

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

Who are you:	Agent
Name:	Martin O'Malley
Reference:	GDKLPF-103045
Submission Made	June 18, 2025 10:41 AM

## Local Planning Framework PART A Strategy

- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole

## Local Planning Framework PART B Settlement Specific Objectives.

- B.8 Land Use Map and Zoning

Please select which town you want to comment on:

Greystones/Delgany

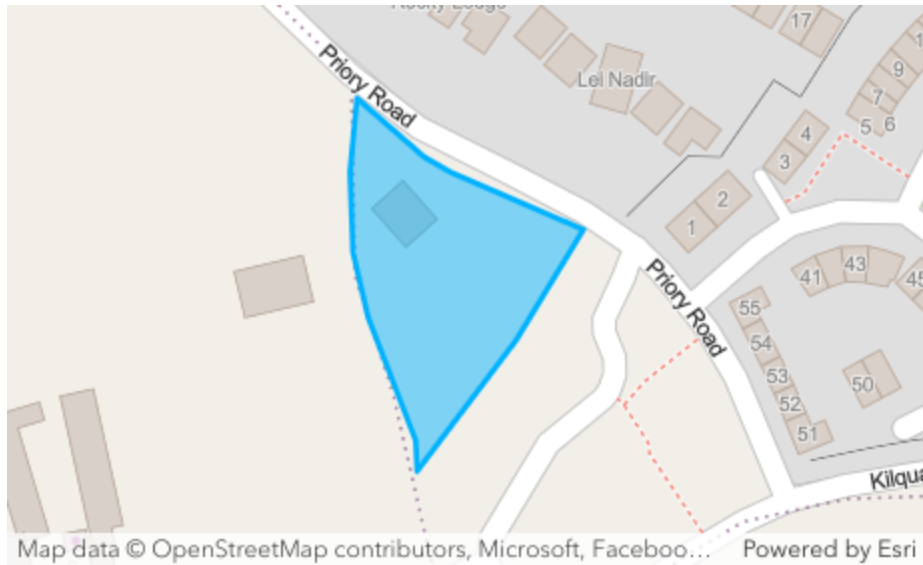
### Observation relevant to the settlement:

This submission is made in respect of Mr. O'Malley's landholding at Avonree, Priory Road, Delgany. A detailed submission is enclosed.

### Summary of Submission:

1. The Avonree site (c.0.24ha) is located within the Farankelly residential area with frontage onto an existing residential street facing the Eden Drive/Eden Wood estate and beside Farankelly Way.
2. 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.
3. Avonree 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. This is entirely illogical.
4. It is proposed that the site is zoned 'RE Existing Residential' consistent with the surrounding area.
5. There are no environmental designation, biodiversity constraints, visual or heritage reasons that justify its rural designation. The site does not act as a buffer between settlements
6. It is proposed that all maps indicating the LPF boundary under Variation 4 be amended to be consistent with the Farankelly townland boundary and include the Avonree site within the LPF area

### Map



### Site Description:

Avonree site (c.0.24ha) is located within the Farankelly residential area with frontage onto an existing residential street facing the Eden Drive/Eden Wood estate and beside Farankelly Way.

---

### Upload a File (optional)

2316 GREYLPF-AVON-V1.pdf, 2.11MB

Our Ref: 2316 Greystones LPF AVON

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

18<sup>th</sup> June 2025

**Re: Draft Greystones-Delgany & Kilcoole Planning Framework and Variation No. 4 of the Wicklow Co. Co. Development Plan 2022-28. Draft Stage Submission by Martin O'Malley**

Dear Sir/ Madam,

MacCabe Durney Barnes, of 20 Fitzwilliam Place, Dublin 2, D02YV58 has been instructed by our client, Martin O'Malley, Avonree, Priory Road, Delgany, to make this submission in relation the **Draft Greystones-Delgany & Kilcoole Planning Framework and Variation No. 4 of the Wicklow Co. Co. Development Plan 2022-28**. This submission is made in respect of Mr. O'Malley's landholding at Avonree, Priory Road, Delgany. We note that on some maps the road is referred to as Eden Drive but the Eircode address is Priory Road.

