

	<h1>Greystones-Delgany & Kilcoole LPF Variation No.4</h1>
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Who are you:	Agent
Name:	Cairn Homes Properties Ltd
Reference:	GDKLPF-175113
Submission Made	June 20, 2025 6:08 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART A Strategy

- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole

Local Planning Framework PART B Settlement Specific Objectives.

- B.2 Residential Development
- B.3 Economic Development
- B.7 Infrastructure, including transport and flooding
- B.8 Land Use Map and Zoning
- B.9 Specific local objectives (SLOs)

Write your observations here:

Please see enclosed submission in four documents:

- Planning report
- Masterplan part A
- Masterplan part B
- Masterplan part C

Please select which town you want to comment on:

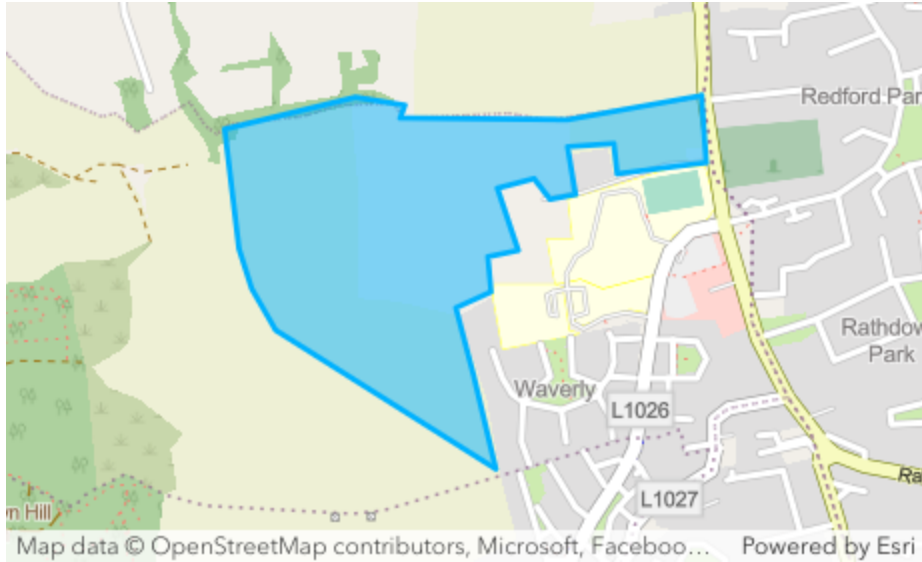
Greystones/Delgany

Observation relevant to the settlement:

Please see enclosed submission in four documents:

- Planning report
- Masterplan part A
- Masterplan part B
- Masterplan part C

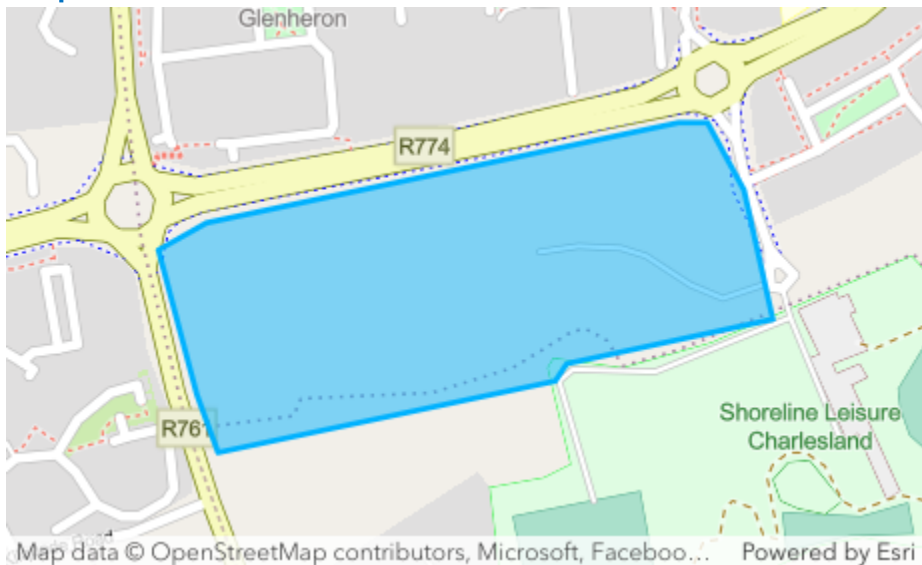
Map



Site Description:

Coolagad is located broadly to the west and rear of Templecarrig School, Naíonra na gCloch Liath and the Greystones Educate Together School and of the Waverly residential estate and broadly north of the Seagreen residential estate.

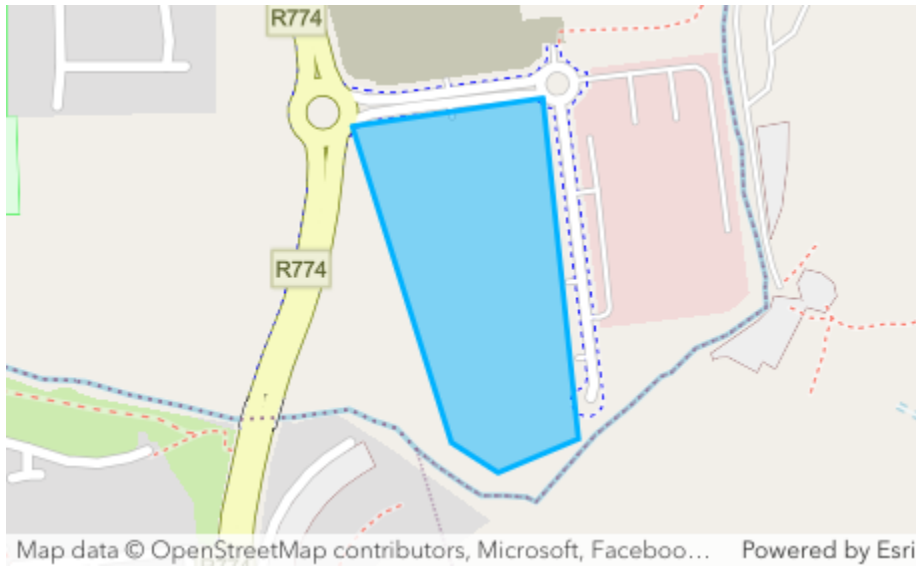
Map



Site Description:

The second landholding is known as the Hawkins Lands. These lands are located to the south of Greystones and are bound by the Kilcoole Road and the R774/L221. These lands total 2.53 ha.

Map



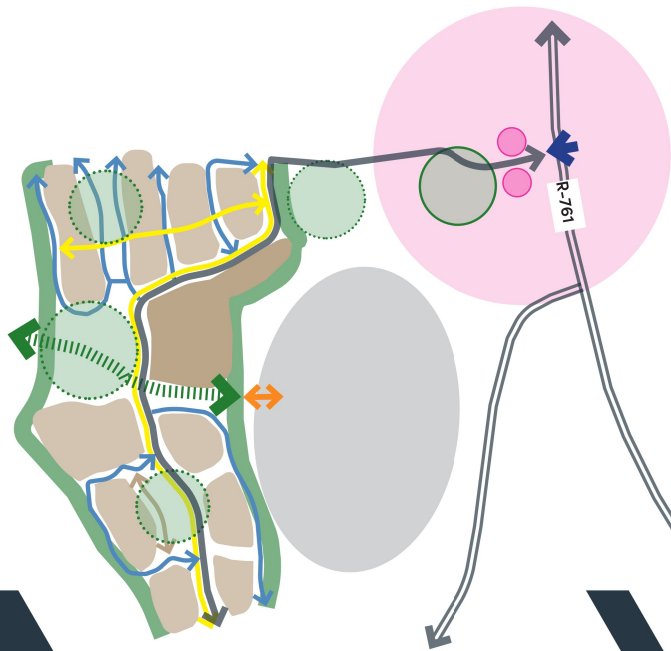
Site Description:

The last landbank was formally part of the IDA business park (c.2.89 ha). It is located directly across from the Council's housing site in Charlesland.

Upload a File (optional)

2315-GYLPF-Cairn Submission FINAL.pdf, 3.43MB

CAIRN



Coolagad Masterplan
Job No. 25011

JUNE 2025

COOLAGAD

MASTERPLAN VISION AND STRATEGY



DUBLIN
NO. 1 GRANTHAM ST
DUBLIN 8

TULLAMORE
BLOCK 6, CENTRAL BUSINESS PARK,
TULLAMORE, CO. OFFALY

SUBMISSION TO WICKLOW COUNTY COUNCIL
DRAFT GREYSTONES / DELGANY & KILCOOLE
LOCAL PLANNING FRAMEWORK

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EXECUTIVE SUMMARY

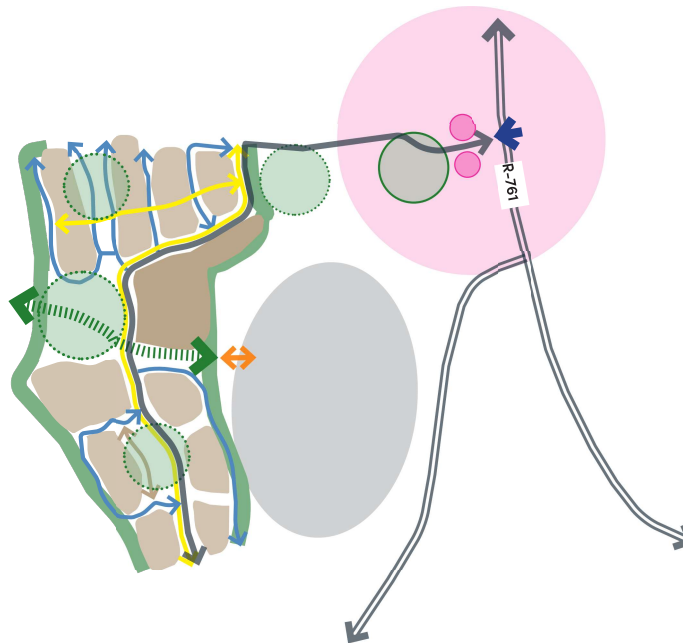
This development vision document has been prepared by MCORM Architecture and Urban Design, on behalf of Cairn, to support a submission to Wicklow County Council regarding the priority zoning of residential lands at Coolagad. The lands are currently zoned Residential Priority 2, and this submission provides a planning and design-led rationale to inform their potential reconsideration as Residential Priority 1 lands within the context of current and emerging policy frameworks.

The subject lands form part of the consolidated northern edge of the Greystones–Delgany settlement and are located within the defined development boundary set out in the Wicklow County Development Plan. The site is well positioned in relation to transport infrastructure, education facilities, and the wider network of community services. Its proximity to the Coolagad educational campus and the Greystones DART station supports the principles of compact, walkable neighbourhoods in line with the Sustainable and Compact Settlements Guidelines (2024) and the National Planning Framework (NPF).

The lands lie within the catchment of the Bray–Greystones Corridor, identified in the Eastern and Midland Regional Spatial and Economic Strategy (RSES) as a priority area for metropolitan consolidation. With strong accessibility and delivery potential, the Coolagad lands reflect the objectives of the Metropolitan Area Strategic Plan (MASP), which seeks to align housing growth with infrastructure capacity and transport connectivity.

Recent updates to national policy, including the Draft First Revision of the NPF, have introduced higher national housing targets, calling for an average of 50,000–60,000 new homes annually. These revised targets emphasise the need to assess and activate suitable zoned lands within existing settlements where infrastructure, services, and transport links are already in place.

In this context, the Coolagad lands represent a logical and serviceable location for near-term development. Their delivery would support the implementation of zoned Open Space, Active Open Space, and Natural Area lands, contributing to a connected green infrastructure network that reinforces both ecological value and neighbourhood quality, serving both the envisioned neighbourhood and wider local community. With consolidated ownership and alignment to key policy objectives, the lands offer a valuable opportunity to support sustainable housing delivery in Greystones.



KEY DEVELOPMENT INSIGHTS



35
DW/HA

Approx. 522 homes | Net area: 14.9HA



2.4
HA

Active Open Space unlocked for the development and wider community



2+1.4
HA

Open Space and overall natural amenity unlocked for the development and wider community



**CRÈCHE +
COMMUNITY
BUILDING**

● Contents

1	INTRODUCTION	3
2	PLANNING FRAMEWORK	13
3	SITE ANALYSIS	17
4	MASTERPLAN VISION AND STRATEGY	22
5	SUBMISSION PROPOSAL	28



1 INTRODUCTION

1.1 PURPOSE OF REPORT

This development vision document has been prepared by MCORM Architecture and Urban Design on behalf of Cairn Homes PLC (landowner of subject site) to support a submission to the Draft Greystones / Delgany & Kilcoole Local Planning Framework seeking the reclassification of lands at Coolagad from Residential Priority 2 to Residential Priority 1.

The subject lands, which are currently zoned for future residential development (Residential Priority 2) are strategically positioned to deliver near-term housing in line with national and regional planning policy, along with significant areas of active open space, landscaped open space, linkages to Greystones town centre and ancillary facilities. They are also 15-min cycling distance to Greystones train station and are served by bus services along Rathdown Road, east of the site.

The purpose of this report is to demonstrate that lands are servicable, accessible, and plan-ready, and that their prioritisation would support national and local planning policy objectives, namely compact growth, sustainable neighbourhoods and the delivery of much-needed housing in County Wicklow.

This submission is supported on a carefully considered masterplan and urban design strategic framework for the lands, as presented below.

The report concludes that the subject lands are in a strong position to support the early delivery of new homes, ancillary infrastructure and open space, and public realm. They should therefore be considered a priority location for future residential growth within Coolagad.

1.2 CAIRN HOMES

Cairn is an award winning developer that since it was founded in 2014 has delivered nearly 10,000 A-rated homes in Ireland. 30,000+ people now live in a Cairn built neighbourhood. 4,000 people work directly and indirectly across Cairn projects daily. To date, Cairn have contributed ca. €450 million to public infrastructure projects and 600 ha of public realm, parks, pitches and green space have been created,

In 2024 Cairn commenced over 4,100 new homes, including 10 new large-scale developments, and aim to exceed this number in 2025.

Cairn won in a number of categories at the Irish Construction Excellence Awards 2025, including 'Project of the Year' for Seven Mills and 'Innovation in Construction' for our lead role in building new homes to Passive House standards in Ireland.

Cairn places community building and placemaking at its core. They design and construct neighbourhoods with the best placemaking practices, creating spaces where quality of life is enhanced and people can thrive.

Cairn's vision is to create communities of connection and belonging, building towards an Ireland where everyone can prosper. Initiatives include:

Seven Mills Community Fund

Launched in November 2024, committed €30,000 to support local organisations across Dublin 22

- Cairn Community Games: partnership with the Community Games, reflecting our core values of equality, inclusion and local impact
- Home Together Programme: an ongoing and expanding programme that focuses on developing community initiatives that are sustainable in the long run. Cairn kickstarts community participation in new developments by providing help and resources to new residents to ensure that any projects get off the ground successfully.

Market Leading Efficiency

- Analysis of Building Control Management System (BCMS) records of residential completions highlights that Cairn delivers on average 9-12 weeks quicker than anyone in the sector
- 9 weeks quicker than the industry at large (from a sample of 25,142 new homes built)
- 11.5 weeks quicker than large main contractors (from a sample of 7,356 new homes built)

In this regard, at Parkleigh, Seven Mills Strategic Development Zone:

- October 2022: planning permission was granted
- December 2022: start on site
- December 2023: 130 units were occupied

Cairn Homes is committed to continuing to work with Wicklow County Council in the delivery of new homes, associated infrastructures including sports and education facilities. Cairn Homes have a proven track record in Wicklow having delivered 1,060 new homes, 2 schools and several sports and community facilities in the county so far. These developments are detailed below. This set of projects also features Bayly development in Douglas, Cork City, demonstrating track record on resolving a site with similar topographical and ecological characteristics as subject lands of this submission.

1.2.1 SORREL WOOD, BLESSINGTON

Phases 1 and 2: 414 homes, crèche, greenway and active open space, first phase of community park

Phase 3: lands rezoned as RN1 (Residential Priority 1), proposed development of 12.24 HA residential, 4.58 HA Active Open Space and 1.24 HA Public Open Space

Sorrel Wood is a development in Blessington Demesne, offering a diverse range of homes that are perfect for first-time buyers, couples, and growing families. The development features exceptional build quality, innovative energy-efficient features, thoughtful design, and modern fixtures and fittings.

A local town park is already serving this development, offering a range of sports pitches, play spaces, walking trails and more. Sorrel Wood is conveniently located with Naas just a short 15-minute drive away, and the nearby N81 providing a quick and efficient link onto the M50 motorway, allowing for easy access to Dublin City Centre in just 45 minutes. The development is also close to a variety of schools, local shops, restaurants, bars, parks, green spaces, and leisure amenities, including the stunning Wicklow Mountains, Glen Ding Forest, Blessington Greenway, Russborough House and Parklands, and Blessington Lake.



Figure 1-1. Sorrel Wood residential development surrounding natural amenity. Source: Cairn.



Figure 1-2. Sorrel Wood residential development built by Cairn in Blessington Demesne, Co. Wicklow. Source: Cairn.

1.2.2 ARCHERS WOOD, GREYSTONES

426 homes, crèche, community building, greenway, active open space comprised of 2 playing pitches

Nestled between the Wicklow Mountains and the Irish Sea by the picturesque village of Delgany is Archers Wood, this development delivers 426no. energy efficient houses in a sustainable and natural setting.

The development also provides a crèche, community building and attractive open space network featuring active open space with 2 playing pitches.

As in the development vision object of this submission, Archers Wood implied unlocking active open space for new residents and wider community.



Figure 1-3. Archers Wood residential development built by Cairn in Greystones, Co. Wicklow. Source: Cairn.



Figure 1-4. Archers Wood residential development built by Cairn in Greystones, Co. Wicklow. Source: Cairn.

1.2.3 GLENHERON, GREYSTONES

242 homes, crèche and open space

The proposed development responds thoughtfully to its context, guided by a balanced vision to create a distinctive and well-structured neighbourhood. The site layout introduces a network of character-rich residential areas, offering a mix of unit types arranged around a series of public open spaces.

The scheme delivers a high-density residential development at 49 units per hectare, combining traditional on-curtilage houses, duplexes, and six-storey apartment blocks that help define strong urban edges. Additionally, the proposal includes 2,817 sqm of development on the designated Employment Lands, comprising a Community Enterprise building and an office building.



Figure 1-5. Glenheron residential development built by Cairn in Greystones, Co. Wicklow. Source: Cairn.



Figure 1-6. Glenheron residential development built by Cairn in Greystones, Co. Wicklow. Source: Cairn.

1.2.4 HAWKINS WOOD, GREYSTONES

354 homes, enterprise building, secondary school campus

Hawkins Wood is a residential development featuring a range of 2, 3, and 4-bedroom family homes located near Greystones, Co. Wicklow.

The development promotes modern family living with thoughtfully laid-out homes, served by expansive open spaces children's playgrounds, and proximity to various sports, and both educational and leisure facilities.



Figure 1-7. Hawkins Wood residential development built by Cairn in Greystones illustrating architectural and landscaping detail. Source: Cairn.



Figure 1-8. Hawkins Wood residential development built by Cairn in Greystones illustrating neighbourhood park overlooked by houses. Source: Cairn.

1.2.5 BAYLY, DOUGLAS (CORK CITY)

472 homes (entire masterplan), open space and greenway extension

Bayly offers a harmonious blend of modern living and natural beauty, featuring a well-planned community with parks, play spaces, fitness trails and more, all meticulously designed to integrate seamlessly with the landscape.

The neighbourhood is peppered with blooming green walls throughout that take their inspiration from Charles Fort in Kinsale, a late seventeenth century star-shaped fort. A new greenway linking up to the popular Ballybrack Valley Pedestrian and Cycleway will run right through the development, allowing residents an easy connection to Douglas village.

Existing vegetation and wildlife corridors have been carefully retained, ensuring a thriving natural habitat. The site layout has been resolved efficiently embracing the existing topography while achieving an efficient use of lands with the given physical constraints.



Figure 1-9. Residential street in Bayly residential development demonstrating an efficient construction of houses which integrates the existing topography in a sustainable manner. Source: Cairn.



Figure 1-10. Birdview demonstrating topographical and ecological integration of Bayly residential development in Douglas, Cork City. Source: Cairn.

1.3 SITE LOCATION MAP

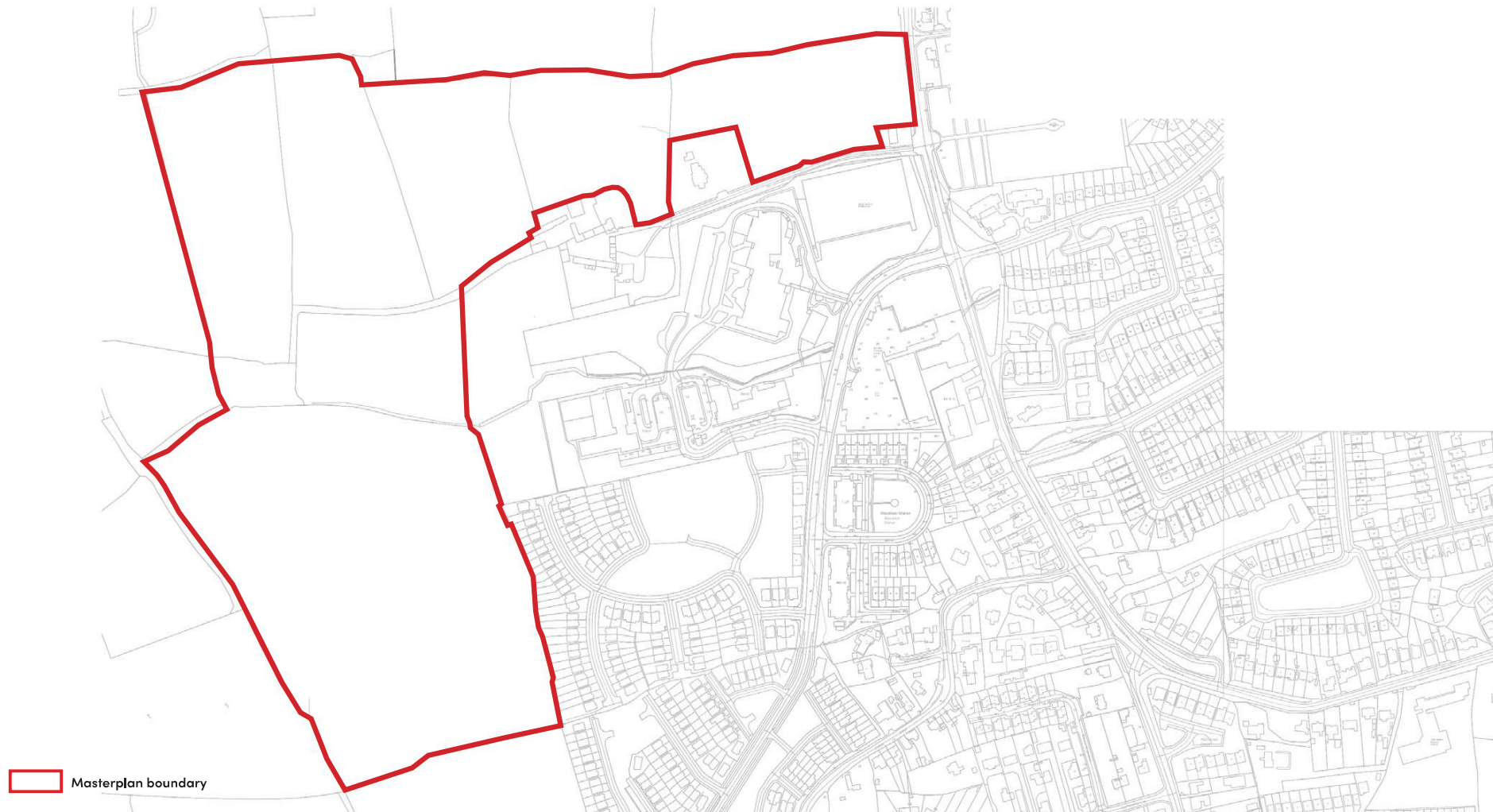


Figure 1-11. Site location OS Map. Source: MCORM, 2025.

