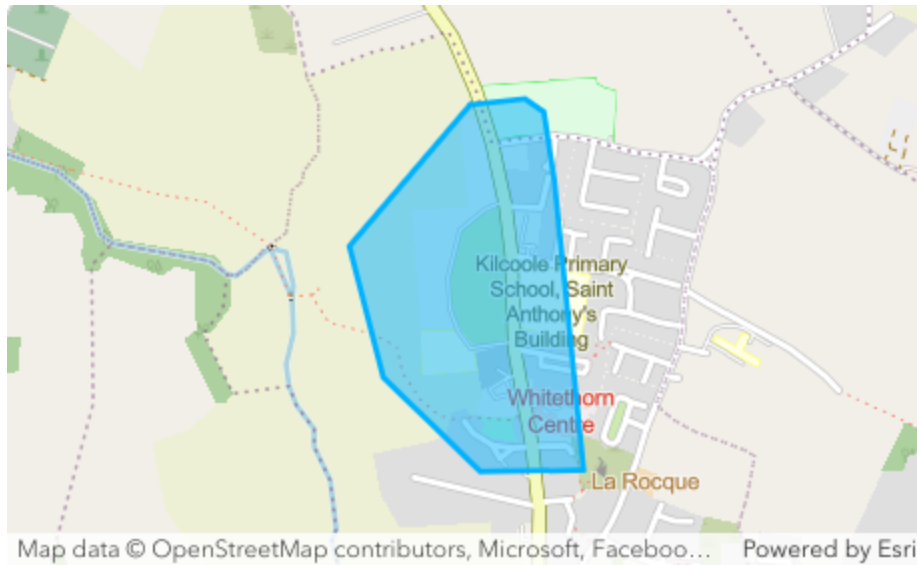




Greystones-Delgany & Kilcoole LPF Variation No.4

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| Who are you: | Agent |
| Name: | Sinead Murphy & Christopher Grey Care of Armstrong Planning |
| Reference: | GDKLPF-140733 |
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Site Description:

Darraghville House, Kilcoole, Co. Wicklow.

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PLANNING SUBMISSION

Draft Greystones, Delgany & Kilcoole Local Planning Framework 2025

Sinead Murphy & Christopher Grey

Darraghville, Kilcoole, Co. Wicklow, A63 W089

Wicklow County Council

06/06/2025

ARMSTRONG PLANNING

CONTENTS

| | | |
|------------|---|-----------|
| 1. | INTRODUCTION & EXECUTIVE SUMMARY | 2 |
| 2. | HERITAGE SIGNIFICANCE OF DARRAGHVILLE HOUSE | 2 |
| 2.1 | Historical Context | |
| 2.2 | Historic Garden and Designed Landscape Status | |
| 2.3 | Current Heritage Designations | |
| 2.4 | Policy Deficiencies | |
| 3. | UNDERSTANDING HISTORIC GARDENS AND DESIGNED LANDSCAPES | 3 |
| 3.1 | Definition and Significance | |
| 3.2 | Components of the Darraghville Designed Landscape | |
| 3.3 | International Best Practice | |
| 4. | RECENT PLANNING HISTORY AND EMERGING THREATS | 4 |
| 4.1 | Erosion of Historic Setting | |
| 4.2 | Landscape Fragmentation | |
| 5. | SPECIFIC AMENDMENTS REQUIRED | 5 |
| 5.1 | Specific Local Objective | |
| 5.2 | Detailed Landscape Protection Measures | |
| 5.3 | Amendment to Policy GDK52 | |
| 5.4 | Land Use Zoning Amendments | |
| 5.5 | Policy Addition - Historic Gardens and Designed Landscapes | |
| 6. | LANDSCAPE CHARACTER AND VISUAL AMENITY | 14 |
| 6.1 | Trees and Woodland Features | |
| 6.2 | Views and Vistas | |
| 6.3 | Spatial Development Considerations | |
| 7. | BIODIVERSITY AND CLIMATE CONSIDERATIONS | 15 |
| 7.1 | Ecosystem Services | |
| 7.2 | Spatial Development Pattern | |
| 7.4 | Integration with Settlement Strategy | |
| 8. | TOURISM AND HERITAGE VALUE | 16 |
| 9. | NATIONAL POLICY CONTEXT | 16 |
| 10. | CONCLUSION | 17 |

1. INTRODUCTION & EXECUTIVE SUMMARY

We act on behalf of Sinead Murphy and Christopher Grey, owners of Darraghville House, Kilcoole, Co. Wicklow. We respectfully submit this response to the public consultation on the Draft Greystones, Delgany & Kilcoole Local Planning Framework 2025 (the "Draft Framework"), which is being prepared as Variation No. 4 of the Wicklow County Development Plan 2022-2028 (as amended).