Section 1 sets an overview of the locational context of the client's site in the LPF. Section 2 sets out the key issues for the planning authority's consideration summarised as follows:

**Summary of Submission:**

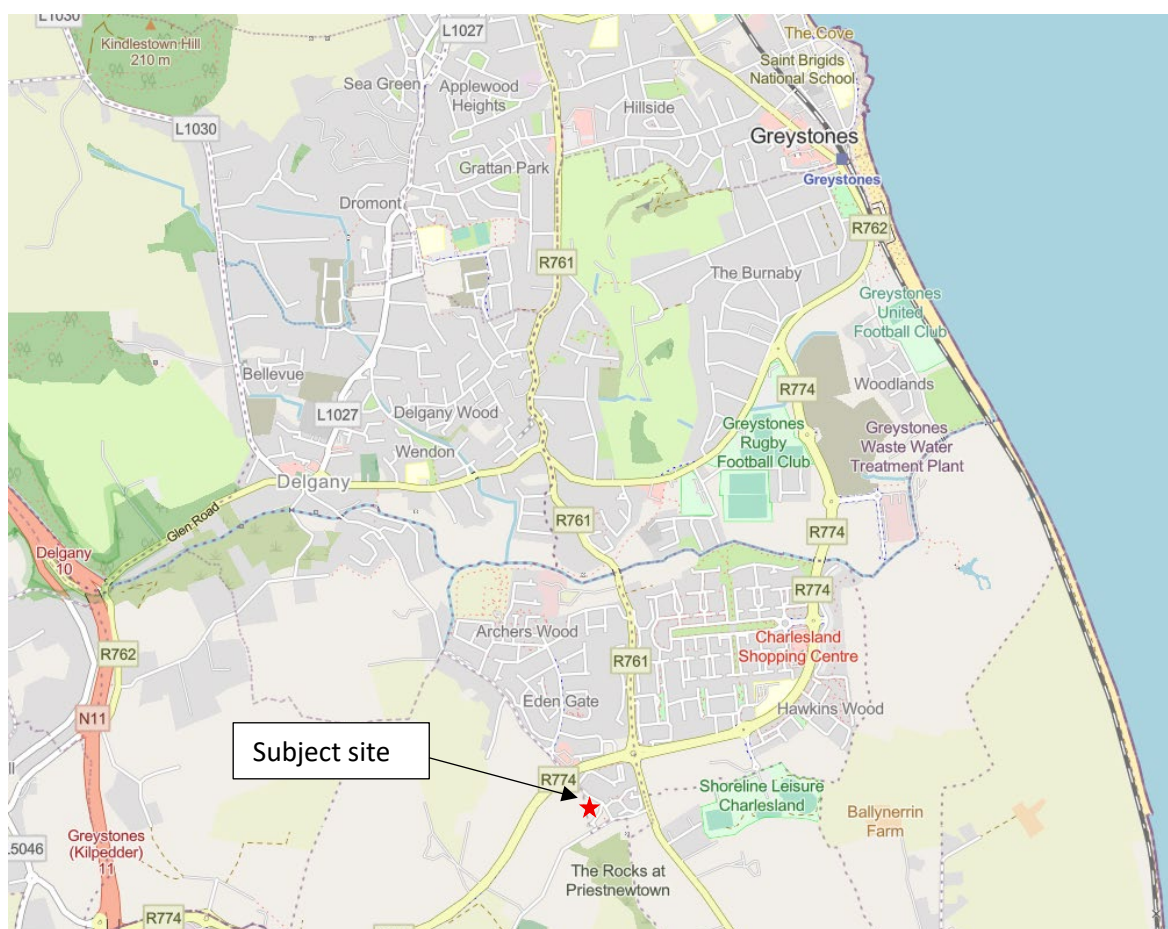
- 1. The Avonree site (c.0.24ha) is located within the Farrankelly residential area with frontage onto an existing residential street facing the Eden Drive/Eden Wood estate and beside Farrankelly Way.**
- 2. The zoning of the site as agriculture is a zoning anomaly in the context of its location within the Greystones-Delgany Census Town Boundary and Farrankelly Townland Boundary.**
- 3. Avonree 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. This is entirely illogical.**
- 4. It is proposed that the site is zoned 'RE Existing Residential' consistent with the surrounding area.**

5. There are no environmental designation, biodiversity constraints, visual or heritage reasons that justify its rural designation. The site does not act as a buffer between settlements
6. It is proposed that all maps indicating the LPF boundary under Variation 4 be amended to be consistent with the Farankelly townland boundary and include the Avonree site within the LPF area

## 1 LOCATION CONTEXT

The application site consists of a site 0.24 ha. on Priory Road (Eden Drive), Delgany, Co. Wicklow. The site is occupied by a single dwelling house. The last planning application on the site is from 2002 (Extension to rear, new dormer level & raised roof). The site is accessed via Kilquade Road to the south

The site is situated on a residential road facing detached dormer style dwellings on Priory Road (Eden Drive) (c. 2014). A Wicklow Co. Co. scheme was granted permission on the adjoining site for 24 houses in c.2007 and 54 houses at Farrankelly. These have been constructed and occupied (see images below). There is also a development by Cosgraves (Borg Development) at Eden Wood which features semi-detached and terraced houses and an apartment block.



