin Metropolitan Area, identified as a strategic growth area in the MASP spatial framework and Table 5.1 of the RSES, including the need to identify a strategic development site for housing. ▪ Part of the lands was previously zoned for residential development in 2013 LAP. ▪ The lands are well located within walking and cycling distance of the DART and key community infrastructure, are serviceable, and offer a logical and sustainable opportunity for future phased residential development with supporting active and passive open space in line with compact growth and transit-oriented development. ▪ Designation as RN2 would allow the lands to be planned and delivered in a phased and sustainable manner and help future proof the CDP in the context of the revised NPF. <p>Request 2: It is requested that the current SLO be replaced with a revised objective supporting a residential-led mixed-use masterplan, with supporting active and passive open space uses. [Suggested text for a revised SLO and a masterplan is included in the submission]. In support of this change, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The only mechanism to facilitate Active Open Space on these privately owned lands will be as part of an overall new residential community as illustrated [in the accompanying masterplan]. ▪ It is requested that the Planning Authority have regard to viability issues when considering this request [and request 1]. <p>Request 3: It is requested that the lands be considered for Urban Development Zone (UDZ) designation. In support of this change, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ It fulfils the criteria for such as a large, consolidated landbank with direct access to high-capacity public transport and clear potential to support compact, integrated and infrastructure-led housing delivery. <p>Request 4: It is requested that, without prejudice to Request 1, that c. 3.7ha of lands, zoned AOS 'Active Open Space' in the draft LPF, be zoned for residential development [illustrated as RN2 'New Residential – Priority 2' in</p>

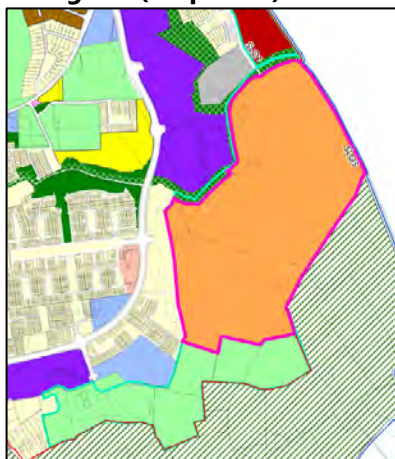
the below maps. In support of this rezoning, the following grounds are raised:

- This part of the subject landholding is currently zoned for residential development under the Greystones-Delgany & Kilcoole LAP 2013.
- Should Request 1 & 2 be deemed not appropriate, the existing land use zoning should be retained in full.

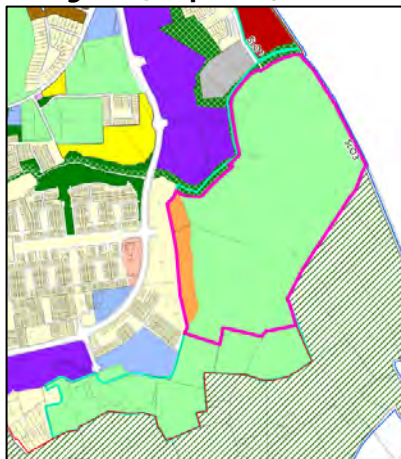
Change from:



Change to (Request 1):



Change to (Request 4):



Chief Executive's Response

In response to **Request 1** and **Request 4**, the residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).
- Result in a reduction in AOS 'Active Open Space' zoned lands compared to the Draft LPF. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.
- Though it is noted that a part of the overall lands were zoned for residential development in the Greystones-Delgany & Kilcoole LAP 2013, attention is drawn to Section 19(6) of the Planning and Development Act 2000 (as amended), which states the following: *'There shall be no presumption in law that any land zoned in a particular local area plan shall remain so zoned in any subsequent local area plan.'*

The CE is satisfied that the phasing provisions in the draft LPF are sufficiently flexible to allow for the delivery of both current and future housing targets. The residential development objectives of the LPF including land zoning provisions have been made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LPF, with flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Following the revision of the National Planning Framework, new population / housing targets were issued in July 2025. In accordance with Ministerial guidance, a staged process of review of these new targets is now commencing, with a view to determining if a variation of the Wicklow County Development Plan will be required to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out. It is only at that stage will it be known if it is intended to increase the population growth rate in Greystones-Delgany and Kilcoole to the extent that the local plan would require revision, for example to zone more land for housing than already set out in the draft LPF.

At this time, it is not evident that additional land will be required to be zoned in Greystones-Delgany in particular over and above that already provided for in the draft LPF to meet any increased targets, given the amount of land proposed to be zoned therein vis-a-vis the current Core Strategy target for the settlement, which has already been met / exceeded i.e. the land proposed to be zoned in the draft LPF may well be adequate to meet even an increased target.

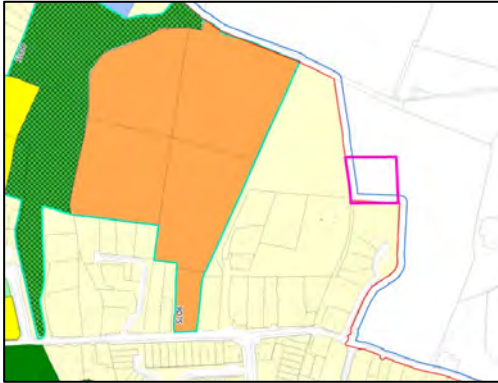
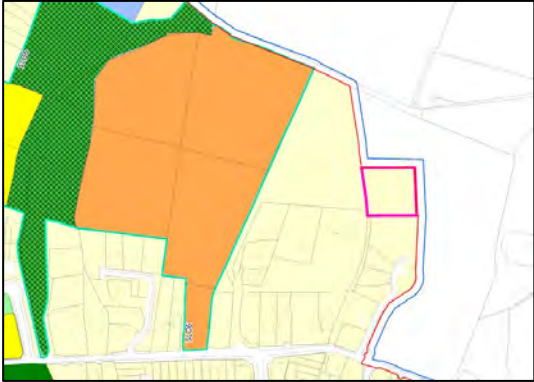
On the basis of the above, it is not recommended to zone the lands (or any part thereof) RN2 'New Residential – Priority 2'.

In response to **Request 2**, as it is not recommended to zone the subject lands for residential development, it is not considered necessary to alter SLO3 as contained in the draft LPF.

In response to **Request 3**, it is not within the remit of this Local Planning Framework to designate the subject lands as an Urban Development Zone.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
72	Andrew O'Kane	<p>This submission relates to lands measuring c. 0.4ha at Ballydonarea, Kilcoole (as shown on the map to follow).</p> <p>It is requested that these lands, outside the settlement/LPF boundary and with no specific land use zoning in the draft LPF, be zoned RE 'Existing Residential'. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The submitter is committed to advancing the core goals set forth in the draft LPF. ▪ The rezoning proposal is fully aligned with the principal goals of the LPF (incl. zoning principles), which advocate for sustainable, compact, and community-centred development. ▪ The proposal supports the LPF objectives specific to Kilcoole, particularly those promoting sustainable and community oriented development. The proposal will respond to increasing demand across County Wicklow for 'commuter-belt' housing. ▪ Road access off Sea Road, no future alterations envisaged, pedestrian footpaths to the village. Kilcoole beach and railway station are within less than 1km or a 10 minute walk. 200 m from the L2-bus terminus. ▪ All utilities are located at the boundary of the existing development. ▪ Existing 'The Laurels' development constructed in 2020 in accordance with County Development Plan. ▪ The land borders the current town limits, offering a logical expansion area as the town's population and economy grow, consistent with WCC's and the CDP projections. <p>Change from:</p>  <p>Change to:</p> 

Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

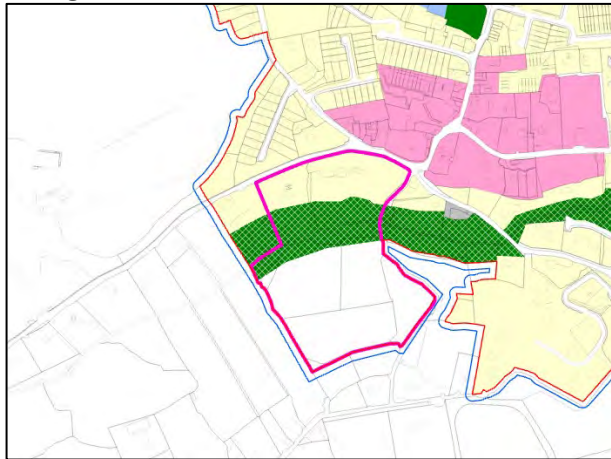
- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Conflict with the assessment of Kilcoole 'Area 1' and the resultant impact on future development options as set out in Section A.3.2 of the draft LPF Written Statement.
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

