



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

Submission Details

Ref	VAR7-101144
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. D. Call for Sites – Summary of Assessment

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Formal Submission on Proposed Variation No. 7 to the Wicklow County Development Plan 2022–2028

**Proposed rezoning of the Éire Óg Greystones lands, Mill Road, Greystones
Site / Submission No. [41]**

To:
Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town,
Co. Wicklow

Re: Proposed Variation No. 7 — objection to proposed rezoning of approximately 3.2 ha of Éire Óg lands from Active Open Space to New Residential

Submitted by: Alan and Michelle Quirke

Date: 23/9/26

1. Introduction

I wish to make a formal submission objecting to the proposed rezoning under Proposed Variation No. 7 of approximately 3.2 hectares of the Éire Óg lands at Mill Road, Greystones, from Active Open Space to New Residential.

I respectfully request that Wicklow County Council delete the proposed New Residential zoning and retain the existing Active Open Space zoning.

This is not an objection to additional housing in Greystones or to the Council appropriately revising its housing requirements. The issue is whether these particular lands are the appropriate, necessary and properly sequenced location for residential development, given that they currently provide established sports and community infrastructure.

The assessment should address: (1) the existing established use; (2) the absence of demonstrated and secured equivalent replacement facilities; (3) the very recent adoption of the Greystones–Delgany & Kilcoole Local Planning Framework; (4) whether additional residential zoning here is actually required; (5) infrastructure-led and sequenced development; (6) cumulative transport, water, wastewater, drainage and social-infrastructure capacity; and (7) reasonable alternatives under the statutory environmental assessment process.

The fundamental planning question is therefore whether removing established Active Open Space before replacement facilities are identified, secured, funded and capable of delivery represents proper planning and sustainable development. In my submission, this has not been sufficiently demonstrated.

2. Executive Summary of Grounds for Objection

Ground 1 — Permanent loss of established Active Open Space. The lands are not vacant or under-used. They contain established sporting infrastructure, including two GAA pitches and associated club and community facilities. Rezoning therefore creates the potential permanent loss of an existing community asset.

Ground 2 — No secured equivalent replacement provision. There is no demonstrated evidence that equivalent replacement sporting facilities have been identified, secured, acquired or placed under enforceable control, granted permission, shown to be environmentally and infrastructurally feasible, funded, and programmed for delivery before the existing facilities are lost.

2. Executive Summary of Grounds for Objection — continued

A future intention to relocate sporting facilities is materially different from secured replacement provision. The proposed sequence risks housing development proceeding while replacement facilities remain aspirational.

Ground 3 — Insufficient demonstration that these particular lands are required for housing. The Greystones–Delgany & Kilcoole Local Planning Framework took effect on 9 February 2026, following a detailed statutory planning process. Before additional land is rezoned, the Council should transparently demonstrate the revised housing requirement attributable to Greystones–Delgany, the capacity of land already zoned for housing, extant permissions, housing under construction, realistic activation, infill and brownfield capacity, the contribution of recently zoned lands, and why functioning Active Open Space must now be included.

A settlement-specific land-budget reconciliation and written reasons for departing from the February 2026 strategy should therefore be published.

Ground 4 — Failure to demonstrate that the sequential approach has been exhausted. Established sports land should not become a first-line source of additional residential land simply because it is within the urban area. The Council should demonstrate that reasonable alternatives—including town-centre opportunities, brownfield land, infill, under-utilised land, existing residentially zoned land and other suitable candidate sites—have been properly considered.

Ground 5 — Infrastructure and cumulative development capacity. Any additional residential zoning should be supported by current evidence that transport, water, wastewater, drainage, schools and community infrastructure can accommodate both existing commitments and the additional development facilitated by Variation No. 7.

Ground 6 — Environmental assessment and reasonable alternatives. Strategic Environmental Assessment should address the consequences of losing operational sports infrastructure for population, human health, recreation, community infrastructure, sustainable transport, material assets and cumulative development. It should also assess retaining the existing Active Open Space zoning as a reasonable alternative.

3. Existing Use of the Lands Is a Material Planning Consideration

The Éire Óg lands should not be treated simply as approximately 3.2 hectares of potentially developable urban land. They are an existing operational sporting and community facility.

The facility includes two playing pitches, floodlit sporting provision, clubhouse facilities, dressing accommodation, indoor sports/function space and meeting/community accommodation. The principal pitch is also used for significant sporting fixtures.

This creates a fundamental planning distinction between rezoning vacant or under-utilised land and rezoning functioning community infrastructure for housing. The latter creates an immediate opportunity cost for the settlement.