**Figure 1: General Site location shown in red**

Source: Map data © OpenStreetMap contributors, Microsoft, Facebook, Inc. and its affiliates, Esri Community Maps contributors, Map layer by Esri

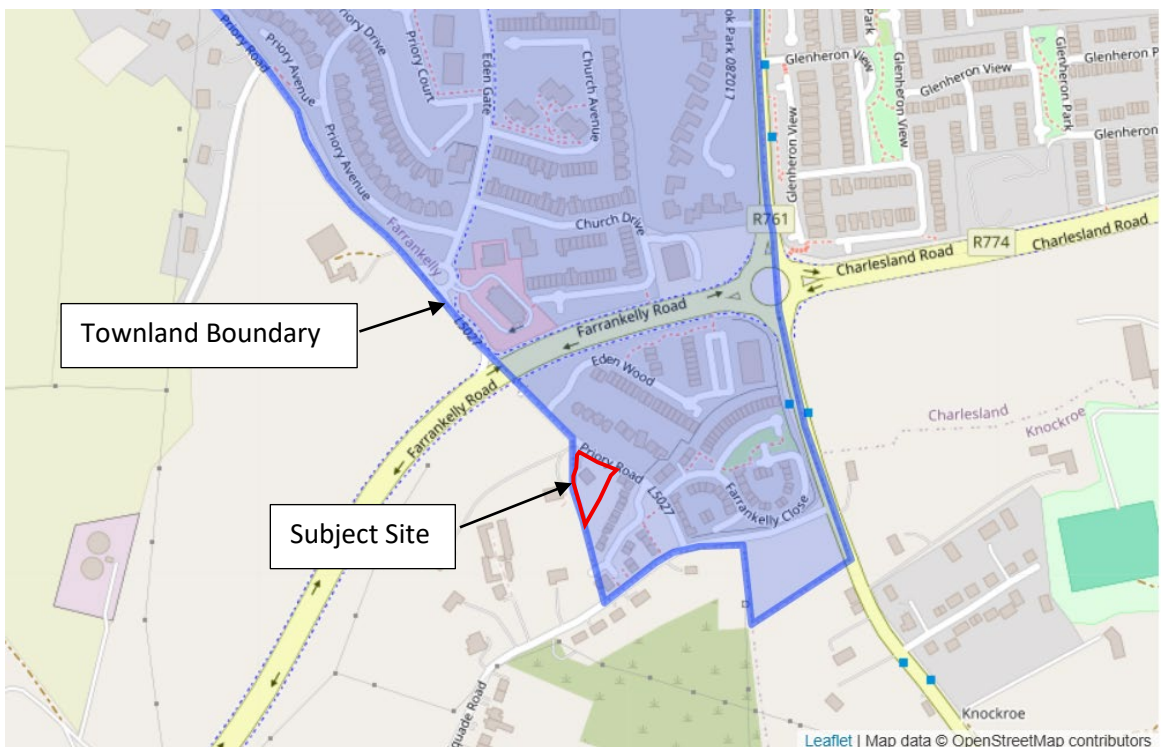


The Eden Gate centre is located just to the north and Charlesland neighbourhood and shopping centre is to the northeast. The R774 to the north and R761 Kilcoole Road form strong barriers around the locality. The L2 bus stop is located on the Kilcoole Road providing linkage to Greystones town centre and the DART station.



