



Greystones - Delgany & Kilcoole Draft LPF Amendment Stage Submission - Report

Who are you:	Group
Name:	Wicklow Planning Alliance
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Topic

LAP - Proposed Material Amendments No 26 Submission

Submission

Please see attached file

File

WPA submission Greystones LPF amendments.pdf, 0.15MB



Wicklow Planning Alliance

To Wicklow Planning Department

18th November 2025

Re: Proposed Material Amendment 26 to Greystones-Delgany and Kilcoole Local Planning Framework

A chara

The Wicklow Planning Alliance wish to raise some serious concerns about Proposed Material Alteration 26 to the Greystones-Delgany and Kilcoole LPF, which extends the urban boundary to include the 29-acre Bellevue Hill site (reportedly earmarked for GAA use) and reclassifies it from unzoned rural land to urban Active Open Space.

While we support the development of sustainable sports facilities, this proposal appears unsustainable and seems to lack due diligence and environmental safeguards. It also risks setting a precedent for development immediately beside a Natura 2000 site and could potentially undermine local nature protection and restoration efforts.

There are several ecological and planning issues with the proposal. The Local Planning Framework mapping omits key details regarding ecology, access, and archaeological potential . Specifically, the site:

- Borders Glen of the Downs (pNHA and SAC) and supports this key ecosystem
- Contains rare native wet woodland habitat
- Includes the Brown Trouts Stream, a major tributary of the Three Trouts River
- Is a site likely to have significant archeological heritage including Viking and La Touche remains. Such remains have previously been found immediately adjacent to the site.

These features have not been acknowledged in the planning framework documents. Furthermore, no road access is described, though there may be a right of way via

Ballydonagh Lane. The implication would seem to be that a new road access (sufficient to accommodate the significant traffic for several GAA pitches) will be cut through the stream and wet woodlands onto Bellevue Hill Road.

Council planners have rightly opposed this zoning, citing poor accessibility and a lack of planning and transport / traffic suitability.

The proposed change seems to set a precedent for urban expansion inconsistent with national biodiversity (birds and habitat) protections and with the Wicklow County Development Plan, specifically the following objectives:

CPO 17.25 Ensure that floodplains and wetlands are retained for their biodiversity and ecosystem services value and resist development and activities that would interfere with....these natural habitats.

The alteration does not identify the wetlands on the site, much less ensure that they are retained for biodiversity value. Development (tree-felling) would appear to have already interfered with the habitat.

CPO 17.26 Protect rivers, streams and other watercourses by avoiding interference... and maintaining a core riparian buffer zone of generally 25m along watercourses.... free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible.

No riparian buffer zone is shown or acknowledged. The watercourse is not even shown.

CPO 18.5 Local authority development plan and local area plans, shall identify, protect, enhance, provide and manage Green Infrastructure in an integrated and coherent manner and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.

CPO 17.1 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.

CPO 17.2 Ensure the protection of ecosystems and ecosystem services by integrating full consideration of these into all decision making.

No such consideration has been integrated into the decision taken by Councillors to approve the boundary extension and zoning.

CPO 17.4 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).

While the 29 acre site in the proposed material alteration is not within the protected Glen of the Downs (GOTD) nature reserve, it is immediately adjacent and supporting. It is part of its ecological network and the wooded wildlife corridor from the Glen nature reserve through Bellevue Woods (to the south of the 29 acre site), then up through the eastern part of the 29 acre site to Kindlestown Woods / Coolagad hill. The GOTD protected area is not sufficiently large (nor sufficiently intact) to be a fully sustainable habitat in isolation without it's surrounding ecological network. This network must be retained in a healthy condition for the protection of the GOTD site and all its protected species.

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.

This site, Bellevue Hill, between (current) Bellevue Woods and Delgany village was part of the La Touche Bellevue Woods. It was, arguably, a key centre of Irish demesne planting (native and exotic), the site of Pennicks of Delgany, gardeners to the La Touche Estates, nurseries and suppliers to many of the landed gentry demesnes of Wicklow and Ireland.

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.

The Alteration makes no reference to the woodland nor mature trees on site and does not strongly discourage their felling. As you know, investigations are ongoing into the felling of 6 mature trees on site within 2 weeks of the Council voting to approve this amendment.

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...

CPO 17.23 To require the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County.

RPO 7.22 Local authority development plan and local area plans, shall identify, protect, enhance, provide and manage Green Infrastructure in an integrated and coherent manner and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.

If the site were to be zoned as AOS, the stream and wet woodland on the site should be omitted and zoned separately as OS2 for nature (this would seem to be the zoning along the stream immediately downstream).

We understand councillors may have approved the alteration to support local GAA development; however, it is notable that most Wicklow GAA pitches are not zoned urban areas. With careful planning, sports facilities could be developed without compromising nature. As we understand, zoning would not be required for that. We also have no guarantee that GAA will complete the sale and continue to own the site for the future. Urban zoning for development could be very valuable to any future owner whatever their business objectives.

If this site were to become part of the urban zone, there would be little to prevent the larger adjoining sites also lobbying and requesting to follow the precedent set. There is also recent local precedent for AOS zoning being changed to Residential zoning, e.g. on the Delgany Golf Club immediately to the South of this 29 acre site. Pressure could continue to enhance the road links to the nearby N11, through Ballydonagh and Glen of the Downs, opening up the (currently rural and protected) area for large scale urban development.

We recommend that the Climate and Biodiversity Office would consider prioritising the mapping of the ecological network around Glen of the Downs, as a pilot project to support informed planning.

Following the zoning decision, locals reported tree-felling and vegetation clearance which is now under investigation. While the urban zoning decision did not directly cause this, it did not sufficiently reinforce the need to protect biodiversity and watercourses.

Given these concerns, we believe the site should be restored rather than further developed. If the zoning proceeds, we recommend strict conservation conditions. For example, the stream and wet woodland could be designated Open Space 2 for Nature and preserved as Green Infrastructure.

A full Environmental Impact Assessment should be undertaken before any final decision on zoning. This decision may set a precedent for future development near protected habitats, so due diligence is essential.

In summary, our primary concerns are the precedent set for urban sprawl encroaching on a Natura 2000 protected habitat, the lack of environmental safeguards, inadequate planning due diligence, and risks to important local wet-woodland habitats. The most sustainable and low risk option would be not to proceed with this alteration.

END

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