



Proposed Variation No. 7 to the Wicklow County Development Plan Submission Report

Submission Details

Ref	VAR7-095230
Who Are You?	Private Individual
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Proposed Variation Parts

Topic	Part 1: Proposed Variation to town / settlement zoning maps and, where relevant, proposed new or amended site specific policy objectives.
Submission	1. Level 3: Greystones-Delgany

Topic	Part 2
Submission	Changes consequent to Chapter 3 (Core Strategy) of the County Development Plan

Topic	Part 3
Submission	2. A. Draft Strategic Environmental Assessment Environmental Report 3. B. Draft Natura Impact Report 4. C. Strategic Flood Risk Assessment 5. D. Call for Sites – Summary of Assessment

Write your observations here:

My previous submission did not go through in full (VAR7-091124). Please use this one with missed section.

Submission / Objection to Proposed Variation ID GSD 2 – Charlesland
Submissions Reference: 157, 190

Dear Planning Authority,

I am writing to formally lodge a strong objection to Proposed Variation ID GSD 2, which proposes to rezone c. 33.9 hectares of land at Charlesland from AOS – Active Open Space to RN – New Residential, alongside amendments to Specific Local Objective 3 (SLO 3).

This submission is made in the interest of proper planning and sustainable development for Greystones, Charlesland, and the wider County Wicklow area. The proposed variation should not proceed for the following primary reasons:

1. Severe Deficits and Strains on Local Transport Infrastructure

Greystones and Charlesland have undergone unprecedented residential expansion over the last two decades, resulting in severe commuting bottlenecks. The local road network—particularly access points along the Charlesland dual carriageway, the regional approach roads, and connections toward the N11— as well as into Greystones Village is already heavily congested during peak morning and evening hours.

While the amended SLO 3 suggests future access via the 'Kilfernoc' and 'Glen' roundabouts, adding a substantial quantum of new housing units will inevitably

compound traffic gridlock, increase commuter times, and worsen local air quality.

Public transport infrastructure, including local bus services and capacity on the DART line during peak times, is already stretched to its limits. Introducing further high-density residential zonings without a prior, comprehensive upgrade to regional transport links violates the core principles of sustainable mobility and transit-oriented development.

2. Deficits in Social Infrastructure: Schools, Healthcare, and Community Facilities

Proper planning requires that essential social infrastructure be delivered in tandem with or prior to new residential populations, rather than lagging behind.

Schools: Primary and secondary schools in the Greystones/Delgany/Charlesland educational cluster are currently experiencing immense pressure, with many at or near full capacity and struggling to accommodate growing local demand.

Adding approximately 34 hectares of new residential land will inevitably generate a surge in school-aged children, exacerbating a shortfall in local educational places.

Childcare: While SLO 3 attempts to mandate childcare facilities (at a ratio of 20 places per 75 residential units), experience shows that standalone creche provisions frequently face viability delays, leaving families stranded without adequate local early-years care.

Community Capacity: The surrounding area already suffers from a deficit of indoor community, recreational, and youth spaces relative to its population size. Relying on speculative future development triggers within an SLO is not a robust enough mechanism to guarantee that infrastructure will be built and operational before new residents occupy homes.

3. Incompatible Loss of Strategic Active Open Space (AOS)

The subject lands (comprising Charlesland Golf Club, Shoreline Sports Park, and agricultural lands) are currently zoned Active Open Space (AOS), providing a vital green lung and recreational buffer for a rapidly expanding coastal town.

Rezoning c. 33.9ha of these lands to RN – New Residential permanently erodes the long-term capacity of Greystones to cater for future regional sporting, recreational, and ecological needs.

While the variation attempts to package this with the provision of alternative pitches and a Woodland Park on the remaining area, a net reduction in open-space zoning compromises the long-term health, wellbeing, and recreational resilience of the community.

4. Environmental and Ecological Vulnerability (The Murrough SPA & SAC)

The subject lands are intrinsically linked hydrologically and ecologically to sensitive coastal environments, notably The Murrough Special Protection Area (SPA) and The Murrough Wetlands Special Area of Conservation (SAC), via the Three Trouts Stream network.

Intensive construction and subsequent urban runoff associated with a major housing development of this scale carry inherent risks of severe cumulative impacts on water quality, local flora, and protected bird species.

Even with proposed safeguards (such as a 25m riparian buffer and Appropriate Assessment requirements), the sheer proximity of high-density residential development to these European-designated sites creates a high risk of disturbance, light pollution, and hydrological disruption that cannot be robustly mitigated over the lifecycle of the project.

5. Submission / Objection to Proposed Variation ID GSD 2 – Charlesland

Submissions Reference: 157, 190 Breach of Overarching European Environmental and Ecological Directives

The proposed variation directly conflicts with binding EU environmental law, exposing the plan to significant legal vulnerability under European frameworks:

- The Habitats & Birds Directives (92/43/EEC & 2009/147/EC): The lands are intimately connected to the aquatic and coastal environments leading to the Murrough Special Protection Area (SPA) and the Murrough Wetlands Special Area of Conservation (SAC). Rezoning these greenfields for high-density housing introduces severe risks of surface water run-off, construction-phase disturbance, and operational lighting impacts. Under EU law, any plan threatening the conservation objectives of Natura 2000 sites cannot legally proceed without passing rigorous tests that this variation fails to satisfy.
- The Water Framework Directive (2000/60/EC): Paving over open space significantly increases impermeable surfaces and urban runoff, threatening local water bodies like the Three Trouts Stream. The plan risks causing deterioration of water body status contrary to EU mandates.
- The EU Nature Restoration Regulation & SEA Directive (2001/42/EC): The permanent loss of active open space and natural buffers runs directly counter to binding EU ecosystem restoration targets and undermines the strategic environmental assessment objectives required for proper spatial planning.

Conclusion and Action Requested

Proposed Variation ID GSD 2 represents over-development of a sensitive and strategically important suburban holding. It threatens to overwhelm already overburdened transport, educational, and community infrastructure while permanently sacrificing vital open space and risking ecological damage to nearby European-protected sites.

In light of the above, I urge Wicklow County Council to reject Proposed Variation ID GSD 2 and retain the subject lands under their original protective Active Open Space (AOS) zonings.

Yours sincerely,

Wayne Earls