**Figure 2 Site Location context – aerial view**

Source: Maxar, Microsoft | Esri Community Maps Contributors, Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

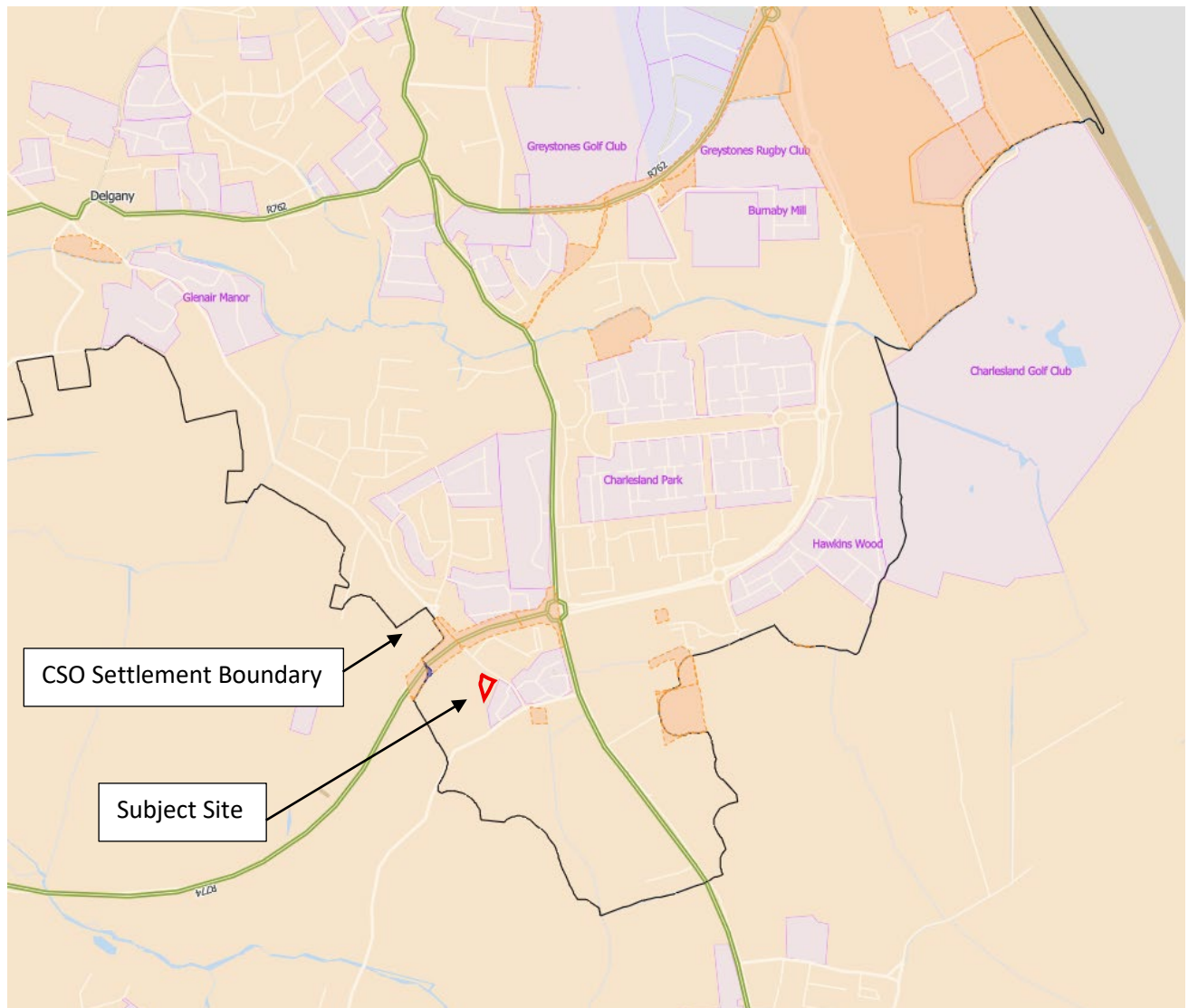


**Figure 3 Townland Boundary - Farrankelly**

<https://www.townlands.ie/wicklow/newcastle/kilcoole/kilcoole/farrankelly/>

Figures 1 and 2 illustrate the context of the site within Greystones-Delgany at Farankelly. Figure 3 below shows the location the townland boundary of Farankelly which notably includes the Avonree site.

Figure 4 below shows that the site within Greystones-Delgany settlement boundary as defined by the CSO. For the purposes of the census of population, the site is considered to be within the town.



**Figure 4 Greystones-Delgany Census Town Boundary 2022**

Source: Land Developments Agency 2021, CSO

The images below are of the adjoining roads and residential streets around the site. It illustrates that the immediate neighbourhood is residential in nature, with medium density layouts. It shows that the subject site at Avonree is a complete anomaly in this context.