2 PLANNING FRAMEWORK



2.1 NATIONAL AND REGIONAL POLICY CONTEXT

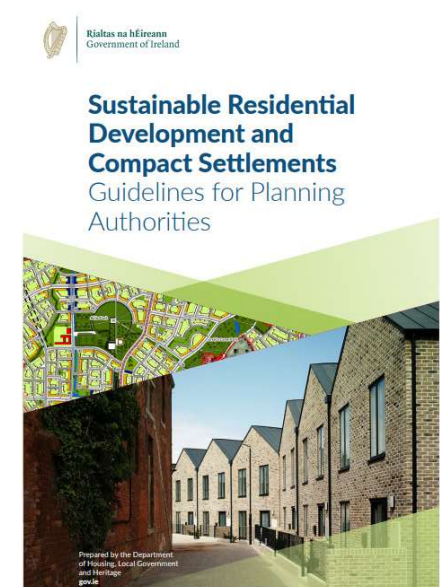
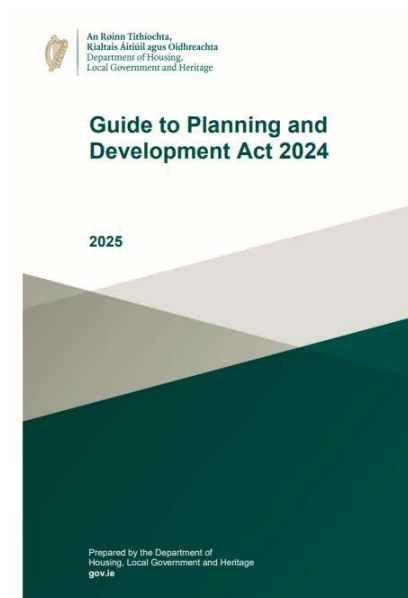
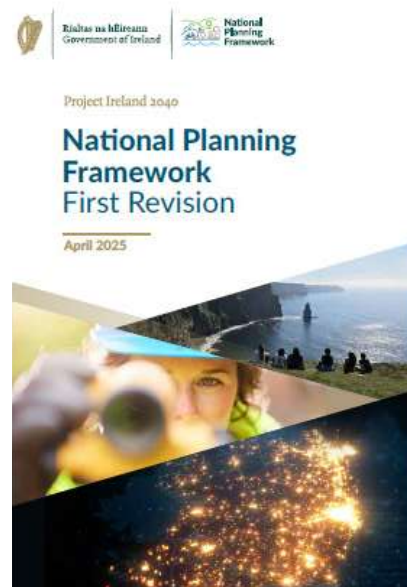
Ireland's national and regional planning frameworks have undergone a notable shift in the most recent years, placing greater emphasis on the acceleration of housing delivery, the optimisation of land readiness, and the creation of compact, sustainable settlements. This shift is particularly evident in the draft First Revision of the National Planning Framework (NPF), which proposes higher population projections and annual housing output targets in response to updated demographic evidence and evolving national priorities.

Under the draft revision, national population growth is projected to reach 6.1 million by 2040, with an associated requirement to deliver an average of 50,000 homes per year, scaling up to 60,000 by the end of the decade. These targets reflect the increasing urgency to address existing housing need and future demand, and are intended to guide plan-making at all tiers of the planning system.

At regional level, the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports this direction through its focus on compact urban growth, transit-supported development, and the prioritisation of locations with capacity for early delivery. Within the Metropolitan Area Strategic Plan (MASP), the Bray–Greystones corridor is identified as a strategically located area with strong transport connections, service infrastructure, and a robust settlement structure suitable for future residential development.

The recently published Sustainable and Compact Settlements Guidelines for Local Authorities (2024) provide further direction on how development priorities should respond to increased targets. These guidelines advocate for a design- and delivery-led approach to land use planning, ensuring that new development is well-integrated with infrastructure, public transport, and existing communities.

In this context, there is a clear policy emphasis on reviewing and sequencing zoned residential lands to reflect emerging housing requirements, infrastructure availability, and the broader objective of achieving balanced and sustainable settlement growth.



2.2 LOCAL DEVELOPMENT CONTEXT

In the analysis of the local context it is important to note that:

1. Lands locate in between the 1km and 2km radius from Greystones town centre and would consolidate its current urban settlement at its north-western boundary. It can therefore be stated that the proposed development would be a natural urban extension within Greystones.
2. Lands would unlock new green infrastructure amenities for Greystones, namely a central east-west corridor that could connect the town to its surrounding natural environment and a generous public park including active open space and landscaped public realm overlooked by the proposed development within this submission.
3. Lands are already serviced by surrounding facilities (education campus) and would deliver a crèche and community building ancillary to the adjoining active open space.

LEGEND

-  Site boundary
-  Neighbourhood Centres
-  Greystones town centre
-  Consolidated urban settlement (Greystones)
-  New Residential (RN1 and RN2)
-  Green infrastructure/Open space & Active Open Space
-  Neighbourhood Centre
-  Community and Education
-  Small Local Centre
-  Employment

ROADS & ROUTES

-  Existing Railwail line
-  Existing local distributor road sections
-  National road
-  Regional roads
-  Junction Improvement
-  Pathfinder Scheme

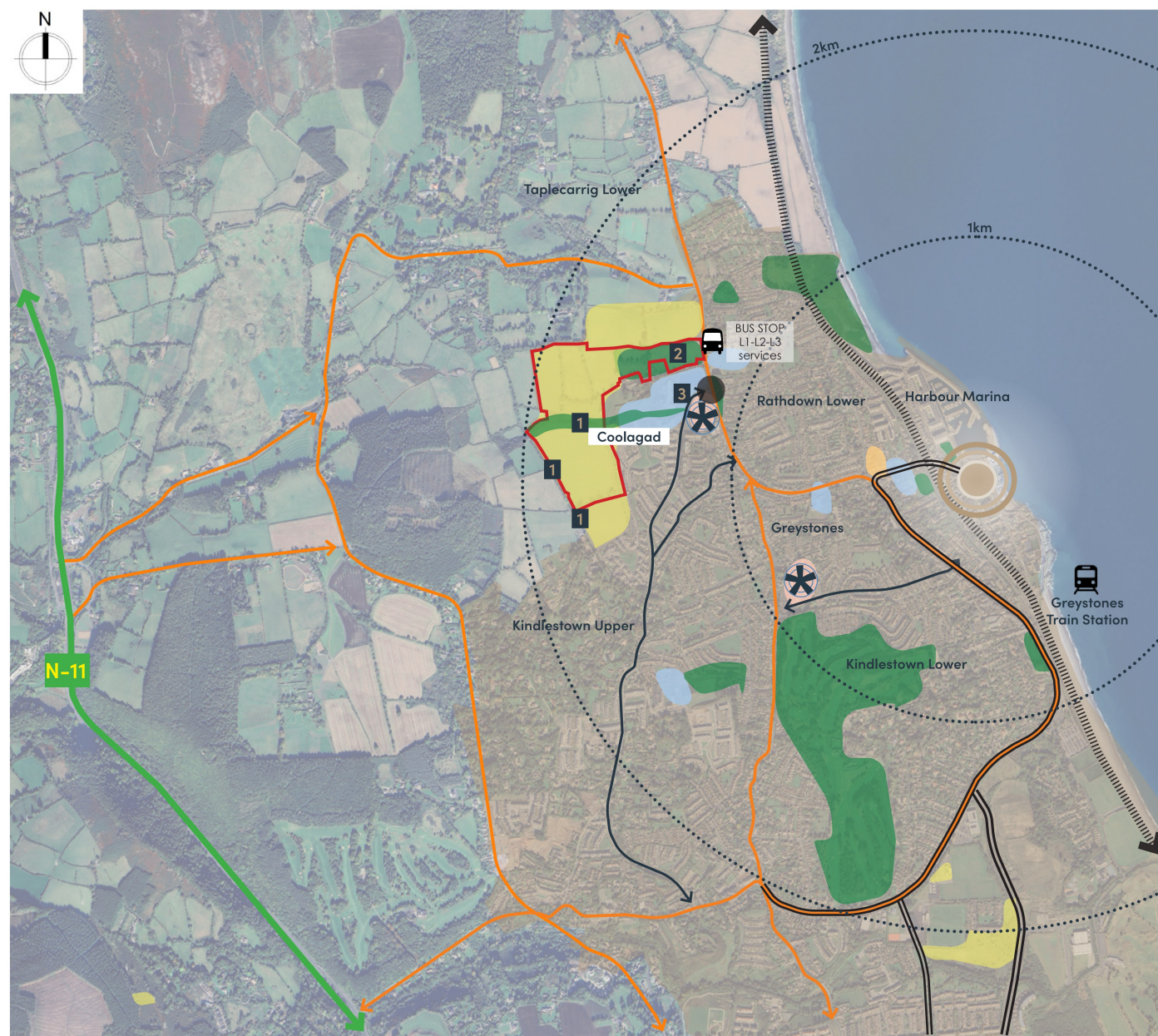


Figure 1-12. Site's local context. Source: MCORM, 2025.

2.3 LOCAL AREA PLAN ZONING

The Draft Greystones / Delgany & Kilcoole Local Planning Framework (LPF) 2025 is being prepared under proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028.

The subject site object of this report is identified opposite and spans c.25 HA including currently zoned "Residential Priority 2", "Active Open Space" and "Natural Area lands".

Legend

- RE: Existing Residential
- TC: Town Centre
- VC: Village Centre
- NC: Neighbourhood Centre
- LSS: Local Shops & Services
- MU: Mixed Use
- PU: Public Utility
- CE: Community and Education
- T: Tourism
- AOS: Active Open Space
- OS1: Open Space
- OS2: Natural Area
- E: Employment
- RN1: New Residential - Priority 1
- RN2: New Residential - Priority 2
- RS: Special Residential
- AG: Agriculture
- SLC: Small Local Centre
- GHM: Greystones Harbour & Marina

Site boundary

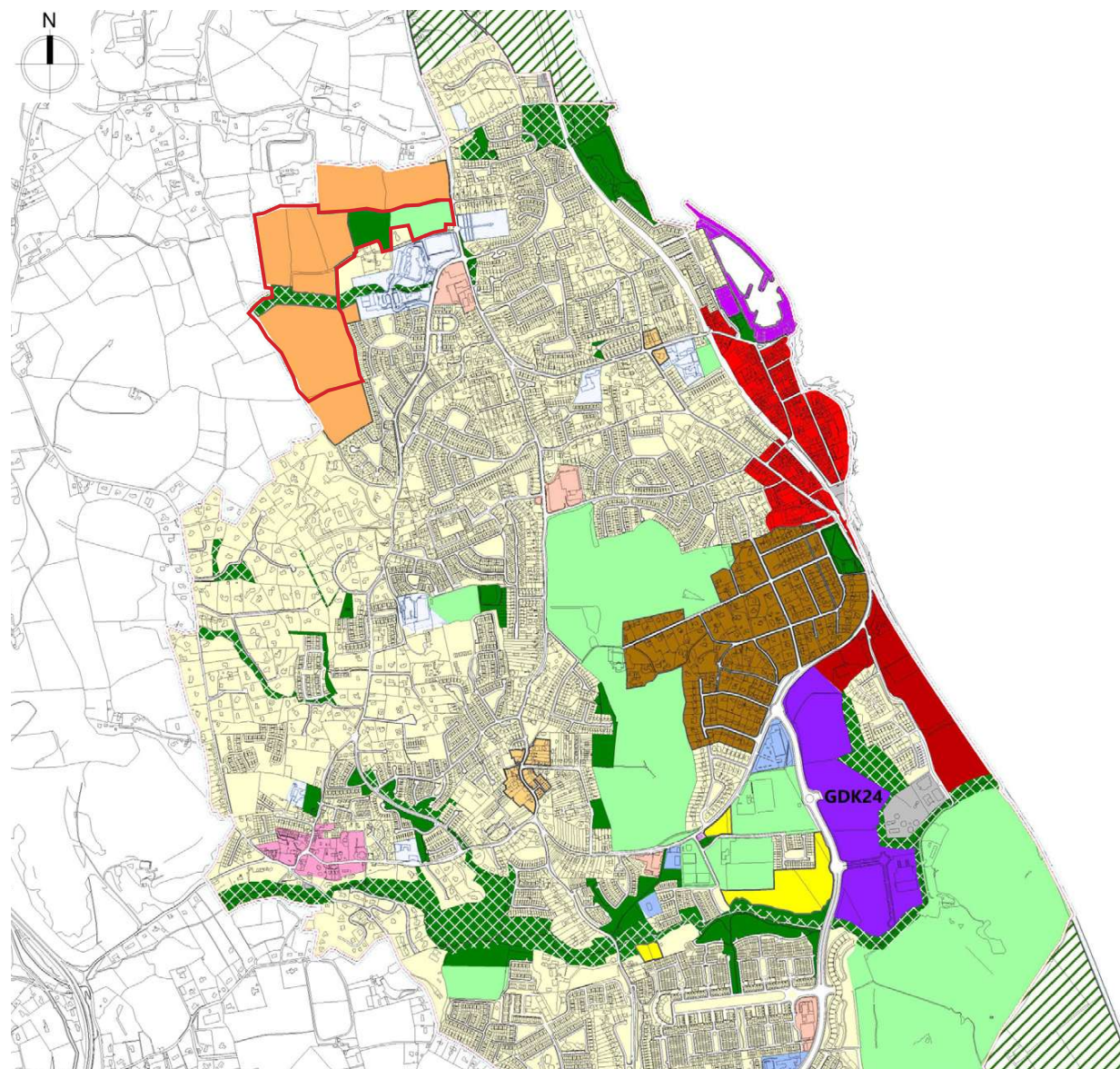


Figure 1-13. Zoning map indicating subject site. Source: Draft Greystones / Delgany & Kilcoole Local Planning Framework 2025.

3 SITE CONTEXT



3.1 SITE PHOTOGRAPHS



3.2 SITE CONTEXT AND CONNECTIVITY

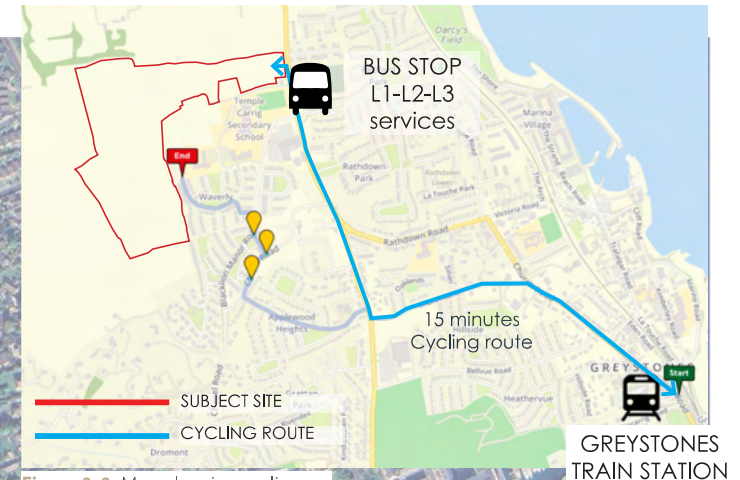
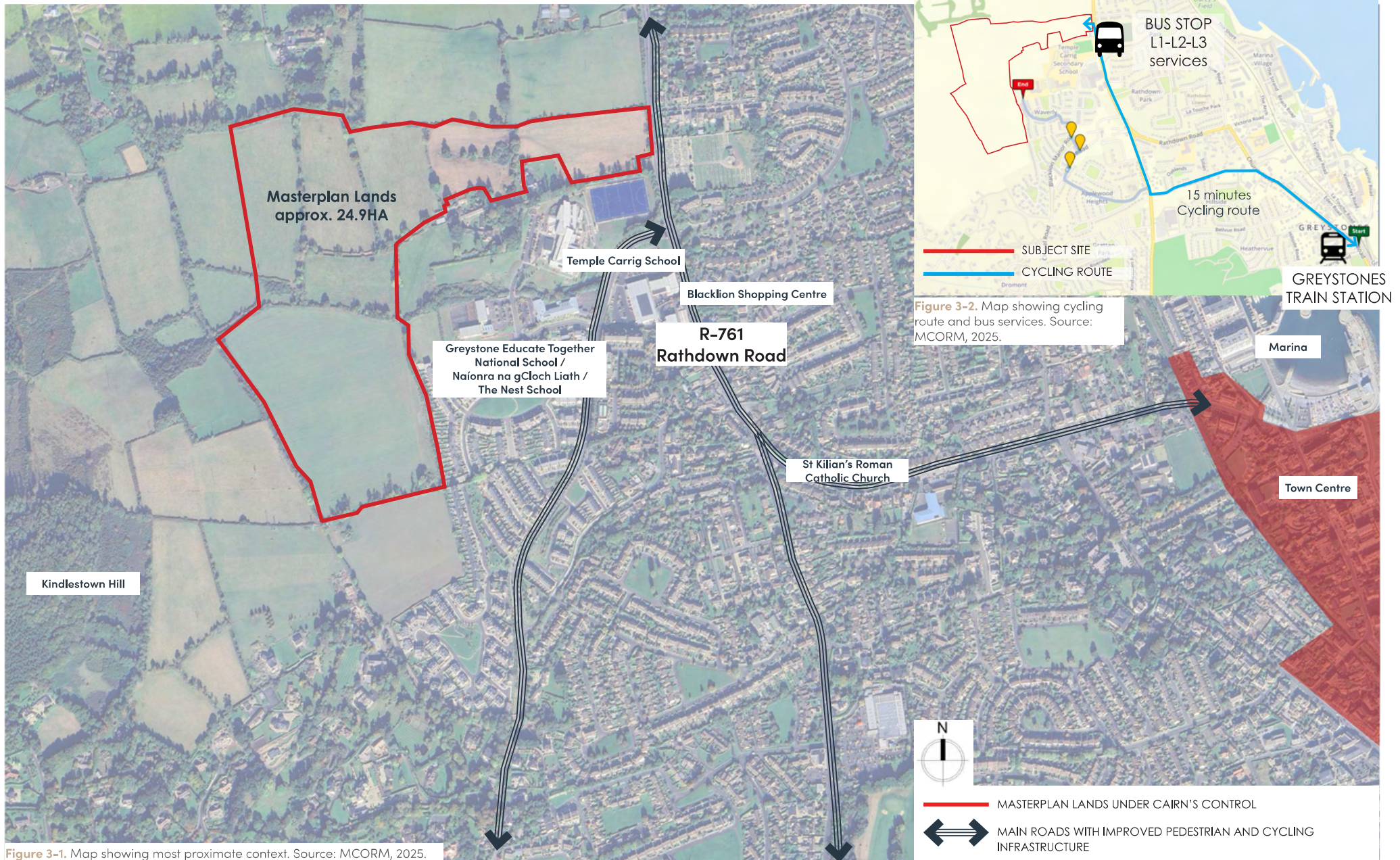
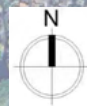


Figure 3-2. Map showing cycling route and bus services. Source: MCORM, 2025.



- MASTERPLAN LANDS UNDER CAIRN'S CONTROL
- MAIN ROADS WITH IMPROVED PEDESTRIAN AND CYCLING INFRASTRUCTURE

3.3 SITE OPPORTUNITIES AND CONSTRAINTS

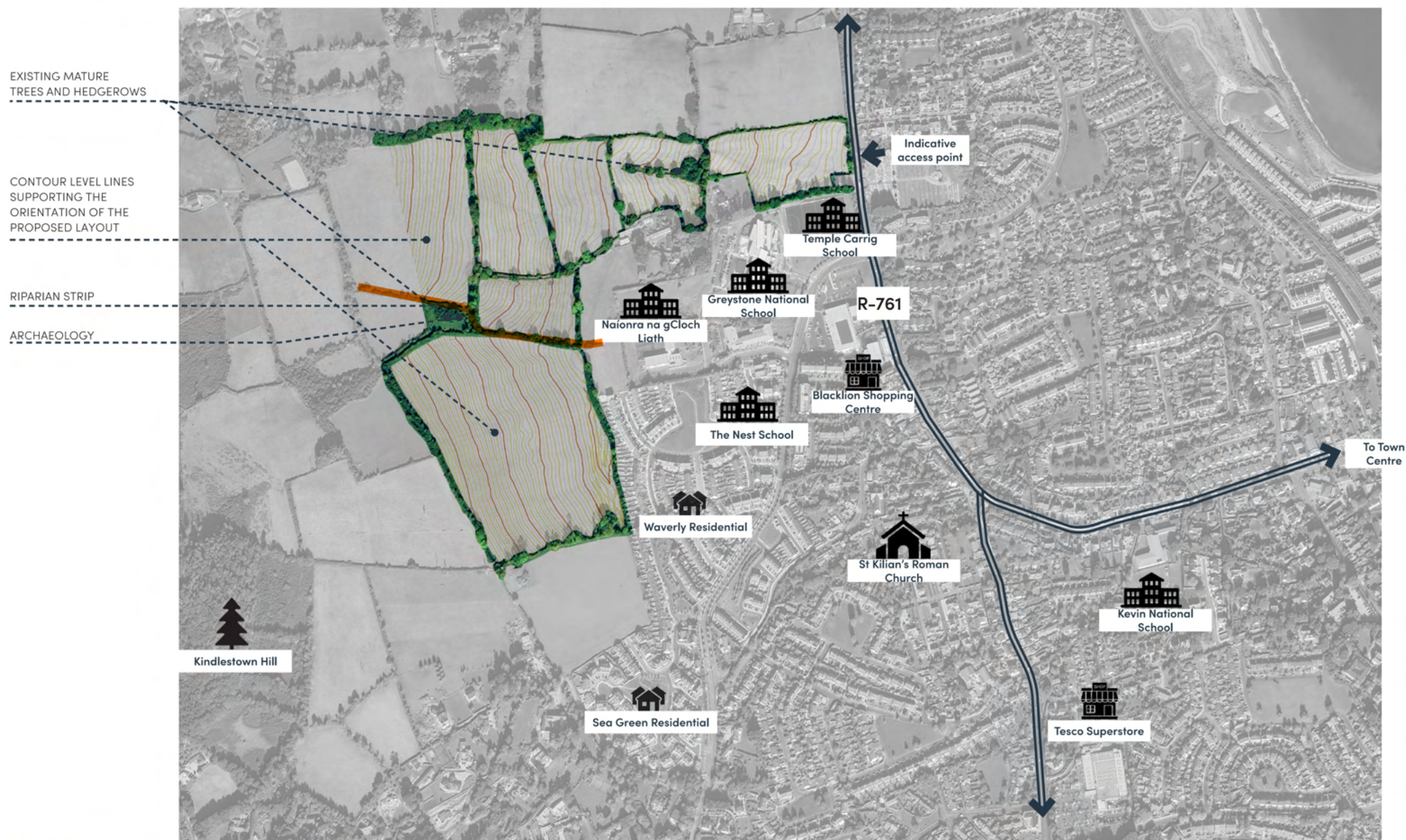


Figure 2-1. Map analysing site opportunities and constraints. Source: MCORM, 2025