The relevant assessment should therefore consider not only the number of residential units potentially obtained, but also what Greystones would lose in order to obtain them.

4. Existing Demand for Sporting Infrastructure

The current use of the lands is particularly relevant because available evidence does not establish that the sporting facilities are redundant or surplus to requirements. On the contrary, Éire Óg Greystones has previously identified a requirement for additional playing capacity, particularly associated with juvenile participation.

Where an existing sporting organisation is already experiencing pressure for additional capacity, the planning response should not ordinarily remove existing capacity unless a demonstrably superior replacement solution has first been secured.

The appropriate sequence is therefore:

- existing sporting capacity is rezoned for residential development;
- development value and expectations attach to the land;
- existing sporting activity then requires relocation;
- replacement land must be identified;
- planning, environmental, access and infrastructure issues must be resolved;
- funding must be secured; and
- replacement facilities must ultimately be constructed.

That sequence creates a material risk that housing development becomes certain while replacement sporting provision remains aspirational. This would not represent balanced or sustainable settlement planning.

5. Replacement Provision Must Precede, Not Follow, the Loss

If the Council considers residential development of the Éire Óg lands appropriate, the minimum safeguard should be that equivalent or superior replacement facilities are secured before the existing facilities can be lost.

Replacement should not mean a general intention to provide another parcel of land. It should be demonstrated to provide, at minimum:

- equivalent playing-pitch capacity, dimensions and quality;
- equivalent floodlighting;
- changing and clubhouse facilities;
- community accommodation;
- adequate parking and safe pedestrian access;
- cycling and public-transport accessibility;
- appropriate road access;
- drainage and utility infrastructure; and
- capacity for existing and reasonably foreseeable future demand.

The replacement location should also be assessed against the accessibility of the existing Mill Road location. Moving facilities to a peripheral site that substantially increases car dependency would not necessarily constitute an equivalent planning outcome.

6. A Binding Delivery Mechanism Is Essential

A policy aspiration that replacement facilities will be provided at some future date would not adequately protect the community interest.

If rezoning proceeds notwithstanding this objection, Proposed Variation No. 7 should contain a specific and binding site objective preventing the loss of existing sporting facilities until equivalent or superior replacement sporting and community facilities have been fully secured, consented, serviced, constructed and made operational.

The replacement should be available before, rather than after, the existing facilities cease operation. This is important because once residential zoning is adopted, the strategic planning balance changes materially. The appropriate time to protect replacement provision is therefore the plan-making stage.

7. The February 2026 Local Planning Framework Is Highly Relevant

The timing of Proposed Variation No. 7 requires particular scrutiny. The Greystones–Delgany & Kilcoole Local Planning Framework took effect on 9 February 2026 following a statutory process considering matters including population growth, residential land requirements, infrastructure, transport, social infrastructure, environmental constraints, flood risk, open space and settlement development.

The adopted framework reportedly provides approximately 38 hectares of residential land in Greystones–Delgany, arranged through phased development. Proposed Variation No. 7 therefore arises only a relatively short time after completion of a comprehensive statutory planning exercise.

This does not prevent the Council from responding to revised national housing requirements. It does, however, create a strong requirement to explain transparently why the recently adopted land-use strategy is now insufficient and why these particular Active Open Space lands must be rezoned.

8. Revised Housing Targets Do Not Automatically Justify This Site

I acknowledge that revised national Housing Growth Requirements materially increase the housing requirement applicable to County Wicklow. That is an important planning consideration. However, an increased county-level housing requirement does not logically establish that every site submitted for residential zoning should be accepted, nor that functioning Active Open Space should automatically be rezoned.

The revised requirement should instead trigger a transparent planning exercise establishing:

- the revised county requirement;
- its distribution through the settlement hierarchy;
- the resulting requirement for Greystones–Delgany;
- existing zoned-land capacity and realistic housing yield;
- extant permissions and development under construction;
- likely activation and delivery;
- infrastructure capacity;
- brownfield and infill opportunities; and
- any residual requirement for additional greenfield zoning.

Only after that exercise can the necessity for Site 41 property be established.

9. A Settlement-Specific Housing Land Budget Should Be Published

Before adopting the proposed rezoning, Wicklow County Council should provide a clear and auditable Greystones–Delgany housing land budget identifying the following:

9. Settlement-Specific Housing Land Budget — continued

- Revised housing requirement: additional dwellings allocated specifically to Greystones–Delgany.
- Existing zoned land: area and realistic dwelling yield.
- Extant permissions: permitted but unbuilt dwellings.
- Construction: units currently being delivered.
- Activation: realistic probability and timing of development.
- Phase 1 lands: capacity and infrastructure status.
- Phase 2 lands: capacity and infrastructure status.
- Brownfield/infill: realistic additional capacity.
- Infrastructure: serviced/serviceable status.
- Additional requirement: residual need after the above.
- Site selection: why Site 41 performs better than reasonable alternatives.