**Figure 5 Wicklow Co. Co. housing development at Farankelly Way to the south east of the site**  
(Source: Google Maps)



**Figure 6 Subject at site on Eden Drive (Priory Road) with WCC Farankelly scheme in background**  
(Source: Google Maps)





***Figure 7 Subject at site on Eden Drive (Priory Road) with detached houses opposite***  
(Source: Google Maps)



***Figure 8 Example of residential development at Eden Wood***  
(Source: Google Maps)



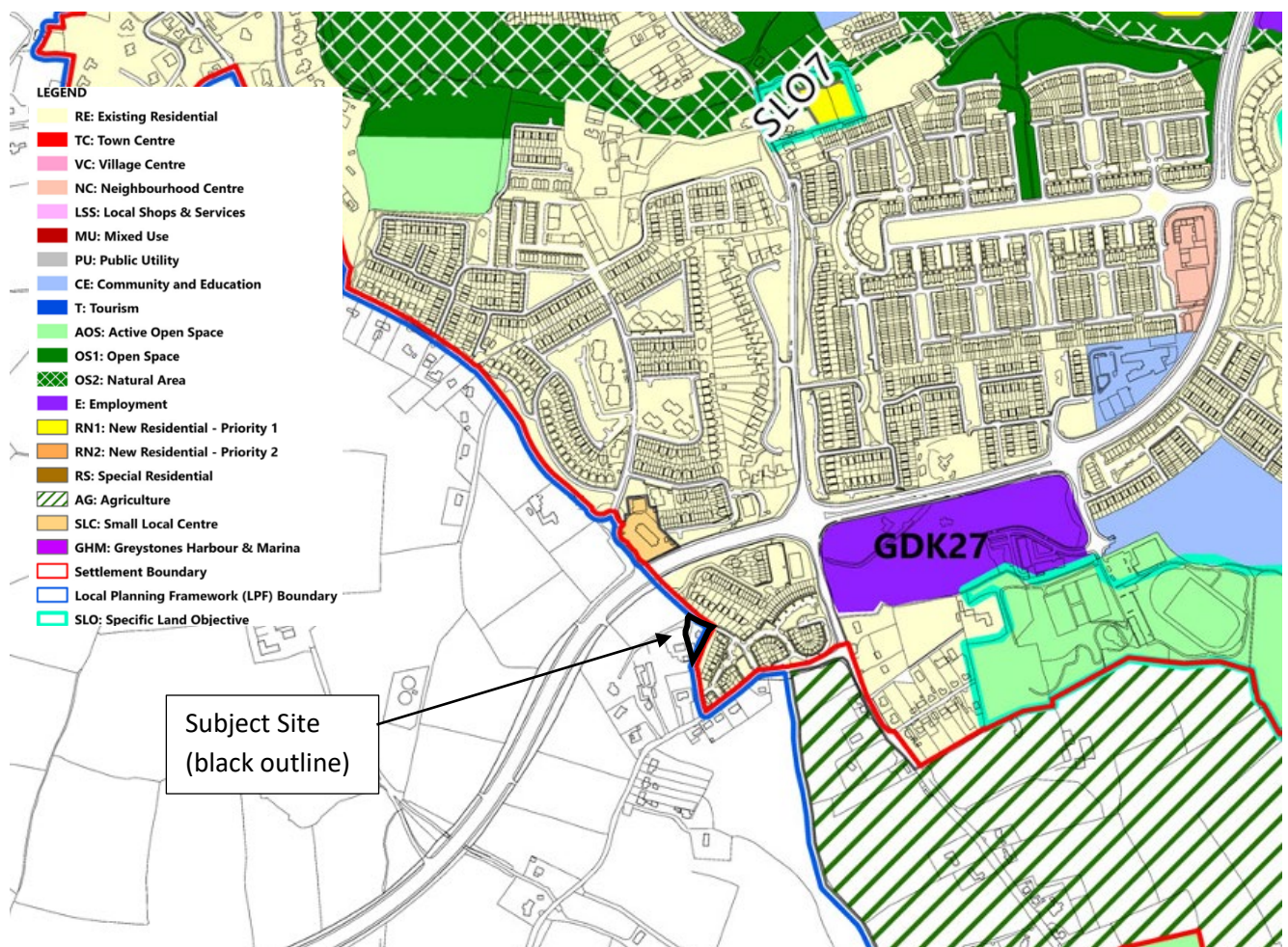
## 2 ZONING AMENDMENT PROPOSAL

### 2.1 Proposed RE Zoning for Avonree site, Farankelly

The Draft LPF document states at section A2.2 that *“The focus during the period of this LPF therefore 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”.*

It is submitted that that the subject site at Avonree very much falls into this category of an ‘infill serviced site’. However, the zoning designation is unsupportive and contradictory of this overall aim.

