

# **GAP (Greystones Area Planning) Community**

Greystones Area Planning Community  
30.08.21

Re: GAP Community Submission on Chapter 3 Core Strategy into Draft County Wicklow Development Plan 2021 – 2027.

We are a group of residents from Greystones and Delgany who have come together following the recent, significant developments that have taken place over the past number of years. We believe that these developments are unsustainable due to lack of investment in all other aspects associated with granting planning permission such as public services (schooling, medical, dental) transport infrastructure (traffic congestion), recreational facilities (lack of), residential issues resulting in an adverse impact into the biodiversity of the area.

Several these developments (Glenheron) have been approved under the Strategic Housing Development (SHD) process. We are also aware of the Carmelite development in Delgany which is under a Judicial Review and an upcoming SHD at Coolagad. We believe strongly that the SHD process is completely undemocratic as they bypass residents' rights to object to planning proposals in the normal manner – making representations to elected councillors and the county council. It has been reported by architect and surveyor bodies that SHD's have led to high density badly designed residential developments that tend to override democratically devised Local Area Plans (LAP) especially on density levels.

Greystones Area Planning Community welcomes this opportunity to input into the Wicklow County Development Plan 2021 – 2027 to try and ensure that planning of developments going forward is sustainable.

Our input is as follows;

## **CHAPTER 3 Core Strategy**

Fundamentally, we have seen in Greystones / Delgany area significant levels of development in residential housing (Ashcroft, Archers Wood, Churchlands, Eastmount, Glenheron View, Glenheron Park, Hawkins Wood, Marina Village, Seagreen, The Orchard & Waverly) in recent years and there are many more planning permissions granted which have yet to be built. The area does not have the public transport, social or cultural or community facilities needed to sustain the current population. It does not have a moderate level of jobs.

A significant “pause” is needed to allow facilities and infrastructure to catch-up and grow at the same pace.

Additionally, we believe strongly that the zoning of land in the Greystones-Delgany & Kilcoole Local Area Plan 2013 - 2019 should be should reviewed as a matter of priority.

There have been numerous developments to the north of Greystones without any investment into the infrastructure in that area. The R761 Windgates road (in normal times) has significant traffic congestion on it and particularly so at the junction of Blacklion Retail Centre with close to 1,850 students going to the 3 schools there. This is further supported by the fact that the NTA has committed € 150,000 to complete a Greystones traffic study.

To consider additional planning applications such as the Coolagad SHD PL27.308945 for that area is in our view an example of unsustainable planning. The AP1 Coolagad Action Plan Area (highlighted in yellow, yellow with red lines bordered by dark blue and light blue line) is zoned for residential development. This is approx. 36 hectares in size – 31 hectares for residential, 4 hectares for open space (OS on picture) including public park and playground.

This **Coolagad SHD** proposal applies to the area in yellow labelled **R22 and AP1**. When you look at the Coolagad Action Plan area versus the existing housing estates – it is approx. the same size as Redford, Rathdown, Waverly, Seagreen, Blacklion Manor and Blacklion School campus combined.

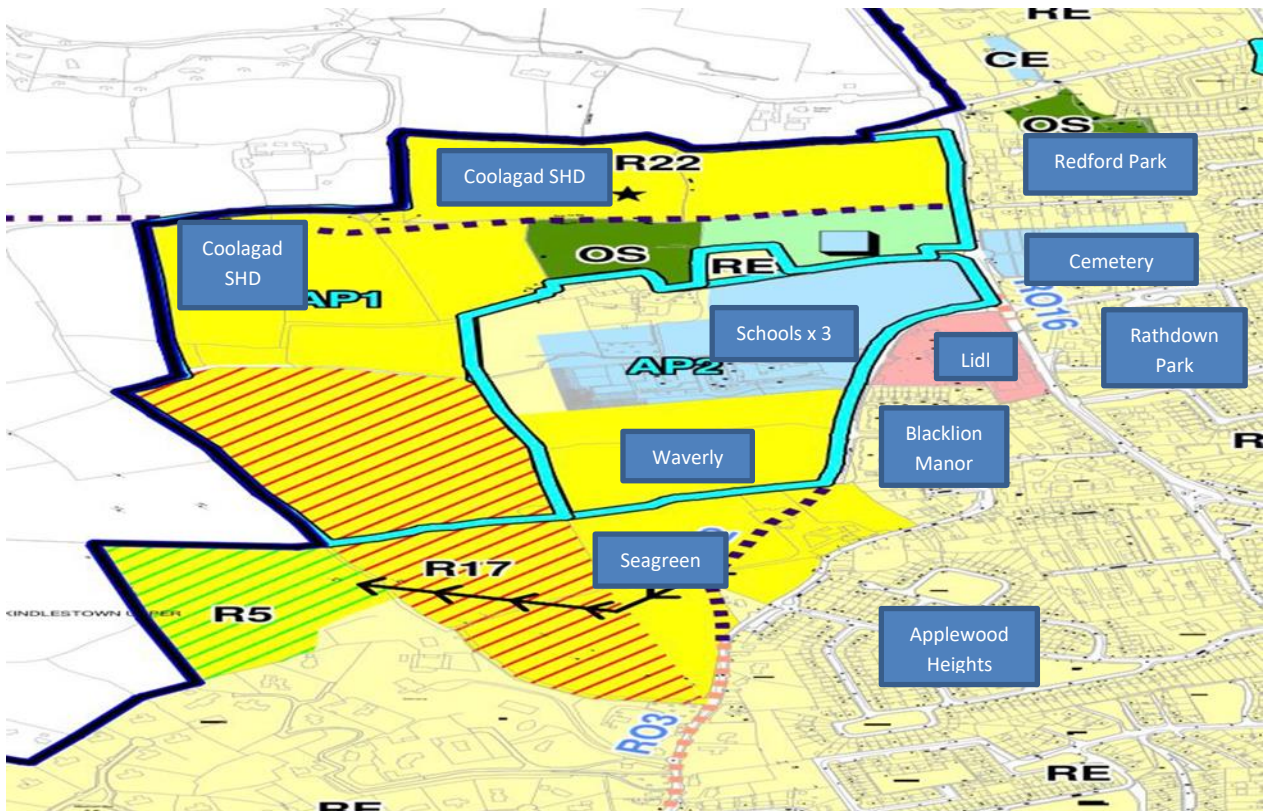
As it stands today, Greystones and the coast is cut off from this Glen of the Downs natural area with no cycling routes, very few walking routes and NO NATURAL CORRIDORS for wildlife.

