

Greystones-Delgany & Kilcoole Local Area Plan Submission -Report

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SUBMISSION ON

DRAFT KILCOOLE/GREYSTONES LOCAL AREA PLAN 2024

COOLDROSS MIDDLE, KILCOOLE

RICHARD and DAVID FOX



Director of Services (Planning) Proposed Greystones/Kilcoole Local Area Plan Submission Planning Department Wicklow County Council County Buildings, Wicklow

<u>RE: Submission on the Proposed Kilcoole Local Area Plan 2024 Regarding Lands at</u> <u>Cooldross Middle, Kilcoole – Richard and David Fox</u>

Dear Sir or Madam,

We wish to make a submission on the preparation of the proposed Greystones/Kilcoole Local Area Plan 2024 for the consideration of the Council.

Please contact us if we can be of any further assistance on any of the matters raised.

Yours sincerely,

Richard Fox

David Fox

1. <u>Proposal</u>

We, as owners of land at Cooldross Middle, Kilcoole, Co. Wicklow, that is currently zoned as SLB, propose that it be rezoned for residential development as part of the 2024 Greystones/Delgany/Kilcoole LAP.

2. Description

The lands in question are located at Cooldross Middle, Kilcoole (please see maps at end of submission). They are located between the Woodstock/Ballycrone Manor housing estates at Cooldross Lane and the Holywell housing estate at Sea Road. They are adjacent to the Holywell housing estate. The lands are currently zoned SLB, (Strategic Land Bank; To provide a strategic land bank for future phases of settlement after the lifetime of the 2013-2019 plan) and are illustrated in Map 1.

Prior to the lifetime of the 2013-2019 plan, this site in question was zoned AGR "agricultural use"- in the 2008 Kilcoole Local Area Plan with a comment that "these lands are amongst the lands that the Council currently deems most suitable for development" in the next Kilcoole Local Area Plan. The eastern portion of these lands are presently zoned AG for agricultural purposes. **Indeed, the site was zoned for residential development in the 1998 Draft LAP,** but like several sites, was removed from the final plan as it was feared that Kilcoole would grow too quickly during the lifetime of that plan.

The site is well served by the eastern distributor road, which adjoins the Holywell housing estate. The lands are accessible from the Newcastle Road and Cooldross Lane to the south and from the Sea Road to the north. The lands are adjacent to Cooldross Lane, with vehicular access from the public road. The lands in question amount to 1.7 hectares (4.1 acres) which is zoned SLB in the current Local Area Plan. There have been no planning applications on these lands.

Submission Objectives

We request the Council to consider the changing of the zoning of the entire lands to "R" i.e. as "*Proposed Residential – To provide for residential development for local growth*" and to extend the town boundary to include all of the subject lands:

- Site A on Map 2– from SLB in 2013 local area plan to Residential
- Site B from AG in 2013 local area plan to SLB or Residential and extend the town boundary to include the site.

2. BACKGROUND

2.1 Kilcoole Local Area Plan 2013

The existing 2013 Local Area Plan contains the following objectives relating to these lands. See Map 1.

- Circa 1.7 hectares (4.1 acres) adjacent to the eastern distributor road is zoned SLB Agriculture with the comment that *"these lands are amongst the lands that the Council deems most suitable for development"* in the next Kilcoole Local Area Plan i.e. the current review. See Site A.
- The balance of circa 2.2 hectares (5.4 acres) is zoned AG agricultural use and is located outside of the town boundary line. See Site B.

2.2 Population Trends – Kilcoole Zoning

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 4000 to a target population of 4500 by 2016 and 5000 by 2022. This population target has been adjusted to 4778 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. Given the current housing crisis, the impending ESRI report into national housing targets and the as yet unpublished Housing Commission Report we 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.

3. JUSTIFICATION OF THE PROPOSED ZONING

We believe that these lands are suitable for residential zoning for the following reason:

- 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, we feel 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 distribution 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 our land

Advantages over other sites available

The criteria used for the 2008 plan were

- "<u>Unzoned land closest to the existing town centre shall be considered first</u> for new zoning (the town centre being taken as the Sea Road and Main <u>street junction</u>). Within this context, the choice of zoned land will be informed by the natural topography of the town, accessibility and location of established residential areas.
- Lands that meet a social or community need
- Lands adjacent to community and social infrastructure, such as schools and open space.
- Lands zoned AGR in the 2002 LAP, along with other lands that fit in with these above criteria, shall be considered."
- For the 2013 LAP, a similar zoning in effect was placed on this site, with the AGR zoning replaced by SLB, with a very similar description.

A: Proximity to centre of town.

The site that we are proposing (site A) is the closest SLB zoned site to the town centre as defined in the 2008 plan, apart from the site to the rear of the girls Primary School (adjoining AP9), which remains totally undeveloped and has no current infrastructural advantage. The site that we are proposing has direct access onto an already constructed link road.

The adjoining Site B is also closer to the town centre than the SLB zoned lands on the Sea Road. The upgrade of the Sea Road and provision of footpaths and cycle lanes has been slow and of a piecemeal approach. Cycle lanes and footpaths currently serve the upper

portion of Cooldross Lane and the Eastern distributor Road that adjoin the lands that this submission relates to.

B: Infill Site

The site we are proposing has existing residential development on three sides of it (Holywell, Ballycrone Manor and Sea Road Cottages) and could be considered as an infill site.

In contrast, the lands zoned SLB on the Sea Road (modification 22a 2008 plan) are only adjacent to residentially developed or zoned land on the west side of it (sea road cottages) and could not be considered to be an infill site.

The SLB site adjoining AP9 is only adjacent to residentially developed or zoned land on two sides.

The SLB site further down Cooldross Lane adjacent to the Ballycrone Manor Development is also only adjacent to residentially developed or zoned land on one side.

C: Available Infrastructure.

The site that we are proposing is the only SLB site with direct access available onto an existing road of appropriate specification.

The lands zoned SLB on the Sea Road (modification 22a 2008 plan) can be accessed from the Sea Road, but a large section of the Sea Road would require upgrading in terms of width of the road and footpaths. The Holywell development has seen considerable improvements to the Sea Road and these improvements would need to be continued down the Sea Road to the site to facilitate safe movement of people in that area. The further upgrade of the Sea Road would presumably be difficult to achieve, given the number of landowners and householders that would be affected in the process.

The SLB site adjoining the Convent to the west has no available infrastructural access at present. In the current, 2013 plan, a link road is proposed from the centre of Kilcoole to access AP9. However, there is no sign of construction of this road.

The SLB site further down Cooldross Lane would presumably either be accessed through Ballycrone Manor or by further upgrading Cooldross Lane. The further upgrading of Cooldross Lane was not a priority of the 2008 or 2013 LAP and there has been no provision for this in the construction of Ballycrone Manor. Similar to the Sea Road, the upgrade of Cooldross Lane would be difficult to achieve, given the number of landowners and householders that would be affected in the process.

The development of this site could also lead to improvements to the design of the roundabout on Cooldross Lane, which is of much inferior specification to the adjoining roundabout in the Holywell estate.

4. CONCLUSION

We request the Planning Authority to support this zoning submission. We believe that these lands are suitable for residential zoning and address the concerns outlined in the Background Issues Paper, the Wicklow County Development Plan and indeed National Planning Policies including the National Spatial Strategy and the Technical Updates of the Regional Planning Guidelines. Please contact us if we can be of any further assistance. We will gladly make an oral presentation submission if this is requested, facilitate viewing of the site or supply additional information.

Enclosed:

Map 1