We would point out that Darraghville House represents the sole Protected Structure within Kilcoole's defined settlement boundary, yet the Draft Framework fails to provide adequate protection for this significant heritage asset and its associated Historic Gardens and Designed Landscapes. We maintain that this represents a critical policy deficiency requiring immediate amendment.

We respectfully submit that the Draft Framework requires substantial amendment to address the following fundamental concerns:

- The complete absence of recognition or protection for Darraghville as a designated 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.

We note that recent planning permissions granted within the historic estate boundaries (Reg. Refs. 22921, 21469, and 221064) demonstrate the urgent need for explicit protective policies before further fragmentation occurs. Furthermore, we maintain that the current policy vacuum risks the permanent loss of County Wicklow's most intact historic demesne landscape within an urban setting.

2. HERITAGE SIGNIFICANCE OF DARRAGHVILLE HOUSE

2.1 Historical Context

We would respectfully remind the Planning Authority that Darraghville House was constructed in 1782 as the residence of John Darragh, former Lord Mayor of Dublin. The property subsequently served as a convent from c.1890 until 2020, when our clients restored it to its original residential use. We note that the National Inventory of Architectural Heritage (NIAH Reg. No. 16401302) recognizes the property as being of Regional Importance, with particular emphasis on its "memorable" setting.

2.2 Historic Garden and Designed Landscape Status

We would particularly draw the Planning Authority's attention to the fact that Darraghville is designated by the National Inventory of Architectural Heritage as a Historic Garden and Designed Landscape (NIAH Ref. 4318). We respectfully submit that this designation recognizes the demesne as an integrated work of landscape design, where the house, gardens, parkland, and planted features form a unified composition of cultural and heritage significance.

We maintain that a Historic Garden and Designed Landscape represents more than a collection of individual features - it constitutes a deliberate artistic creation where:

- The spatial arrangement reflects conscious design intent
- Views and vistas are carefully orchestrated
- Planting schemes create specific effects and experiences
- Built and natural elements combine in planned relationships
- The whole composition tells the story of landscape design evolution

In this regard, we note that the NIAH designation specifically recognizes Darraghville's historic importance as a designed landscape of regional significance.

2.3 Current Heritage Designations

We respectfully point out that Darraghville benefits from the following heritage designations:

- Protected Structure status (Wicklow RPS Ref. 13-08 13)
- NIAH Historic Garden and Designed Landscape (Ref. 4318) - of Regional Importance
- Tree Protection Order along the R761 boundary (TPO No. 43)

However, we maintain that these designations alone provide insufficient protection without corresponding policy support that recognizes the integrated nature of the designed landscape.

2.4 Policy Deficiencies

We have significant concerns that the Draft Framework fails to provide adequate protection for Historic Gardens and Designed Landscapes, despite national policy requirements. We note that Policy GDK44 of the Draft Framework addresses Protected Structures but makes no reference to their attendant grounds, historic gardens or designed landscapes, contrary to the requirements of:

- The Architectural Heritage Protection Guidelines for Planning Authorities (2011)
- ICOMOS Florence Charter on Historic Gardens (1982)
- The Burra Charter principles on cultural landscape conservation
- The National Inventory of Architectural Heritage recognition of Historic Gardens and Designed Landscapes

In this regard, we would point out that Section 13.2.1 of the Architectural Heritage Protection Guidelines clearly states that "attendant grounds of a structure are lands outside the curtilage of the structure but which are associated with the structure and are intrinsic to its function, setting and/or appreciation." Furthermore, we maintain that for a designated Historic Garden and Designed Landscape, this protection must extend to the entire designed composition.

3. UNDERSTANDING HISTORIC GARDENS AND DESIGNED LANDSCAPES

3.1 Definition and Significance

We respectfully submit that the Planning Authority must recognize that a Historic Garden and Designed Landscape, as designated by the NIAH, represents a specific category of heritage asset requiring specialized protection measures. We would point out that such landscapes are:

- Cultural Documents: Recording the evolution of design philosophy, horticultural practice, and social history
- Integrated Artworks: Where architecture, topography, water, and planting combine in deliberate composition

- Living Heritage: Dynamic systems requiring active conservation rather than mere preservation
- Vulnerable Assets: Subject to rapid deterioration without appropriate management

3.2 Components of the Darraghville Designed Landscape

We maintain that the Darraghville demesne comprises the following integrated design elements, all requiring protection as parts of the whole:

Spatial Organization:

- The hierarchical arrangement from formal (house and carriage sweep) to informal (parkland)
- The designed sequence of arrival, approach, and revelation
- The relationship between enclosed and open spaces

Circulation Systems:

- The main avenue (now partially lost)
- The carriage sweep and turning circle
- Secondary paths and walks shown on historic mapping
- Service routes deliberately separated from pleasure grounds

Planted Features:

- Structural tree belts defining spaces and views
- Avenue planting creating formal approaches
- Specimen trees as focal points
- Understory planting for seasonal interest and screening

Views and Vistas:

- Designed prospects from the house
- Framed views along avenues
- Borrowed landscapes incorporating distant features
- Internal vistas creating spatial depth

3.3 International Best Practice

We would respectfully remind the Planning Authority that protection of Historic Gardens and Designed Landscapes should follow established international principles, including:

- ICOMOS Florence Charter (1982): Requiring protection of the overall composition
- UNESCO Operational Guidelines: Recognizing designed landscapes as cultural heritage
- IUCN Guidelines: Addressing the living nature of landscape heritage
- Burra Charter Process: Emphasizing understanding significance before intervention

We maintain that the Draft Framework must incorporate these principles to meet best practice standards.

4. RECENT PLANNING HISTORY AND EMERGING THREATS

4.1 Erosion of Historic Setting

We respectfully submit that the following recent developments have already compromised the integrity of the historic demesne:

- Altere Ltd Nursing Home (Reg. Ref. 22921) - constructed immediately north of the Protected Structure

- St. Catherine Association Administration Centre & Respite Centre Adult Day Centre (Reg. Ref. 21469) - additional institutional development within the historic lands
- Waterford & Wexford Education & Training Board new St. Catherine's Special School (Reg. Ref. 221064) - large-scale educational facility on former demesne lands

We maintain that these developments, while individually assessed, demonstrate a pattern of incremental erosion that the Draft Framework must address through comprehensive policy measures.

4.2 Landscape Fragmentation

We note with concern that the surviving landscape features - including the entrance avenue, carriage sweep, mature tree belts, and designed vistas - remain vulnerable to further fragmentation. Furthermore, we would point out that the Draft Framework's failure to map or acknowledge these features effectively renders them invisible in the planning process.

5. SPECIFIC AMENDMENTS REQUIRED

We respectfully request that the Planning Authority incorporate the following amendments into the adopted Framework:

5.1 Specific Local Objective

We maintain that a Specific Local Objective is essential to protect Darraghville and its landscape setting. We respectfully suggest the following wording:

SLO-X: Protection of Darraghville House Demesne, Historic Garden and Designed Landscape

"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. 4318), the Planning Authority shall:

(a) Recognize 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;

(b) Prohibit development that would fragment, diminish, or adversely affect the character, integrity, or understanding of the historic demesne and designed landscape, including:

- 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

(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);

(d) Mandate detailed landscape assessments prepared by qualified historic landscape specialists, to include:

- 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

(e) Ensure the preservation and appropriate management of key demesne features including but not limited to:

- 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

(f) Support the restoration of degraded or lost designed landscape features where substantiated by historical evidence;

(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."

5.2 Detailed Landscape Protection Measures

We respectfully request that the Framework include specific measures to protect:

Historic Landscape Features:

- The carriage sweep and its spatial relationship to the main house
- The remnant avenue planting and entrance features
- The eastern lawns and their designed relationship to the principal elevation
- Historic boundary treatments including stone walls and mature hedgerows
- The location and alignment of historic pathways as shown on OS mapping

Key Views and Vistas:

- View corridors between the Protected Structure and its designed landscape features
- Views from public roads that contribute to the appreciation of the heritage asset
- Internal demesne views that demonstrate the designed nature of the landscape
- Views to and from the Protected Structure that establish its landmark status

Fig. 5.1: Entrance gates and lodge



Fig. 5.2: Gate as viewed from the road



Fig. 5.3: Gate lodge



Fig. 5.4: View northeast from Darraghville to gates



Fig. 5.5: View from gates to Darraghville



Fig. 5.6: View south - from main house



Fig. 5.7: View east from main house



Fig. 5.8: Walled garden - view southwest



Fig. 5.9: Walled garden - view southeast



Fig. 5.10: View northwest - to Sugarload from main garden



Fig. 5.11: View to walled garden to west of Darraghville



Fig. 5.12: View west - from main garden



Fig. 5.13: View south 0- from rear garden



5.3 Amendment to Policy GDK52

We respectfully request that Policy GDK52 be amended to explicitly reference designed landscape planting. We suggest the following revised wording:

"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..."