Chief Executive's Recommendation

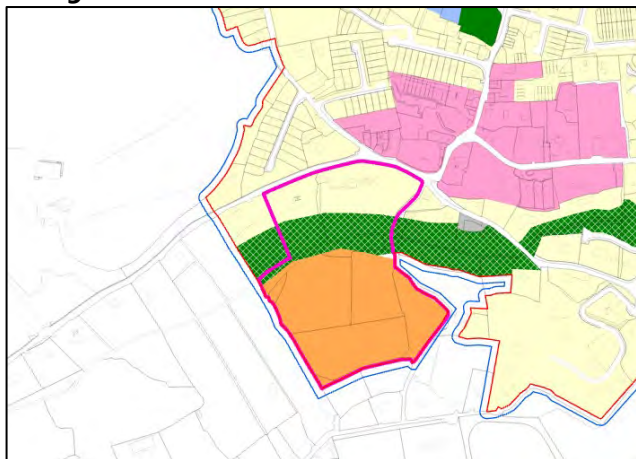
No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
74	RGRE J&R Stylebawn Limited	<p>This submission relates to lands measuring c. 3.4ha at Stilebawn, Delgany (as shown on the map to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>It is requested that these lands, zoned partially RE 'Existing Residential', partially OS2 'Natural Areas', and partially outside the settlement/LPF boundary with no specific land use zoning in the draft LPF, be zoned for residential development. [Though the submission makes multiple references to retaining the current land use zoning under the 2013 LAP, i.e. R2.5 'Residential 2.5/ha', Section 3.4 of the submission objects to the density limitation on this land. Therefore, it is assumed that a more general residential zoning is requested, which is illustrated as RN2 'New Residential – Priority 2'. This is not applied to those lands zoned R2.5 in the 2013 LAP that are proposed to be zoned RE 'Existing Residential' in the draft LPF.]</p> <p>In support of this requested rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The subject lands are fully serviced, infrastructure-ready, capable of immediate residential development, strategically located within a designated Self-Sustaining Growth Town, aligned with national and regional policy, and essential to meeting local housing demand. ▪ The proposed de-zoning is in direct conflict with the First Revision to the National Planning Framework (NPF) and recent Ministerial guidance, both of which prioritise the activation of zoned, serviced land and anticipate sustained population growth. Greystones / Delgany, as a designated growth centre within the Dublin MASP, is expected to play a pivotal role in meeting this demand. ▪ Population growth in Greystones / Delgany has already surpassed local development plan targets, underscoring the urgent need for additional housing capacity. Proposed de-zoning of serviced, residentially zoned land is not only unjustified but counterproductive to achieving local and national planning objectives. The retention of outdated projections represent a significant policy disconnect. ▪ The planning history of the subject lands demonstrates a sustained, proactive effort to bring forward residential development in a manner consistent with local and national planning objectives. ▪ The existing density limitation on the subject lands is no longer fit for purpose, contradicting national planning policy on compact growth and efficient land use. ▪ The lands are subject to the Residential Zoned Land Tax. ▪ The Council should prioritise zoning retention for infrastructure-ready and deliverable sites, and zone a sufficient quantum of residential land to account for low activation. ▪ The submission includes a feasibility study illustrating the site's potential.

Change from:



Change to:



Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Conflict with the assessment of 'Delgany 3' and the resultant impact on future development options as set out in Section A.3.2 of the draft LPF Written Statement, with the remainder of the lands being beyond 2.5km of Greystones Rail Station.
- Conflict with CPO 17.26 of the Wicklow County Development Plan 2022-2028 and the approach to Green Infrastructure & Land Use Zoning in the Green Infrastructure Audit accompanying the draft LPF, in relation to maintaining a 25m riparian buffer zone on both sides of a watercourse.

- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

In addition, as detailed in both the draft LPF and the SEA, this area is particularly environmentally sensitive and therefore is not considered appropriate for continued designation for development.

The CE is satisfied that the phasing provisions in the draft LPF are sufficiently flexible to allow for the delivery of both current and future housing targets. The residential development objectives of the LPF including land zoning provisions have been made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LPF, with flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

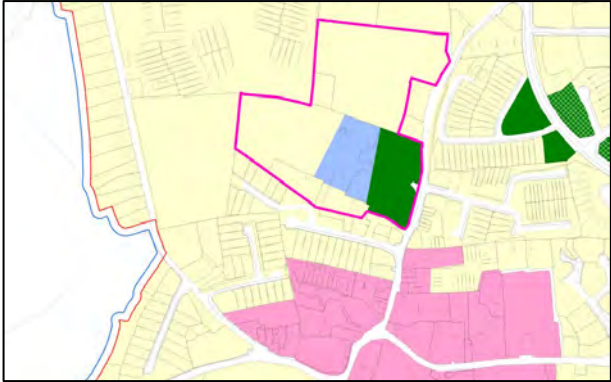
Following the revision of the National Planning Framework, new population / housing targets were issued in July 2025. In accordance with Ministerial guidance, a staged process of review of these new targets is now commencing, with a view to determining if a variation of the Wicklow County Development Plan will be required to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out. It is only at that stage will it be known if it is intended to increase the population growth rate in Greystones-Delgany and Kilcoole to the extent that the local plan would require revision, for example to zone more land for housing than already set out in the draft LPF.

At this time, it is not evident that additional land will be required to be zoned in Greystones-Delgany in particular over and above that already provided for in the draft LPF to meet any increased targets, given the amount of land proposed to be zoned therein vis-a-vis the current Core Strategy target for the settlement, which has already been met / exceeded i.e. the land proposed to be zoned in the draft LPF may well be adequate to meet even an increased target.

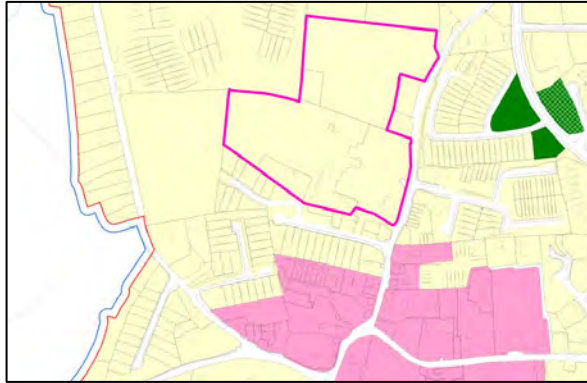
On the basis of the above, it is not recommended to zone the subject lands as requested.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
75	Lowick Homes	<p>This submission relates to lands measuring c. 1.2ha at Delgany (as shown on the map to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>It is requested these lands, zoned CE 'Community & Education' and OS1 'Open Space' in the draft LPF, be zoned for residential development [illustrated below as RE 'Existing Residential']. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> Construction has begun under 21/959. The proposed rezoning notably proposes to remove residential zoning from areas where the submitter is shortly to commence building residential units. A phased approach to financing and construction is in place on this development. The proposed rezoning has caused considerable issues for the submitter, namely concern from funders who consider that should this draft LPF be enacted, their security (i.e. the value of the lands) would be materially diminished. This could result in the cessation of construction works on the subject lands or the non-commencement of the final phases of the development. This undermines the project in a serious and material way. The proposed rezoning of part of the subject site is not consistent with the revised NPF and should be rescinded accordingly. The proposed LPF is premature and is likely to be inconsistent with the revised RSES, and is inconsistent with the clearly stated objectives of the Minister and emerging national planning policy. The submitter would be willing for the area designated as public open space in permission Reg. Ref. 21/959 to be formally rezoned as Open Space if deemed necessary by the planning authority, however it is critical that areas of the lands on which houses are located (and are currently being built) remain zoned as Residential. [A number of appendices are included in the submission in relation to documentation under permission PRR 21/959.] <p>Change from:</p> 

Change to:



Chief Executive's Response

The CE does not consider it necessary to zone the entirety of the lands requested to RE 'Existing Residential', considering the permitted uses under PRR 21/959. However, the CE is amenable to rezoning **only** those areas within the proposed CE/OS1 zones to RE 'Existing Residential' where there are standalone residential units permitted.

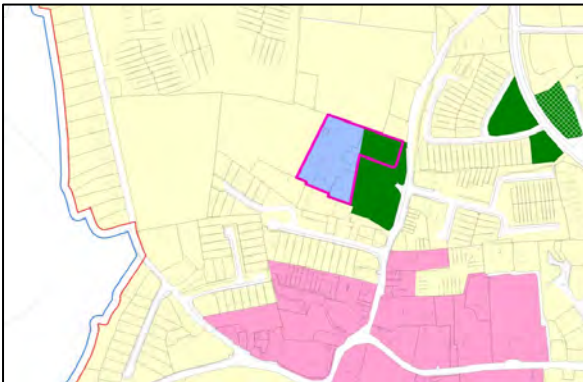
Furthermore, noting the range of uses permitted in the former convent buildings, the CE is amenable to rezoning the CE 'Community & Education' lands to MU 'Mixed Use' on the basis of the inclusion of a specific local objective on the lands.

Chief Executive's Recommendation

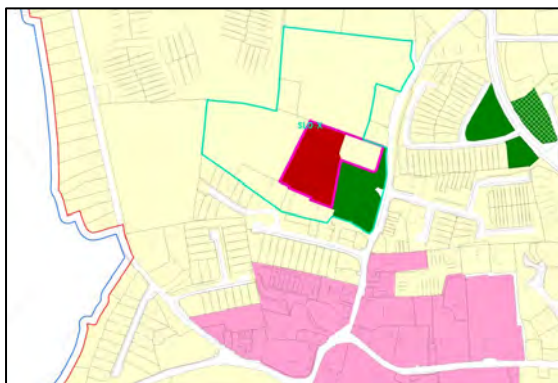
Amend draft Greystones-Delgany and Kilcoole LPF as follows:

Amend Map No. 1 Land Use Zoning Objectives as follows:

From:



To:

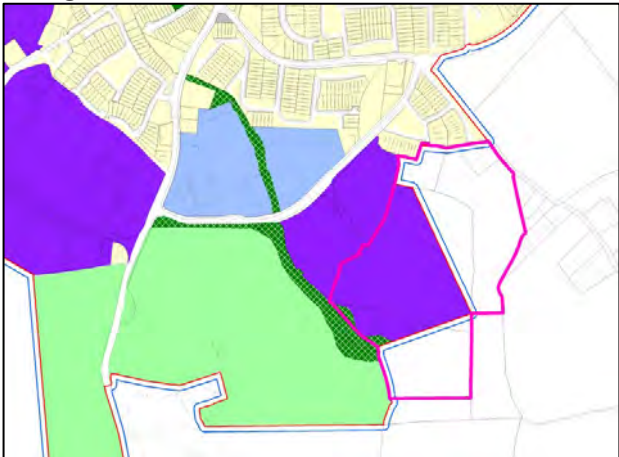


Amend Section B.9 of the Draft LPF Written Statement as follows:

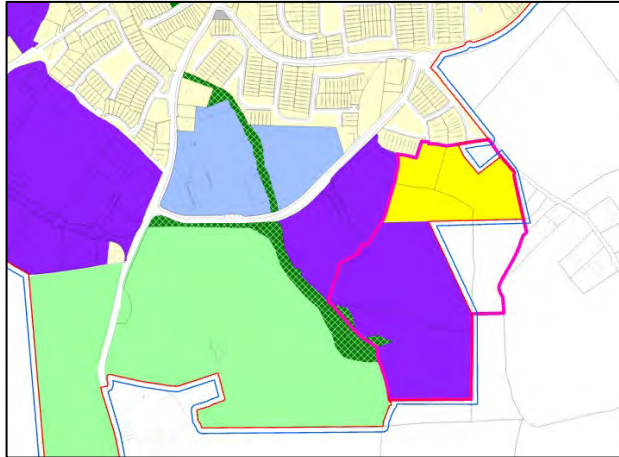
Add new SLO area 'SLO8 - Convent Lands'

These SLO lands comprise the grounds and buildings of the former Delgany Carmelite Convent. The lands measure c. 3.9ha and are zoned RE 'Existing Residential', OS1 'Open Space' and MU 'Mixed Use'. Permission has been granted for a significant housing, open space, employment and community development on these lands, which commenced construction in 2024. In the event that this permitted development is not completed in accordance with this permission or changes are sought to the permitted development, any future development on these lands shall accord with the following requirements:

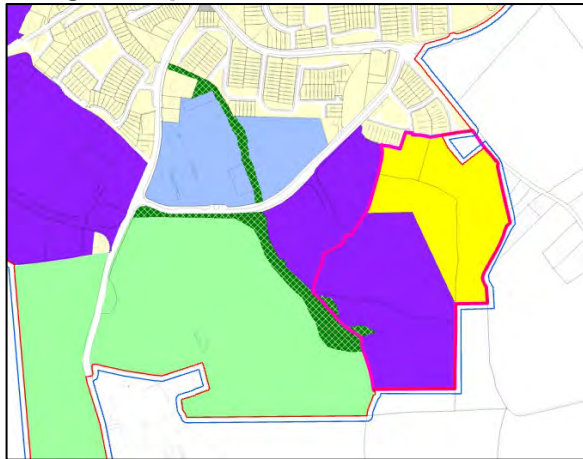
- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to Delgany / to existing transport services and to other new developments to the west;
- The protection of the setting and character of the former Convent (a protected structure) shall be upmost in any design approach;
- There may be no reduction in the quantum of internal community and employment space provided for in the redevelopment of the Convent buildings from that permitted under PRR 21/959;
- Any development shall provide for the highest quality public open space that shall relate to, and be open and accessible from Delgany village.

No.	Name	Issues Raised
76	Paul Brady	<p>This submission relates to lands measuring c. 4.8ha/6.7ha at Ballycrone, Kilcoole (as shown on the map to follow).</p> <p>It is requested that these lands, partially zoned E 'Employment' and partially outside the settlement/LPF boundary with no specific land use zoning, be zoned E 'Employment' and RN1 'New Residential – Priority 1' [two requested options are illustrated below]. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ The Ballycrone Manor development is designed such that the adjoining lands in the submitter's ownership can form an extension to the now existing estate, with existing service connections. ▪ There have been few housing developments built in Kilcoole in recent years. ▪ The planning authority should consider an extension to the Ballycrone Manor development in the same way as the Network Enterprise Park is to be allowed to expand. ▪ That lands zoned E 'Employment' be amended to reflect existing field boundaries (also to facilitate the zoning of lands RN1). ▪ Option A: fields adjoining the Ballycrone Residential Estate could be developed to provide c. 40-55 houses. ▪ Option B: A larger area of land including the Option A lands – owned by the submitter – could be zoned allowing the estate to significantly increase in size. ▪ The rezoning would require the settlement/LPF boundary to be revised, which is justified in achieving the proper expansion of Network Enterprise Park and Ballycrone Manor. <p>Change from:</p> 

Change to (Option A):



Change to (Option B):



Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.

In relation to the request for additional E 'Employment' zoned lands, careful consideration has been given to the provision of E 'Employment' lands in the draft LPF. Having regard to the minimum areas set out in Table 6.5, and the principles for the zoning of greenfield land for employment in Section B.3 of the draft LPF, it is not

considered necessary to expand E 'Employment' land use zoning at this time, considering the quantum of undeveloped employment land provided for at this location.

On this basis, it is not recommended to rezone the subject lands as requested.

Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
79	Cairn Homes Properties Ltd	<p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>This submission relates to three plots of land as follows:</p> <ol style="list-style-type: none"> 1. 19.2ha at Coolagad on the north western edge of the settlement of Greystones. 2. Site of 2.53ha known as 'Hawkins Lands' located in the southern end of the settlement of Greystones. 3. Site of 2.9ha to the south east of Greystones in the townland of Killincarrig on the Farrankelly Road and comprises the land immediately west of 'Procap' factory. <p>Request 1 Coolagad</p> <p>It is requested that these lands, zoned RN2 'New Residential – Priority 2' in the draft LPF, be zoned RN1 'New Residential – Priority 1'. In support of this zoning the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Submitted there are not enough zoned lands in RN1 placing significant impediments to delivering housing. Submitted that RN1 zoning needs to be increased to enable residential development to be brought forward and noting a national policy shift towards increased housing and population targets. ▪ Submitted that most of the RN1 lands in the draft LPF are not likely to be delivered in the lifetime of the plan holding up the development of RN2 lands. ▪ Submitted that this site is the most important strategic land bank in Greystones-Delgany and welcomes the designation of the lands as SLO4 and that the lands are strategically positioned to deliver housing in line with national and regional policy. ▪ Noted that the site is a 15 minute cycling distance from Greystones train station, is served by bus services along Rathdown Road and within a 1-2km radius of Greystones Town Centre and would form a natural urban extension to the settlement. ▪ Submitted that the lands are serviceable, accessible and plan ready. ▪ Submitted that the first homes could potentially be ready for occupation by Q4 2028 if the RN2 lands are rezoned to RN1. ▪ This detailed submission includes an overall masterplan for the development of the lands in question. ▪ Noted there are topographical and environmental challenges on the site but submitted that there is no risk of landslide associated with the site and a flexible approach to density should be incorporated in SLO4. ▪ This submission welcomes the recognition by the Council that the achievement of higher densities in parts of Greystones may not be a realistic prospect due to environmental, topographical, visual and archaeological and service constraints. It is therefore requested that Objective GDK17 be amended to extend to the lands at Coolagad. ▪ Submitted that Objective GDK16 is too restrictive and should be amended as follows: <p>GDK16:</p>

"Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will ~~not~~ be considered for RN2 Priority 2 lands ~~unless the following conditions where the following condition are satisfied:~~

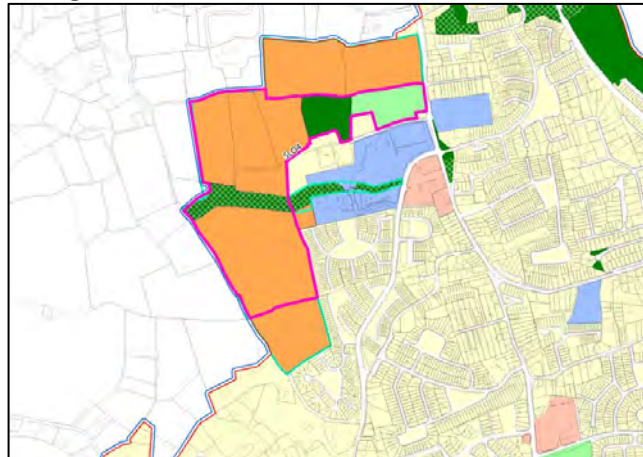
- At least 75% of Priority 1 new residential lands (RN1) lands have ~~been activated (i.e. consent obtained • and development initiated)~~ received planning consent;
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached ~~and that the RN2 lands will deliver residential output in lieu of non-delivery of Priority 1 lands."~~

- Noted that GDK64 requires the preparation of a surface water management plan downstream of Coolagad before any development is considered due to a capacity issue and a risk of downstream flooding. Submitted that the development of lands at Coolagad will attenuate to greenfield runoff levels and will not result in flooding downstream. Further submitted that issues downstream are not linked to the development at Coolagad. Requested that GDK64 is amended as follows:

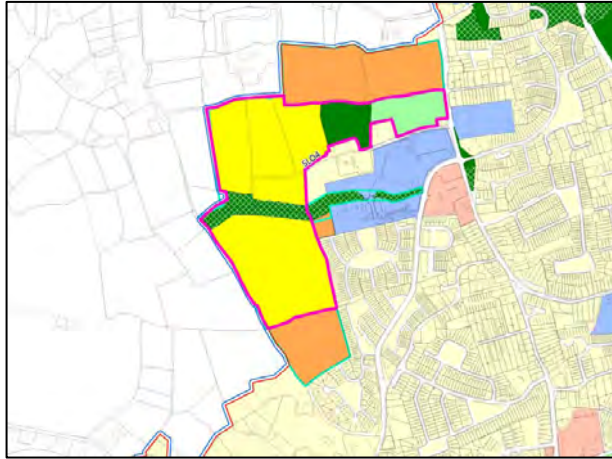
GDK64 ...

"b) new significant development in the Coolagad – Templecarrig area in north Greystones will only be considered where the development's surface water drainage arrangements accord with Wicklow County Council's Sustainable Urban Drainage (SUDs) Policy ~~and an overall Surface Water Management Plan for the area which addresses the capacity of the area network and which~~ obviates flood risk on downstream lands"

Change from:



Change to:



The following text amendments to the Draft LPF are also requested to SLO4 Coolagad as part of this submission:

Amend SLO 4 as follows:

"..... Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site. In this regard, lower overall site density may be appropriate and building height and density shall reduce as landscape elevation increases....."

Amend SLO 4 as follows:

".....Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least 10 25m along each side free from development....."