3.4 SITE TOPOGRAPHY


BM BARRETT MAHONY

TECHNICAL NOTE - BM CONSULTING ENGINEERS

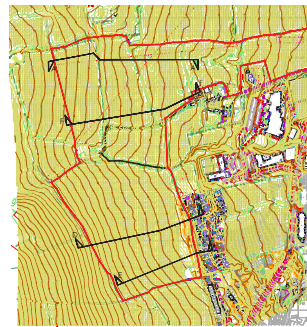
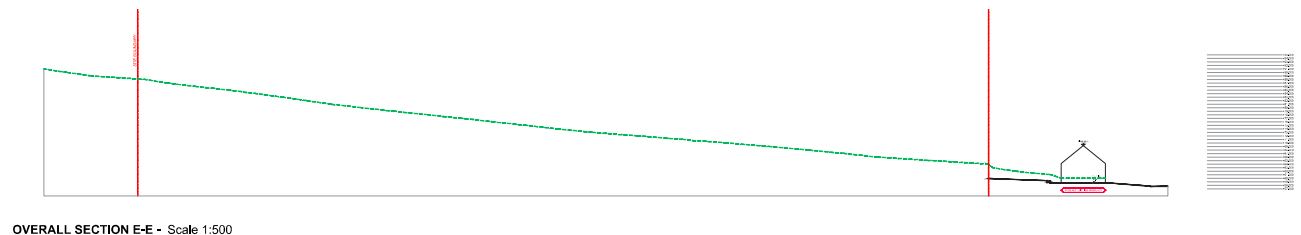
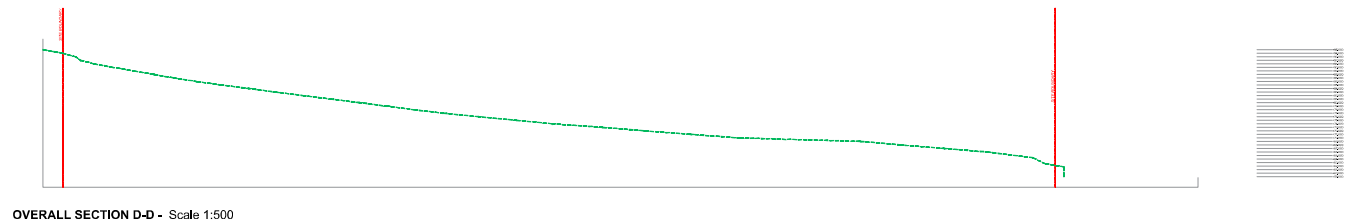
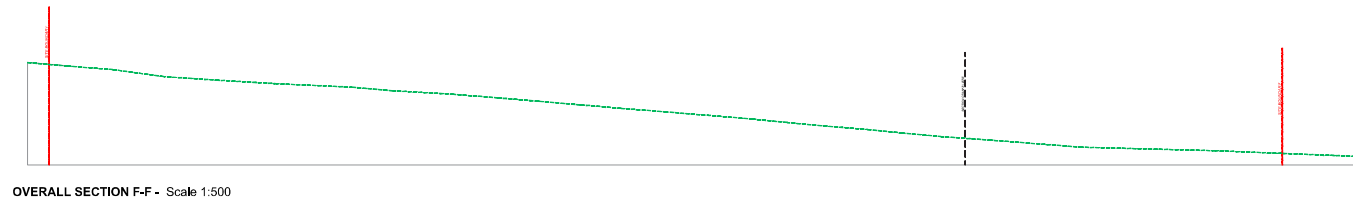
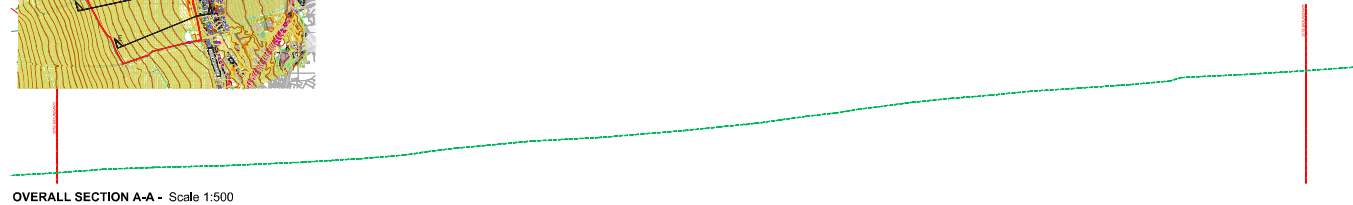
With reference to the Greystones / Delgany & Kilcoole Local Planning Framework, Strategic Environmental Assessment Environmental report, we note the subject site is located in an area defined with landslide susceptibility "low" as outlined in the SEA Section 4.8.3 and Fig.4.9.

The engineering of developments on sloping sites is a common occurrence and notwithstanding the low landslide susceptibility, it is critical that the design is managed over a number of key stages as outlined below.

At the outset, site investigation works are required across the site to develop an understanding of the subsoil profiles and soil properties. This information will provide an understanding of the ground conditions and enable the development of a subsoil ground profile. These investigations, along with surface topography assessments, will also determine the location of existing watercourses on the site and the presence of groundwater.

Surface water management on the site is a key aspect and will involve facilitating the existing watercourse flows through the site in accordance with Local Authority requirements. Surface water generated on the subject site itself will be managed in the typical manner by the introduction of SUDS devices as agreed with the Local Authority during the planning process.

The development of the site will involve the design of a series of new streets to permit access to rows of residential units. These new streets will be designed as a series of longitudinal terraces constructed relative to the existing topography. The foundation details below the houses will be subject to the confirmation of the underlying ground conditions. Level changes between residential sites will be located at the end of rear gardens typically and managed by the construction of retaining walls where required. The overall design of the site will be informed by a cut and fill analysis which will aim to limit the generation of excessive cut and fill volumes, respecting the existing topography.


 KEY PLAN
 NTS


4 MASTERPLAN VISION AND STRATEGY

4.1 OVERALL MASTERPLAN VISION

KEY DEVELOPMENT INSIGHTS



**35
DW/HA**

522 homes Net area: 14.9HA



**2.4
HA**

Active Open Space unlocked for the development and wider community



**2+1.4
HA**

Open Space and overall natural amenity unlocked for the development and wider community



**CRÈCHE +
COMMUNITY
BUILDING**

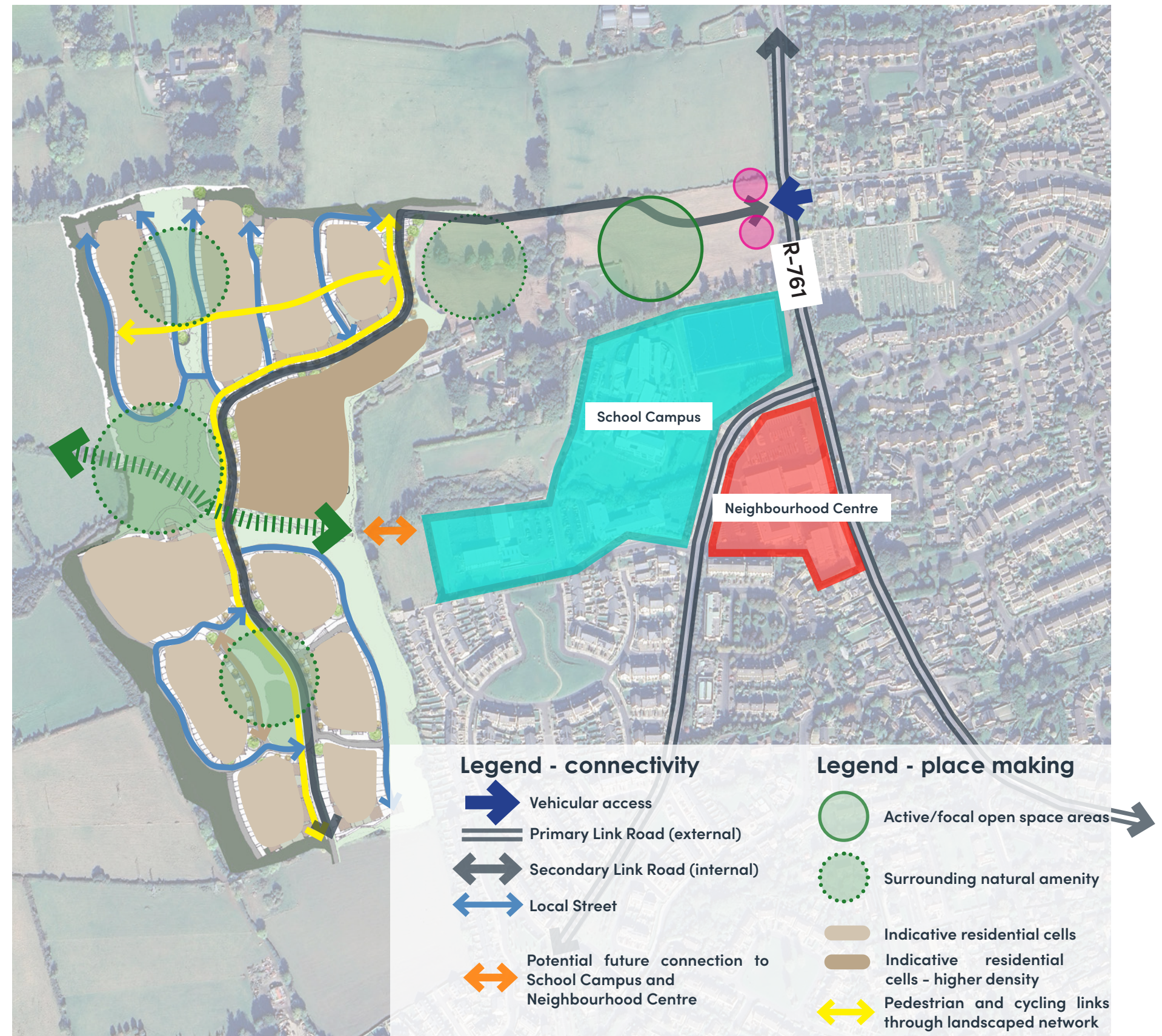


Figure 3-3. Overall masterplan vision proposed. Source: MCORM, 2025

4.2 POTENTIAL MASTERPLAN LAYOUT



CHARACTER AREA 2

Residential cells of 2/3-storey semi-detached and terraced housing including 2,3,4 and 5-bed typologies are structured in efficient cells that embrace existing topography. Overall, the built form is arranged to maximised overlooking of integrated green corridors and eastern park (open space zoned lands).



CHARACTER AREA 3

Residential cells featuring higher density opportunities including duplexes/own-door apartments and terraced houses in the form of 2 and 3-storey more prominent blocks.

Semi-detached houses are also included overlooking the central park to enhance the architectural character and variety of the area. Duplexes/own-door apartment buildings would ensure passive surveillance and legible frontages onto central riparian strip and entrance road.



CHARACTER AREA 1

Residential cells of 2/3-storey semi-detached and terraced housing including 2,3,4 and 5-bed typologies are structured in efficient cells that embrace existing topography and surround a central distinctive open space in this area. Overall, the built form is arranged to maximise overlooking of perimeter ecological buffers along south-western and south-eastern boundaries of the site.



4.3 SUSTAINABLE MOVEMENT AND GREEN INFRASTRUCTURE

High amenity landscaped ways surround the housing cells and duplexes/own-door apartment buildings providing linkages to neighbouring residential developments and local facilities such as the educational to the east. These routes would provide a pleasant and safe environment for short journeys and encourage a move away from car-based transportation for such journeys.

The landscaped green buffer along the western boundary would be fully overlooked by houses along same, which would also enjoy the visual amenity of the adjacent agricultural lands. This ecological corridor will be continuous along the southern boundary including sylvan green ways for pedestrians and cyclists linking back to the central open spaces and housing cells of the scheme.

The scheme will deliver the opportunity for potential future connections with the School Campus and Neighbourhood Centre. A significant area of high quality landscaped space behind the community centre will mark the entrance to this new residential quarter. This area will include an area of active open space which will enjoy the benefit of changing facilities located in the community building adjacent. These amenities would benefit not only the residents of the new scheme, but also the greater community of Greystones.

Legend

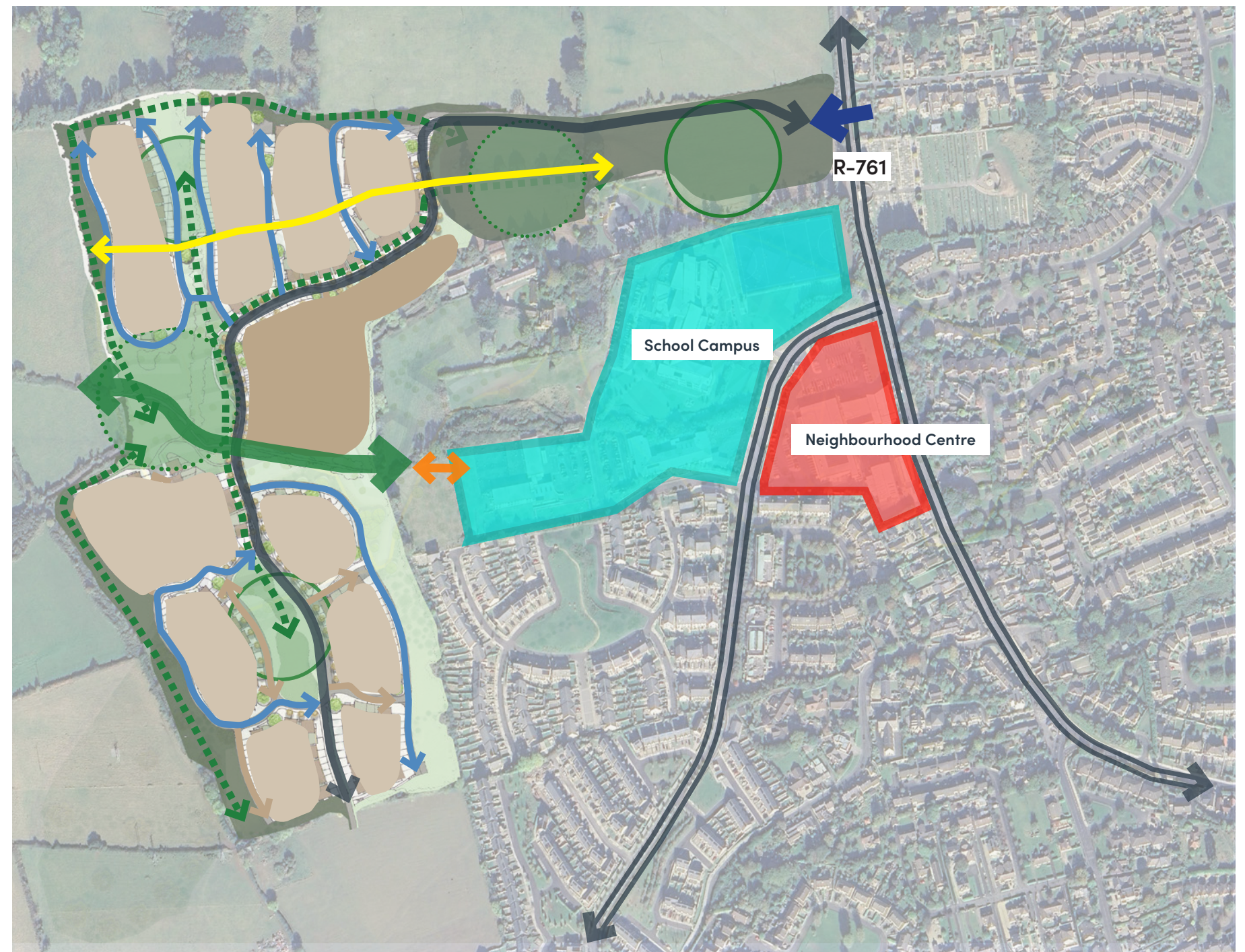
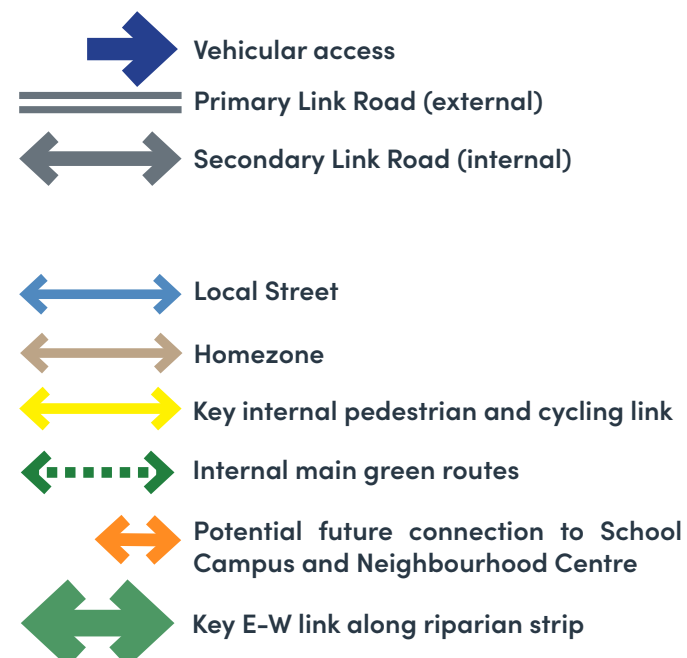


Figure 4-1. Diagram demonstrating connectivity of the subject lands and internal potential street network.

4.4 MASTERPLAN INTEGRATED BUILT FORM

Character Area 1

2/3 storey semi-detached and terraced housing
Neighbourhood park

Character Area 2

2/3 storey semi-detached and terraced housing
Ecological corridor
N-S and E-W links

Character Area 3

Higher density urban form with 3-storey
duplex/own-door apartment buildings in-
tegrated within 2/3 storey houses

Zoned Open Space

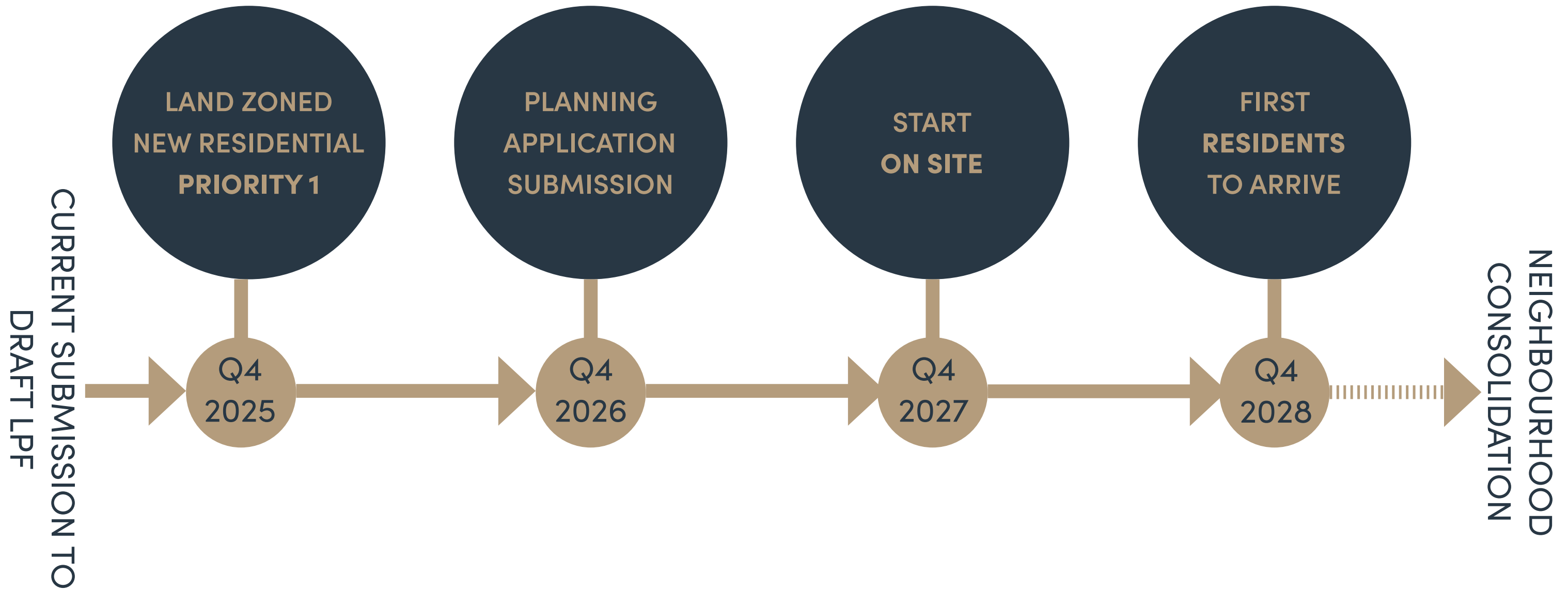
Active Open Space

Community Building

Childcare facility

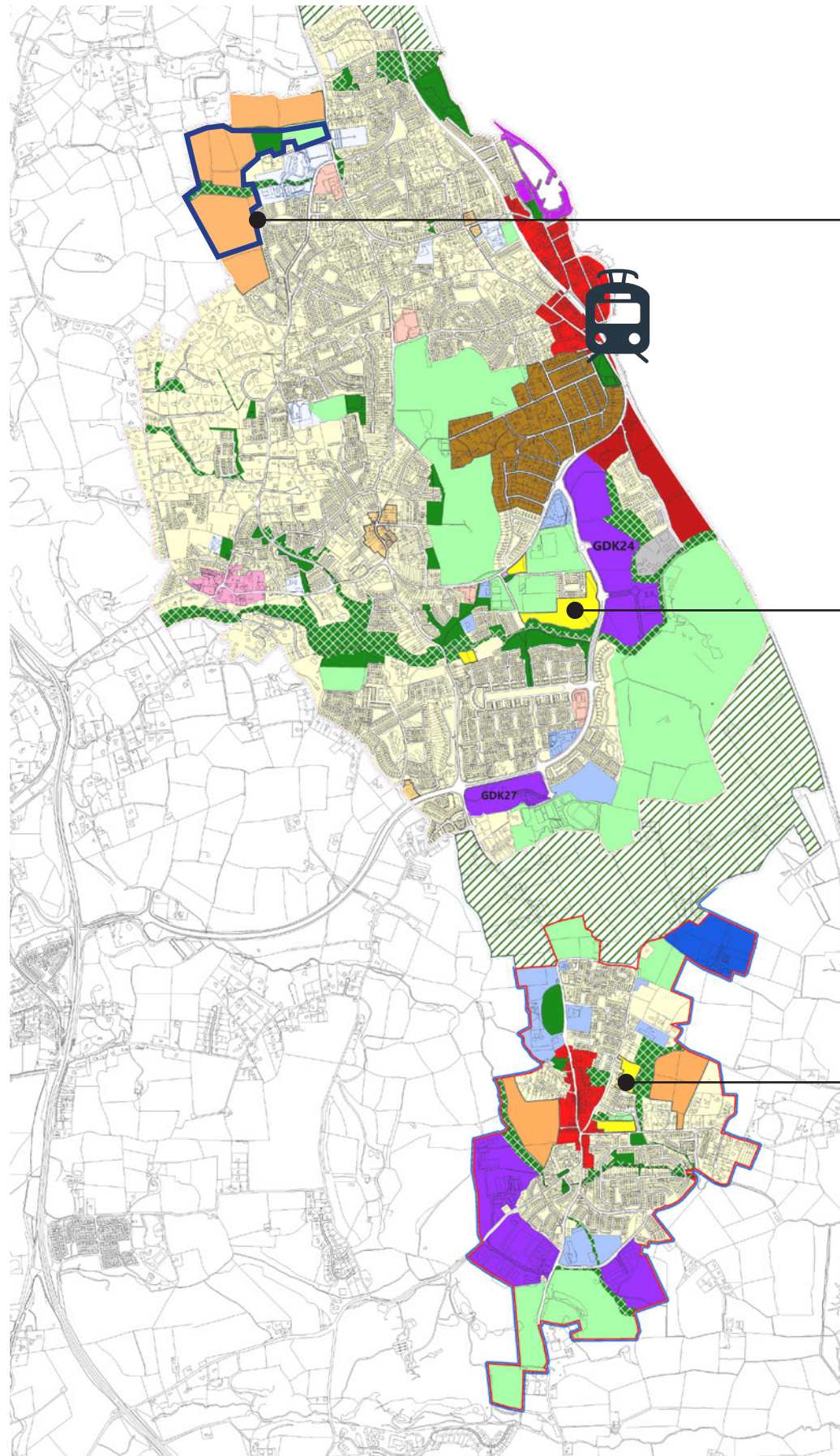


4.5 IMPLEMENTATION



5 SUBMISSION PROPOSAL

5.1 GREYSTONES: UNDERSTANDING OF THE LOCALITY



SUBJECT SITE - COOLAGAD

- Serviced by bus services and Greystones train station
- Serviced by adjoining Neighbourhood Centre and Educational Campus
- Will unlock Active Open Space, Open Space and existing biodiversity assets to the wider Greystones community

