



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

Who are you:	Private Individual
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Reference:	GDKLPF-132618
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## Topic

LAP - Proposed Material Amendments No 32 Submission

## Submission

Proposed Material Alterations to the draft Greystones-Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 to the County Development Plan 2022 - 2028

Dear Sir / Madam,

My submission is with regard to GDKLPF-150518, Andrew O'Kane, who seeks rezoning of agricultural land adjacent to The Laurels, Sea Road, Kilcoole. The submission refers to the right of way through The Laurels, use

of services within the estate for future development, if rezoning and future planning permission are granted. This information is not correct, and also no engagement took place with all the residents of the Laurels to grant this permission.

See Section 34(13) – Planning and Development Act 2000

A planning permission or zoning does not confer any right to access another person's property

To note, as available on the WCC website, the Planning Executive does not support this submission based on the below:

- The land exceeds the Core Strategy requirements
- It would be inconsistent with the County Development Plan (Section 19(2) Planning Act 2000)
- It would constitute sprawl into un-zoned countryside, not compact growth
- It conflicts with the Kilcoole Area 1 assessment
- It is not suitable or appropriate for future release during the lifetime of the LPF
- No development outside the 2.5 km radius should be facilitated without a very high level of infrastructure and accessibility, which this land demonstrably lacks

The LPF Written Statement (Section A.3.2) outlines these lands are unsuitable. Section A.3.2 explicitly states that many outer lands are: "not suitable or appropriate for future release for development, unless a very high level of infrastructure, accessibility, and environmental mitigation can be demonstrated."

This submission cannot demonstrate any of these requirements:

- on access
- on servicing
- on infrastructure
- on environmental criteria
- on compact growth
- and on delivering the LPF strategy

Concern regarding Proximity to Designated Conservation Areas: The site lies very close to nationally and European-designated sites, including SPAs, SACs, and the Kilcoole marshes, which support protected bird species such as little terns and other migratory birds. Rezoning agricultural land in this sensitive ecological zone risks: Increasing disturbance (noise, lighting, human activity) to protected species. Adding pressure to feeding and nesting areas already under threat from climate change and habitat loss. I would expect that any rezoning must demonstrate that it cannot, directly or indirectly, affect the integrity of nearby designated sites.

Increased Flood Risk and Loss of Natural Drainage: This and adjacent band of agricultural land serves an essential natural drainage function, reducing flood risk by absorbing rainfall and channelling it towards natural watercourses. Rezoning for any future developments off the Sea Road from the Laurels towards the beach would likely replace permeable soil with impermeable surfaces, increasing surface-water runoff and exacerbate flood risks downstream. This is likely to undermine climate-adaptation goals which emphasise the retention of green fields and natural buffers.

Sea Road Traffic - Car/Pedestrian: This has increased since the Laurels was developed in 2019/2020, especially within 2025 due to additional housing development and the introduction of the L2 on a 1/2 hour basis (which is a positive and requirement for the residents of sea road) and since 2020 (Covid) more people are walking to and from the beach, and part of the road is without footpath and narrow in parts, in front of the Laurels and eastwards. The road at the Laurels entrance has become extremely busy and 3 accidents have taken place within a few hundred meters each side of the entrance, two this year and one 2022, that I am aware of. Therefore, if additional housing development(s) is(are) granted along this road between the Laurels and eastwards to the beach, this will add additional pressure.

To add, as you are aware the traffic pressure increases each year to exit Kilcoole village during peak times since Covid with each year busier than the previous, thus requiring many Kilcoole residents to depart earlier for work or school due to catch their dart, bus or drive to the N11. This also impacts the departure and ontime of the bus routes from Kilcoole to Greystones and onwards to Bray, and future developments granted will impact this further. As you know this will increase further when people move into the 100+ houses off Lott Lane, Kilcoole)

(To note, there is a commuter train service from Kilcoole at 06:41 which is full or almost full nearly every morning when it arrives from Gorey/Wexford, I'm sure the 2 trains after and before 09:00 are most probably the same, not helping the departure of Kilcoole residents to work in the city where they would rather sit in their car then stand for 55 minutes)

Please consider all of the above if/when a planning development application is requested, subject to rezoning being granted at no 32 as per maps and any rezoning and future planning applications for the Kilcoole area.

Yours sincerely,

Sandra Hayes

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