Amend SLO 4 as follows:

"Green links shall be provided throughout within the area. The Council will investigate the feasibility to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods, subject to agreement with the landowners and technical feasibility."

Amend SLO 4 as follows:

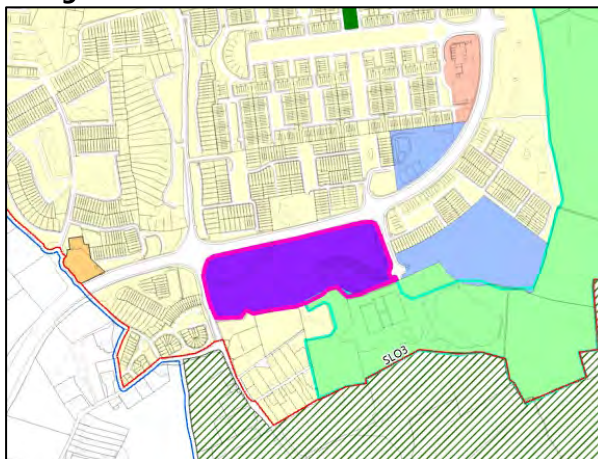
"...Community facilities shall be provided within the SLO area to meet the needs of the new and existing resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out."

Request 2: 'Hawkins Land', Charlesland

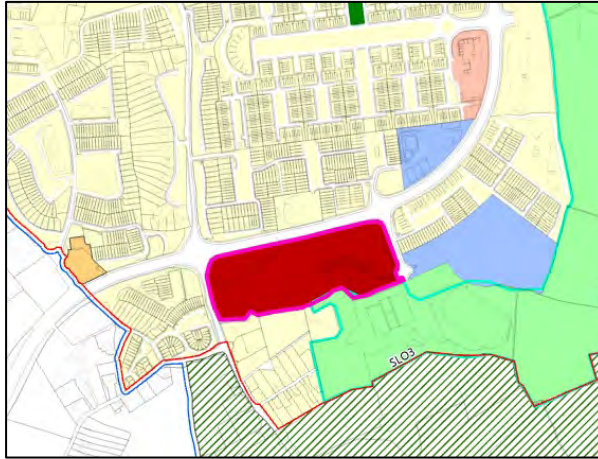
It is requested these lands, zoned E 'Employment' in the draft LPF, be zoned MU 'Mixed Use'. In support of this zoning the following grounds are raised:

- Request that the lands are rezoned from employment to mixed use to allow for residential development along with other potential uses such as a nursing home and petrol filling station.
- Submitted that the site is strategically located on Kilcoole Road and the R774/L221 and 3km from the railway station.
- Noted that the lands are zoned 'E: Employment' under the draft LPF and are subject to objective GDK27. Noted that they have been zoned for employment purposes since 2006 and despite this zoning over a prolonged period of time, the lands have not been developed for employment purposes. Requested that GDK27 is deleted on foot of this submission.
- Noted the lands are fully serviced reflecting the planning permission ABP Ref: ABP-305773-19 which includes the Weaver Buildings.
- Submitted that there are challenging market conditions with regard to letting the Weaver Buildings.
- Submitted that the surrounding road network is capable of accommodating a mixed-use form of development at this location
- Given the size of this landbank, submitted that a mixed use development rather than pure employment would be better on this site.
- Submitted that the rezoning of lands at Charlesland and Hawkins lands will not detract from the draft LPF objectives to deliver over 26.2ha of employment lands.
- Considered there is an opportunity for the LPF to address the legacy of the overprovision of employment lands and redesignate effectively 'surplus' sites to more sustainable mixed use and residential development in the short term to address significant population growth needs.

Change from:



Change to:

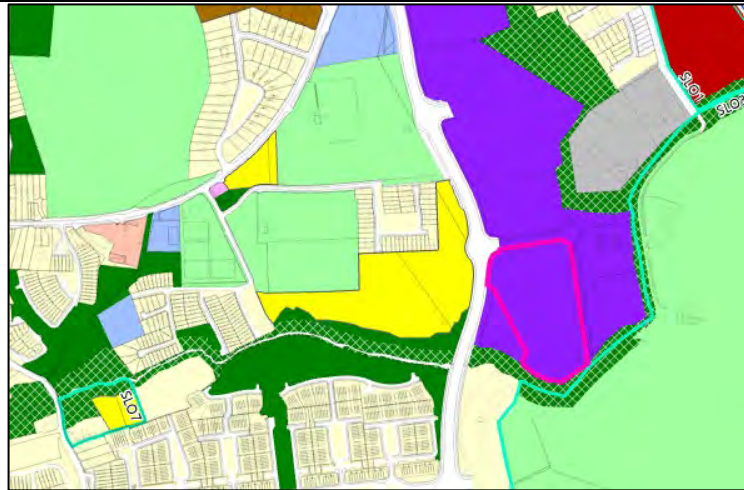


Request 3: West of 'Procap', Farrankelly Road

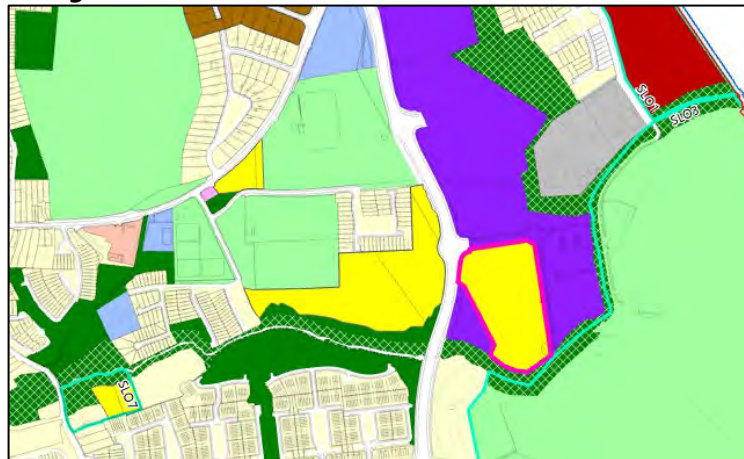
It is requested that these lands, zoned E 'Employment' in the draft LPF, be zoned RN1 'New Residential – Priority 1'. In support of this zoning the following grounds are raised:

- Noted that the site is currently subject to designation GDK24 '*To facilitate and support the development of large-scale employment generating development*'.
- Noted that the draft LPF maintains the proposed AOS zoning of the Charlesland golf club and proposes to expand to the AOS zoning in this area to encourage the development of these lands as a new sports and recreation zone for the wider area.
- Submitted that the change of zoning from employment to either RN1 or RN2 would promote a compact settlement approach with proximity to public transport and community / recreation uses, proximate to the town centre in accordance with the principles of the Compact Settlement Guidelines, RSES and NPF.
- Submitted that Table 6.5 of the Draft LPF seeks an unrealistic jobs ratio in 2031 for Greystones-Delgany and that the LPF proposes 37ha of undeveloped employment lands (39% over the minimum required). It is submitted that Table 6.5 should be amended to provide for 50% jobs ratio in 2031 and that that the landowners sites currently zoned employment be rezoned to RN1.
- Further submitted that the employment sector has changed with more flexible working arrangements, including working from home. Noted that long standing employment zoned lands have not been developed and revised zonings should be considered.
- Submitted that the rezoning of lands at Charlesland and Hawkins lands will not detract from the draft LPF objectives to deliver over 26.2ha of employment lands.
- Considered there is an opportunity for the LPF to address the legacy of the overprovision of employment lands and redesignate effectively 'surplus' sites to more sustainable mixed use and residential development in the short term to address significant population growth needs.

Change from:



Change to:



Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

With regard to **Requests 1, 2 and 3** the request for the zoning of additional land for residential use/mixed use allowing for residential development, or the removal/alteration of phasing provisions, as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended).
- Requests 2 and 3 would result in a significant reduction of E 'Employment' zoned lands compared to the Draft LPF. These are essential zonings that are necessary to support the sustainable development of the LPF area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles. Furthermore, the subject lands in relation to Request 3 are identified as a strategic employment location in the Eastern and Midland Regional Assembly's Regional Spatial & Economic Strategy.

- In relation to issues raised in the submission in relation to impending revisions to population targets, the residential development objectives of the LPF including land zoning provisions have been made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LPF, with flexibility in the zoning provisions to ensure that:
 - (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
 - (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Following the revision of the National Planning Framework, new population / housing targets were issued in July 2025. In accordance with Ministerial guidance, a staged process of review of these new targets is now commencing, with a view to determining if a variation of the Wicklow County Development Plan will be required to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out. It is only at that stage will it be known if it is intended to increase the population growth rate in Greystones-Delgany and Kilcoole to the extent that the local plan would require revision, for example to zone more land for housing than already set out in the draft LPF.

At this time, it is not evident that additional land will be required to be zoned in Greystones-Delgany in particular over and above that already provided for in the draft LPF to meet any increased targets, given the amount of land proposed to be zoned therein vis-a-vis the current Core Strategy target for the settlement, which has already been met / exceeded i.e. the land proposed to be zoned in the draft LPF may well be adequate to meet even an increased target.

With regard to density and amending the text of Objective GDK17 to include Coolagad, GDK17 refers to areas that are constrained to providing a very low density of development, including some areas that were zoned R2.5 'Residential 2.5/ha' in the 2013 LAP, in particular areas that do not have mains wastewater networks. While the lands at Coolagad do have some constraints that may affect the achievable density, as referenced in SLO4, the inclusion of Coolagad in this objective is not considered appropriate and is not supported.

With regard to density on the Coolagad lands, it is considered that SLO4 adequately addresses issues of density in relation to the topography and visual impact of the lands. The exact locations of any reduced density shall be determined at the development management stage. It is not considered that a lower overall site density is appropriate, as this would represent an inefficient use of zoned land in a location where the lower levels of the land are far less constrained in terms of visual impact.