PRIORITISED RESIDENTIAL SITES IN GREYSTONES SOUTH

- Well serviced
- Limited housing delivery due to its contained area
- Almost equidistant from Greystones town centre and station compared to subject site

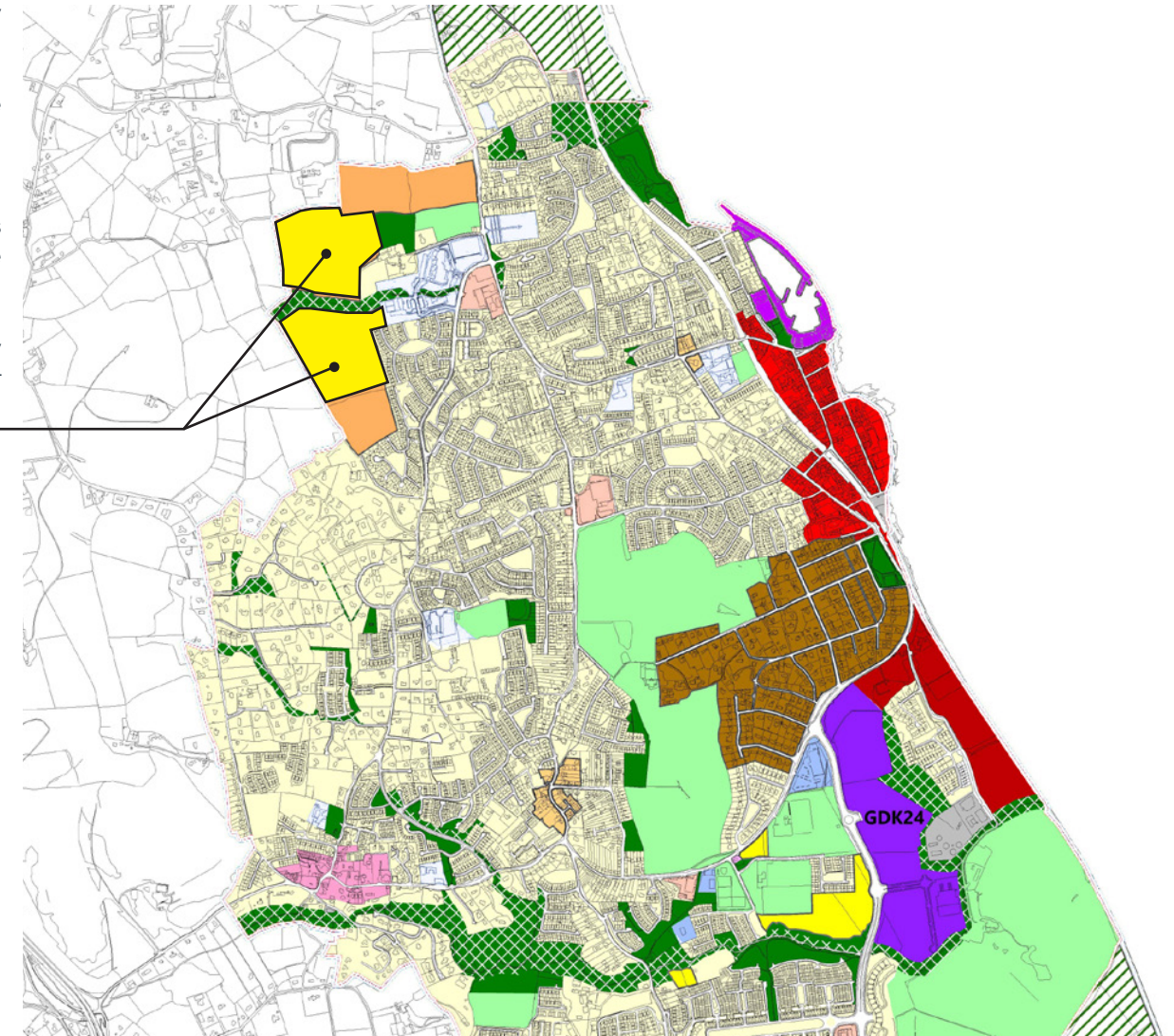
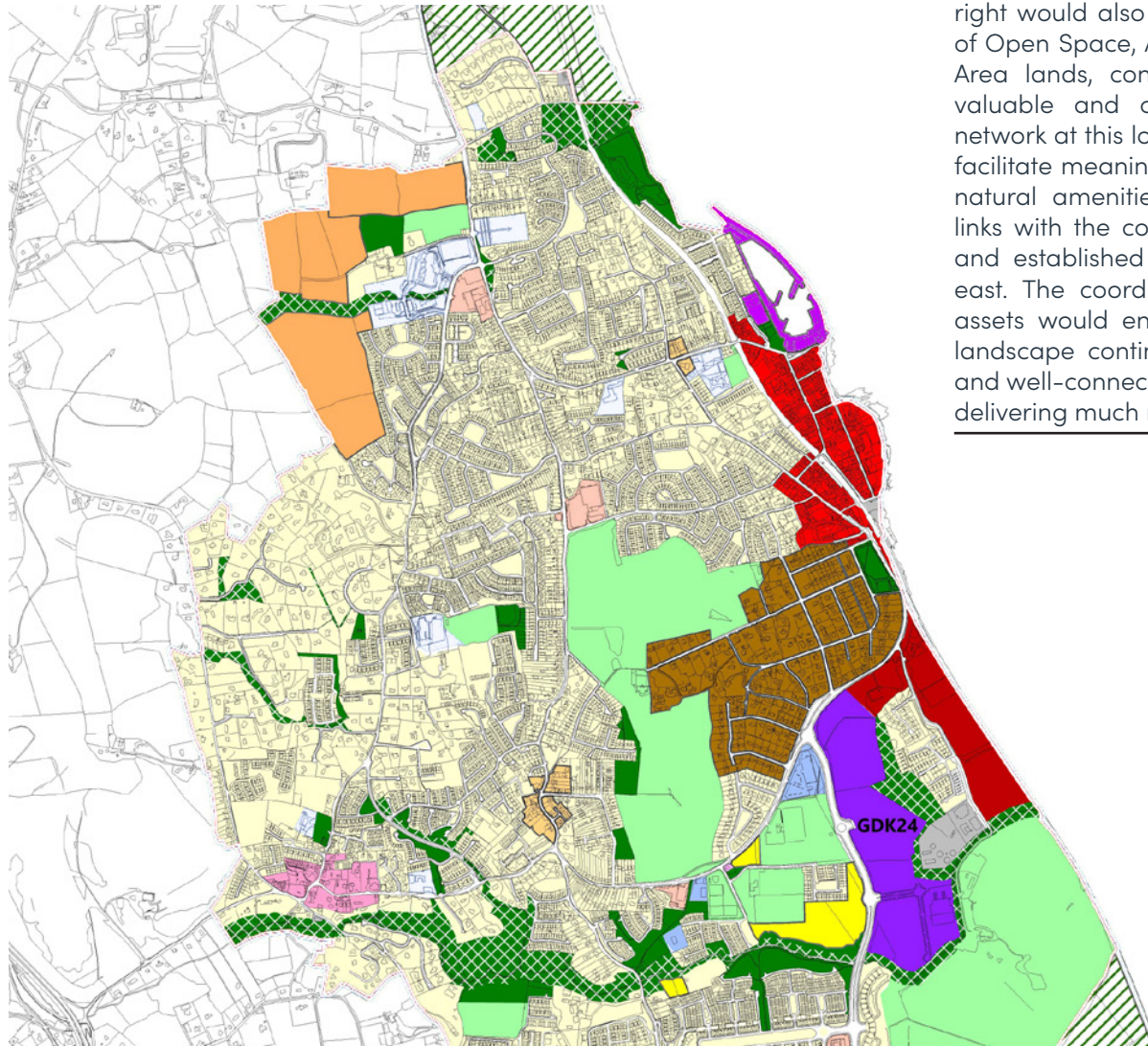
RESIDENTIAL SITES IN KILCOOLE

- Not prioritised as sites are in a less sustainable location and significantly more remote from transport services, infrastructure, facilities and Greystones town centre compared to subject site

5.2 SUBMISSION REQUEST

According to the rationale exposed in this document, the scarcity of developable residential lands “priority 1” and the national policy shift towards increased housing and population targets, Wicklow County Council is requested to **consider lands in Coolagad as “Residential Priority 1”**, as illustrated.

The development of the lands identified to the right would also unlock and enable the delivery of Open Space, Active Open Space, and Natural Area lands, contributing to the creation of a valuable and connected green infrastructure network at this location in Greystones. This would facilitate meaningful integration with the existing natural amenities to the west and strengthen links with the consolidated educational campus and established residential communities to the east. The coordinated delivery of these green assets would enhance both local amenity and landscape continuity, supporting a high-quality and well-connected neighbourhood environment delivering much needed housing.



LEGEND

RE: Existing Residential	AOS: Active Open Space	Settlement Boundary
TC: Town Centre	OS1: Open Space	Local Planning Framework (LPF) Boundary
VC: Village Centre	OS2: Natural Area	
NC: Neighbourhood Centre	E: Employment	
LSS: Local Shops & Services	RN1: New Residential - Priority 1	
MU: Mixed Use	RN2: New Residential - Priority 2	
PU: Public Utility	RS: Special Residential	
CE: Community and Education	AG: Agriculture	
T: Tourism	SLC: Small Local Centre	
AOS: Active Open Space	GHM: Greystones Harbour & Marina	



Proposed Variation No.4 to the Wicklow County Development Plan 2022-2028 draft Greystones – Delgany & Kilcoole Local Planning Framework

Submission on behalf of Cairn Homes Properties Ltd



MACCABE DURNEY
BARNES
Planning Environment Economics

On behalf of:



June 2025

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1. INTRODUCTION.....	7
1.1 Background	7
1.2 Report Structure	10
1.3 Masterplan Submission and Specialist Input	11
1.4 Requested Amendments.....	11
2. PART A: STRATEGY	12
2.1 Submission 1: A2 County Development Plan Strategy for Greystones-Delgany & Kilcoole	12
3. PART B: SETTLEMENT SPECIFIC OBJECTIVES	18
3.1 Submission 2 - B.2 Residential Development (Priority 1. RN1/Priority 2.RN2 & Density)	18
3.2 Submission 3 – B.3 Economic Development.....	22
3.3 Submission 4 – Coolagad (B.8 Zoning and Land Use, B.9 SLO4, B.7 Infrastructure)	25
3.4 Submission 5 – Hawkins Lands (B.8 Zoning and Land Use).....	32
3.5 Submission 6 – Charlesland Lands (B.8 Zoning and Land Use)	38
4. CONCLUSION	44
APPENDIX 1 – HOUSING COMPLETIONS	45

LIST OF TABLES

Table 1: Proposed Amendments	3
Table 2: ESRI Population Projections	14
Table 3: Structural Housing Demand Projections by Local Authority	14
Table 4: Rate of Activation of zoned land by Region/County	15
Table 5: Draft LPF Zoning with Commentary	19

LIST OF FIGURES

Figure 1: Archers Wood, Greystones by Cairn	8
Figure 2: Sorrell Wood and Phase 1 of Blessington Town Park by Cairn	9
Figure 3 Cairn Homes sites in Greystones-Delgany & Kilcoole.....	10
Figure 4: Extract from the CDP showing the sequential approach for site identification.....	20
Figure 5: Cairn Lands in Coolagad	26
Figure 6: Extract of land use zoning map showing Coolagad	26
Figure 7: Proposed amendments to RN1 zoning at Coolagad	27

Figure 8 Coolagad Masterplan.....	31
Figure 9: Cairn Lands in Hawkins	32
Figure 10: Proposed zoning for the Hawkins Lands.....	33
Figure 11: The Weaver Building.....	34
Figure 12: Cairn Masterplan Proposal for the Hawkins lands.....	34
Figure 13: Proposed zoning amendment to Hawkins Lands	36
Figure 14: Archers Wood.....	37
Figure 15: Cairn Homes Landbank in Charlesland	38
Figure 16: Proposed zoning for lands at Charlesland	39
Figure 17: Proposed zoning amendment for lands at Charlesland	41
Figure 18: Archers Wood, Delgany.....	42
Figure 19: Hawkins Wood, Greystones	43
Figure 20 Planning Permissions by House Type Nationally and in Greater Dublin Area.	46
Figure 21 Planning Completions by House Type Nationally and in Greater Dublin Area.....	46



EXECUTIVE SUMMARY

Cairn Homes welcomes the preparation of the proposed Variation no. 4 to the Wicklow County Development Plan (WCDP) 2022-2028 in relation to the Greystones, Delgany and Kilcoole Local Planning Framework (GDKLPF). This will provide an important framework for the development of the town up to 2030 and beyond. Cairn Homes has an important stake-holding in the sustainable development of the LPF area and in particular its implementation. Despite their best endeavours, Cairn Homes have three undeveloped landbanks in Greystones at Coolagad Greystones within the northeastern part of the settlement area; the Hawkins land at Kilcoole Road on the southern side of the R774 ring road in the southern part of the settlement, and the Charlesland land to the east of the R774 adjoining the Kilfernoc Roundabout. This submission principally addresses three landholdings in the ownership of Cairn Homes.

Strategic Issues - A2 County Development Plan Strategy

- There is an urgent need for housing that is not being met by the Variation or LPF. The LPF sets out a land use strategy that is still based on the 2013 Local Area Plan rather than address pressing housing and demographic needs for the Greater Dublin area. The Government's NPF 2025 revision makes it clear that all contemporary plans must presume that the strategic context has already changed. The LPF does not even record the 2022 Census population for the town or provide a strategy based on present day needs.
- The LPF seeks to reinterpret the settlement's 'growth town' designation to 'catch-up' and consolidation status. This is counter to the settlement's designation under the RSES and contrary to the NPF.
- The LPF highlights the advantages; high quality DART/rail line links to Dublin, good quality bus links and easy access onto the M/N11 but does seek to leverage or build on this, with an over emphasis on infill development and reorientating the town to target major employment investment.
- Cairn submits that the LPF should be a proactive amendment to the County Development WCC that encourages and supports the provision of new high quality residential development to support population needs in the short term. The LPF should presume the Core Strategy will be amended for new NPF targets.

Residential Zoning - B.2 Residential Development (Priority 1. RN1/Priority 2.RN2 & Density)

- There is not enough zoned lands in RN1 and unnecessarily places important residential lands in RN2. This approach places significant impediments to delivering housing permissions and developments in the short term and within the life of the plan.
- Draft objective GDK16 is obstructive to bringing RN2 lands forward for consideration, with reliance placed on permissions and developments on RN1 landbanks that have little prospect of delivering housing.
- The quantum of lands within RN1 zoning needs to be significantly revised in order to enable residential permissions and development to be brought forward consistent with the CDP's Sequential Approach.
- It is imperative that Cairn Homes' landbank at Coolagad is rezoned RN1.
- It is requested that GDK17 is amended to allow for appropriate residential density at Coolagad.

Economic Development - B.3

- The draft LPF places a reliance on an employment market inherited from the policies of the expired Local Area Plan that has failed to deliver new employment to the town. The draft LPF employment strategy will exacerbate the effects of the previous policy and only serve to deliver 'planning blight'.

- The draft LPF and Variation is an opportunity to objectively review and amend the strategic approach. The employment lands are in sustainable locations, close to the town centre and served by public transport, that can be better used to deliver residential development in the short term.
- Table 6.5 of the draft LPF presumes an additional 2,100 jobs will be provided in Greystones up to 2031. It should be amended to accommodate a realistic jobs ratio target for Greystones in 2031 of 50%, reflecting the settlements current jobs ratio and designation as a Growth Centre and Residential Settlement.
- The Council currently proposes to include 37 hectares of undeveloped lands for employment uses (39% of zoned lands). The rezoning of lands at Charlesland to residential and Hawkins to mixed use as requested by Carin Homes in following sections would still provide a residual area of c.31.58 (20% of zoned lands).

Coolagad - B.8 Zoning and Land Use, B.9 SLO4, B.7 Infrastructure

- Coolagad is the most important strategic landbank in Greystones-Delgany.
- The Cairn lands total c.25ha, of which c.16 ha are zoned RN2 (out of c.27 ha RN2). In the interest of delivering sustainable residential communities within the life of the plan it is imperative that the lands are zoned RN1.
- Cairn welcomes the designation of the lands at Coolagad as SLO 4.
- Cairn is supportive of the vision set out under the SLO 4 and is committed to the delivery of a new residential community, well-served by on-site facilities and well connected to the wider settlement.
- Cairn Homes are confident that subject to detailed design, the masterplan that accompanies this submission could deliver a density of between 30 and 35 uph for the site, bearing in mind the topographical, environmental and services challenges on the site. There is no risk of landslide associated with the site. A flexible approach to density within the site should be incorporated in SLO4.
- The SLO4 designation of a core riparian buffer zone should be no more than 10m
- Cairn is committed to the delivery of community infrastructure at Coolagad, but SLO4 should be amended to enable regard to existing, as well as new communities.
- In respect Surface Water Management, Cairn is committed to implementation of best practice SUDs measures. Objective GDK64 should be re-worded to ensure the obligations of future applications are related to the development lands only.

Hawkins Lands (B.8 Zoning and Land Use)

- Hawkins lands are strategically located on Kilcoole Road and the R774/L221 and total 2.53 ha.
- The lands are zoned 'E: Employment' under the draft LPF and are subject to objective GDK27. These lands have been zoned for employment purposes since 2006. However, despite this zoning over a prolonged period of time, the lands have not been developed for employment purposes.
- The lands are fully serviced reflecting the planning permission ABP Ref: ABP-305773-19 which includes the Weaver Buildings. The surrounding road network is capable of accommodating a mixed-use form of development.
- It is submitted that the Hawkins land be considered for 'MU: Mixed Use' zoning as presented in the masterplan proposal put forward by Cairn Homes.

Charlesland Lands (B.8 Zoning and Land Use)

- Cairn's lands at Charlesland are also subject to a designation GDK24 'To facilitate and support the development of large-scale employment generating development
- Cairn Homes submit that the Charlesland be rezoned 'RN1 – New Residential Priority 1.
- This will support the delivery of sustainable residential neighbourhood in a location proximate to the town centre in accordance with the principles of the Compact Settlement Guidelines, RSES and NPF

Proposed Amendments

The table below shows the proposed amendments to the draft Greystones – Delgany and Kilcoole Local Planning Framework.

Table 1: Proposed Amendments

Proposed Amendments
<p><u>Requested Amendment 1</u></p> <p>A2.2 – Role and Function of the settlements</p> <p>‘While the ‘growth town’ designation would suggest that is consistent the RSES and NPF objectives that significant new population growth is planned for Greystones – Delgany for the duration of the County Development Plan, in fact this designation is intended to reflect the growth that has already occurred in the 2016-2025 period having regard to housing development completed, underway and due for completion within this timeframe. The focus during the period of this LPF therefore will be on the provision of ‘catch up’ infrastructure to match this to balance the need to deliver significant residential growth and with respect to further residential development, both utilising will be on infill development and consolidation of the built up area with new residential communities as appropriate.</p> <p>The town should aim to attract a concentration of major employment generating investment and should target investment from foreign and local sources in a mixture of ‘people’ and ‘product’ intensive industries. In addition, the town should provide for the retail needs of its population and its catchment, in the form of a mixture of both comparison and convenience retail offer.</p>
<p><u>Requested Amendment 2</u></p> <p>B.2 Residential Development</p> <p>We respectfully submit amended wording for GDK16 as follows:</p> <p>“Notwithstanding the zoning / designation of land for new ‘greenfield’ residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions where the following condition are satisfied:</p> <ul style="list-style-type: none"> At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated received planning consent; <p><i>It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached and that the RN2 lands will deliver residential output in lieu of non-delivery of Priority 1 lands.</i></p>
<p><u>Requested Amendment 3</u></p> <p>Most of the RN1 lands in the draft LPF are not likely to be delivered in the lifetime of the plan, but much beyond. It is therefore respectfully submitted that this is an ad-hoc approach to the designation of RN1 and RN2 lands and it is absolutely imperative to increase the quantum of RN1 lands in the Greystones-Delgany settlement to offer more suitable and sustainable alternatives. On foot of this, we submit the Cairn landbanks for consideration, either as a whole or in parts for RN1 zoning. We discuss specific points for each landbanks in the dedicated sections.</p>
<p><u>Requested Amendment 4</u></p>

"GDK17:However, lower density residential developments may be required at certain locations; where by virtue of environmental, topographical and service constraints, including lack of public mains infrastructure, poor road access, steep gradients, flooding issues and significant coverage of natural biodiversity; a lower density of development is preferable. In particular, the planning authority will carefully control new housing development and the density of new development on lands zoned 'RE: Existing Residential' at Blackberry Lane, Kindlestown Upper, ~~and Bellevue Demesne~~ **and Coolagad.**"

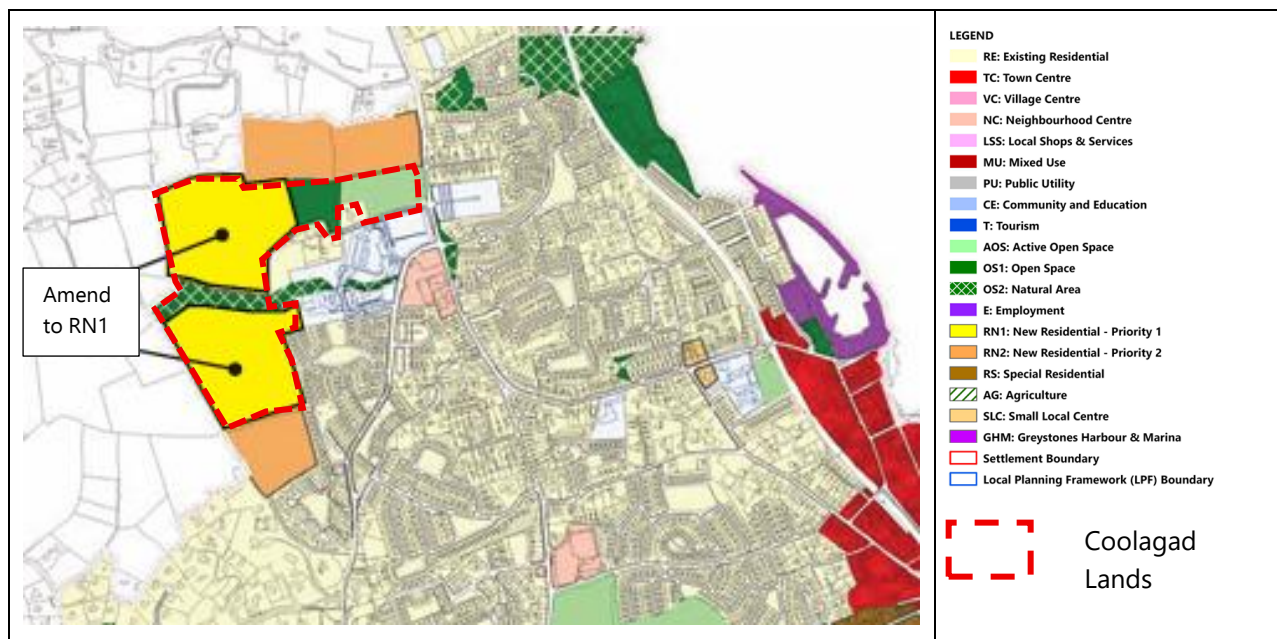
Requested Amendment 5

It is submitted that Table 6.5 should be amended to provide for 50% jobs ratio in 2031.:

	Jobs ratio 2016	Jobs ratio 2022	Targeted future jobs ratio 2031	Jobs target for settlement in 2031	Jobs growth 2022-2031	Minimum quantum of zoned employment land (ha)
Greystones - Delgany	32%	49%	73.5% 50%	6,275 4942	2,100 751	26.25
Kilcoole	46%	77%	805	1,500	150	4

Requested Amendment 6

We request that Map No.1 be amended as follows:



Amendments to SLO 4 as follows:

Requested Amendment 7

".....Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural lands / Kindlestown Hill to the rear of the site. In this regard, **lower overall site density may be appropriate and building height and density shall reduce as landscape elevation increases.....**"

Requested Amendment 8

".....Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least **10 25m** along each side free from development.....".