5.4 Land Use Zoning Amendments

We maintain that the current zoning designations fail to reflect the established uses and heritage sensitivities of the site. We respectfully request:

- Darraghville House and immediate curtilage: Rezoning from 'Community' to 'Special Residential' to reflect the established residential use (Planning Ref. 221113)
- Lands north of the House: Extension of the 'Agriculture' zoning to include the recent institutional developments, acknowledging their location within the historic demesne
- Carriage sweep area: Retention of 'Open Space' zoning with additional protective notation
- Eastern tree belt along R761: Designation as 'Conservation' or similar protective zoning

5.5 Policy Addition - Historic Gardens and Designed Landscapes

We respectfully request the insertion of a new policy specifically addressing Historic Gardens and Designed Landscapes:

Policy GDK-XX: Historic Gardens and Designed Landscapes

"To protect, conserve and enhance Historic Gardens and Designed Landscapes identified by the National Inventory of Architectural Heritage, recognizing 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."

We maintain that this policy is essential given that the Draft Framework currently contains no recognition of this important heritage category, despite Darraghville being the only such designated site within the Framework area.

6. LANDSCAPE CHARACTER AND VISUAL AMENITY

6.1 Trees and Woodland Features

We respectfully submit that the mature tree belts and woodland features associated with Darraghville House constitute an integral component of the designed landscape and merit specific protection. We note that these features include:

- **Eastern Boundary:** Mature mixed broadleaf woodland along the R761, subject to Tree Protection Order No. 43
- **Northern Tree Belt:** Linear woodland feature separating the historic core from recent development
- **Specimen Trees:** Individual mature specimens including Oak (*Quercus*), Beech (*Fagus*), and Lime (*Tilia*) within the carriage sweep
- **Avenue Planting:** Remnant formal tree lines along the historic entrance drive

We would point out that these trees serve multiple functions:

- Screening recent development and maintaining the sense of enclosure essential to the demesne character
- Providing critical wildlife corridors between Kilcoole Stream and the wider landscape
- Contributing to carbon sequestration and climate resilience
- Defining the historic spatial arrangement of the designed landscape

Furthermore, we maintain that the Draft Framework's failure to acknowledge these landscape features represents a significant oversight, particularly given the documented presence of:

- Six bat species with highest habitat suitability index (National Bat Database)
- Eurasian Badger (*Meles meles*) - protected under Wildlife Acts
- Red Squirrel (*Sciurus vulgaris*) - near threatened species
- Multiple bird species of conservation concern

6.2 Views and Vistas

We respectfully submit that the designed views and vistas associated with Darraghville House form an essential element of its heritage value. We have identified the following key visual relationships requiring protection:

Primary Views:

- The approach view from the R761 entrance gates to the house (currently compromised)
- The reciprocal view from the house to the entrance gates
- The panoramic vista from the carriage sweep across the eastern lawns

Secondary Views:

- Internal demesne views along the tree-lined boundaries
- Views from the house to the walled garden area
- The visual connection between the main house and former stable block

We note with concern that recent developments have already severed several historic sight lines, particularly the visual connection between the entrance gates and the main house. We maintain that protecting the remaining views is essential to understanding and appreciating the designed landscape.

6.3 Spatial Development Considerations

We would respectfully draw the Planning Authority's attention to the spatial development patterns emerging in this area. We note that:

- The Draft Framework correctly identifies pressure for ribbon development along the R761
- Recent permissions have created a pattern of institutional uses within the historic demesne
- The spatial relationship between Darraghville and Kilcoole's historic core remains legible but vulnerable

In this regard, we maintain that Darraghville's landscape provides a crucial "green lung" and transition zone between different development densities. We respectfully submit that this function should be explicitly recognized through appropriate zoning and policy measures.

Furthermore, we would point out that the Draft Framework's objective of "reorienting development away from the R761" can only be achieved if the remaining open lands associated with Darraghville are protected from inappropriate development pressure.

7. BIODIVERSITY AND CLIMATE CONSIDERATIONS**7.1 Ecosystem Services**

We respectfully submit that the Darraghville demesne landscape provides significant ecosystem services that align with national and local climate action objectives:

- Carbon Storage: Mature trees providing substantial carbon sequestration
- Flood Mitigation: Permeable surfaces and tree cover reducing surface water runoff
- Temperature Regulation: Tree canopy providing cooling effects in increasingly warm summers
- Air Quality: Vegetation filtering particulates from increased traffic on the R761

7.2 Spatial Development Pattern

We respectfully submit that Darraghville's landscape plays a critical role in the spatial structure of Kilcoole. We would point out that:

- The demesne historically defined the northern edge of the settlement
- Its tree belts create a natural boundary between different development densities
- The open character provides visual relief from increasingly dense development
- The R761 frontage maintains a semi-rural character essential to the area's identity

In this regard, we note that the Draft Framework acknowledges development pressure along the R761 corridor but fails to recognize how Darraghville's landscape helps manage this transition. We maintain that explicit policy recognition of this spatial function is essential.