In relation to the requested reduction in the riparian buffer zone in SLO 4, this requested amendment would be contrary to CPO 17.26 of the Wicklow County Development Plan 2022-2028 and is not supported.

In relation to the provision of green links throughout SLO 4 and the requested text changes in this regard, it is considered that green links/active travel routes are a vital component in the development of any new residential area, including the SLO4 lands. The link to Kindlestown Hill/Bellevue Woods would represent a significant improvement in the accessibility of these significant trip attractors to the wider LPF area and SLO4, and is considered necessary for the proper planning and sustainable development of the LPF area.

In relation to the following text change *"...Community facilities shall be provided within the SLO area to meet the needs of the new **and existing** resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out."* the CE is amenable to this request.

With regard to surface water drainage issues and the development of the lands at Coolagad, it is the opinion of the CE that it will be necessary to carefully control surface water flows generated by identified development lands in the Coolagad – Templecarrig areas west of the regional road, which drain towards the east to a surface water network in the Rathdown – Redford area that does not have capacity to accommodate increased flows. While it may be possible that greenfield run-off levels be maintained in the development of these lands, there is a desire on the part of the Local Authority for a more co-ordinated approach to surface water management in the area. On this basis, Objective GDK64 is considered appropriate for the proper planning and sustainable development of the area.

With regard to the submitters requested to amend Table 6.5 to provide for a 50% jobs ratio, the CE is satisfied that Table 6.5 is consistent with Chapter 9 of the Wicklow County Development 2022-2028, where it is stated that it is the aim of the Council to increase the (county) 'Jobs Ratio' to 0.7 by 2031.

With regard to the requested reduction in the intensity of employment uses on the 'Hawkins Site', this request is not desirable, noting the areas location in proximity immediately adjacent to substantial areas of residential development, and the visual prominence of the site with substantial street frontage at the entrance to Charlesland (where low intensity uses may not provide an appropriate design response). Furthermore, the provision of active travel links through the site is considered a logical and appropriate measure to improve pedestrian permeability in the area and encourage modal shift towards active travel/public transport.

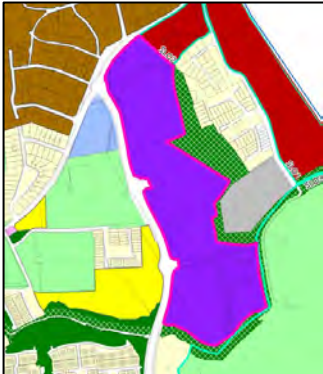
Chief Executive's Recommendation

Amend the Draft LPF as follows

Section B: 9 Specific Local Objectives (SLO)

Amend the text of **SLO4** as follows:

- Community facilities shall be provided within the SLO area to meet the needs of the new **and existing** resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out.

No.	Name	Issues Raised
80	Sporting Greystones FC & Greystones Cricket Club	<p>This submission relates lands measuring c. 3ha at the townland of Killincarrig, on the east side of the Farrankelly Road (as shown on the map to follow).</p> <p>Request the rezoning of 3ha of Folio WW21981F-100441 from E: Employment to AOS: Active Open Space to facilitate the development of a shared community sports facility [Note: As the specific 3ha requested has not been indicated, this has not been mapped, however a map of the overall area referred to is provided below].</p> <p>Noted that SGFC is a community football club founded in 2017, now serving over 300 boys and girls from Academy to U19 level. The club currently only has access to one undersized pitch (suitable for 9-a-side), and lost its previous full-size pitch rental in Bray. As a result, the club has over 100 children on a waiting list and no adequate facility to host regulation 11-a-side matches.</p> <p>The following comments are made in support of this rezoning submission:</p> <ul style="list-style-type: none"> ▪ The proposal would support town vitality by enhancing quality of life and social infrastructure for families living in and around Greystones. ▪ Submitted it would support existing and future residential growth by delivering essential recreational infrastructure in close proximity to large-scale housing developments such as Charlesland and surrounding estates. ▪ By supporting large community-based club structures and regular sporting events, this facility will contribute to indirect local economic activity, including employment, local spending, and volunteer engagement. ▪ The clubs currently have no full-sized football or cricket pitch within Greystones. The proposed rezoning would enable shared use between two community clubs, local schools (none of which have full-size pitches), and wider community stakeholders. This proposal directly addresses the area's identified shortfall in accessible, multi-sport infrastructure. ▪ The proposed site will be developed in line with best practices for low-impact sports infrastructure and will maintain substantial green areas. They will design the pitch layout and landscaping to enhance natural drainage and preserve biodiversity wherever possible. ▪ The site is located close to residential areas, schools, and public transport routes. This supports sustainable access via walking and cycling. No major flood risk constraints are known for the 3-hectare portion proposed for rezoning. <p>Change 3ha within purple outline from E 'Employment' to AOS 'Active Open Space':</p> 

Chief Executive's Response

The accompanying Greystones-Delgany & Kilcoole Social Infrastructure Audit sets out the rationale for the quantum of AOS lands within the draft LPF. In accordance with the analysis set out in same, the LPF already makes considerable provision for new AOS lands, close to the centres of population of the settlement and identified area of new housing growth. Therefore there are no strong grounds for the zoning of these lands for AOS on the basis of inadequacy of existing and proposed AOS in the area.

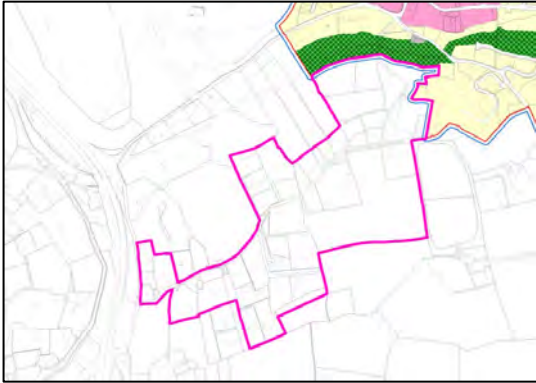
The request would result in a reduction of 3ha of E 'Employment' zoned lands compared to the Draft LPF. These are essential zonings that are necessary to support the sustainable development of the plan area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles. Furthermore, the subject lands are identified as a strategic employment location in the Eastern and Midland Regional Assembly's Regional Spatial & Economic Strategy.

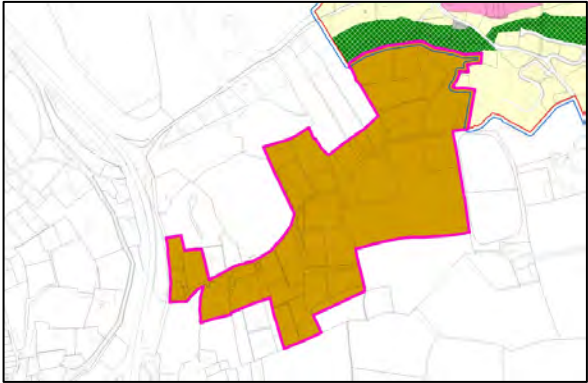
Attention is drawn to the objective set out in the Draft LPF to support the redevelopment of Charlesland golf club for such organised sports activities; these lands are located immediately south of the location suggested in this submission and their development for such use would not compromise the employment lands suggested for re-zoning in this submission.

On the basis of the above, it is not recommended to rezone the subject lands as requested.

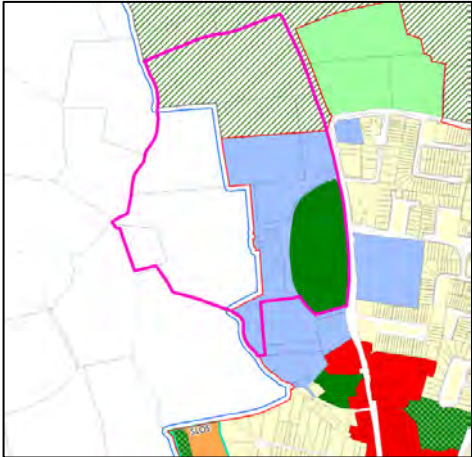
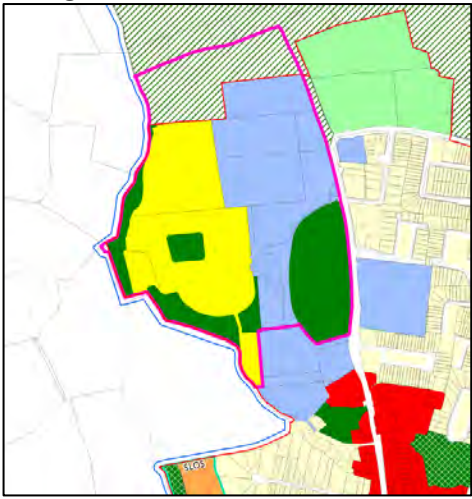
Chief Executive's Recommendation

No change to draft Greystones - Delgany & Kilcoole LPF.