Requested Amendment 9

"Green links shall be provided ~~throughout~~ **within** the area. **The Council will investigate the feasibility** to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods, **subject to agreement with the landowners and technical feasibility.**"

Requested Amendment 10

"...Community facilities shall be provided within the SLO area to meet the needs of the new **and existing** resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out."

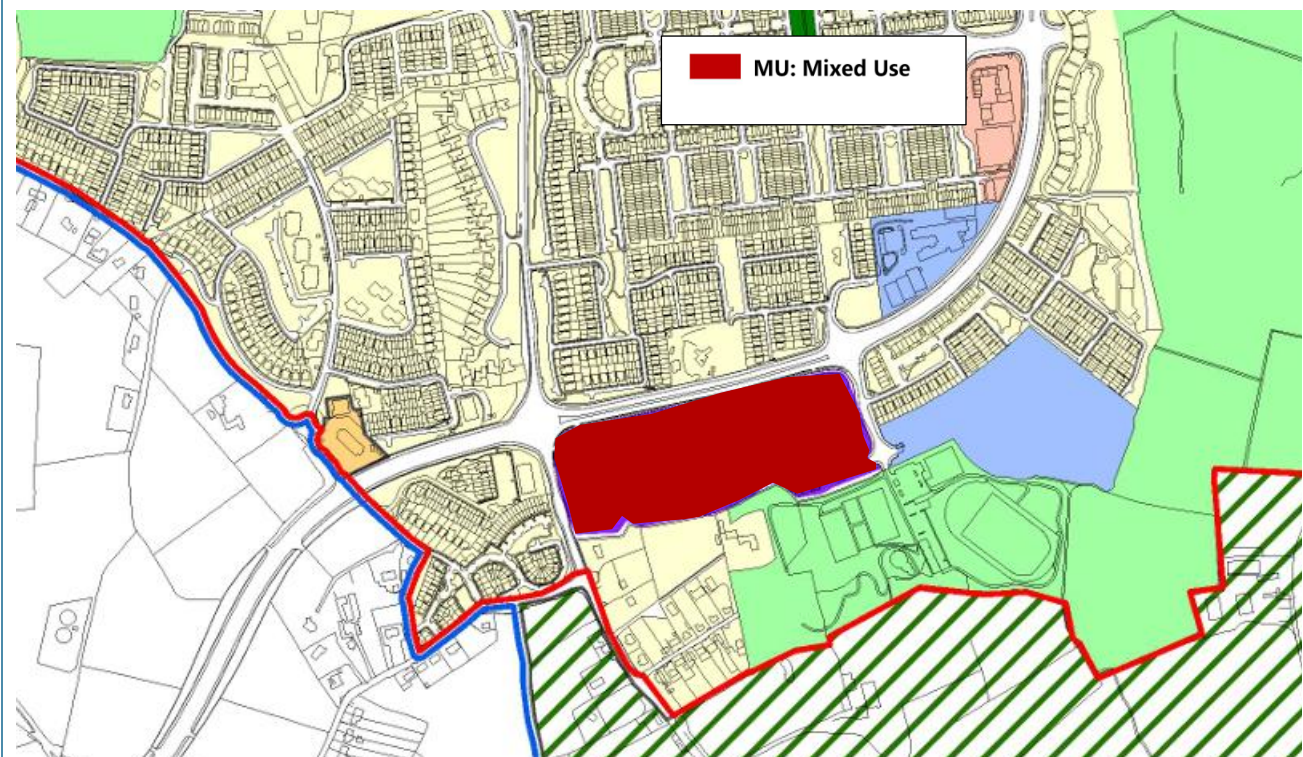
Requested Amendment 11

"GDK64

b) new significant development in the Coolagad – Templecarrig area in north Greystones will only be considered where the development's surface water drainage arrangements accord with Wicklow County Council's Sustainable Urban Drainage (SUDs) Policy ~~and an overall Surface Water Management Plan for the area which addresses the capacity of the area network and~~ **which** obviates flood risk on downstream lands'.

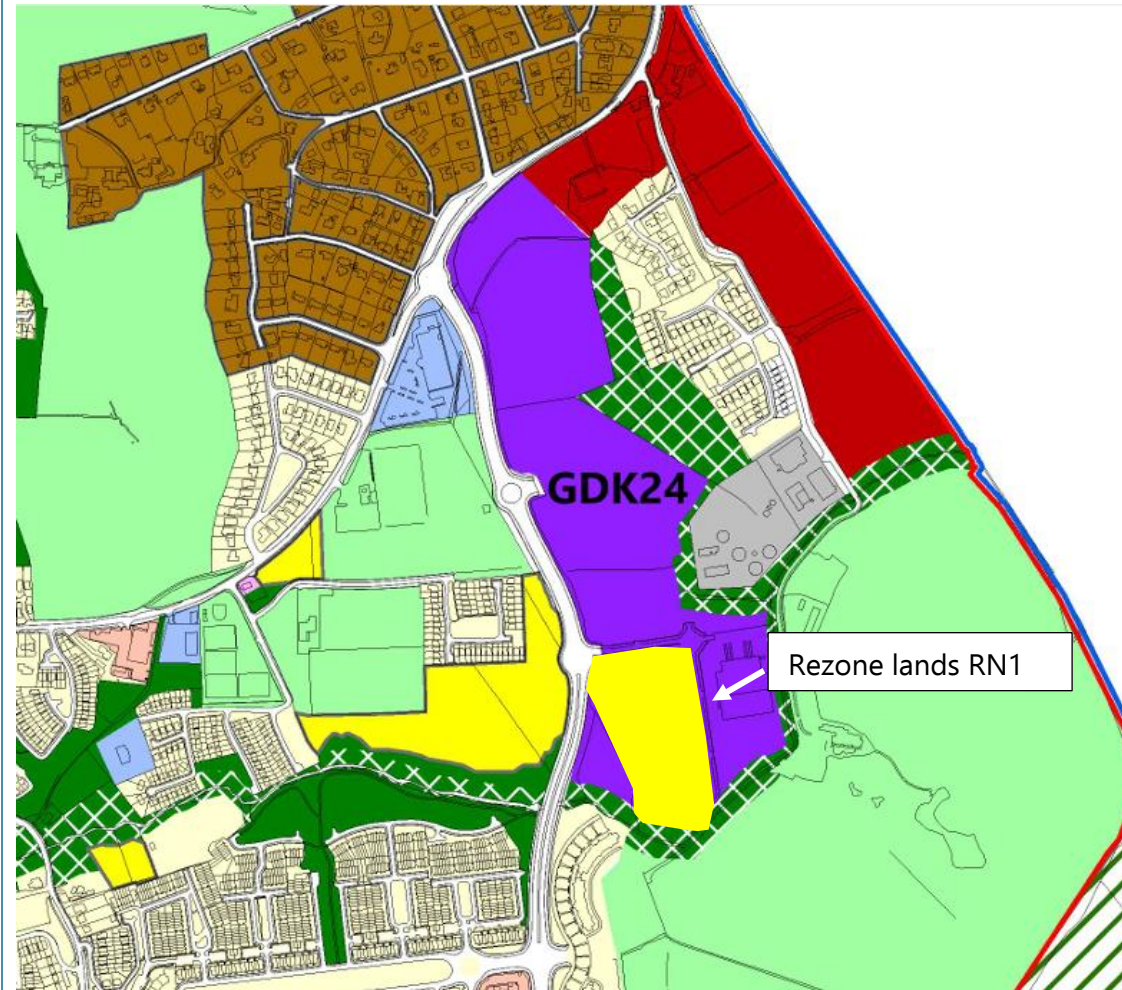
Requested Amendment 12

It is submitted that the **Hawkins land** be zoned '**MU: Mixed Use**' zoning as presented in the masterplan proposal put forward by Cairn Homes. **Delete policy objective GDK27.**



Requested Amendment 13

It is submitted that the Charlesland site of c.2,89 ha be rezoned from GDK24 to 'RN1 – New Residential Priority 1.



1. INTRODUCTION

1.1 Background

MacCabe Durney Barnes has prepared this submission on behalf of **Cairn Homes Properties Ltd (“Cairn Homes”)** of 45 Mespil Road, Dublin 4, D04 W2F1 in response to proposed variation no. 4 to the Wicklow County Development Plan (WCDP) 2022-2028 in relation to the Greystones, Delgany and Kilcoole Local Planning Framework (GDKLPF). Cairn Homes made a detailed submission on the issues paper of the Draft Greystones – Delgany and Kilcoole Local Area Plan 2024-2030 in January 2024.

Cairn Homes welcomes the preparation of the GKLPF, which will provide an important framework for the development of the town up to 2030 and beyond. Cairn has a keen interest in the sustainable development of the LPF and is a stakeholder with various landholdings within the area. Despite their best endeavours, Cairn Homes have three undeveloped landbanks in Greystones at Coolagad within the northeastern part of the settlement area; the Hawkins land at Kilcoole Road on the southern side of the R774 ring road and the Charlesland lands on the eastern side of the R774 adjoining the Kilfernoc Roundabout. This submission principally addresses these landholdings in the ownership of Cairn Homes (Figure 3).

Cairn Homes track record of delivery

Cairn is actively engaged in the delivery of some 15,000 homes over the coming years and have to date completed over 8,000 homes. In 2024 Cairn commenced over 4,100 new homes, including 10 new large-scale developments, and aim to exceed this number in 2025.

Cairn won in a number of categories at the Irish Construction Excellence Awards 2025, including ‘Project of the Year’ for Seven Mills and ‘Innovation in Construction’ for our lead role in building new homes to Passive House standards in Ireland.

Cairn places community building and placemaking at its core. They design and construct neighbourhoods with the best placemaking practices, creating spaces where quality of life is enhanced and people can thrive.

Cairn’s vision is to create communities of connection and belonging, building towards an Ireland where everyone can prosper. Initiatives include:

- Seven Mills Community Fund
 - Launched in November 2024, committed €30,000 to support local organisations across Dublin 22
- Cairn Community Games
 - Partnership with the Community Games, reflecting core values of equality, inclusion and local impact
- Home Together Programme
 - An ongoing and expanding programme that focuses on developing community initiatives that are sustainable in the long run. Cairn kickstarts community participation in new developments by providing help and resources to new residents to ensure that any projects get off the ground successfully.

Market Leading Efficiency

- Analysis of Building Control Management System (BCMS) records of residential completions highlights that Cairn delivers on average 9-12 weeks quicker than anyone in the sector
- 9 weeks quicker than the industry at large (from a sample of 25,142 new homes built)
- 11.5 weeks quicker than large main contractors (from a sample of 7,356 new homes built)

Cairn Homes in Wicklow and Greystones

To date Cairn have delivered 1,116 new homes in Wicklow and has been engaged over a long period of time in significant residential in Greystones-Delgany at Archers Wood Delgany and Glenherron Greystones. In addition, Cairn has been played a key role in the delivery of 2 new schools in Greystones in the Charlesland area plus other significant community and sports facilities and enterprise units. Cairn is committed to working with Wicklow County Council in the delivery of much-needed new homes together with the associated infrastructure necessary to deliver new communities with improved and high-quality amenities.

The delivery of new housing communities has brought new public and social infrastructure by Cairn including:

- 6.3 acres of public parks in Greystones
- 3 playing pitches
- 10 Playgrounds
- 2km of greenway in Greystones and Blessington
- Delivery of the Phase 1 of the Blessington Town Park which opened in January 2025
- 1,300 sqm of community & enterprise offices at the GRID in Greystones (recently opened by Wicklow County Council,
- 3 creches
- Upgraded roads, pathways and cycleways
- Facilitated a primary & secondary school in Greystones.



Figure 1: Archers Wood, Greystones by Cairn



Figure 2: Sorrell Wood and Phase 1 of Blessington Town Park by Cairn



Figure 3 Cairn Homes sites in Greystones-Delgany & Kilcoole

The first landholding is known as **Coolagad**, which totals 24.8 ha. It is located to the north of Greystones, close to Templecarrig. The principal access for these lands is via the R761. These lands are located broadly to the west and rear of Templecarrig School, Naíonra na gCloch Liath and the Greystones Educate Together School and of the Waverly residential estate and broadly north of the Seagreen residential estate.

The second landholding is known as the **Hawkins Lands**. These lands are located to the south of Greystones and are bound by the Kilcoole Road and the R774/L221. These lands total 2.53 ha. Glenheron development lies to the north, Eden Wood to the west and Hawkins Wood to the East. Offices, the Weaver Buildings, comprising a two-storey community enterprise building (1,356 sqm) and a two-storey office building (1,376 sqm) have been developed by Cairn Homes in the south eastern portion of the overall landholding as part of the SHD development permitted under ABP Ref: ABP-305773-19. The lands are shown on the figure below.

The last landbank was formally part of the **IDA** business park (c.2.89 ha). It is located directly across from the Council's housing site in **Charlesland**.

1.2 Report Structure

This report is structured as follows:

PART A: STRATEGY

Submission 1: A2 County Development Plan Strategy

PART B: SETTLEMENT SPECIFIC OBJECTIVES

Submission 2 - B.2 Residential Development (Priority 1. RN1/Priority 2.RN2 & Density)

Submission 3 – B.3 Economic Development

Submission 4 – Coolagad (B.8 Zoning and Land Use, B.9 SLO4, B.7 Infrastructure)

Submission 5 – Hawkins Lands (B.8 Zoning and Land Use)

Submission 6 – Charlesland Lands (B.8 Zoning and Land Use)

1.3 Masterplan Submission and Specialist Input

This submission on the GDKLPF 2025 has been prepared as part of multi-disciplinary team. This planning report summarises the key issues and policy related requests by our client. The overall vision for Cairn Homes lands at Coolagad is articulated in the Masterplan document:

- Masterplan Vision and Strategy MCORM Architects

It is informed by professional inputs from:

- KFLA Landscape Architects, and
- Barrett Mahony Consulting Engineers

1.4 Requested Amendments

Throughout this submission requested deletions are illustrated with ~~strike through~~ and additions are in red.

2. PART A: STRATEGY

2.1 Submission 1: A2 County Development Plan Strategy for Greystones-Delgany & Kilcoole

Section A2.2 'Role and function of the settlements' seeks to reinterpret the settlement's 'growth town' designation to 'catch-up' and consolidation status. This is counter to the settlement's designation under the RSES and contrary to the NPF.

The LPF highlights the advantages; high quality DART/rail line links to Dublin, good quality bus links and easy access onto the M/N11 but does seek to leverage or build on this, with an over emphasis on infill development and reorientating the town to target major employment investment.

Cairn submits that the LPF should be a proactive amendment to the County Development WCC that encourages and supports the provision of new high quality residential development to support population needs in the short term.

The Core Strategy should have been amended to reflect the new NPF targets. We expect that such amendment is forthcoming and imminent.

2.1.1 Draft GDK LPF

Greystones-Delgany is designated as a Level 3 Self-Sustaining Growth Town in the Core Strategy in the Core Region. Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.

The Wicklow Core Strategy for Greystones notes that such towns are targeted to grow by 25% to 30%. The town is in the Dublin Metropolitan Area. The LPF sets out a land use strategy that is still based on the 2013 Local Area Plan rather than address pressing housing and demographic needs for the Greater Dublin area.

Under section A2.2 Role and function of the settlements the Council states:

*'While the 'growth town' designation would suggest that significant new population growth is planned for Greystones – Delgany for the duration of the County Development Plan, in fact this designation is intended to reflect the growth that has already occurred in the 2016-2025 period having regard to housing development completed, underway and due for completion within this timeframe. **The focus during the period of this LPF therefore will be on the provision of 'catch up' infrastructure to match this significant residential growth and with respect to further residential development, will be on infill development and consolidation of the built up area'.***

This overall objective is overly conservative and restrictive. It places an emphasis on a retrospective view of the settlement rather than a forward looking vision. This is out of line with the Government's direction in the Revised NPF (April 2025), the RSES and Compact Settlement Guidelines. The Council would be expected to emphasise the considerable advantages of Greystones in terms of location, access and amenity.

The draft plan goes on to state:

The town should aim to attract a concentration of major employment generating investment and should target investment from foreign and local sources in a mixture of 'people' and 'product' intensive industries. In addition, the town should provide for the retail needs of its population and its catchment, in the form of a mixture of both comparison and convenience retail offer.

The LPF is in effect seeking to redefine the role and status of Greystones-Delgany from an important Self-Sustaining Growth Town to an employment centre. With no evident demand from the market that reflects this ambition, employment lands in good locations will not be utilised to their capacity.

2.1.2 Cairn Submission

There is an undue focus in the LPF on the provision of 'catch up' infrastructure and infill development, without recognising that new residential development has been suppressed since the adoption of the County Development Plan in 2022, and expiry of the Greystones-Delgany Local Area Plan. This retrospective focus on the *status quo* not only fails to address a legacy of under-performance in housing delivery across Wicklow, but is now misaligned with the updated National Planning Framework's ambitions to considerably increase housing delivery across the country.

One of the key factors cited in the new Variation to Development Plan policy that justifies greater flexibility in zoning is *changes to the National Planning Framework (NPF)*. The **National Planning Framework First Revision** was adopted by the Government in April 2025. The new LPF policy incorporated in the CDP does not give due consideration to changes to the NPF.

The 2018 NPF had projected a population of 5.85 million in 2040. This was superseded by the revised NPF which now projects a population of 6.1 million by 2040. Yet the draft LPF put forward by WCC does not reflect any changes in population targets and uses outdated population figures and targets. It repeats those set out under the Core Strategy of the WCDP, in spite of the LPF being a variation of the plan, therefore allowing for amendments to the Core Strategy. The LPF even states in section A2.2 that its focus is not of the delivery of residential development but of infrastructure.

The NPF provides a clear direction that Planning Authorities must have regard to significant higher population needs. There is no question that LAPs (or LPFs) now must reflect changes in the Core Strategy or population / housing targets. There is no question that this "*may arise*"; it is in fact national policy that it has happened.

In the proposed amendments to section 3.5, the revised plan says:

'..., with flexibility in the zoning provisions to ensure that (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise and (b) the LAPs/ LPFs do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation'.

The LPF does not even record the 2022 Census population for the town. It is questionable how a planning authority can develop a strategy for a settlement where the current population figure is ignored. The NPF has already amended the regional population targets as seen under NPO 3. There is a clear direction that figures at local level can now increase to reflect the change. The LPF should presume the change in population targets has already happened rather than an amendment to be addressed at a later date.

ESRI Population Projections, The Flow of new Households and Structural Housing Demand (July 2024)

The ESRI update referred to in the NPF projects indicate an annual housing demand for Wicklow of between 1,374 and 1,465 between 2023 and 2040. This contrasts with the grossly inaccurate ESRI projects from 2020 of between 773 and 881 units between 2021 and 2040. The ESRI's revised population projections are 66% to 78% higher than their 2020 estimates, demonstrating that housing demand has surpassed the Core Strategy's population targets and estimates of residential zoning need. It is these figures upon which the Housing Targets were prepared pursuant to the section 28 guidelines. It is evident therefore that the housing targets for Wicklow will significantly increase in the near future.

Table 2: ESRI Population Projections

TABLE A.1 POPULATION PROJECTIONS

	Population ('000) Baseline				Annual Growth in %, 2022–2040		
	2022	2027	2032	2040	Baseline	High Migration	Low Migration
State	5184.0	5532.1	5781.0	6106.1	1.0%	1.2%	0.8%
Wicklow	156.9	166.3	172.9	182.9	0.9%	1.1%	0.8%

Table 3: Structural Housing Demand Projections by Local Authority

TABLE A.2 STRUCTURAL HOUSING DEMAND PROJECTIONS BY LOCAL AUTHORITY

	Average Across All Assumptions		Lowest		Highest	
			low migr, current trend headship & 0.25% obs.		high migr, lower hh size headship & 0.5% obs.	
	2023–2030	2030–2040	2023–2030	2030–2040	2023–2030	2030–2040
State	44,047	39,654	35,018	27,805	53,294	52,445
Wicklow	1,141	1,129	912	816	1,374	1,465

The proposed variation no. 4 to the development plan provides the lands that are zoned to meet the core strategy targets for 2031. But the Plan also states that much of this target, if not all, would be achieved by 2025. It continues by stating the zoning approach is such that it would allow the achievement of targets 'in the event of unforeseen impediment'.

This approach is unclear and contradictory, does not provide flexibility and is not aligned with the requirements of the Revised NPF. As it stands, using the same logic, no lands can put be put forward for development, including landbanks owned by the Council which would have been put forward for social and/or affordable housing until the year 2031.

This approach is wholly unsustainable and contrary to the fundamental principles underpinning section 10 of the Planning and Development Act 2000 on the role of development plans in providing an overall strategy for the proper planning and sustainable development of an area. By not considering an increase in the population target for Greystones, the council is restraining development from coming forward. This is also contrary to the development plan guidelines, specifically section 4.4.2 of the Development Plan Guidelines which states that;

*'it is recognised that **there is a need for some degree of competition and choice in the residential development land market** and to ensure a future pipeline of well-located serviced land. Accordingly, in considering whether to zone additional new land and sites for residential (or a mixture of residential and other uses) to meet housing need, planning authorities must ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the development plan, while also considering and factoring in the proportion of projected housing need to be met on unzoned land in rural areas.'*

Zoning Land Activation (unforeseen impediments to the development of lands)

The new Variation to Development Plan policy cites **(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise.**

The achievement of the housing requirements for the settlement depends on 75% of all zoned land being activated, with planning permission granted, all necessary infrastructure provided, and all permitted houses completed on 75% of all zoned land in the county within the 6 year timeline of the plan. The projections do not have regard to actual or likely land activation and housing completion rates. In Greystones, the WCC Charlesland site represents much of that target.