Without this reconciliation, it is difficult to establish that the loss of existing Active Open Space is necessary rather than merely convenient.

10. Sequential Development and Compact Growth

National and regional planning policy supports compact growth. Compact growth should not, however, be interpreted as meaning that every open space within an urban footprint is automatically appropriate for residential development.

A sustainable sequential approach should ordinarily prioritise:

- vacant and derelict sites;
- brownfield land;
- town-centre regeneration;
- infill opportunities;
- under-utilised land;
- existing appropriately zoned residential land; and thereafter
- additional land demonstrated to be necessary.

Functioning sports pitches are fundamentally different from vacant land because they already perform an important urban function. The Council should therefore demonstrate why the housing requirement cannot reasonably be accommodated through less socially disruptive alternatives before established Active Open Space is removed.

11. Social Infrastructure Must Grow With Population

Housing growth cannot be considered independently of community infrastructure. Additional population creates demand for schools, childcare, healthcare, recreation, sports facilities, parks, community facilities and sustainable transport.

It would be contradictory to increase Greystones' residential capacity while simultaneously reducing established recreational capacity unless equivalent replacement provision is secured. This is particularly important in a settlement experiencing sustained population and housing growth.

The planning assessment should therefore consider net social-infrastructure capacity after development, rather than simply the gross number of additional dwellings facilitated.

12. Transport and Accessibility

Transport should also be assessed cumulatively. Previous planning analysis for Greystones has identified significant outward commuting and substantial reliance on private cars.

The relevant question is not simply whether a future residential development can provide a technically acceptable vehicular entrance. The strategic assessment should consider cumulative traffic from existing permissions, recently zoned residential lands, Proposed Variation No. 7, school-related peak traffic and sporting-event traffic, together with pedestrian, cycling and public-transport connectivity.

The consequences of relocating existing sporting activity are particularly important. If centrally accessible sporting facilities are displaced to a more peripheral location, the rezoning could simultaneously generate additional residential trips at Mill Road and increase car journeys associated with relocated sporting activity. That potential displacement effect should form part of the strategic transport assessment.

13. Water and Wastewater Infrastructure

I do not suggest that there is presently conclusive evidence demonstrating that Greystones lacks water or wastewater capacity. Previous consultation evidence indicated that Uisce Éireann considered capacity sufficient for the growth assumptions applicable at that time.

However, Proposed Variation No. 7 responds to increased housing-growth requirements. The relevant question is therefore whether infrastructure remains adequate under the revised cumulative development scenario.

The Council should demonstrate that the proposed residential lands are either fully serviced or demonstrably serviceable within the relevant plan period, addressing potable water, wastewater network and treatment capacity, surface-water drainage, SuDS, required network reinforcement, delivery responsibility, funding and timing.

Where infrastructure upgrades are required, residential zoning should be appropriately phased against their delivery.

14. Flood Risk and Surface-Water Management

I do not rely on an unsupported assertion that the Éire Óg lands are subject to unacceptable flood risk. Instead, I request that the Council demonstrate clearly, by reference to the Strategic Flood Risk Assessment and associated mapping, that the proposed residential zoning satisfies applicable flood-risk planning requirements.

The assessment should address fluvial and pluvial/surface-water risk, climate-change allowances, downstream effects, attenuation requirements and cumulative effects arising from additional impermeable development. Any material flood-risk issue should be resolved at zoning stage rather than deferred entirely to a future planning application.

15. Strategic Environmental Assessment

The SEA accompanying Proposed Variation No.7 should not assess Site 41 solely in terms of conventional ecological constraints. The loss of functioning sports infrastructure engages broader SEA considerations, particularly population, human health, material assets, land use, sustainable transport, community infrastructure and cumulative effects.

The SEA should therefore expressly consider the consequences of removing existing recreational capacity from a growing settlement and the alternative of retaining the existing Active Open Space zoning.

16. Reasonable Alternatives

A particularly important issue is whether reasonable alternatives have been adequately assessed. For Site 41, these should include:

- Alternative A — Retain the existing Active Open Space zoning. This should form the baseline alternative.
- Alternative B — Meet additional housing requirements through existing residentially zoned land. The realistic capacity and activation potential of existing zoned land should be established.
- Alternative C — Prioritise brownfield and infill opportunities. This could deliver compact growth without sacrificing functioning community infrastructure.
- Alternative D — Select alternative candidate sites. If additional greenfield zoning is genuinely required, sites that do not involve loss of established sporting infrastructure should be considered first.
- Alternative E — Defer Site 41 pending secured replacement provision. If the Council considers the lands strategically suitable in the longer term, rezoning could be deferred until replacement sporting facilities are demonstrably deliverable.