- Furthermore, we would respectfully suggest that the demesne landscape offers opportunities for:
- Creating a green infrastructure network linking to Kilcoole Stream
- Establishing pedestrian and cycle connections away from the busy R761
- Providing a buffer between residential and institutional uses
- Maintaining the visual separation between Kilcoole and Newcastle

7.3 Integration with Settlement Strategy

We respectfully submit that protecting Darraghville's landscape directly supports the Draft Framework's stated objectives regarding:

- Compact growth and sustainable development patterns
- Green infrastructure provision and connectivity
- Climate action through ecosystem services
- Heritage-led regeneration opportunities

We maintain that these connections should be explicitly acknowledged through appropriate cross-referencing in the adopted Framework, particularly in relation to the protection of Historic Gardens and Designed Landscapes as multi-functional heritage assets.

8. TOURISM AND HERITAGE VALUE

We respectfully submit that appropriate protection of Darraghville House and its designed landscape could contribute significantly to local tourism and economic development objectives. We note that:

- Heritage tourism represents a growing sector with demonstrated economic benefits
- The property's connection to John Darragh (former Lord Mayor of Dublin) provides historical interest
- The intact demesne landscape offers potential for heritage trails and educational initiatives
- Sensitive adaptive reuse has already been demonstrated through the residential conversion

Furthermore, we maintain that protecting this heritage asset aligns with regional tourism strategies emphasizing the development of authentic cultural experiences.

9. NATIONAL POLICY CONTEXT

We respectfully remind the Planning Authority of its obligations under:

- The Planning and Development Act 2000 (as amended), particularly Section 51 regarding Protected Structures
- The Architectural Heritage Protection Guidelines for Planning Authorities (2011)
- The National Landscape Strategy 2015-2025
- The Heritage Ireland 2030 Framework
- The National Biodiversity Action Plan 2017-2021
- The Climate Action Plan 2023

We maintain that the requested amendments are necessary to ensure compliance with national policies and guidelines, particularly those relating to the protection of Historic Gardens and Designed Landscapes as recognized by the National Inventory of Architectural Heritage.

10. CONCLUSION

We respectfully submit that the Planning Authority has both an opportunity and an obligation to address the critical policy deficiencies identified in this submission. We would point out that Darraghville House represents not merely Kilcoole's only Protected Structure within the settlement boundary, but also a designated Historic Garden and Designed Landscape of Regional Importance - a rare and irreplaceable heritage asset requiring comprehensive protection.

We maintain that failure to incorporate the requested amendments would:

- Contravene national heritage policy and guidelines, particularly regarding Historic Gardens and Designed Landscapes
- Fail to provide adequate protection for a site recognized by the National Inventory of Architectural Heritage as being of Regional Importance
- Risk irreversible damage to a regionally important designed landscape that cannot be reconstructed once lost
- Fail to recognize the integrated nature of the demesne as a unified work of landscape art
- Result in continued fragmentation of the historic designed landscape
- Compromise the integrity of one of County Wicklow's few intact historic demesnes
- Undermine Ireland's commitments under international heritage charters
- Result in the loss of critical green infrastructure and biodiversity corridors
- Compromise the landscape character and visual amenity of Kilcoole
- Set a dangerous precedent for other Historic Gardens and Designed Landscapes in the county

We would respectfully emphasize that once a designed landscape is fragmented, its coherence, meaning, and heritage value are permanently diminished. Unlike individual buildings, designed landscapes cannot be restored once their spatial integrity is compromised.

We respectfully request that our clients be notified of any further consultations or proposed amendments to the Draft Framework. Furthermore, we would welcome the opportunity to engage with the Planning Authority to discuss these matters in greater detail, including the potential for developing comprehensive Conservation Management Plan guidelines for Historic Gardens and Designed Landscapes within the county.

We look forward to the Planning Authority's positive consideration of this submission and to the incorporation of appropriate protective measures that recognize Darraghville's significance as both a Protected Structure and a Historic Garden and Designed Landscape.

Please direct all correspondence in this matter to Armstrong Planning at 12 Clarinda Park North, Dún Laoghaire, Co. Dublin, A96 V6F9.

Yours faithfully,



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