We refer to the recent report by Goodbody research¹ which demonstrates that actual activation and housing completion rates are far below 75% of all zoned land in a 6 year period. The table below highlights that Wicklow is only achieving an implied activation rate of 36%. Therefore, the draft LFP clearly does not make adequate provision for this scenario to ensure there is adequate provision for zoned and serviced sites that will likely to come forward during the lifetime of the plan.

Table 4: Rate of Activation of zoned land by Region/County

Components of Historical Zoned Completion Rate by Local Authority						
NUTS 2	NUTS 3	Local Authority	Plan Period	Housing Yield of Zoned Land	Completions	Annual Completions
Northern & Western	Border	Donegal	2018-2024	7,681	3,261	544
	West	Galway City	2017-2023	9,093	1,459	243
Southern	South-West	Cork City	2015-2021	11,910**	3,392	565
		Cork County	2014-2020	44,077**	6,220	1,037
Eastern & Midland	Dublin	DLR	2016-2022	33,600	7,082	1,180
		Dublin City	2016-2022	52,450	12,891	2,149
		Fingal	2017-2023	49,541	11,638	1,940
		South Dublin	2016-2022	40,143	7,342	1,224
	Mid-East	Louth	2015-2021	57,418*	3,005	501
		Meath	2013-2019	49,098*	5,556	926
		Wicklow	2016-2022	27,882*	5,664	944
	Midlands	Laois	2017-2023	4,848	2,119	353
		Longford	2015-2021	2,370*	499	83
		Westmeath	2014-2020	8,254	824	137
Total				398,365	70,952	11,825

20% Actual Activation

20% Actual
Activation

¹ Goodbody (September 2024) Residential land availability, an assessment of residential land provision in Ireland

Components of Implied Zoned Completion Rate by Local Authority						
NUTS 2	NUTS 3	Local Authority	Plan Period	Housing Yield of Zoned Land	Housing Supply Target (HST)	Annual HST
Northern & Western	Border	Donegal	2024-2030	12,126*	7,678	1,280
	West	Galway City	2023-2029	6,942	4,433	739
Southern	South-West	Cork City	2022-2028	20,461	16,236	2,706
		Cork County	2022-2028	42,798^	22,611	3,769
Eastern & Midland	Dublin	DLR	2022-2028	22,181	18,515	3,086
		Dublin City	2022-2028	49,175	40,150	6,692
		Fingal	2023-2029	35,001	16,245	2,708
		South Dublin	2022-2028	21,490	15,576	2,596
		Louth	2021-2027	20,525*	6,524	1,087
	Mid-East	Meath	2021-2027	20,581*	16,989	2,832
		Wicklow	2022-2028	23,623	8,467	1,411
	Midlands	Laois	2021-2027	3,948	3,998	666
		Longford	2021-2027	2,734*	2,568	428
		Westmeath	2021-2027	5,319	4,983	831
Total				286,904	184,973	30,829

36% Implied Activation

Source: Goodbody 2024 Residential land availability report

The ongoing *impediments to the development of lands* is further reflected in the Appendix 1. Planning Permissions and Completions at National level and in the Greater Dublin area has remained static is not achieving the housing delivery required by the NPF.

There is a legacy from the preparation of the County Development Plan that has not been resolved and now acts as a burden on residential development throughout the County. The wholly inaccurate housing target numbers and resultant inadequate zoning provisions for the County, and in Greystones in particular, as detailed in the Wicklow County Development Plan 2022-2028, lies at the heart of the undetermined Judicial Review proceedings taken by our client and others [2022/922JR]. This Variation provides the opportunity to address these fundamental issues. However, it fails to do so, as it effectively merely reflects the provisions of the Development Plan. The Variation therefore possesses the same fundament flaws as original Plan adopted in September 2022.

Requested Amendment 1

Wicklow County Council is requested to provide a more balanced and proactive context for its designation as a growth centre.

~~While the 'growth town' designation would suggest that~~ **is consistent the RSES and NPF objectives that significant new population growth is planned for Greystones – Delgany for the duration of the County Development Plan, in fact this designation is intended to reflect the growth that has already occurred in the 2016-2025 period having regard to housing development completed, underway and due for completion within this timeframe.** The focus during the period of this LPF therefore will be ~~on the provision of 'catch up' infrastructure to match this~~ **to balance the need to deliver**-significant residential growth and with respect to further residential development, ~~both utilising will be on~~ **infill development and consolidation of the built up area with new residential communities as appropriate.**

It is submitted the emphasis on the settlement as a major employment generating centre is misplaced and counter to the objective to deliver residential communities in sustainable locations.

~~The town should aim to attract a concentration of major employment generating investment and should target investment from foreign and local sources in a mixture of 'people' and 'product' intensive~~

~~industries. In addition, the town should provide for the retail needs of its population and its catchment, in the form of a mixture of both comparison and convenience retail offer.~~

The Core Strategy should have been amended to reflect the new NPF targets. We expect that such amendment is forthcoming and imminent.

3. PART B: SETTLEMENT SPECIFIC OBJECTIVES

The development strategy in section A.4 does not zone sufficient lands in RN1 and unnecessarily places important residential lands in RN2. This approach places significant impediments to delivering housing permissions and developments in the short term and within the life of the plan.

Draft objective GDK16 is obstructive to bringing RN2 lands forward for consideration, with reliance placed on permissions and developments on RN1 landbanks that have little prospect of delivering

The quantum of lands within RN1 zoning needs to be significantly revised in order to enable residential permissions and development to be brought forward consistent with the CDP's Sequential Approach.

It is imperative that Cairn Homes' landbank at Coolagad is should be zoned RN1

It is requested that GDK17 is amended to allow for appropriate residential density at Coolagad

3.1 Submission 2 - B.2 Residential Development (Priority 1. RN1/Priority 2.RN2 & Density)

3.1.1 Draft GDK LPF

Quantum and distribution of Priority RN1 & Priority RN2

The development strategy is presented in section A.4 of the draft LPF. In general, is does not zone sufficient lands in RN1 and unnecessarily places important residential lands in RN2. It includes a number of statements on:

- The focus of development should be on infill and consolidation;
- The provision of dense, mixed-use regeneration and development of town and village centre infill sites as a priority above edge of centre or peripheral, greenfield locations.
- The prioritisation of lands served by existing or planned high-capacity public transport services. It clearly states that '*no lands will be identified as 'Priority 1 New Residential' designation if not currently served by existing or planned high-capacity public transport service*'.

The plan then identifies RN1 and RN2 lands in draft map 1 land use zoning objectives and table 5.1 of the LPF.

The plan states that permission for lands zoned RN2 will only be considered where '*at least 75% of priority 1 new residential (RN1) lands have been activated (i.e consent obtained and development initiated)*'.

This is accompanied by GDK15 which repeats the development strategy focus on lands zoned 'town centres', 'village centres', 'mixed use' and 'existing residential'.

Under GDK16, the draft LPF conditions the development of RN2 lands as follows:

'Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:

- *At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached'.*

The plan further states that:

*“Edge of centre’ locations will be considered the priority location for such new greenfield residential development and will generally be zoned as ‘New Residential - Priority 1’ (zoned RN1), while more ‘out of centre’ housing sites (zoned ‘New Residential - Priority 2’ RN2) will only be considered where objective **GDK-15** is satisfied and on the basis of integrated housing / community facilities / open space schemes that can be well connected to the existing built up area.*

In order to be cognisant of extant permissions and/or the key role that some sites will play in the delivery of essential infrastructure, it may be necessary for some ‘out-of-centre’ sites to remain as Priority 1’.

3.1.2 Cairn Submission

Priority RN1 & Priority RN2

The overall strategy of the draft LPF seeks to incorporate flexibility, that enables a balance of town centre infill with greenfield development. However, both in terms of quantum of lands provided, as well as policy mechanisms there are significant concerns that the draft LPF does not provide a robust framework to manage development and facilitate adequate housing growth for the town. There is no detailed analysis of the residential or population need in the draft LPF. We provide some commentary on the RN1 lands in the table below.

Table 5: Draft LPF Zoning with Commentary

Location	Status	Zoning / Priority	Comments
Greystones - Charlesland	Local Authority scheme in design	RN1	In design for 2+ years. Dependent on central government funding and on procurement procedures.
Greystones Mill Road	Development Permitted	RN1	
Greystones Three Trouts SLO7	No permission	RN1	Zoned residential for 20 years without any development forthcoming.
Kilcoole – Lott Lane SLO6	No permission	RN1	Zoned residential for 20 years without any development forthcoming. Depending on pedestrian and cycling upgrades to access the train station. Road upgrade needed between Kilcoole and Greystones.
Kilcoole – Sea Road / Lott Lane	Development Permitted	RN1	

The rationale for designated land priority is unclear. Based on Table 5.1 of the LPF (adapted above), around 20% of these sites have received planning permission. The major share lies with the Wicklow County Council’s site in Charlesland (c.57% of the RN1 lands). Without prejudice to our earlier point that the council contends that virtually no development could take place in Greystones, there is no clarity on the timeline for delivery of the Council’s Charlesland site. There may be significant delays or ‘impediments’ prior to the actual delivery of housing units on the site. There are also no time limits for the activation of Part 8 consent. Any consent, including

part 8 consent, given to any lands in RN1 may also be subject to lengthy judicial review proceedings, adding delays potentially beyond the plan period.

Cairn Homes is fully supportive of local authority housing as a critical components of a healthy housing market, but the reliance on the delivery of one site which itself depends on external factors for development is not a solid rationale for prioritising lands as it may give rise to the 'impediments' mentioned in the draft LPF.

In contrast, the Cairn landbanks are located along the same bus corridors and have access to sufficient pedestrian facilities that would allow prospective residents to walk or cycle to the train station. There are no lengthy delays associated with securing central government funding or with procurement procedures. Cairn Homes is committed to the delivery of high-quality neighbourhoods with community infrastructure and high-quality open space. The sites are discussed in detail in dedicated sections.

On average, Cairn Homes takes approximately 6 months, between the final grant of permission and commencement. By way of example, the builder secured planning permission in 2021 for its 'Phase 1' site in Blessington Demesne. Most units are now occupied and the permitted town park was formally opened in January 2025. Cairn Homes has consistently delivered critical public infrastructure, particularly in Greystones as detailed in section 1 of this report. There would be no impediment arising on the Cairn landbanks.

Draft GDK16 conditions the development of RN2 lands by imposing that a) 75% of RN1 lands be activated and b) that the applications for development on RN2 lands demonstrate no breach of the Core Strategy. RN2 lands will not be able to proceed to planning as they depend on the delivery of the RN1 lands. Meaning, even if the core strategy is amended, but 75% of RN1 lands have not been activated, planning permission still cannot be secured for RN2 lands. This is overly restrictive.

Prior to discussing each site owned by Cairn Homes in Greystones, we hereby demonstrate how each of the landbank complies with the Sequential Approach set out in the CDP. The extract is shown below:

Principle 4 – Sequential Approach classifies the priority locations for new residential development into four categories, which include:

- **Priority 1** – designated 'town', 'village' and 'neighbourhood centre' also referred to as the 'primary zone';
- **Priority 2** – strategic sites as identified by the RSES and the Metropolitan Spatial Area Plan;
- **Priority 3** – infill within the built envelope of the town as defined by the CSO town boundary,
- **Priority 4** – where there is a need for greenfield residential development, a two-tier approach will be taken as per the NPF:
 - Tier 1 – Serviced Zoned Land, whereby the land are able to connect to existing development services and for which there is service capacity available. Such lands would either be located within the existing built-up footprint or be contiguous to existing developed lands. A sequential approach will be applied to zoning.
 - Tier 2 – Serviceable Zoned Land, where the lands are not currently sufficiently serviced but have the potential to become fully serviced. An infrastructural assessment would need to be carried out to justify the zoning of such lands. The sequential approach discussed above would also apply.

Figure 4: Extract from the CDP showing the sequential approach for site identification

We have undertaken research on site capacity and planning permissions in Greystones and Delgany up to the year 2023. No significant application was identified between 2023 and 2025. These are summarised as follows and detailed in Table 1 (as illustrated on Figures 5 and 6).

All three of Cairn Homes landbanks are within or immediately adjacent to the built footprint of the settlement, with their own frontage on the two main roads in Greystones–Delgany. Coolagad is adjacent to the Blacklion neighbourhood centre and has frontage on the R761. The Hawkins landbank is bound on its north, west and south by residential development. The Charlesland lands are located directly across from the Council’s landbank in Charlesland. The Charleslands and Hawkins sites are close to the Charlesland Neighbourhood centre. All three landbanks comply with the sequential test of the CDP.

Requested Amendment 2

We respectfully submit amended wording for GDK16 as follows:

“GDK16: Notwithstanding the zoning / designation of land for new ‘greenfield’ residential development (RN), permission will ~~not~~ be considered for RN2 Priority 2 lands unless the following conditions *where the following condition are* satisfied:

- At least 75% of Priority 1 new residential lands (RN1) lands have ~~been activated (i.e. consent obtained and development initiated)~~ *received planning consent;*

It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached and that the RN2 lands will deliver residential output in lieu of non-delivery of Priority 1 lands

Requested Amendment 3

Most of the designated RN1 lands in the draft LPF are not likely to be delivered in the lifetime of the plan. It is submitted that this is an ad-hoc approach to the designation of RN1 and RN2 lands and it is imperative to increase the quantum of RN1 lands in the Greystones-Delgany settlement to offer more suitable and sustainable alternatives. On foot of this, we submit the Cairn landbanks for consideration, either as a whole or in parts for RN1 zoning. We discuss specific points for each landbanks in the following sections.

Density

Table 6.1 of the CDP identifies Greystones as a Large Town where a minimum density of 35 to 50 uph. This is aligned with the Compact Settlement Guidelines specifically table 3.3. We welcome the recognition by the Council that the achievement of higher densities in parts of Greystones may not be a realistic prospect in certain circumstances due to environmental, topographical and service constraints. This is particularly the case for the Coolagad lands, where we suggest that a density of between 30 and 35 uph would be appropriate. The constraints are considered in further detail below in section 3.3.3. Given the constraints we would however request that GDK17 be amended to extend to the lands at Coolagad.

Requested Amendment 4

*“GDK17:However, lower density residential developments may be required at certain locations; where by virtue of environmental, topographical and service constraints, including lack of public mains infrastructure, poor road access, steep gradients, flooding issues and significant coverage of natural biodiversity; a lower density of development is preferable. In particular, the planning authority will carefully control new housing development and the density of new development on lands zoned ‘~~RE: Existing R~~ residential’ at **Blackberry Lane, Kindlestown Upper, and Bellevue Demesne and Coolagad.**”*

3.2 Submission 3 – B.3 Economic Development

The draft LPF places a reliance on an employment market inherited from the policies of the expired Local Area Plan that has failed to deliver new employment to the town. The draft LPF employment strategy will exacerbate the effects of the previous policy and only serve to deliver 'planning blight'.

The draft LPF and Variation is an opportunity to objectively review and amend the strategic approach. The employment lands are in sustainable locations, close to the town centre and served by public transport, that can be better used to deliver residential development in the short term.

Table 6.5 of the draft LPF should be amended to accommodate a realistic jobs ratio target for Greystones in 2031 of 50%, reflecting the settlements current employment ratio and its designation as a Growth Centre and Residential Settlement.

The Council currently proposes to include 37 hectares of undeveloped lands for employment uses (39% of zoned lands). The rezoning of lands at Charlesland to residential and Hawkins to mixed use as requested by Carin Homes in following sections would still provide a residual area of c.31.58 (20% of zoned lands).

3.2.1 Draft GDK LPF

The Draft Plan zones significant land banks for employment within the built-up area of the settlement to reflect the LPF's strategic goal to provide a concentration of major employment generating investment and targeting investment from foreign and local sources in a mixture of 'people' and 'product' intensive industries. The LPF places an emphasis on jobs ratio as a justification for reserving and zoning employment lands. It notes; *"in Greystones - Delgany has improved substantially from 32% to 49% between 2016 and 2022. The LPF seeks a higher level of employment is targeted into the future to match the high growth in resident population that has already occurred in the settlement; aiming to increase the jobs ratio by 50% in Greystones – Delgany."*

Table 6.5 of the Draft LPF seeks an unrealistic jobs ratio in 2031 for Greystones-Delgany. The draft LPF seeks to provide for an additional 2,100 jobs in the town; a 50% increase to that existing.

	Jobs ratio 2016	Jobs ratio 2022	Targeted future jobs ratio 2031	Jobs target for settlement in 2031	Jobs growth 2022-2031	Minimum quantum of zoned employment land (ha)
Greystones - Delgany	32%	49%	73.5%	6,275	2,100	26.25
Kilcoole	46%	77%	80%	1,500	150	4

It is noted that the jobs ratio for Kilcoole is high at 77%, but this is only reflected in 4 hectares of zoned employment land compared to 26.25 ha in Greystones-Delgany.

The Council currently proposes to include 37 hectares of undeveloped lands for employment uses (39% over the minimum quantum required). The proposed rezoning of lands at Charlesland to residential and Hawkins to mixed use as requested by Cairn Homes in following sections would still provide a residual area of c.31.58 (20% over the minimum quantum required). So even without amending the Jobs ratio the LPF area would still have sufficient lands to meet the Council's high projection of 26.25 ha.

3.2.2 Cairn Submission

The draft LPF places a reliance on an employment market inherited from the policies of the expired Local Area Plan that has failed to deliver new employment to the town. The draft LPF employment strategy will exacerbate the effects of the previous policy and only serve to deliver ‘planning blight’ on sites that are more suitable for housing. **The draft LPF and Variation is an opportunity to objectively review and amend the strategic approach. The employment lands are in sustainable locations, close to the town centre and served by public transport, that can be better used to deliver residential development in the short term.**

Since the CDP was prepared and adopted, the full set of results from the CSO 2022 census of population have been made available. The 2022 census provides insights that was not available in previous censuses of population in relation to remote work. It found that of 9,852 residents of Greystones who work, 5,392 or 54.73% work from home, meaning over half of the working population.

A resident population that works from home will deliver a thriving local economy which can support small businesses contributing in turn to a healthy, thriving town. Additionally, there has been a shift in demand away from tech firms, which historically had larger office space requirements. The dynamics of remote working/flexible working arrangements have weakened the relationship between job growth and office demand. Additionally, the tech sector's substantial growth during Covid-19, followed by a sharp decline in tech leasing, has heightened office occupancy rates, lessening the need for commercial floor space. In contrast, the demand for additional housing to combat the ongoing accommodation crisis remains exceedingly high.

There is a need to consider other forms of development which cater for employment, including potentially a nursing home and filling station, in addition to a further limited provision of offices on the site. The IDA's strategic site has now secured permission for the Greystones Media Campus development which will in part reinforce Greystones employment base. However, since it received planning permission in 2022, there has been limited to no progress on the site. Without a pre-identified user of employment lands, particularly FDI and large users, development of employment lands is very challenging. To retain a solely enterprise and employment type zoning on these lands is likely to result in the non-development of important accessible and serviced lands.

A review of the Wicklow Planning Register has not shown any planning application for commercial or office space in Greystones of significance since 2022, suggesting a lack of interest for employment lands in the town. The June 2025 edition of the Dublin Economic Monitor notes that *‘uncertainty around the implementation of US tariffs will likely weigh on business activity in the coming quarters as businesses in the region contend with the prospect of expanding trade restrictions’*. It further notes that during Q1 of 2025, the manufacturing section experienced a contraction for the first time in three quarters, and that the construction and services grew at a slower rate than seen in Q4 2024, suggesting that there may be slower growth and therefore demand for space in the near future.

The **OPR Practice Note ‘The Development Plan and Employment Land’** provides guidance to Planning Authorities on the identification of suitable lands for employment. In section 4, the OPR considers that it is important planning authorities have an understanding of macrotrends at international, national and regional levels that inform the policy context. With the same type of zoning applied on the lands for nearly 20 years resulting in little to no development is synonymous of a lack of understanding of context. Section 5 of the practice note sets out the steps for the assessment of enterprise and employment lands ahead of zoning (or rezoning as the case may be). The steps are presented below:

1. Gather existing data on enterprise and employment lands;
2. Assess site suitability to determine area of available land suitable to accommodate enterprise and employment uses;

3. Forecast workforce supply;
4. Determine employment sector demand;
5. Translate future workforce supply into land-use requirements;
6. Quantify the shortfall/surplus of land for each employment sector
7. Conclude the assessment and prepare the final report.

The assessment should be done using the site appraisal form under Appendix C of the practice note.

There is no evidence either in the draft LPF or the CDP that such exercise was carried out. This would be particularly pertinent given the long-term zoning for employment and lack of demand for such uses in Greystones. We would refer to this helpful citation from the Development Plan Guidelines 2022 in section 3.2.1:

‘Evidence-based policy making is based on the premise that policy decisions should be better informed by available information. This is now an intrinsic part of the plan-making process and requires the identification of key evidence and data to inform policy formulation for the development plan’.

The rezoning of lands at Charlesland and Hawkins lands will not detract from the draft LPF objectives to deliver over 26.2ha of employment lands. There is an opportunity for the LPF to address the legacy of the overprovision of employment lands and redesignate that are effectively ‘surplus’ sites to more sustainable mixed use and residential development in the short term to address significant population growth needs.

Requested Amendment 5

It is submitted that Table 6.5 should be amended to provide for 50% jobs ratio in 2031:

	Jobs ratio 2016	Jobs ratio 2022	Targeted future jobs ratio 2031	Jobs target for settlement in 2031	Jobs growth 2022-2031	Minimum quantum of zoned employment land (ha)
Greystones - Delgany	32%	49%	73.5% 50%	6,275 4942	2,100 751	26.25
Kilcoole	46%	77%	805	1,500	150	4

3.3 Submission 4 – Coolagad (B.8 Zoning and Land Use, B.9 SLO4, B.7 Infrastructure)

Coolagad is the most important strategic landbank in Greystones-Delgany.

The Cairn lands total c.25ha, of which c.16 ha are zoned RN2 (out of c27 ha RN2). In the interest of delivering sustainable residential communities within the life of the plan it is imperative that the lands are zoned RN1.

Cairn welcomes the designation of the lands at Coolagad as SLO 4.

Cairn is supportive of the vision set out under the SLO 4 and is committed to the delivery of a new residential community, well-served by on-site facilities and well connected to the wider settlement.

Cairn Homes are confident that subject to detailed design, the masterplan that accompanies this submission could deliver a density of between 30 and 35 uph for the site, bearing in mind the topographical, environmental and services challenges on the site. However, a flexible approach to density within the site should be incorporated in SLO4.

The SLO4 designation of a core riparian buffer zone should be no more than 10m

Cairn is committed to the delivery of community infrastructure at Coolagad, but SLO4 should be amended to enable regard to existing, as well as new communities.

In respect Surface Water Management, Cairn is committed to implementation of best practice SUDs measures. Objective GDK64 should be re-worded to ensure the obligations of future applications are related to the development lands only.

3.3.1 Overview

The Cairn lands are shown in the figures below. This section is focussed on the lands in the ownership of Cairn which have been earmarked as SLO 4 in the GDK draft LPF. This section should be read in conjunction with the submission made by MCORM Architects, KFLA Landscape Architects and Barrett Mahony Consulting Engineers which provides a coherent vision for the sustainable development of Coolagad.

3.3.2 Draft GDK LPF

B.8 Zoning and Land Use

The Draft GDK LPF, the subject lands are zoned RN2: New Residential Priority 2, AOS: Active Open Space, OS1: Open Space, and O22: Natural Area. The total area of SLO4 is 31.8 ha of which RN2 zoning accounts for c27 ha. The Cairn lands total c25ha, of which c.16 ha are zoned RN2.