The significant local development has already breached even the most pessimistic scenario of the last Greystones-Delgany Strategic Environment Assessment (SEA) (2012), and FAILED to reserve minimum level of GREENBELT for a healthy environment rather than a further barrier of concrete overdevelopment at this location.

This is clearly outlined in the Greystones Biodiversity Action Plan 2021 commissioned by Greystones Tidy Town committee.

There are more suitable locations towards the south side of Greystones where traffic infrastructure exists - we would propose that there is a “Zoning Land swap”.

We believe that the proposed location under consideration for the Coolagad SHD would in all interests be best served being re-zoned as a Special Area of Conservation (SAC) with a focus on generating a Natural Green Corridor linking Glen of the Downs Nature Reserve, Kindlestown Woods down to Greystones Beach.



**DESIGNATION of Greystones/Delgany**

The draft plan classifies the Greystones/Delgany area as a “Self-Sustaining Growth Town”.

We believe that Delgany-Greystones needs to be classified as a “**Self-Sustaining Town**” in line with the Eastern Midland Regional Assembly’s submission on this draft county development plan. Self-Sustaining Growth Towns are defined as 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. We believe that Greystones / Delgany does not meet this definition. (as does the Eastern Midland Regional Assembly). Designation as a “Self-Sustaining Town” would seem to be far more appropriate. It would also allow for focus to be put on the development of Bray as a Metropolitan Key Town.

We note the population targets and housing targets in tables 3.6 and 3.7 as follows:

2016 Greystones - Delgany (pop 18,021) and 2031 (target pop 21,630)

Delgany (1,738 units constructed/under construction since 2016)

It is not clear at what point the data was compiled. Construction is ongoing on many sites at present including two large Strategic Housing Developments (SHDs). We would ask for robust data to be compiled in this instance, and use of forecasting and econometric tools could greatly enhance the quality of the data which is crucial for proper future planning.

The Draft County Development Plan would benefit from the inclusion of tables along the following lines:

Population	Census 2016	Current estimates 2021	2025 Projections	2030 Forecasts	Additional Housing needed:
A. Delgany					
B. Greystones					
C. Kicoole					
D. Total A+B+C					

	Health - Public health centres	Education -primary - secondary	Transport - Public transport improvements - Road infrastructure	Utilities - Water - Sewerage - ESB -	Community Amenities
Delgany					
Greystones					
Kilcoole					

We believe is such data in easy to read tables as above were used, it would be clear that Greystones-Delgany should not be classified as a Self-Sustaining Growth Town when the RSES has not identified it as such.

While the growth figures seem far in excess of, what is required, we welcome the phasing of the housing targets in figure 3.8 and hope that the council will follow through on implementing this phased growth.

There is a need for further land to be designated for educational, industrial and recreational use before any additional planning permissions are granted. We welcome the social audit of Greystones/Delgany that is underway and hope that it will be used to inform future zoning proposals. We would request that re-zoning of land in this area be limited to the areas that are close to infrastructure which has already been constructed.

The feedback and input in this submission is designed to improve / strengthen the Draft Wicklow County Development Plan 2021 – 2027 even further.

Yours Sincerely,  
Greystones Area Planning Committee.