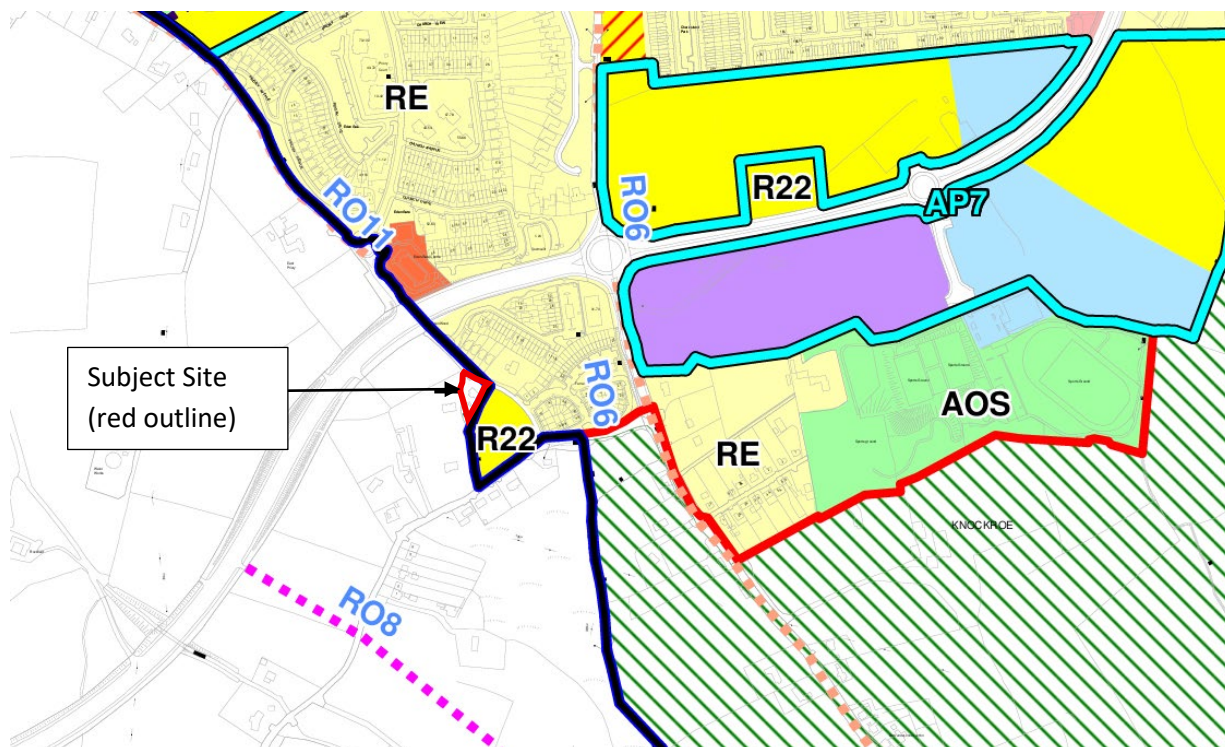
The Avonree site is not zoned in the expired Greystones-Delgany & Kilcoole Local Area Plan 2013 – 2019 (see Figure 10 below). The Draft Zoning map for the LPF does not include the site within the zoned area either while the adjoining residential area is designated ‘RE’- ‘Existing Residential’.



**Figure 9 Extract from Draft Greystones-Delgany & Kilcoole Planning Framework Zoning map**

The Settlement boundary and LPF boundary are inconsistent with the Farankelly Townland boundary which runs along the western boundary of the subject site as illustrated above.

It is notable that the lands to the south (designated R22) have now been developed and zoned RE in the LPF.



**Figure 10 Extract from expired Greystones-Delgany & Kilcoole Local Area Plan 2013 - 2019**

### Proximity to Greystones town centre

Section A3.2 of the Draft LPF Historic pattern of development identifies Farankelly as one of the Significant new housing areas (p.23)

The Draft LPF goes on to state on page 24

*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.*

*Within this radius however there are areas of environmental and heritage importance and vulnerability, and therefore it is necessary to identify and evaluate these areas with respect to their acceptability for any further 'greenfield' development (see Section A3.3 to follow).*

The subject site is on the edge of this 2.5km radius identified in the LPF.