Figure 5: Cairn Lands in Coolagad

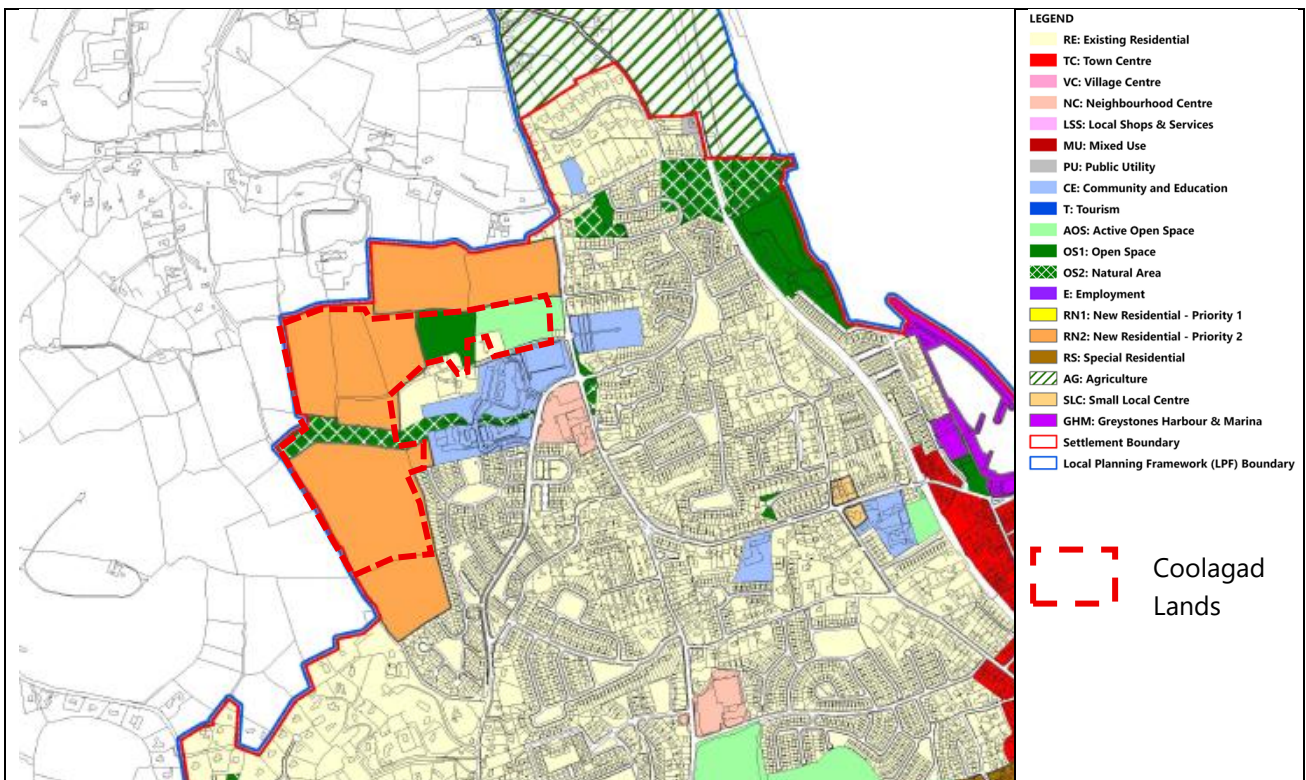


Figure 6: Extract of land use zoning map showing Coolagad

B.9 SLO4- Coolagad

The Cairn landbank in Coolagad forms part of SLO 4 Coolagad in the GDK draft LPF.

B.7 – Water Services

GDK64 b) indicates that new development at Coolagad will only be considered when an overall Surface Water Management Plan for the area which addresses the capacity of the area network and obviates flood risk on downstream lands is in place.

3.3.3 Cairn Submission

Zoning and Land Use

The strategic case for rezoning the lands RN1 to meet satisfy the requirements of the revised NPF housing targets, and the housing needs of Wicklow is made above under section 3.10. However, there are specific points to make in relation to lands at Coolagad and their suitability for residential development.

It is emphasised that these lands are ready-to-go and developable as illustrated in Wicklow County Council's initial decision in 2024 (PA.Ref. WW-RZLT-06-2024) to place the lands on the Residential Zoned Land Tax Map. The site is adjacent to a neighbourhood centre, schools and public transport. It has the capacity to deliver community infrastructure and active open space for Greystones and to support the achievement of compact growth. Cairn Homes is Ireland's leading home builder and has the capacity to delivery this critical housing immediately. Reference is made to the masterplan document prepared by MCORM which sets out the development strategy for the site. It shows how a high-quality development in a sustainable location which can be delivered efficiently.

Requested Amendment 6

We request that Map No.1 be amended as follows:

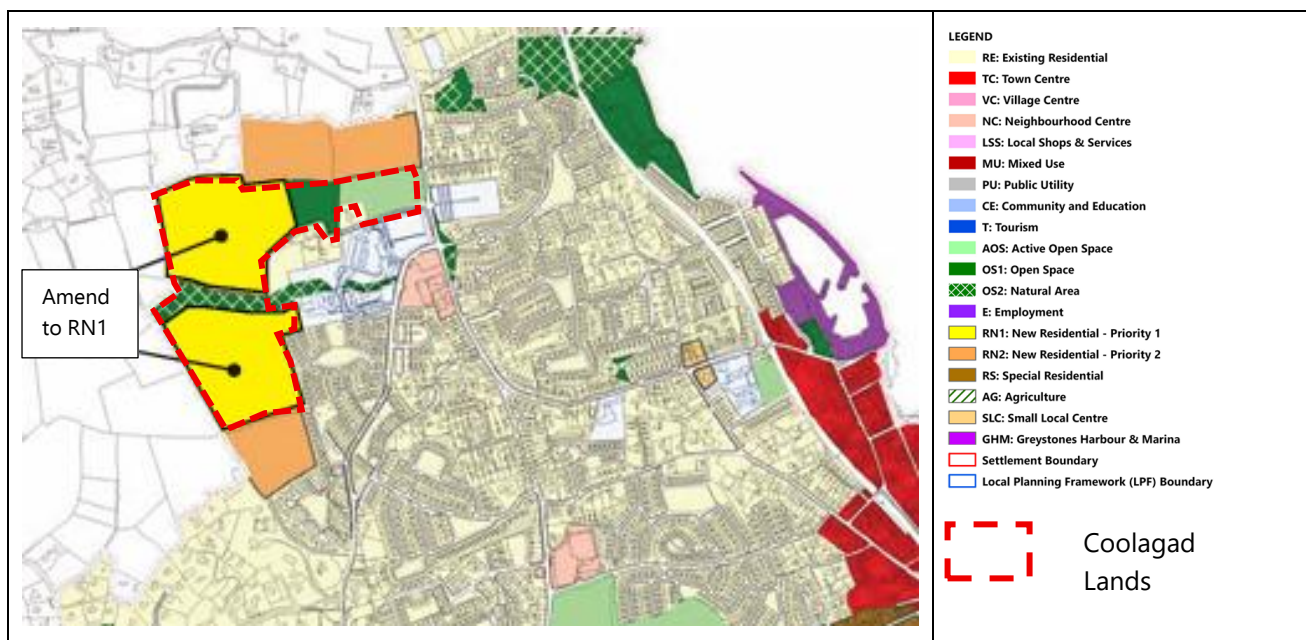


Figure 7: Proposed amendments to RN1 zoning at Coolagad

SLO4- Coolagad

Without prejudice to our previous points on zoning, Cairn welcomes the designation of the lands at Coolagad as SLO 4. Cairn is supportive of the vision set out under the SLO 4 and is committed to the delivery of a new residential community, well-served by on-site facilities and well connected to the wider settlement.

However, we refer to the MCORM masterplan document which sets out what Cairn can realistically achieve on a landbank as challenging as Coolagad. The masterplan has due regard to the parameters of SLO4. The landbank previously underwent a detailed design stage (see the Coolagad SHD for reference) and environmental impact assessment which clearly highlighted the challenges associated with the site. We wish to elaborate on specific points as follows.

Density

The principal points to support a density of lower than those specified in the Compact Settlement Guidelines of between 35 to 50 uph are as follows:

- **Previous LAP:** In the previous LAP, the lands were zoned R17 and R22, which reflected lower density requirements (respectively 17 uph and 22uph). These densities were justified on the basis of the topography of the site and the necessity to ensure a visual transition. In addition, Policy RES7 of the LAP noted that lower densities may be required where there were specific constraints (e.g. steep gradients, flooding issues).
- **Previous SHD Scheme:** Apartment blocks were proposed on the western part of the site to provide for the required minimum density of 35 uph. However, Wicklow County Council was not in favour of this element of the development owing to the visual impact. This indicates that a lower density is required.
- **Topography:** The site topography is challenging as illustrated in section 3.4 of the MCORM masterplan. This is recognised by the draft LPF in section A3.3 which splits Coolagad between areas North_3 and North_4. The SEA notes a low risk of landslide.
- **Views:** The Draft Plan notes that in addition to topography, that the site is seen from a distance with views towards Kindlestown Hill, from the R761 and the Greystones coast.
- **Adjoining Properties:** The MCORM masterplan illustrates how the development is set back with a buffer zone from those houses in Waverly, which back onto the site. This reduces the area for development.
- **Archaeology:** There is an archaeological feature at the centre of the site, located at the confluence of the existing laneway, tree groupings and the stream. On foot of consultation with the National Monument Service, there is a requirement to preserve in situ 60% of the feature.
- **Flood Risk:** Substantial on-site attenuation will be required to mitigate any risk of flood risk downstream.

Cairn Homes are confident that subject to detailed design, the masterplan that accompanies this submission could deliver a density of between 30 and 35 uph for the site, bearing in mind the topographical, environmental and services challenges on the site. Cairn is also confident that there is no risk of landslide associated with the site subject to detailed design and the consideration of different construction techniques as discussed in the Masterplan by MCORM architects.

Requested Amendment 7

In order to facilitate this flexibility in relation to density, we request that the following amendment be made to the second bullet point of SLO4.

".....Development shall be of a design and layout that is appropriate to the topography of the site and the necessity to ensure there is a visual transition between these developed lands and the unzoned agricultural

lands / Kindlestown Hill to the rear of the site. In this regard, *lower overall site density may be appropriate and building height and density shall reduce as landscape elevation increases.....*"

Public Open Space OS2

We note here that the Council has extended the buffer along the stream from 10m to 25m on either side. CP013.3 of the CDP specifies that a ".....a buffer of generally 25m along watercourses should be provided (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible." The document 'Planning for Watercourses in the Urban Environment' actually recommends a buffer zone width for larger river channels (>10m) is 35m to 60m and for smaller channels (<10m) is 20m or greater. This is the case in relation the watercourse on the subject lands. The fact that SLO4 does not refer to the flexibility allowed in the Inland Fisheries guidance effectively renders the provision relating to the 25m buffer inconsistent CPO13.3 of the CDP.

Requested Amendment 8

We request the following amendments be made to SLO4:

*".....Any development on these SLO lands shall protect the water courses by avoiding interference with the stream bed, banks and channel and maintaining a core riparian buffer zone of at least **10 25m** along each side free from development....."*

Green Links

SLO 4 requires a series of green links with *community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods*. While Cairn Homes can facilitate the provision of linkages, they do not avail of sufficient power to deliver such requirements without the consent of adjacent landowners. Much of the landbank is located to the rear of private properties. The boundary between Coolagad and Waverly comprises of the rear gardens of Waverly Avenue, and a site in a third-party ownership separate Coolagad from the school.

Requested Amendment 9

We would therefore request that the wording of SLO4 be amended to reflect what is possible:

*"Green links shall be provided **throughout within** the area. **The Council will investigate the feasibility** to link residential areas with community infrastructure, schools, adjoining housing lands and the Blacklion neighbourhood centre, along with providing a link to Kindlestown Hill/Bellevue Woods, **subject to agreement with the landowners and technical feasibility.**"*

Community Infrastructure

Cairn Homes looks forward to working with the relevant departments in Wicklow County Council to deliver much needed community and recreational amenities. Cairn has prepared plans for an active open space, playing pitches, a community facility and a creche for the Coolagad lands. Indeed, Cairn has delivered significant community infrastructure in Greystones in the last 10 years. This includes 6.3 acres of public parks, playing pitches, creches, a community & enterprise offices at the GRID, and has facilitated a primary and secondary school. Cairn can be categorized as one of the principal providers of community infrastructure in the area. We see the AOS lands at Coolagad as having the potential to not only serve the needs of the new residential

community, but also of addressing deficits in community infrastructure for existing residential communities in the area.

Requested Amendment 10

*“...Community facilities shall be provided within the SLO area to meet the needs of the new **and existing** resident community of the area; in determining requirements for community facilities, a community services audit shall be carried out.”*

B.7 - Water Services

GDK64 requires the preparation of a surface water management plan downstream of Coolagad before any development is considered, as there is a capacity issue and a risk of downstream flooding. The development of the lands at Coolagad will attenuate to greenfield runoff levels and therefore will not result in flooding downstream. Any issues downstream are not linked to the development at Coolagad. There is a lack of clarity in relation to the responsibility of the preparation of the surface water management plan and no clear timeline. The area is also not clearly defined. We understand that there is a lack of data available to prepare the plan and would welcome any opportunities to engage further with the Council on this matter and to provide support as necessary. However, to link the surface water management plan and associated required works to the development at Coolagad introduces a parameter that is wholly unnecessary and potentially beyond the developer to deliver.

Requested Amendment 11

“GDK64

*b) new significant development in the Coolagad – Templecarrig area in north Greystones will only be considered where the development’s surface water drainage arrangements accord with Wicklow County Council’s Sustainable Urban Drainage (SUDs) Policy ~~and an overall Surface Water Management Plan for the area which addresses the capacity of the area network and~~ **which** obviates flood risk on downstream lands’.*



Figure 8 Coolagad Masterplan

3.4 Submission 5 – Hawkins Lands (B.8 Zoning and Land Use)

Hawkins lands are strategically located on Kilcoole Road and the R774/L221 and total 2.53 ha.

The lands are zoned 'E: Employment' under the draft LPF and are subject to objective GDK27. These lands have been zoned for employment purposes since 2006. However, despite this zoning over a prolonged period of time, the lands have not been developed for employment purposes.

The lands are fully serviced reflecting the planning permission ABP Ref: ABP-305773-19 which includes the Weaver Buildings. The surrounding road network is capable of accommodating a mixed-use form of development.

The LPF is a vital opportunity to re-evaluate the zoning of this strategically located site, to enable a more sustainable balance of uses for the surrounding residential communities

It is submitted that the Hawkins land be considered for 'MU: Mixed Use' zoning as presented in the masterplan proposal put forward by Cairn Homes.

3.4.1 Overview

The Hawkins lands are bounded by Kilcoole Road and the R774/L221 and total 2.53 ha. The Glenheron development lies to the north, Eden Wood to the west and Hawkins Wood to the East. Offices, the Weaver Buildings, comprising a two-storey community enterprise building (1,356 sqm) and a two-storey office building (1,376 sqm) have been developed by Cairn Homes in the south-eastern portion of the overall landholding as part of the SHD development permitted under ABP Ref: ABP-305773-19. They are currently zoned for E: Employment The lands are illustrated in the figure below.



Figure 9: Cairn Lands in Hawkins

3.4.2 Draft GDK LPF

The lands are zoned 'E: Employment' under the draft LPF and are subject to dedicated objective as follows:

GDK27: To require Employment zoned land at Charlesland to be developed as follows:

- *at a high density with the highest standard of architectural design reflecting the key location at a gateway to the settlement - low intensity / low employment uses will not be considered appropriate at this location;*
- *the layout makes provision for well supervised, public green routes (including foot and cycleways) from both the R761 and the L-1221 Charlesland dual carriageway across the site to the Charlesland Sports Park*

The proposed zoning is shown in the figure below**Figure 10: Proposed zoning for the Hawkins Lands**

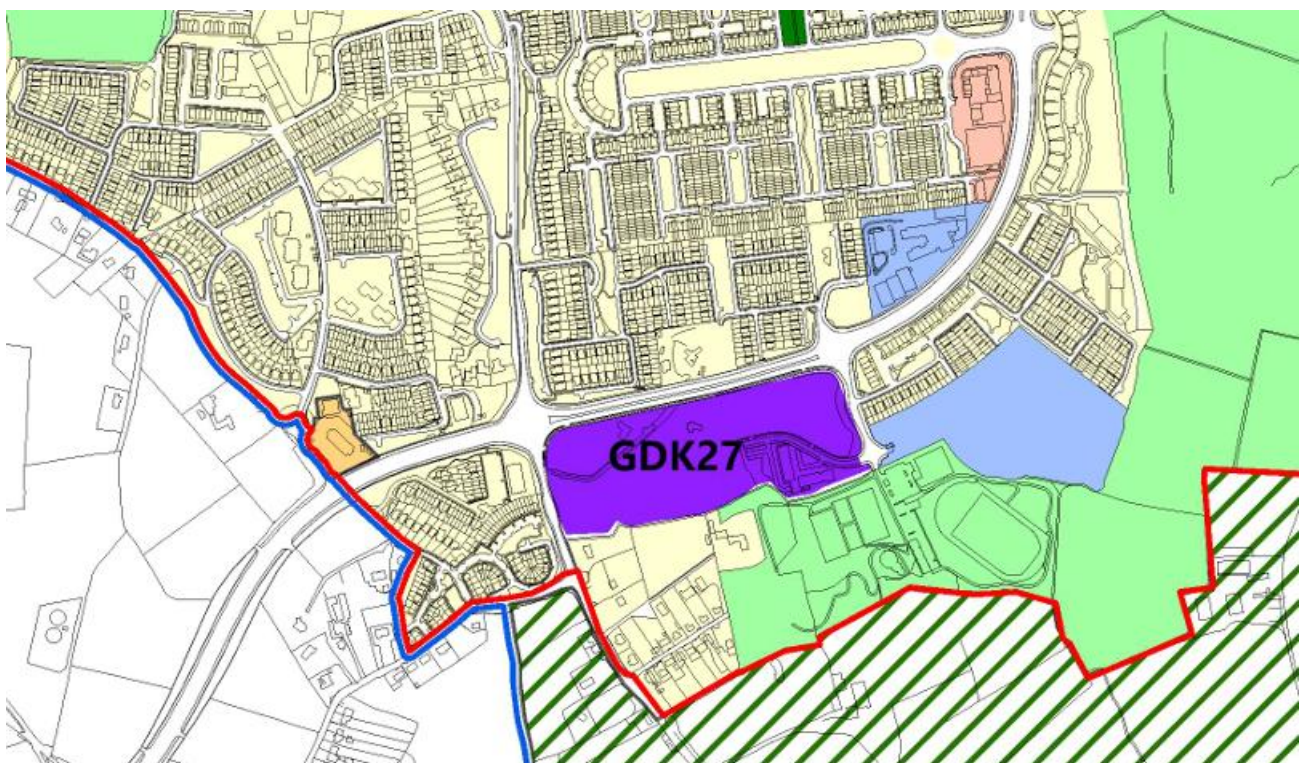


Figure 10: Proposed zoning for the Hawkins Lands

3.4.3 Cairn Submission

The case that there is an excessive amount of lands zoned for employment is made in section 3.2 above.

The lands are fully serviced with potable water supply, foul sewerage and surface water infrastructure. This is reflected in the planning permission ABP Ref: ABP-305773-19 which includes the Weaver Buildings. The surrounding road network is capable of accommodating a mixed-use form of development, which would include residential, services, shops and petrol filling station, in addition to community facilities in the form of a nursing home (see Figure 12: Cairn Masterplan Proposal for the Hawkins lands

below).

The LPF is a vital opportunity to re-evaluate the zoning of this strategically located site, to enable a more sustainable balance of uses for the surrounding residential communities



Figure 11: The Weaver Building

RESIDENTIAL SKETCH PROPOSAL

Site Area 29,389m² (2.94 Hectare)
(excluding Wayleave & shared access)
Total No. Dwelling 96 units
Density 32.65u/ha

Mix of Dwellings		
2-Bed Duplex Ground	30 units	2-Bed = 31.3%
3-Bed Duplex First	30 units	
3-Bed Terraces	16 units	3-Bed = 47.9%
4-Bed Semi Detached	20 units	4-Bed = 20.8%



Figure 12: Cairn Masterplan Proposal for the Hawkins lands

These lands have been zoned for employment purposes since 2006. However, despite this zoning over a prolonged period of time, the lands have not been developed for employment purposes. The Weaver Buildings in the southeastern part of the overall zoned lands have been developed as part of the SHD for lands to the east. However, there are challenging market conditions in letting the buildings. It is proposed that the Hawkins lands be rezoned from enterprise to **mixed use**, which could potentially accommodate a range of land uses such as commercial enterprise / incubator, residential, offices, nursing home and a petrol filling station.

These lands accord with the principles of sequential development, and they are edge of built-up area with built form to the north, east and west. They are serviced by good road infrastructure and are within 3km of the railway station and are served the L2 bus services along Kilcoole Road and the R774. Commercial floorspace has already been developed in phase 1 of the overall development. However a pure commercial/enterprise development of the overall lands is not viable owing to the change in market demands, with a significant decline in the demand for offices arising from changes on work patterns and working from home practices. This matter is considered further in relation to employment below.

A mixed-use zoning of these lands will allow for a sustainable form of development with commercial, enterprise, residential and potential to provide for local services. The mono employment use has failed to materialise and a mix of uses and development types will assist in creating a sense of place, contribute to a sustainable community and facilitate an appropriate urban design framework.

The CDP seeks to develop further employment opportunities in Greystones -Delgany. Cairn have contributed significantly to provision in Phase 1 of the Hawkins development (Weaver Buildings), which accommodates 2,700sqm in two buildings capable of accommodating 207 places of employment (based on 1 job per 13 sqm as per the OPR PN04 Advice Note). However, as indicated above market demands have experienced a structural

change in relation to this form of development exclusively on the site. A mix of uses on the site will potentially accommodate a similar amount of employment and provide a funding mechanism for same.

Given the size of the landbank and its relative isolated location compared to other employment land and the lack of evidence suggesting this is the best use of lands, its zoning does not align with the Economic Strategy policy of the RSES which prefers economic clusters, promoting economies of scale and network effects. It will not support clustering of activity or a long-term viable enterprise.

We would also note that the proposals by Cairn would be better suited to achieve the second part of GDK27, which requires that *'the layout makes provision for well supervised, public green routes (including foot and cycleways) from both the R761 and the L-1221 Charlesland dual carriageway across the site to the Charlesland Sports Park'*. The provision of housing units would allow for greater all day / all week natural surveillance on the public green routes and onto the R761 and L-1221.