No.	Name	Issues Raised
81	William and Aine Sparkes	<p>This submission relates lands measuring c. 28.6ha at Stilebawn/Drummin East, Delgany (as shown on the maps to follow).</p> <p>Request to change the LPF boundary to include former residentially zoned lands at Stilebawn/Blackberry Lane, south of Three Trout River to allow for development of 2.5 units per hectare. [A map outlining the lands in question was not included in the submission, it is assumed that the submission refers to all lands previously zoned in this area]. In support of this rezoning, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Submitted that the site is strategically located. Its de-zoning during a housing crisis is considered to be fundamentally misguided. ▪ Noted that this parcel of land was rezoned following the Greystones / Delgany Town Development Plan 1999 and continued in subsequent development plans. ▪ Submitted that the LPF ignores documented population growth. Noted that the following figures in the current plan only shows a modest growth target of 72 to 22,081 by 2031 while actual growth in population necessitates more housing not less. ▪ Submitted that such decisions are pricing out the next generation. People who were born and grew up in the locality cannot afford to buy in their own locality. ▪ Submitted that the proposal contradicts sustainable development principles noting that the site is within walking distance of the village and services and would not be car reliant. Removing zoning here pushes development further out, increasing sprawl and carbon emissions. ▪ The zoning under the current plan of 1 unit per hectare at this location is an inefficient use of prime well located land. Requested along with rezoning that the density be increased to 2.5 units per hectare increasing housing supply, improving affordability, maximising this location, promoting sustainability and efficient infrastructure use as well as creating vibrant communities through the development of medium density housing. <p>Change from:</p> 

	<p>Change to:</p> 
<p>Chief Executive's Response</p>	
<p>The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:</p> <ul style="list-style-type: none"> ▪ The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy; ▪ Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022). <p>The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.</p> <p>In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:</p> <ul style="list-style-type: none"> ▪ Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended) ▪ Conflict with the assessment of 'Delgany 3' and the resultant impact on future development options as set out in Section A.3.2 of the draft LPF Written Statement, with the remainder of the lands being beyond 2.5km of Greystones Rail Station. ▪ Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection. These lands are not served by adequate road infrastructure to support new development; in particular Blackberry Lane is severely deficient in width and alignment and is lacking pedestrian and cycling infrastructure. <p>In addition, as detailed in both the draft LPF and the SEA, this area is particularly environmentally sensitive and therefore is not considered appropriate for continued designation for development.</p> <p>On this basis, it is not recommended to zone the subject lands as requested.</p>	
<p>Chief Executive's Recommendation</p>	
<p>No change to draft Greystones - Delgany & Kilcoole LPF.</p>	

No.	Name	Issues Raised
82	The Bloom Partnership	<p>This submission relates lands measuring c. 19.97ha at the northern side of Kilcoole (as shown on the maps to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>This site is located to the north west of the settlement of Kilcoole and comprises a land parcel of c. 19.97ha and forms part of the wider curtilage of the property known as Darraghville House or Kilcoole Holy Faith Convent which is listed as a protected structure (Ref 13.08) under the Wicklow County Development Plan 2022-2028.</p> <p>Under the 2013 LAP the eastern portion of the lands were zoned GB: Greenbelt, CE: Community and Education, and OS: Open Space while the western portion of the lands were unzoned.</p> <p>It is requested that the lands are zoned for mixed use to allow for residential development and the following elements:</p> <ul style="list-style-type: none"> a) Community / Education 5.83ha b) Open Space 4.59ha c) Green Belt 2.99ha d) Residential 6.56ha <p>In support of this rezoning request, the following grounds are raised:</p> <ul style="list-style-type: none"> ▪ Submitted that the application site is located within walking distance of the town of Kilcoole and is served by adequate public transport. ▪ The site would tie in with Roads Objective RO9 –“to provide for the development of a Western Distributor Road to bypass Kilcoole”. The road objective is aligned along the western boundary of the masterplan lands. There is also an east-west link to the R761 which traverses the northern portion of the masterplan lands. ▪ Noted development has commenced on St. Catherine’s Special Needs Campus and school and this development would hugely benefit from being integrate into the population of the town. Submitted that housing development would enable this. ▪ A masterplan for the site has been submitted which also includes the development of the following: A public park (2.6ha), an urban farm/allotments, a nursing home, crèche, café, meeting rooms along with residential development of c. 250 units.

		<p>Change from:</p>  <p>Change to:</p> 
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Chief Executive's Response

The residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the Planning Act 2000 (as amended)
- Conflict with the assessment of Kilcoole 'Area 3' and the resultant impact on future development options as set out in Section A.3.2 of the draft LPF Written Statement.
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection.
-

As the additional residential zonings are not supported, the requested additional OS1 'Open Space' zonings are not considered necessary.

It is requested that the lands that comprise the historic walled garden of Darraghville House be zoned for residential use and the sketch masterplan submitted shows possible roadways cutting across the extant walls (which are in good and complete condition). Serious heritage concerns arise with respect to the impact such development could have on this historic structure and therefore these proposals cannot be supported. Overall it does not appear that the concept has given adequate consideration to the overall history, heritage and landscape of this area.

It should be noted that Objective R09 mentioned in the submission is no longer an objective of the LPF following various assessment and analysis carried out as part of the Local transport Study. Therefore any development of these lands would be serviceable only by the existing regional road to the east of the lands.

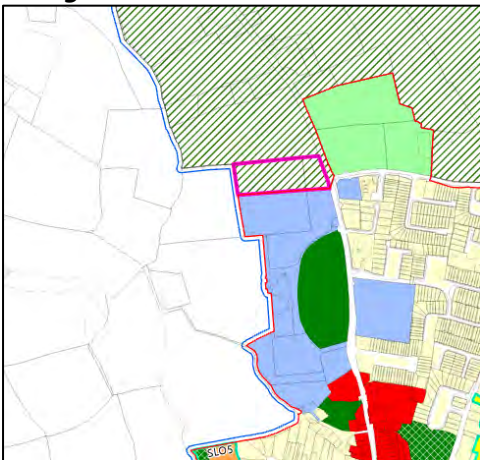
However, it is recommended to zone the permitted future location of St. Catherine's School to 'Community & Education' to reflect the permitted future use of the lands.

Chief Executive's Recommendation

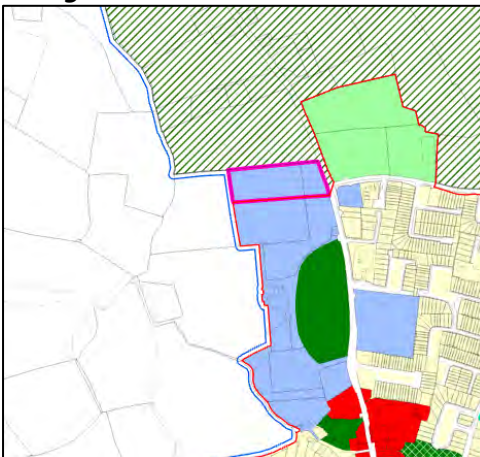
Amend the Draft LPF as follows:

Amend Map No. 1:

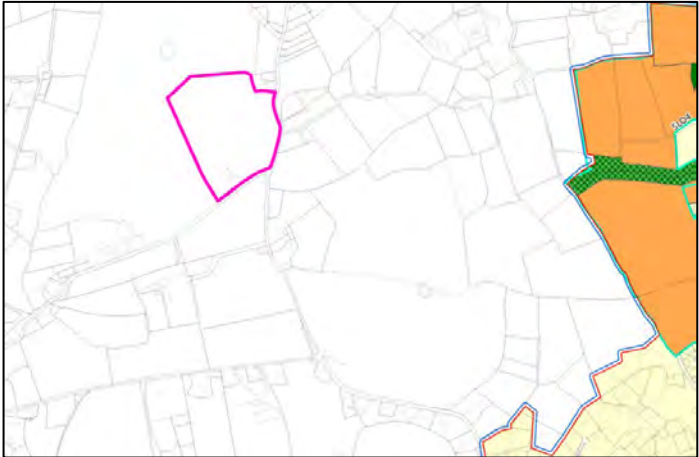
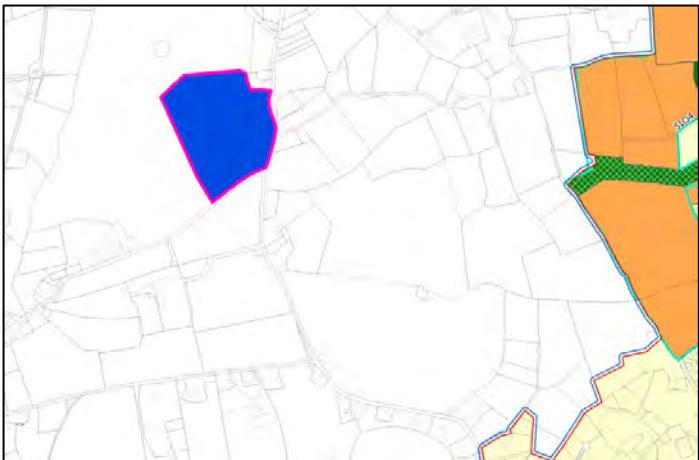
Change from:



Change to:



No.	Name	Issues Raised
83	Sarah Doyle	<p>This submission relates to lands of 8.8ha at Coolnaskeagh, north of Delgany (the former Glen of the Downs Golf Club) as shown on the maps to follow.</p> <p>This submission seeks that this site is zoned to allow for the development of a wellness and retreat project.</p> <p>[The submission does not clearly state what zoning objective they seeking to be applied to the site; however the development is described as a tourism venture in the submission. The zoning request is assessed on the basis of a requested T 'Tourism' zoning. It is noted that this submission is seeking changes to the wording of Tourism Objectives under Chapter 11 of the 2022-2028 Wicklow County Development Plan and may be requesting that the lands be included as an Integrated Tourism/Leisure/Recreation Complex].</p> <p>The submission puts forward that the proposal for the site would comprise of the following:</p> <ul style="list-style-type: none"> ▪ Focus exclusively on wellness, ecotherapy and nature immersion activities including outdoor recreational activities such as Spa trials, walking, yoga and related activities — directly leveraging the rural setting as essential to the offering. ▪ Nature-based education, craft workshops, and passive tourism. ▪ Reuse of existing building footprint and the addition of sensitive new structures such as sauna and hot tubs. ▪ Phased introduction of low-impact, sedum-roofed accommodation cabins ▪ Submitted that this would be an appropriate use due to the unique location which offers views of the Sugarloaf Mountains and forestry. <p>The submission notes that planning permission for a broader wellness proposal was refused by WCC under PRR 25/27. Key issues related to the following:</p> <ul style="list-style-type: none"> ▪ Lack of sufficient justification for siting in a rural, AONB-designated landscape ▪ Uncertainty regarding wastewater treatment system compliance ▪ Perception that the use was more suited to an urban context ▪ Concerns over visual sensitivity, particularly the introduction of new built forms <p>Submitted that any proposal on site would have a full site suitability and WWTS report in line with EPA 2021 CoP and address visual sensitivity via strategic siting, native landscaping, and limited built massing.</p>