## A4 Development Strategy

We comment on two elements of the Development Strategy.

**3. *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 subject site is an infill site in the Farankelly neighbourhood area on Eden Wood and Eden Drive. However, amendment of the LAP boundary to be consistent with the Townland boundary does not constitute settlement expansion as it consolidates an infill site.

**4. *To maintain an agricultural buffer between the two settlements.***

The rezoning of the Avonree site from Agriculture to RE Residential would constitute infill development and does not encroach on the agricultural buffer between Greystones-Delgany and Kilcoole.

**7. *To utilise to the maximum extent the existing road network rather than one that is dependent on the construction of new distributor roads through greenfield lands.***

The subject site has road frontage onto Eden Drive (Priory Road) and does not require new infrastructure.

## Zoning for residential development

### **The Draft LPF states;**

*It is an aim of this LPF to focus new residential development into the existing serviced built envelope of the settlements. The 'Town Centre' (TC), 'Village Centre' (VC) and 'Existing Residential' (RE) zones all present significant housing opportunities through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In any development proposal for these areas, particular cognisance must be taken of the need to respect the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within the settlement.*

*It is submitted that the subject site at Avonree falls into this category of **infill and backland development** in Existing Residential areas.*

### **Housing objectives**

We note that the Draft LPF **Housing Objective GDK15** states;

*In cognisance that the potential of such regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this LPF or the associated tables on the number of units that may be delivered within the built up envelope of the towns/villages.*

Again, we highlight that the site at Avonree is located within the *built up envelope* of Farankelly and would deliver infill housing in accordance with Council policy. It is also consistent with policy **GDK 19**:

*In areas zoned 'Existing Residential' house improvements, alterations and extensions and appropriate infill residential development (including that which comprises the replacement of*



***existing lower density development with higher density development**) in accordance with principles of good design and protection of existing residential amenity will normally be permitted (other than on lands permitted or designated as open space, see CPO 6.25 of the Wicklow County Development Plan). While new developments shall have regard to the protection of the residential and architectural amenities of houses in the immediate environs, alternative and contemporary designs shall be encouraged (including alternative materials, heights and building forms), to provide for visual diversity.*

It is submitted that the existing *de facto* Agriculture zoning inappropriately restricts development at the subject site and it should be revised to **RE Existing Residential**, described in the LPF as follows:

ZONING	OBJECTIVE	DESCRIPTION
<b>RE: Existing Residential</b>	To protect, provide and improve residential amenities of existing residential areas	To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. 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; however new housing or other non community related uses will not normally be permitted.
<b>AG: Agriculture</b>	To provide for the sustainable development of agriculture, forestry and essential rural development	Subject to the protection and enhancement of natural biodiversity, the rural landscape, and built and cultural heritage, to facilitate the further development and improvement of agriculture, forestry and essential rural development including rural-related enterprise and amenity / utility related infrastructure in accordance with the County Development Plan policies and objectives relating to rural areas.

### 3 CONCLUSIONS

The key point of this submission is that the land use of our client's property on Priory Road (Eden Drive ) is appropriate for designation as **'RE' 'Existing Residential'** and is wholly consistent with **Housing Objectives GDK15 and GDK19**.

The Avonree site (c.0.24ha) is located within the Farankelly residential area with frontage onto an existing residential street facing the Eden Drive/Eden Wood estate and beside Farankelly Way.

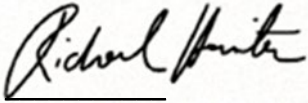
The zoning of the site as agriculture is a zoning anomaly in the context of its location within the Greystones-Delgany Census Town Boundary and Farrankelly Townland Boundary.

Avonree 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. This is entirely illogical.

There are no environmental designation, biodiversity constraints, visual or heritage reasons that justify its rural designation. The site does not act as a buffer between settlements

Our client looks forward to further engagement with the Planning Authority as the LPF progresses. We trust all is in order and should you have any queries please do not hesitate to contact this office.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Richard Hamilton', is written over a light blue rectangular background.

**Richard Hamilton MIPI MRTPI**  
**Director**  
**MACCABE DURNEY BARNES**