Requested Amendment 12

We would therefore submit that the Hawkins land be considered for 'MU: Mixed Use' zoning as presented in the masterplan proposal put forward by Cairn Homes. **Delete policy objective GDK27.**

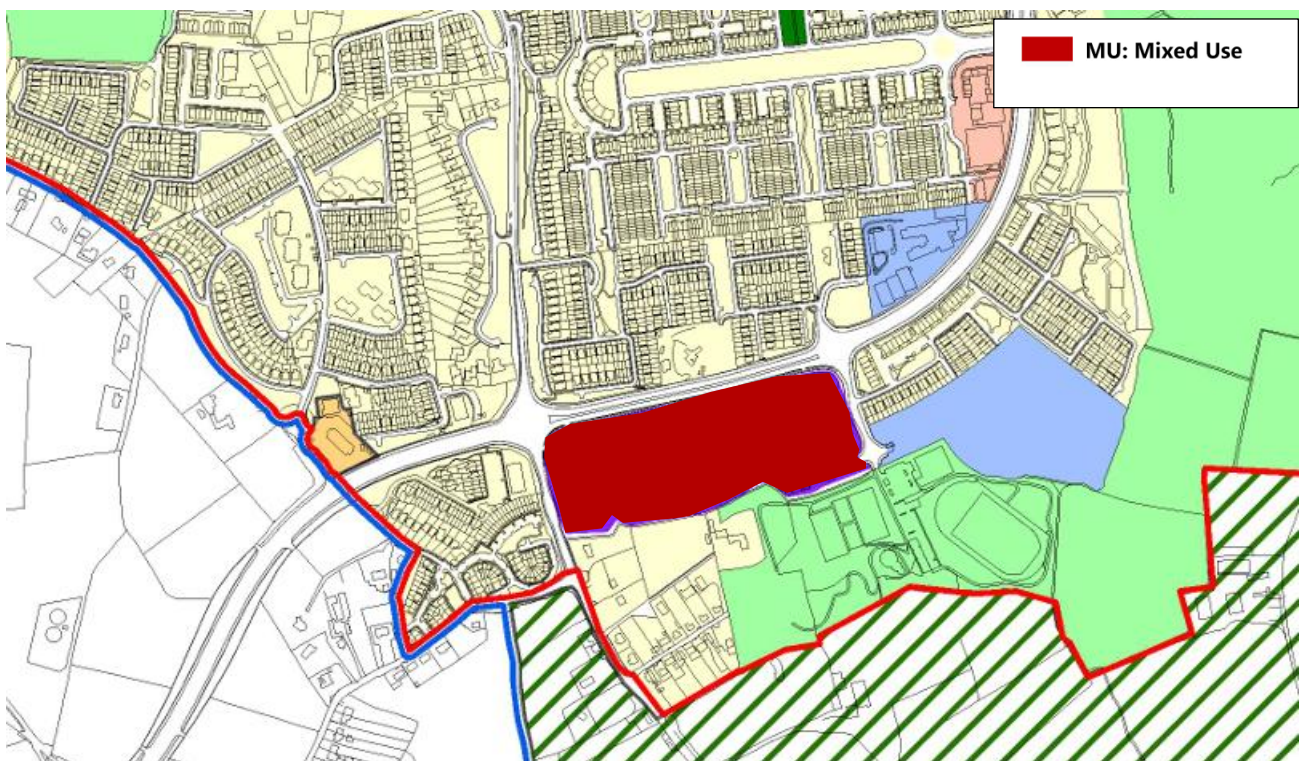


Figure 13: Proposed zoning amendment to Hawkins Lands



Figure 14: Archers Wood

3.5 Submission 6 – Charlesland Lands (B.8 Zoning and Land Use)

Cairn's lands at Charlesland are also subject to a designation GDK24 'To facilitate and support the development of large-scale employment generating development

The LPF is a vital opportunity to re-evaluate the zoning of this strategically located site, to enable a more sustainable balance of uses for the surrounding residential communities

Caire Homes submit that the Charlesland be considered for 'RN1 – New Residential Priority 1.

This will support the delivery of sustainable residential neighbourhood in a location proximate to the town centre in accordance with the principles of the Compact Settlement Guidelines, RSES and NPF

3.5.1 Overview

Cairn Homes own a third landbank in Greystones located on the former IDA lands, east of the R774, west of the Charlesland golf course and broadly north of the Seabourne View apartments. It is also located directly across from the housing lands owned by Wicklow County Council. The lands are shown in the figure below. The lands measure c. 2.89 ha.



Figure 15: Cairn Homes Landbank in Charlesland

3.5.2 Draft GDK LPF

They were formerly owned by the IDA and are proposed to be zoned employment as can be seen in the figure below. They are also subject to a designation GDK24 'To facilitate and support the development of large-scale employment generating development on the Strategic Employment lands at Mill Road Killincarrig'.

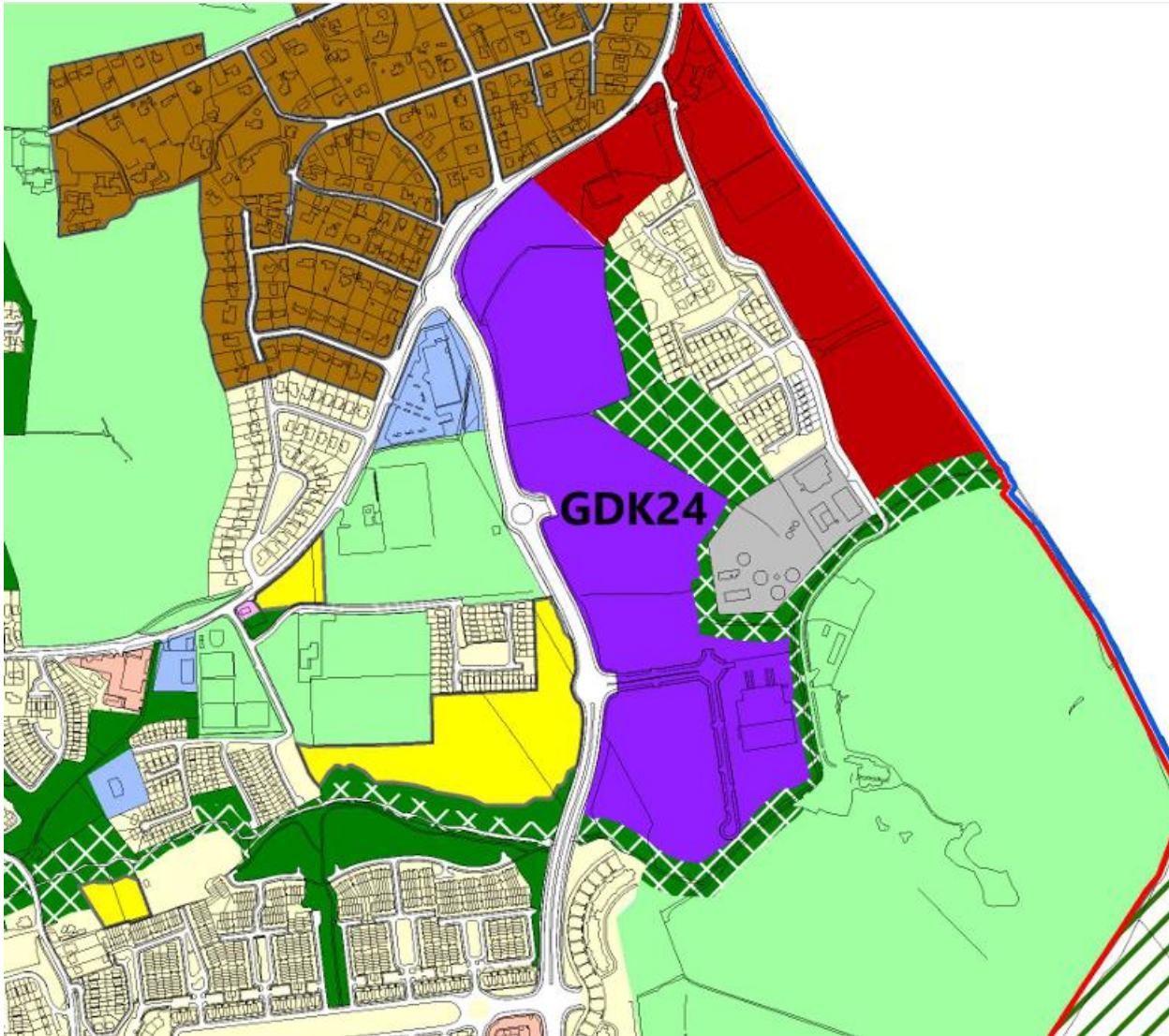


Figure 16: Proposed zoning for lands at Charlesland

3.5.3 Cairn Submission

Our strategic argument in relation to the employment zoning has been detailed in section 3.2 of this report. We would note that in this instance the lands have been deemed 'strategic'. The RSES provides helpful context for the designation of strategic employment landbanks. The RSES provides Guiding Principles which should be considered in the designation of such landbanks, specifically:

Planning to accommodate strategic employment growth at regional, metropolitan and local level should include consideration of:

- *Location of Technology and Innovation Poles - Institutes of Technology (IoTs) and Universities, as key strategic sites for high-potential growth of economic activity.*

- Current employment location, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises.
- Locations for expansion of existing enterprises.
- Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability.
- Locations for potential relocation of enterprises that may be better suited to alternative locations and where such a move, if facilitated, would release urban land for more efficient purposes that would be of benefit to the regeneration and development of the urban area as a whole, particularly in metropolitan areas and large towns.
- Within large urban areas where significant job location can be catered for through infrastructure servicing and proximity to public transport corridors.

Reflecting on these principles, it should be noted that

- The lands are not located near a university or an institute of technology.
- Evidence shows that half of the working population in Greystones works from home.
- There is no known demand by an existing enterprise in Greystones for expansion. Planned enterprises are slow to proceed to their construction phase.
- The lands are not located in a large urban area.

We note the recent announcement by Vodafone to leave their long-held premises in Sandyford. They cited that in making the decision to move from Sandyford, an area served by multiple bus routes and the Luas, to St Stephen's Green in Dublin 2, they chose to be '*closer to [their] customers including many businesses and State bodies*'. This move was announced in light of the company's move to a net zero commitment by 2028, seeking to have its carbon emissions for their headquarters by facilitating a shift to public transport alongside more energy efficient building. Cushman and Wakefield MarketBeats² report notes that 75% of office taken up in Q1 of 2025 was in the central business district of Dublin, which suggests that the focus was on more central locations. It can be reasonably expected that other companies will favour more central locations for their operations in the future.

We also note that the Council is maintaining the proposed AOS zoning of the Charlesland golf club and to expand to the AOS zoning in this area to encourage the development of these lands as a new sports and recreation zone for the wider area. The change of zoning from employment to either RN1 or RN2 would promote a compact settlement approach with proximity to public transport and community / recreation uses.

We reiterate the point that the change of zoning would not affect the job ratio and still allows for employment zoning over and above the minimum requirement.

The LPF is a vital opportunity to re-evaluate the zoning of this strategically located site, to enable a more sustainable balance of uses for the surrounding residential communities. The site's location proximate to the town centre and public transport access is suited to sustainable residential development without recourse to 'leap frogging' or rezoning greenfield lands outside the settlement boundary.

Requested Amendment 13

Cairn Homes submit that the Charlesland be considered for 'RN1 – New Residential Priority 1.

² Cushman & Wakefield Marketbeat Ireland Office, Industrial and Retail Q1 2025:
<https://www.cushmanwakefield.com/en/ireland/insights/ireland-marketbeat>

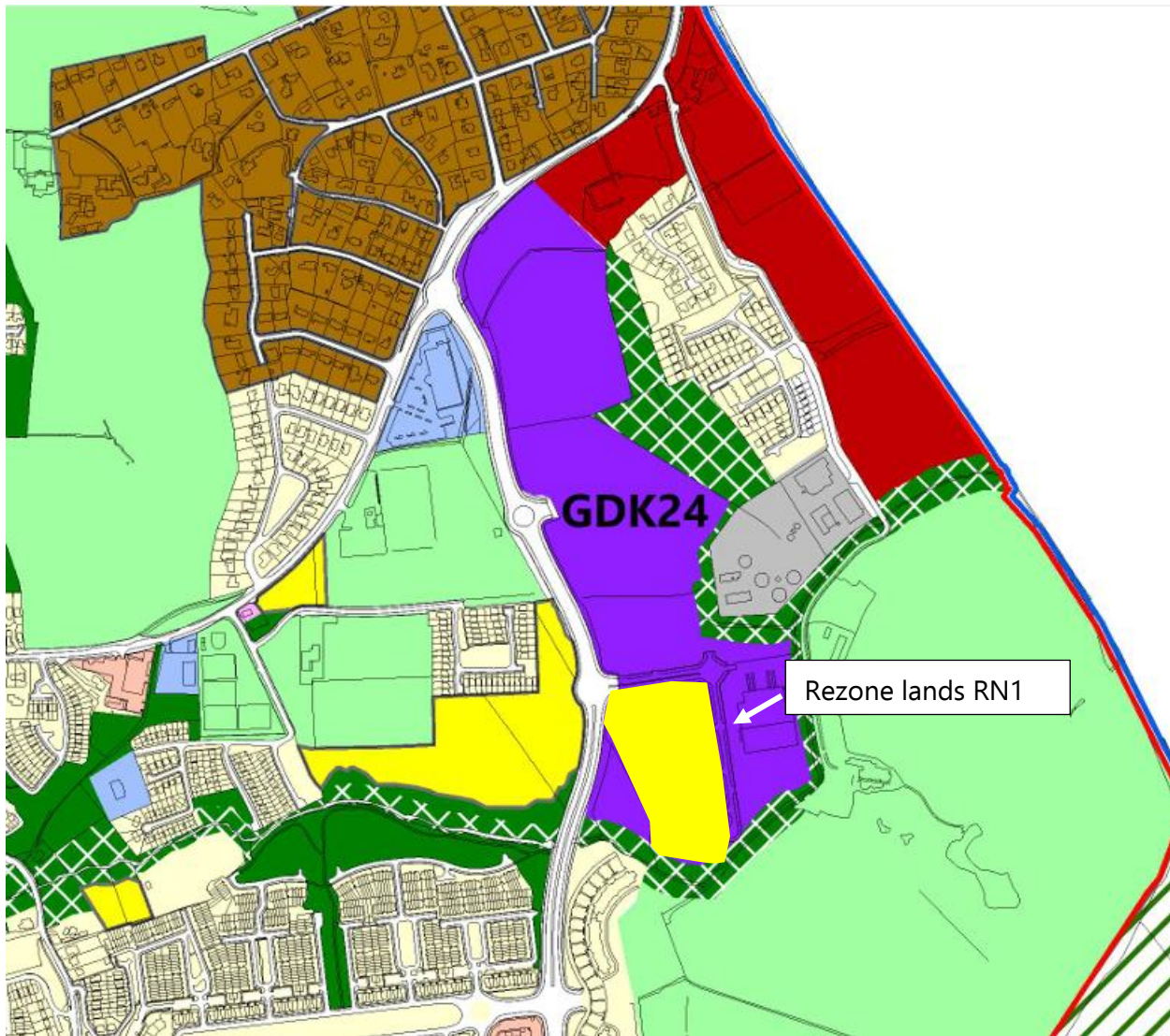


Figure 17: Proposed zoning amendment for lands at Charlesland



Figure 18: Archers Wood, Delgany



Figure 19: Hawkins Wood, Greystones

4. CONCLUSION

Cairn Homes welcome the publication of the Greystones – Delgany & Kilcoole draft Local Planning Framework, which acknowledges the challenges faced by the Council in relation to Greystones. The strategy is clearly intended to incorporate a degree of flexibility that has regard to the fact that the Core Strategy in the 2022 County Development Plan is based on outdated 2016 census data. Therefore, at the outset with there is insufficient lands set for Priority 1 zoning. The RSES requires Local authorities to ensure sufficient zoned and serviced land is available at appropriate locations capable of meeting the housing needs of the targeted population.

The Draft incorporates a Priority zoning strategy that is based on sequential land use in accordance with the NPF and Development Plan Guidelines. The criteria for allowing development in Priority 2 lands is overly rigid and liable to substantial impediments such as the commencement of development on 75% of lands zoned RN1. The priority 1 lands include many sites that are depending on too many external factors to be realistically delivered during the plan period. Some other sites have been zoned but would not comply with sustainable development and are reliant in substantial investment in road, cycling and pedestrian infrastructure.

As stakeholders with key landholdings in the county, it is submitted that the amendments proposed in this report will be vital to achieving the strategic goals of the plan and the early delivery of sustainable residential neighbourhoods that integrate with the town as it continues to grow.

Cairn Homes have prepared a masterplan for Coolagad that provides a long-term vision for the sustainable expansion of the settlement. They have also prepared a high level masterplan for their lands at Hawkins. These are enclosed.

All three Cairn landbanks would provide for much needed housing and infrastructure.

As the key stakeholder for delivery of this LAP, Cairn Homes will continue to work with Wicklow County Council to bring forward development proposals with associated infrastructure and amenity investments.

Appendix 1 – Housing Completions

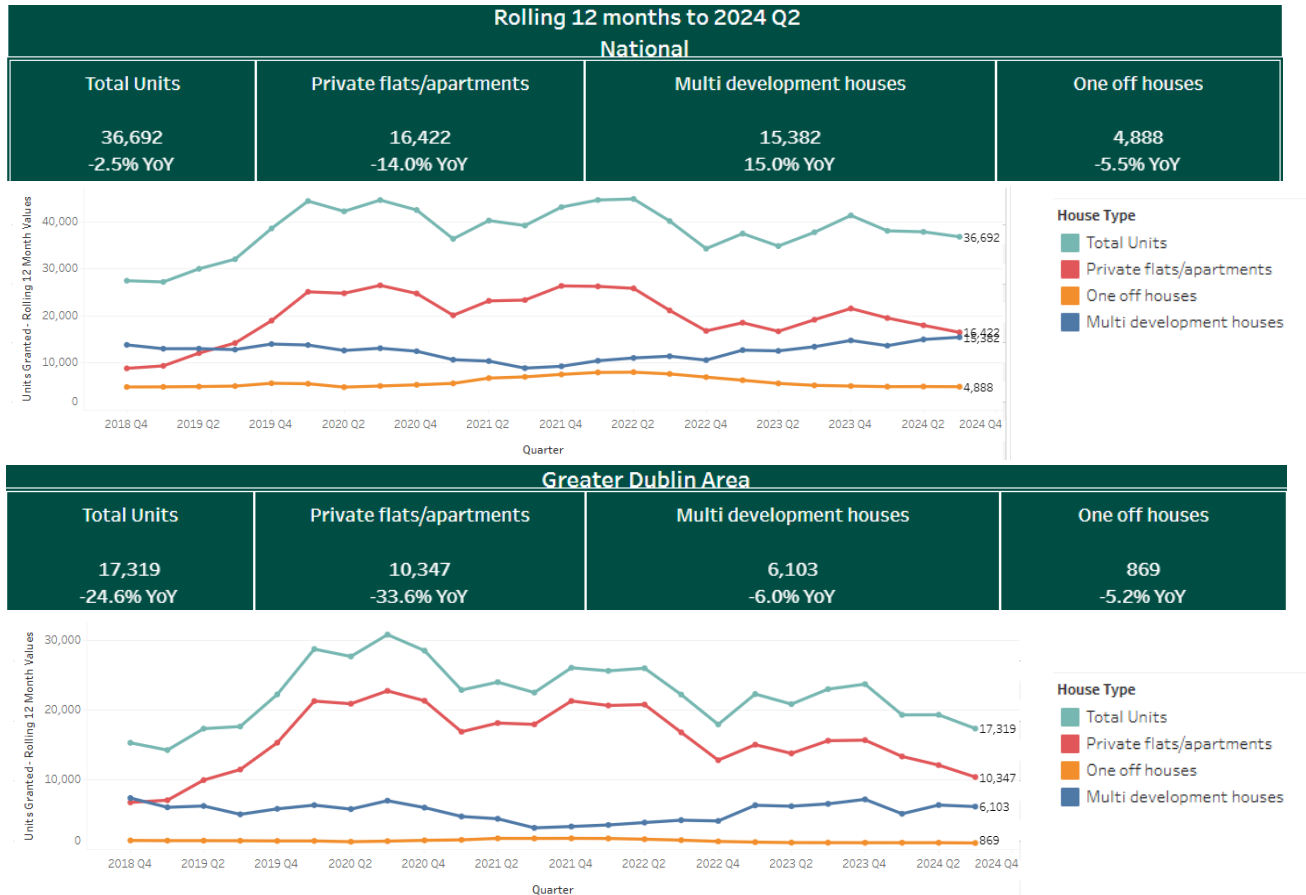


Figure 20 Planning Permissions by House Type Nationally and in Greater Dublin Area.

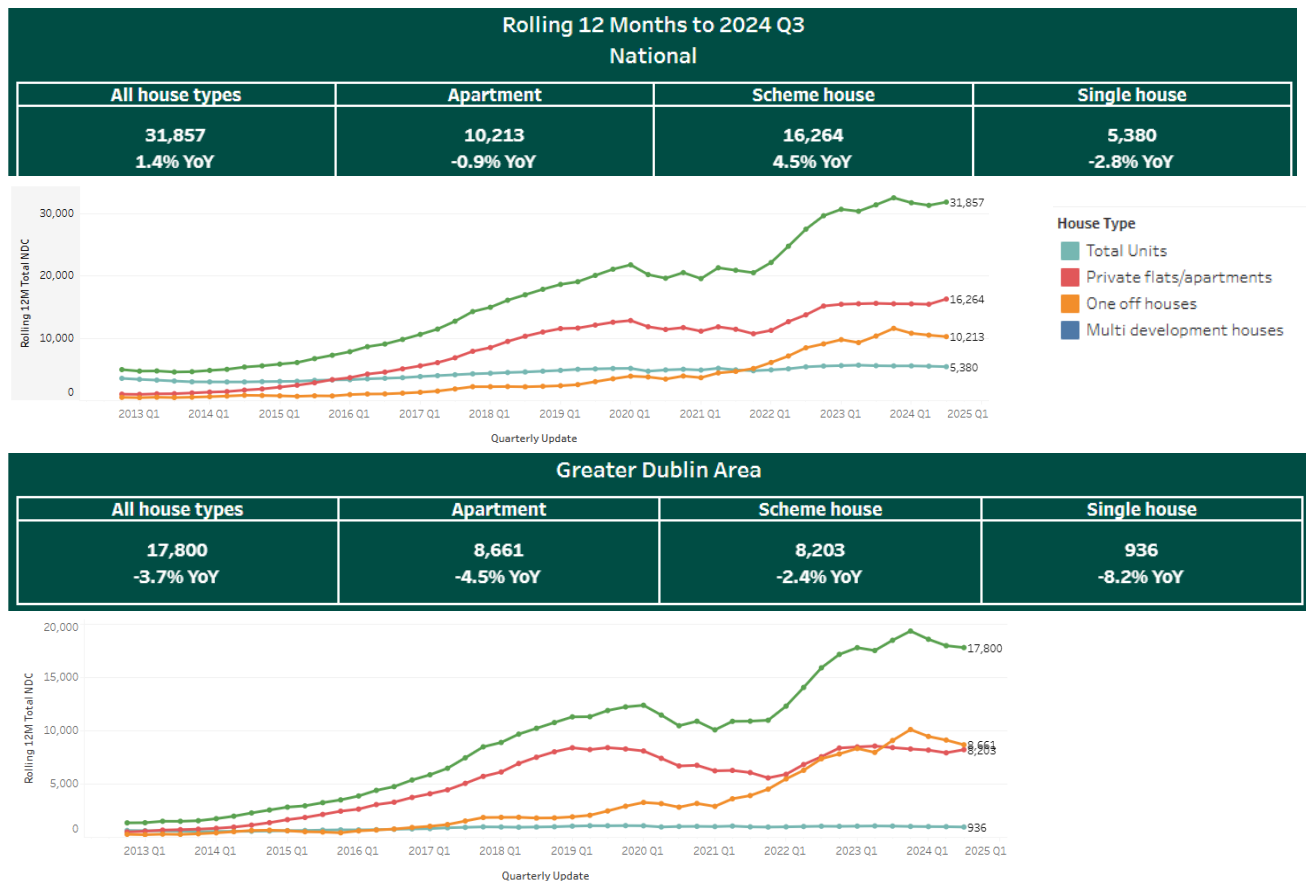


Figure 21 Planning Completions by House Type Nationally and in Greater Dublin Area.

Source: Housing for All Dashboard: https://public.tableau.com/app/profile/statistics.unit.housing/viz/HousingforAll/0_Overview



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