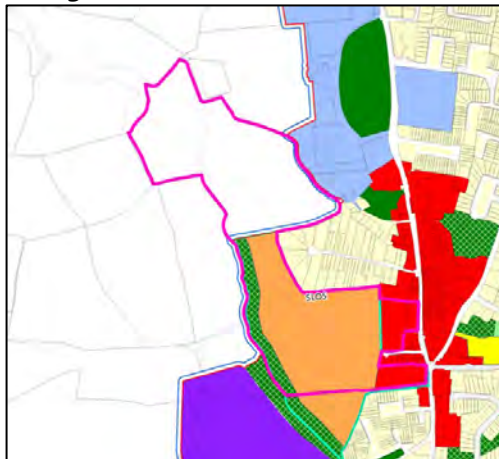
	<p>Change from:</p>  <p>Change to:</p> 
<p>Chief Executive's Response</p>	
<p>The lands in question are at a considerable distance outside of the LPF area and it is not recommended that the LPF area either be extended to include these lands (which would require the zoning of the intervening lands) or that the LPF include disconnected satellite zones surrounding it. Such proposals would be more appropriately considered in the next County Development Plan review.</p> <p>In addition, with respect to the request for changes to the tourism chapter / objectives of the County Development Plan, this is not a matter that is the subject of the variation and therefore it is outside the scope of this variation. Only changes consequent of the LPF may be made to the County Development Plan at this time.</p> <p>A full review of the County Development Plan will commence in 2027.</p>	
<p>Chief Executive's Recommendation</p>	
<p>No change to draft Greystones - Delgany & Kilcoole LPF.</p>	

No.	Name	Issues Raised
77	Brookhampton Limited	<p>This submission relates lands measuring c. 18.6ha on the western side of Kilcoole (as shown on the maps to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>There are 2 rezoning requests under this submission:</p> <p>Request 1: Request that the southern portion of the lands which are zoned RN2 under the draft LPF be rezoned RN1. These lands measure c. 10ha and were zoned R22, TC and OS under the 2013 LAP.</p> <p>Request 2: Request that the northern portion of the lands which were formerly zoned SLB under the 2013 LAP be rezoned to RN2. Also requested that an additional plot to the north west is included as RN2/OS under the LPF.</p> <ul style="list-style-type: none"> ▪ With regard to the first rezoning request it is submitted that should an 'RN1' designation not be deemed appropriate at this time, it is requested that greater flexibility be provided in respect of the phasing of 'RN2' lands where the lands are appropriately located, serviceable and sequential to existing development. ▪ It is submitted that 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 to align the Core Strategy with the targets set out in the revised NPF. ▪ Submitted that 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 not be activated. ▪ Further submitted that should RN2 designation for the land previously zoned SLB, not be deemed appropriate, this submission requests that at a minimum the lands be included within the boundary of the Draft LPF 2025, and the existing SLB land use zoning be retained in full. <p>The following main points are made in support of these land use rezoning requests:</p> <ul style="list-style-type: none"> ▪ The southern portion of the lands (c. 10 ha) were zoned residential (R22, c.6.7ha), town centre (TC, c. 2.9 ha) and open space (OS), and was subject to AP9 designation under the 2013 Plan. ▪ The northern portion was designated as Strategic Land Bank (SLB). ▪ Noted that the residential zoned lands were identified for medium density (22 units per ha. maximum), under the 2013 LAP. ▪ Noted there have been challenges in securing planning permission for the development of the lands mainly due to density concerns, infrastructural capacity in the area to cater for additional development, including roads and water, and the requirement for infrastructure on third party lands. ▪ Noted that there is a live application on part of the lands for the development of a new discount food store. ▪ Submitted that the concerns in respect to prematurity due to Irish Water

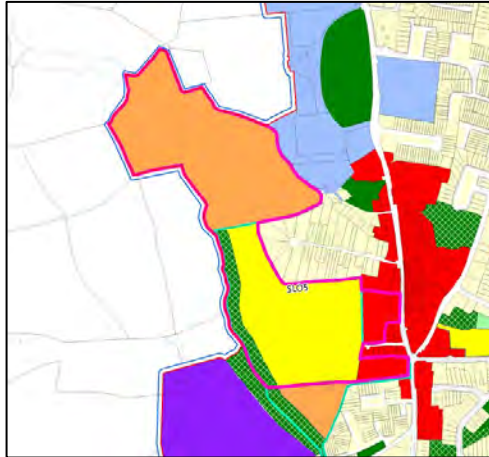
constraints are now resolved, as evidenced by the IW COF letter which accompanied the most recent application under WCC Reg. Ref.: 22/15.

- Submitted that the Draft LPF is premature pending the update of the Core Strategy and Housing Strategy in line with the Revised National Planning Framework noting 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.
- In light of the Revised NPF, it is submitted that the Planning Authority should set new housing targets for Kilcoole, allowing for the zoning of additional residential lands to what is in the Draft LPF, otherwise the variation would be contrary to legislation which requires the County Development Plan to align with the NPF, as revised in this case.
- 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 delaying the delivery of housing.
- Submitted that the subject lands are serviceable and centrally located within walking and cycling distance of public transport and key community infrastructure.
- Considered that the former SLB lands which have been de-zoned under the draft LPF are needed for the long term development potential of the area to meet new housing targets. Further submitted that these lands are contiguous to the submitter's lands to the south and would allow for planned phased development noting they are within cycling and walking distance of public transport and key community infrastructure.

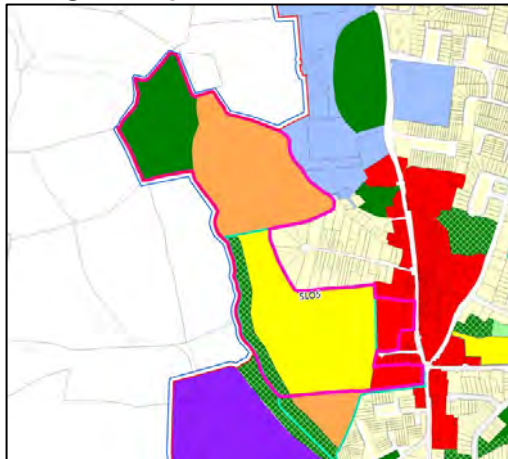
Change from:



Change to (Option with northwest site as RN2):



Change to (Option with northwest site as OS1):



The submission includes the following additional requests:

Request 3: SLO 5 Bullford

This submission seeks the following amendments to 'SLO 5 Bullford' so that it aligns more closely with the current masterplan proposals prepared by the landowner in particular with regard to the type, location and quantum of open space to be provided.

- The submission 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
- Submitted that following a design team review of the lands as part of the preparation of a planning application, 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. It is considered that the open space requirements are overly aspirational and that no site surveys/analysis were undertaken as part of the preparation of SLO 5 in the Draft LPF.
- It is submitted that the requirement to provide full-size, fully serviced

		<p>pitches within the subject lands should be removed from SLO5. It is submitted that 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</p> <ul style="list-style-type: none"> ▪ Further submitted that while the requirement for character areas within SLO5 are reasonable, it is considered that the requirement for the scheme to be divided into a least two distinct character areas / estates <i>"either side of a central green area"</i> is unnecessarily specific and overly onerous and will serve to constrain development on the lands. ▪ Requested that SLO5 Bullford be amended to provide for more flexibility and to align more closely with the current masterplan proposals prepared for the lands, particularly in respect of the type, location and quantum of open space to be provided. <p>Request 4: Opportunity Sites 7 and 8</p> <ul style="list-style-type: none"> ▪ Requested that the text relating to 'OP7 Kilcoole Centre' and 'OP8 Kilcoole West' be amended to align more closely with the current proposals, which provide 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. ▪ While the landowner supports the identification of the opportunity sites, this submission seeks that the text relating to OP7 and OP8 be amended to align with the landowner's 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. ▪ Submitted that the requirement for high density development as set out under OP7 and OP8 conflicts with the density requirements for Kilcoole as set out in the County Development Plan and the Sustainable and Compact settlements Guidelines 2024. ▪ Noted that under the County Development Plan the expectation for Kilcoole is a graduated density of between 30-40+uph on centrally located sites and 20-35uph on edge of centre sites. ▪ Submitted that the site zoned TC is required to respond to existing context while the remainder of the lands would have a density range of 25-40uph under the Compact Settlement Guidelines 2024. ▪ It is further submitted that 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. <p>This submission requests the following text changes to OP7 and OP8:</p> <p><i>"Objectives for OP7</i></p> <ul style="list-style-type: none"> ▪ <i>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</i>
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		<p>that pedestrian / cyclist access and public transport uses are prioritised, and the creation of a public park / plaza in this area;</p> <ul style="list-style-type: none"> ▪ 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." <p>"Objectives GDK OP8</p> <ul style="list-style-type: none"> ▪ 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".
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Chief Executive's Response

In relation to **Requests 1 and 2**, the residential zoning provisions of the draft LPF have been carefully calibrated to ensure compliance with:

- The NPF, RSES and Wicklow County Development Plan requirements and objectives, in particular consistency with the Wicklow Core Strategy;
- Sound spatial principles in accordance in particular with the requirements of guidance set out in the NPF and Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities' (2022).

The settlement/LPF boundaries have been carefully considered in the crafting of the draft LPF, having regard to the analysis presented in Section A.3 of the draft LPF Written Statement.

In these regards, the request for the zoning of additional land for residential use, or the alteration of phasing provisions as detailed in this submission would:

- Exceed Core Strategy requirements, including likely longer term requirements, and therefore would be inconsistent with the Wicklow County Development Plan, which is precluded under Section 19(2) of the

Planning Act 2000 (as amended).