The existence of these alternatives means the planning choice is not simply between rezoning Éire Óg or failing to meet housing targets.

17. Matters That Should Not Be Deferred to a Future Planning Application

Certain detailed matters can appropriately be addressed through a future planning application. However, the following are strategic plan-making questions that should be resolved before the zoning decision: whether established Active Open Space should be lost; whether additional residential zoning is necessary; whether Site 41 is preferable to reasonable alternatives; whether replacement sporting provision is achievable; whether the settlement has sufficient social-infrastructure capacity; whether development is appropriately sequenced; and whether cumulative infrastructure capacity exists.

A future planning application cannot retrospectively correct an inadequately justified strategic zoning decision.

18. Precaution Against an Irreversible Planning Outcome

The consequences of retaining the existing Active Open Space zoning are reversible. If future evidence conclusively demonstrates that additional residential land is required, alternative sites are unsuitable, infrastructure is available and equivalent replacement sporting facilities have been secured, the zoning can be reconsidered through an appropriate statutory planning process.

The consequences of residential rezoning are materially different. Once residential zoning is adopted, development expectations arise, land values may change, development pressure increases, and retention of the existing sporting use becomes progressively more difficult.

Where the evidence supporting the loss of an established community asset remains incomplete, the more sustainable planning approach is therefore to retain the existing zoning until the necessary conditions have been demonstrated.

19. Requested Decision

For the reasons set out above, I respectfully request that Wicklow County Council not adopt the proposed New Residential zoning of approximately 3.2 hectares of the Éire Óg lands.

The preferred outcome should be retention of the existing Active Open Space zoning. This would not prevent the Council from reconsidering the longer-term planning of the lands through a future statutory process if circumstances materially change.

20. Alternative Safeguards if the Council Proceeds With Rezoning

Without prejudice to the primary objection, if Wicklow County Council nevertheless determines that residential rezoning should proceed, Proposed Variation No. 7 should incorporate binding site-specific objectives providing as follows:

20.1 Replacement facilities. No existing playing pitch or associated sporting/community facility should cease operation until equivalent or superior replacement facilities are fully operational.

20.2 Land control. Replacement lands must be demonstrably secured and subject to appropriate long-term ownership or control before residential development proceeds.

20.3 Equivalent capacity. Replacement provision should provide at least equivalent pitch capacity, sporting functionality, floodlighting, changing facilities, clubhouse/community accommodation and ancillary infrastructure.

20.4 Accessibility. Replacement facilities should provide equivalent or better accessibility by walking, cycling, public transport and private vehicle.

20.5 Planning and environmental consent. All necessary planning, environmental and infrastructure approvals for replacement facilities should be secured before development resulting in the loss of existing facilities commences.

20.6 Delivery. Replacement facilities must be constructed and operational—not merely planned or permitted—before existing facilities are lost.

20.7 Infrastructure sequencing. Residential development should be phased against confirmed transport, water, wastewater, surface-water and required community-infrastructure capacity.

21. Conclusion

The Éire Óg lands are not unused land awaiting a productive purpose. They already perform an important and established function for Greystones by providing sporting and community infrastructure within a settlement experiencing continuing population and housing growth.

There is unquestionably a legitimate public interest in delivering additional housing. However, housing growth does not remove the need to ensure that the settlement retains the infrastructure required to support that growth. Those objectives are not mutually exclusive.

The appropriate planning response is therefore to demonstrate first:

- how much additional residential land Greystones–Delgany actually requires;
- what capacity already exists within recently zoned and permitted lands;
- whether brownfield, infill and other alternative sites can satisfy any residual requirement;
- whether infrastructure can accommodate the cumulative growth proposed; and
- where, when and how equivalent replacement sporting facilities will be delivered.

Until those matters have been satisfactorily demonstrated, the proposed residential rezoning of functioning Active Open Space is premature and insufficiently justified.

Accordingly, I respectfully request that Wicklow County Council delete the proposed New Residential zoning relating to the Éire Óg lands under Proposed Variation No. 7 and retain the existing Active Open Space zoning.

Alternatively, the Council should defer the rezoning until a settlement-specific housing-land assessment, infrastructure-capacity assessment and binding replacement-sports-facility strategy have been completed and subjected to appropriate public and environmental assessment.

Yours faithfully,

Alan and Michelle Quirke

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Date: 23rd September 2026