- Conflict with the assessment set out in Section A.3.3 of the draft LPF Written Statement in relation to Kilcoole 'Area 3' and the resulting impacts on development options. The CE is satisfied that this assessment remains robust.
- Comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, and environmental protection.

As the request for additional residential lands is not supported, the CE does not consider it appropriate at this time to zone the north-western portion of the subject lands for open space purposes (as requested as an option), disjointed from the remainder of the built-up area.

In relation to **Request 3**, the CE has carefully considered the landscape review included in the submission. However, the CE is satisfied that the provisions set out in SLO5 are appropriate. The enclosed landscape review largely focused on a relatively small area of the overall SLO5 area, outlined in red in the south east of the SLO. Images within this document showing the topography of the site clearly indicate flatter lands to the immediate northwest of the smaller area outlined in red, all within the ownership of the submitter. This is corroborated by internal GIS resources. The topography of the site would therefore align well with the development of a 'central green area' and 'large accessible public parks' as set out in SLO5.

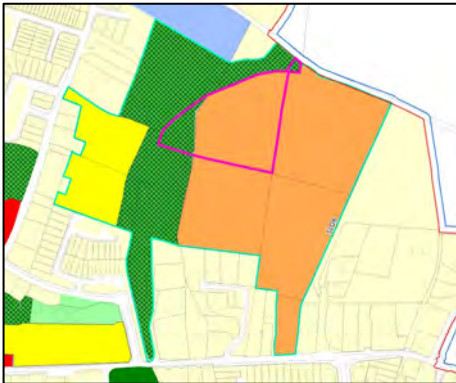
In relation to **Request 4**, the CE is satisfied that the requirement for higher density development in OP7 and OP8 is appropriate. The *'Sustainable Residential Development and Compact Settlements' Guidelines for Planning Authorities* state that development at small/medium town centres should respond positively to the scale, form and character of existing development, the CE is satisfied that higher density development is achievable in this location, where attention is drawn to recent higher density mixed use developments to the immediate south of OP7. Other requests in relation to OP7 and OP8 reduce the clarity and strength of the policy framework as to what is expected in the OP sites, e.g. replacing longer descriptions of junction improvements with 'junction upgrades', or removing requirements for infrastructure/access arrangements. The CE deems these objectives to be necessary for the proper planning and sustainable development of the town centre, and therefore does not support these requests.

On the basis of the above, it is not recommended that changes be made to the Draft LPF.

Chief Executive's Recommendation

No change to draft Greystones / Delgany & Kilcoole LPF.

Specific Local Objectives (where not addressed in rezoning submissions above)

No.	Name	Issues Raised
32	Chris Gammell	<p>The submission relates to proposed SLO 6 Ballydonarea area, formally Action Area Plan 8 (AAP8) under the 2013 LAP and seeks amendments to the development requirements of SLO 6.</p> <p>This submission notes the following:</p> <ul style="list-style-type: none"> ▪ Under AAP8 the landowner/submitter had access to their lands from the proposed distributor Link Road RO9 which was to connect Sea Road to Lott Lane. Noted that this access arrangement was previously agreed between the other landowners and the planning authority in order to ensure full integration of the area. ▪ There is a live planning application with ACP concerning this area – Ref PL27.320257. The outcome of this decision will have a bearing on whether the previous agreed access remains in place. ▪ Under the Draft LPF, it appears that access to the submitters land would need to be provided via Sea Road and is dependent on crossing third party lands. Without a formal agreement in place, this raises the risk that the submitter’s lands will be landlocked. ▪ It is respectfully requested that that any future planning application for SLO6 Ballydonarea area is required to form part of a single , integrated masterplan-agreed by all landowners within the SLO 6 boundary. This would help to ensure equitable access and full integration for all landowners. ▪ Further submitted that such a masterplan should include co-ordinated provision for all essential services, including drainage, electricity, roads and cycleway access. 

Chief Executive’s Response

The removal of Road Objective RO9 is consistent with the assessment of Kilcoole ‘Area 1’ as set out in Section A.3.3 of the draft LPF, with particular reference to the following text:

‘A key objective shall be for new development to utilise to the maximum extent possible the services that are already present. With respect to the ‘eastern distributor road’, having regard to preliminary assessments carried out as part of the Transport Study, it is apparent that all of the elements of this route are now in situ and with improvements particularly to junctions and priority, it would not be necessary to construct major new sections of this route through greenfield lands, as was an objective of the previous plan. In addition, such new route sections would have required traversing a number of areas of biodiversity value, including a watercourse, and this is not

considered an optimal future development strategy.'

Furthermore, attention is drawn to the introductory text for 'Specific Local Objectives', which states that '*a masterplan for the entire SLO area may be required to be submitted as part of the first application within the SLO.*'

However, to prevent land locking within the SLO, and for clarity, the CE is amenable to the inclusion of text in relation to access to individual land parcels.

Chief Executive's Recommendation

Amend Draft LPF as follows:

Section B:8 Specific Local Objectives

Amend introduction as follows:

The purpose of an SLO is to guide developers as to the aspirations of the LPF regarding the development of certain 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. A masterplan for the entire SLO area may be required to be submitted as part of the first application within the SLO. **In particular, both masterplans and individual applications within SLOs shall show the proposed overall roads and infrastructure layout for the entire SLO area to ensure that all land parcels within the SLO are serviceable and no development prejudices or unduly constrains the development of another parcel.**

For a number of the SLOs concept sketches are shown in this LPF. These 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 Any application for permission on said lands must conform to all standards and requirements of the Planning Authority, as set out in this LPF and the Wicklow County Development Plan

Part 4.12 SEA of Draft LPF

No.	Submission Text/Issues Raised	Response	Recommended Updates
9. Office of Public Works			
A	This submission provides information and suggestions relating to flood risk management.	If any proposed amendment arises from this submission, it will be screened for the need to undertake SEA and Stage 2 AA.	None.
B	<p>The submission mentions SEA as follows:</p> <p>Justification Tests</p> <p>The OPW welcomes the inclusion of plan making justification tests in the draft plan. Part 3 of the Plan Making Justification Tests included in the SFRA notes in all cases that <i>"Assessment of flood risk has been incorporated into the Plan SEA Process"</i>. Part 3 of the Plan Making Justification Test as set out in the Guidelines is that <i>"A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere"</i>. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this</p>	The required information on Justification Tests is presented in the SFRA report that accompanies the Plan and SEA documents.	<p>To update the SEA Environmental Report under Section 4.9.9 "Flooding" as follows (existing text in black, text to be added in red):</p> <p>"A Strategic Flood Risk Assessment (SFRA) document accompanies this SEA Environmental Report and the Proposed Variation. Requirements in relation to SFRA are provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of Environment and Office of Public Works, 2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014.</p> <p>The most significant source of flood risk within the Local Planning Framework area is from fluvial (from rivers and streams) and coastal sources. There are other sources of flooding present, including from pluvial (rainwater) and from surface drainage systems sources.</p> <p>Flood risk management and drainage provisions are already in force through the Wicklow County Development Plan 2022-2028 (as varied) and related provisions have been integrated into the Local Planning Framework.</p> <p>The SFRA took into account predictive and historic flood risk indicator mapping in identifying Flood Zones (geographical areas within which the likelihood of flooding is in a particular range), which have informed the LPF's land use zoning.</p>

No.	Submission Text/Issues Raised	Response	Recommended Updates
	should not be passed on to development management.		<p>There are three types of flood zones defined for the purposes of the Flood Guidelines:</p> <ul style="list-style-type: none"> • Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding); • Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding); and • Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all other areas that are not in zones A or B. <p>Flood Zones A and B identified by the SFRA are mapped on Figure 4.14.</p> <p>The SFRA has enabled the following of the sequential approach outlined in the Guidelines, including avoiding inappropriate land use zoning on lands that are subject to elevated levels of flood risk. The SFRA report that accompanies the Plan and SEA documents contains the findings of Justification Tests, assessing whether certain zoning provisions in the Variation's Local Planning Framework that are situated within areas at risk of flooding meet specific criteria for proper planning and sustainable development, and demonstrates that relevant provisions will not result in unacceptable risk nor increase flood risk elsewhere.</p> <p>Flood risk as one of the key environmental criteria used by this SEA in the assessment of the Variation (refer to relevant Strategic Environmental Objectives for the environmental component of "Water" included in Section 5 of this report and refer to the assessments provided under Sections 7 and 8). Furthermore, Flood Risk Management and associated measures from the Development Plan and associated Variation's Local Planning Framework are identified by this SEA (refer to relevant measures for the environmental component of "Water" included in Table 9.1 of this report)."</p>

No.	Submission Text/Issues Raised	Response	Recommended Updates
17. Eastern and Midland Regional Assembly			
A	<p>5.0 Strategic Environment Assessment (SEA) and Appropriate Assessment (AA)</p> <p>The Assembly welcomes the preparation of the Variation of the CDP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). The SEA Environmental Report was issued with the Draft Variation of the CDP and sets out the iterative process to date including an assessment of the overall environmental effects arising from the Draft Variation of the CDP provisions.</p> <p>The Environmental Report concludes that taking into account the mitigation measures which have been integrated into the Variation of the CDP, it has been determined that significant residual adverse environmental effects will not occur as a result of the implementation of the Plan. The Draft Variation of the CDP is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. The NIR concluded that the Draft Variation of the CDP will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects.</p>	Noted.	None.

No.	Submission Text/Issues Raised	Response	Recommended Updates
20. Coolagad Environmental			
A	Submission relates to flood risk indicator.	If any proposed amendment arises from this submission, it will be screened for the need to undertake SEA and Stage 2 AA.	None.
23. O'Meara			
A	Submission relates to various issues including flood risk.	If any proposed amendment arises from this submission, it will be screened for the need to undertake SEA and Stage 2 AA.	None.